



# SEASPAN VANCOUVER DRYDOCK WATER LOT PROJECT

Public Engagement Consideration Report  
Appendix A – Part 2: 2021 Community Feedback

February 22, 2023

## COMMUNITY FEEDBACK – PART 2

This Appendix includes all electronic feedback received by Seaspan during the 2021 public engagement activities. Feedback provided during the 2022 public engagement activities can be found in Appendices B, C and D.

In 2021, feedback was provided directly to Seaspan via the feedback forms, emails and voicemails, and via emails forwarded from the port authority. Copies of letters and handwritten communications have also been included.

The feedback is listed chronologically, is verbatim and has not been corrected for punctuation and grammar. Feedback from voice mails have been transcribed.

Part One (found in the companion document) includes:

1. comments received via email (body), online feedback form and phone, presented in a table.

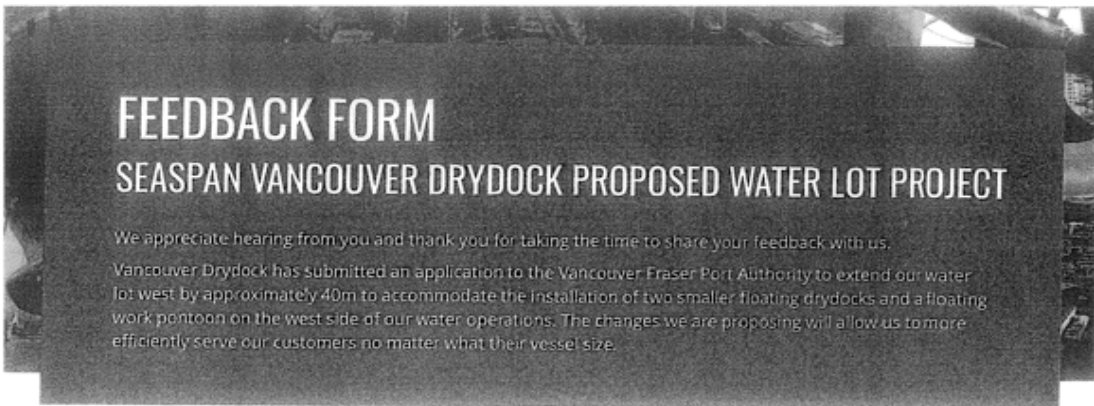
Part Two includes:

2. Comments received by handwritten letter or handwritten feedback form
3. Comments received via email (as attachments)

Names and contact information for private individuals have been redacted for privacy.

Of note, where an individual submitted multiple, but similar, comments through two or more feedback channels (such as a feedback form, voicemail or email), comments were documented separately.

## 2. Comments Received by Handwritten Letter or Handwritten Feedback Form



### PROJECT FEEDBACK

Please share your primary interests / concerns with the proposed water lot project:

Marine habitat  Water  Views & shading  Light  Noise  Air quality  Construction  Other

Please provide your specific interests / concerns

I am a proud owner of the [REDACTED]  
in [REDACTED] Feb 2019

I have invested a very high amount of  
kapital in that Unit. That proposed Drydock  
is going to have a very substantial impact  
of devaluing the 3 Waterfront Buildings.

If the very good and respectful  
Seaspan Shipyards Company  
has a good conscience towards the people in  
the Buildings and to the City of Northvancouver,  
proposed project can never get a go ahead

July 30th 2024

respectfully

[REDACTED]

Please continue to next page



# FEEDBACK FORM

## SEASPAN VANCOUVER DRYDOCK PROPOSED WATER LOT PROJECT

We appreciate hearing from you and thank you for taking the time to share your feedback with us.

Vancouver Drydock has submitted an application to the Vancouver Fraser Port Authority to extend our water lot west by approximately 40m to accommodate the installation of two smaller floating drydocks and a floating work pontoon on the west side of our water operations. The changes we are proposing will allow us to more efficiently serve our customers no matter what their vessel size.

### PROJECT FEEDBACK

Please share your primary interests / concerns with the proposed water lot project:

Marine habitat    Water    Views & shading    Light    Noise    Air quality    Construction    Other

Please provide your specific interests / concerns

*This would be an absolute disaster to our community. Now it is like a park here for everyone's enjoyment. The lights now are on all night long. There is welding and other noise continually. The seals, band otters, & seagulls enjoy that area too. It also blocks the view for everyone that walks in this area and for the condos in this area.*

*I do not understand why they do not expand EAST where they are not blocking everyone's view and enjoyment of walking the beautiful trail.*

*This is a very popular area for North Vancouver residents. It would be an absolute shame to spoil it with expansion to the west. Shame on Seaspan for not thinking of the community and their enjoyment of the views.*

*Obviously I am totally against the expansion as are everyone I talk to in the area. This should absolutely not happen! Also this area has become a major tourist attraction for other communities in B.C. and a must see for tourists out of Canada.*



# FEEDBACK FORM

## SEASPAN VANCOUVER DRYDOCK PROPOSED WATER LOT PROJECT

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### PROJECT FEEDBACK

Please share your primary interests / concerns with the proposed water lot project:

- Marine habitat    Water    Views & shading    Light    Noise    Air quality    Construction    <sup>Community</sup> Other

Please provide your specific interests / concerns

good neighbour

I have concern for the negative impact construction to the west of Seaspan will have on the residents, visitors and families that use the Spirit Trail particularly for the noise & air pollution to the children's play area & family picnic area. Seaspan claim to be capturing dust, etc. from their work - but particles show on my fruit & veggies I grow on my balcony and when I sweep!

The added transportation on the water will have an effect on the marine wildlife - which I see finally returning since the construction of the lower levels.

The Shipyard business community has supported us through the pandemic and we have supported them. A dry dock to the EAST of Seaspan could also so support to their neighbours and community and also provide needed jobs and assist in their expansion that they want

Please continue to next page

# FEEDBACK FORM

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### PROJECT FEEDBACK

Please share your primary interests / concerns with the proposed water lot project:

Marine habitat  Water  Views & shading  Light  Noise  Air quality  Construction  Other

Please provide your specific interests / concerns

I need to say that I am shocked to learn of Seaspans plan to Build Two New Drydocks on already developed waterfront property which is residential (overdeveloped residential high rises) and a small recreational space consisting of a concrete walk area towards a public pier, which is heavily utilized.

Your Project plans will no longer be a healthy welcoming space for walking by the limited access to water space.

When I moved here 25 years ago, the water & City of Vancouver could be seen while walking along Esplanade.

This project will likely create a mass exodus from this beautiful area.

I live within 2 blocks of the project and will be seriously affected by the noise particularly PILE DRIVING and constant noise pollution.

Please continue to next page



Please share any additional feedback or questions you may have

We are recommending that  
you MNE Wait of your current  
Seaspan Building  
where this would be less intrusive  
if it has to be built (at all).  
OR ELSEWHERE

~~Delta?~~  
Delta?

Seaspan Shipyards  
Vancouver Drydock

July 7, 2021

Dear Lisa:

We are in opposition to the proposed drydock expansion at your shipyards for the following reasons:

1. More noise - day or night
2. More dust
3. More bright lights
4. More parking problems in the area.

Yours very truly,

[Redacted signature]

[Redacted contact information]



### 3. Feedback Received via Email (Attachments)

**FEEDBACK FORM**  
**SEASPAN VANCOUVER DRYDOCK PROPOSED WATER LOT PROJECT**

We appreciate hearing from you and thank you for taking the time to share your feedback with us.

Vancouver Drydock has submitted an application to the Vancouver Fraser Port Authority to extend our water lot west by approximately 40m to accommodate the installation of two smaller floating drydocks and a floating work pontoon on the west side of our water operations. The changes we are proposing will allow us to more efficiently serve our customers no matter what their vessel size.

**PROJECT FEEDBACK** *Infodrydock@Seaspan.com Submitted July 30, 2021 by Email pg 1 of 2*

Please share your primary interests / concerns with the proposed water lot project:

Marine habitat  Water  Views & shading  Light  Noise  Air quality  Construction  Other

Please provide your specific interests / concerns

This expansion project greatly concerns me, and I know many others on the North Shore. While I am not against economic growth and job creation, it should not come with such huge detriments to the local community. Immediately, what resonates, is why the need to expand West and not a single study on development to the East. To many people, the logistics looks bad and we see very large beautiful vessels belonging to the owner of SeaSpan to the East and wonder, why can't this expansion be moved there and put your beautiful vessels to the East so at least the community can look upon those while also limiting the increased particulate in that direction where there is much less residential buildings and access for expansion. We see nothing that was done to move this East and it is a huge concern. There is no resistance to the expansion itself, but how and where it is done is of great importance. We feel that there is little care and concern on the community affects. Where are the studies done for noise, light and air that were done? There is already a huge particulate falling issue on many residences balconies not to mention the light and noise all night long. Increasing this to the West will only increase the frustration and anger. After millions of dollars have been invested by the City of North Vancouver to beautify our waterfront at the Shipyards area locals are finally able to enjoy it and are now coming outside after 1.5 years of Covid, only now to be hit with this expansion proposal and it is enraging to hear this and wonder, what is SeaSpan thinking? I personally have not run into a single person, who agrees with this expansion. For an owner who now brags how they have helped our community in various, this is a very strange move. In any case, SeaSpan should be supporting the local community. We all pay taxes as well and hope that planning and environment decisions are carefully done with people in mind, not just profits. If it costs more to build East, so be it. This company has obviously lots of funds to propose this project and the owner is very wealthy with his many mega yachts. To people of the North Shore, this is careless and inconsiderate. It does not sit well at all.

The submission and consultation process seems very incomplete. Technical studies on air quality assessment were not provided to us. We would like to have this information. How will air quality be changed, what increase in contaminants are going to be released and in what form? What kind of monitoring will be done in the residential areas? These are questions even if expansion were to be proposed to the East!

Please continue to next page

Please share any additional feedback or questions you may have

There is a very large and beautiful children's playground right in front of the proposed expansion. How the heck did SeaSpan miss that? Kids play on the equipment which will be covered with particulate during the overnight work. Then they put their hands in their mouths. Was this even talked about?

In June, 7<sup>th</sup> to be precise, there was an oil spill believed to be by one of the tugs pushing in a ship to be worked on. How this spill was handled was very concerning. I say this, because it brings into question how SeaSpan dealt with issues affecting our environment. The oil spill protocols were not used. It seems, that the tugs swished the water around to disperse it. If the oil recovery methods were used, residents would have seen that. There were many witnesses to this event. Not only that, but red colored matter was spotted and was quite prevalent in the water going right to the shore with no one knowing what it was. If SeaSpan operates like this, their transparency is suspect and make us not trust future issues that arise.

We have way too many concerns to be positive about this expansion and need/demand to be heard and our questions answered. Meetings thus far has been less than satisfactory. I have lived on the North Shore most of my life. I have never, ever, encountered this kind of blatant disregard to what we are as a community, trying to achieve at the Shipyards area. It is quite heartbreaking.

### TELL US ABOUT YOURSELF

**July 30<sup>th</sup> Deadline**

I am a resident of the:

City of North Vancouver

Other municipality:

District of North Vancouver

Yes, I would like to receive future updates about Vancouver Drydock.

Please provide your contact information (optional):



Draft Letter of Objection to Seaspan, Vancouver Fraser Port Authority, City of North Vancouver, MLA for North Vancouver, MP for North Vancouver & Others (?)

Dear Sirs,

Re: Waterfront Community at the Shipyards District of Lower Lonsdale in the City of North Vancouver and the Proposal of Seaspan to expand its Dry Dock Facilities in front of the Waterfront Community at the Shipyards District

The undersigned Strata Corporations, on behalf of over 300 Owners/Residents at The Trophy and Cascade at the Pier condominium developments, hereby submit strongest objections to the planning application of Seaspan to expand its dry dock facilities, as the proposed development will:

- directly and detrimentally impact the existing views,
- increase the noise pollution levels in the neighbourhood, which currently often continues until 10 PM at night,
- negatively impact the ambiance of the recently rejuvenated and vibrant Shipyards District,
- be a deterrent to the use and enjoyment recreational, educational, and cultural character (Polygon, Maritime and the First Nation Museums, and Capilano University) in the Shipyards District not only for the owners of over 300 newly (recently) constructed condominiums but also for other residents and visitors (of all age groups) from the Lower Mainland,
- adversely impact the property values of the recently constructed residential condominiums,
- result in diminished revenues of commercial enterprises recently established in the rejuvenated recreational space on the North Shore, and
- permanently damage the North Shore Shipyards District vision of the City of North Vancouver, which took some many years to come to fruition.

The current and recently rejuvenated Shipyards Community is vibrant and thriving at one of the last and unique, one-of-a-kind, urban waterfront locations in the whole of metro Vancouver. It would be a huge loss of amenity for the entire North Shore Community if the Seaspan application was authorized and approved by the Vancouver Fraser Port Authority (Port Authority).

The existing water lot owned by Seaspan has ample space on the East side of its existing facilities (in an already industrialized zone) for the expansion of its proposed new facilities without any need for encroachment into the newly established residential and recreational areas of the Shipyards District.

[Draft: TM/20June2021]

1

*A great many representations from residents were made to the City of North Vancouver when the city was asking for feedback for the creation of the Shipyards District and its Community.*

*The Vancouver Fraser Port Authority should consider the spirit and the sentiments expressed by the Lower Lonsdale Community over many years to build the current vibrant Shipyards Community and acknowledge the benefits it brings to the City of North Vancouver, which will be cannibalized by the expansion proposed by Seaspan.*

*The Port Authority should also note that the recreational facilities in the Shipyards District have successfully introduced children of all ages into its waterfront environment where they can play, learn, and socialize.*

*Demand in the Shipyards District is increasing for high quality events that are put on with large numbers attending each event. This demand may dwindle because of the proposed increased shipbuilding activities and the resulting in increased noise and environmental pollution inherent in shipbuilding enterprises.*

*The profit-oriented motives of Seaspan must be balanced against the quality of life of the residents in the waterfront community.*

*The bottom line is that the current residential, recreational, and commercial developments demonstrate how much nature has made its mark. It now looks natural, and it is. It has a nascent history of serving the community that we would like to continue. Building additional shipbuilding infrastructure will destroy the vision and aspirations of the residents of the City of North Vancouver.*

*There is no precedent of the proposed intrusion of shipbuilding infrastructure in a state-of-the-art waterfront community, which we urge all the members of the Port authority to go and see, especially during weekends and during special events (e.g., Friday Night Market). We are confident that the members will see that the ambiance of the existing developments is something that the Port authority should be supporting and preserving, and not permanently destroying through allocation of more water lot space for the expansion of the drydock facilities of Seaspan.*

*We hope that the members of the Port authority take our objections into consideration when coming to a decision and we sincerely urge and hope that the members will **RESTRICT** expansion of Seaspan's shipbuilding activities to the East side of its current operations and **REFUSE:***

- *grant of any additional water lease area to Seaspan on the West side of its existing operations.*
- *the proposed application of Seaspan for any expansion of its shipbuilding operations on the West side of its existing facilities.*

*Comments:*

**Proposed Expansion of Seaspan Water Lot North Vancouver.**

TO: Mayor Buchanan and Council, City of North Vancouver

Seaspan Vancouver Drydock

Vancouver Fraser Port Authority

**Comments:**

As a resident of North Vancouver, I live at Lonsdale and Keith Road East, within a few minutes walk of Lonsdale Quay and the Shipyards District. Since returning to the city in 2017 after many years away, I marvel at how the area at the foot of Lonsdale has been transformed into one of the most diversified and attractive “people places” on the entire Port of Vancouver shoreline.

Seaspan’s activities obviously contribute substantially to the local economy. But that does not mean it can take lightly the needs and concerns of other waterfront users. The intrusion of the proposed expanded drydock facilities into what has become a much more public space in recent years, as new development has occurred, can and should be avoided.

Furthermore, public expenditure by the City of North Vancouver and other levels of government towards the re-purposing of outdated and redundant facilities on the waterfront has been substantial and that investment must be protected as much as possible.

The obvious question is: why cannot the proposed facilities be located somewhere else in Seaspan’s considerable holdings? The main reason for not locating the new facilities to the east of the site is said to be the need to operate barges in the area, according to Paul Hebson, General Manager of Vancouver Drydock. Mr Hebson also commented at the July 15th public meeting that the Pemberton site did not have “one square inch of extra space.”

If there is no other acceptable option for Seaspan, then the relinquishing of much of the public enjoyment of Burrard pier could partly be alleviated by Seaspan disposing of the small property at 115 Carrie Cates Court, just east of Polygon Gallery. It appears to only contain offices that could be relocated and forms a significant barrier to natural pedestrian movement in the most intensively used part of the Lower Lonsdale waterfront. The City of North Vancouver should pursue this “quid pro quo”

Finally, any discussion of the jobs that Seaspan provides in North Vancouver, should be tempered by the fact that all these jobs are paid for by The Federal Government through its national shipbuilding strategy.

Respectively submitted,

[Redacted signature block]





July 5, 2021

Scott Neaves  
125-19358 96<sup>th</sup> Ave,  
Surrey, BC,  
V4N 4C1

George Geatros  
Manager Special Projects  
Seaspan

Re: Vancouver Drydock Water Lot Project

George,

Sherwin Williams has been made aware of the Water Lot Project at Vancouver Drydocks and we are very excited to see the expansion to the drydocks. We feel it will bring many long lasting, well paying jobs to the Lower Mainland. The increased capacity will also help fortify the excellent reputation Seaspan has in the ship building and maintenance community bringing more vessels to the area.

From a supplier's point of view, Vancouver Drydocks has been an excellent partner. This expansion would only enhance our relationship. We will continue to support Vancouver Drydocks with the most current, innovative, and environmentally friendly products available. This will help to maintain a high level of success for your customer's asset protection, while lessening the impact on the environment.

Please let me know if you have any questions.

Thank you,

Scott Neaves

Technical Sales Representative  
Protective & Marine Coatings  
NACE Coatings Inspector Level 2 - Certified  
Cert. No. 45537

Cell: [604-340-8245](tel:604-340-8245)  
Email: [scott.neaves@sherwin.com](mailto:scott.neaves@sherwin.com)

The Sherwin-Williams Company



July 7, 2021

**Re: Seaspán Vancouver Drydock Water Lot Expansion**

To whom it may concern,

We at PacRim Filtration Services Inc (tradenamé PetroKleen) wholeheartedly support Seaspán's application. We hope that the additional drydocks will be a direct contributor to our continued growth.

Our association with Seaspán began in earnest in 2008 and since that time our work force has tripled, our employee benefits have more than doubled and outsource to local suppliers as quadrupled. While this growth is not all direct Seaspán revenue the mentorship that Seaspán has provided to us is a major contributing factor. The mentorship in environmental stewardship, health & safety leadership and consistent employee training has made it so we are a leader of these critical requirements for a company of our size.

If the expansion plan is approved our own management has forecasted the requirement of an additional six to eight personnel, some \$200,000 of equipment purchase and another 1200sq ft of shop and fabrication space. All these resources will be hired, purchased or leased in the lower mainland.

While we credit our growth and success to our incredible team, it is made easier when the path is set by Seaspán's corporate leadership.

Thank you for the opportunity and please contact me with further questions.

Regards,

A handwritten signature in black ink, appearing to read "Kevin Hughes".

Kevin Hughes

124 Mountain Highway  
North Vancouver, BC V7J 2K3  
P: 604 990-9797 F: 604 990-9793  
[www.petrokleen.com](http://www.petrokleen.com)



## **MARINE WORKERS & BOILERMAKERS INDUSTRIAL UNION LOCAL 1**

Phone: 604-254-8204  
Facsimile: 604-608-2925  
www.marineworkers.ca

136 – 4299 Canada Way  
Burnaby, BC  
V5G 1H3

**July 13, 2021**

### **Re: Support for Vancouver Drydock Proposed Water Lot Project**

**Dear Sirs/Madams:**

The Marine Workers & Boilermakers Union has represented members in shipyards including the Vancouver Drydock Co. (previously Wallace Shipyards, Burrard Dry Dock Co., then Versatile Pacific) since the 1920s. Ship building and repairs has played a key role in building British Columbia's economy and advancing the social interest of many families. While the MWBIU represents most of the employees including fabricators, fitters, labourers, painters, riggers, and welders at the Vancouver Drydock, the site also employs machinists (IAM 692), pipefitters (UA 170) and electricians (IBEW 213).

A 2014 research paper written by Blair Redlin and David Fairey of the Columbia Institute states that according to an analysis by Stokes Economic Consulting, the economic advantage of local shipbuilding and repairs: that for every 100 jobs in the shipyard, there is an additional 135 jobs created locally. It also states the financial benefits of tax revenue including property taxes to the city and increased provincial and federal tax revenue.

The story of the Burrard Dry Dock Company unfolded over the course of a century. In 1925, a new floating drydock was completed at Burrard Dry Dock, allowing it to obtain work on ships that had grounded along the coast, work that had formerly gone to Seattle. The operation grew as an organization with thousands of employees earning good wages and gained a global reputation for quality in building new ships and repairing existing vessels.

Burrard Dry Dock was then the largest shipyard in BC, with quality equipment and large enough property to adapt to the changes in the industry and was able to survive the depression. After the depression vast amounts of capital was invested into expanding the facility.

While there were trials and tribulations, the Dry Dock, continued to maintain a stable workforce, affording many families a steady income and good benefits. The construction of the "Panamax" class drydock was completed in 1982, however, with rising interest rates amongst other factors, by 1987, the drydock now operating as Versatile had its assets acquired by the merchant bankers who then sold them to a Toronto based conglomerate attracted by the federal government's promise to contract the construction of the Polar-8 Icebreaker. The 1990 budget, where the federal



government cancelled the Polar-8 contract left the industry and workers who had dedicated decades to the industry in a spiral descent. If it was not for BC Ferries commitment to build the Spirit Class vessels completed in 1993-1994, there was not much hope the North Vancouver shipyard could have survived.

Ferries completed and facing the prospect of the loss of the industry and consequently the loss of well-paid jobs and tax revenues, the Marine Workers' union through the Shipyard General Workers' Federation along with industry and union leaders and local government, became ambassadors to the industry, advocating on behalf of these workers.

Since 2015, the Vancouver Drydock has steadily employed 100 to 200 highly skilled, well compensated, unionized employees, at times busting at the seams trying to accommodate emergency dockings along booked projects, always hoping not to turn away clients who alternatively may go south for repairs and maintenance.

Over the last few decades, Lower Lonsdale has evolved into a thriving community hub and tourist destination with residences, businesses, and the recently completed park, The Shipyard, themed with the rich shipbuilding history of the area including the erection shop originally located at the bottom of St. Georges and which politicians had the sign taken down for Expo 86, timecard display, waterpark, walkways and more. Now with the potential to add two docks and a possible additional 100 jobs, we have an opportunity to rebuild VDC's reputation as a world leading ship repair facility where future generations of families living in Metro Vancouver can continue to access family-sustaining jobs. Hopefully one day, many new timecards will proudly be displayed in the park along with those from the past.

Respectfully,



Fred Simmons  
President of MWBIU and Chair of the Council of Unions at VDC

COPE 378



13 July 2021

**Letter of Support : Seaspan and Vancouver Drydock Company Ltd. (VDC) Expansion Project**

To Vancouver Fraser Port Authority and interested parties,

Nickel Bros is a local company based in the Vancouver area since 1956. We specialize in relocating houses including historic buildings for reuse to avoid demolition of sound structures that lead to unnecessary tons of waste into our landfills, and delivering affordable housing. We also support various industries by providing solutions for challenges relating to heavy lifting and transportation.

We would like to express our support for Seaspan's plans to expand their Vancouver DryDock in North Vancouver. As a transportation company, we operate heavily on land and by sea. We appreciate Vancouver as a coastal, seaport city and we are fortunate to have Seaspan as a reputable company in our own backyard to support the marine industry. Their development plans will continue to place Vancouver as a world class destination with modern facilities and sustainable support for employment and economic impact to our communities.

Nickel Bros has a history of collaborating with Seaspan in accessing our waterways through their facilities for barging saved buildings. We have also been contracted for industrial jobs at their shipyards, most recently, we performed the move of HMCS CORNERBROOK submarine for the Canadian Royal Navy in preparation of its re-launch. We highly commend the investment Seaspan is placing in the Vancouver shipyard's expansion as they provide integral services to marine processes and jobs, an innate essential for the coastal characteristic of Vancouver.

Thank you for your kind consideration towards this vital project.

Sincerely,

Jeremy Nickel  
President  
Nickel Bros  
[Jeremy@nickelbros.com](mailto:Jeremy@nickelbros.com)  
(604) 649-7148

**Safety. Precision. Integrity.**

**Vancouver**  
1528 Broadway Street  
Port Coquitlam, BC V3C 2M8  
Toll free: 1-866-813-9430

**Vancouver Island**  
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**Seattle**  
10405 19<sup>th</sup> Ave SE  
Everett, WA 98208  
Toll free: 1-866-920-2767

**Montreal**  
Tour Scotia, 1002 rue Sherbrooke O  
Bureau 1900, Montreal, QC, H3A 3L6  
Toll free: 1-866-813-9430

Residential: [www.nickelbros.com](http://www.nickelbros.com)

Industrial: [www.nickelbrosindustrial.com](http://www.nickelbrosindustrial.com)

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
July 13, 2021  
DELIVERED BY EMAIL

Seaspan Shipyards  
[infodrydock@seaspan.com](mailto:infodrydock@seaspan.com)  
[ggeatros@seaspan.com](mailto:ggeatros@seaspan.com)

Jonathan Wilkinson, MP North  
Vancouver  
[Jonathan.Wilkinson@parl.gc.ca](mailto:Jonathan.Wilkinson@parl.gc.ca)

Vancouver Fraser Port Authority  
[Community.Feedback@portvancouver.com](mailto:Community.Feedback@portvancouver.com)

Bowinn Ma, MLA North  
Vancouver  
[Bowinn.Ma.MLA@leg.bc.ca](mailto:Bowinn.Ma.MLA@leg.bc.ca)

Mayor and Council  
City of North Vancouver  
[mayor@cnv.org](mailto:mayor@cnv.org)

John Horgan, Premier of BC  
[premier@gov.bc.ca](mailto:premier@gov.bc.ca)

**Prime Minister of Canada, Justin Trudeau**

Dear Sirs/Mesdames:

Re: Seaspan Vancouver Drydock Proposed Water Lot Project

We write to you as Owners/Residents of property adjacent to the proposed water lot project ([REDACTED]).

We have a number of concerns related to this project, some of which include, but are not restricted to the following:

1. Effect on wildlife in, on or near the water;
2. Water pollution/hazardous waste controls and enforcement;
3. Likely increase in noise levels - already existing 24/7;
4. Likely increase in air pollution levels and/or dust levels - already existing;



5. Effect of dredging and pile driving on the stability of the buildings nearby;
6. Loss of views;
7. Negative affect on values to properties in The Shipyards area i.e. The Trophy building, Cascade East and West, The Atrium buildings, the Promenade and businesses located at or near the project.

We chose to purchase our retirement home on the waterfront even before it was built. My husband had worked at Vancouver Shipyards in his youth and had a strong attachment to the shipyard industry and a love of ships and the waterfront.

We are not per se against the development of a strong shipbuilding or ship repair industry on the North Shore and the added jobs related thereto but we have concerns regarding public notification, disclosure and transparency regarding this proposed project. We also question why this project needs to encroach on the massive residential development to the west, Shipyards Common etc. rather than moved towards the industrial development on the east side of the shipyard – to be clear, on the Cargill side.

We write to add our voice to that of our neighbours and to stand in solidarity with them.

Yours truly,

████████████████████  
████████████████████  
████████████████████  
████████████████████

July 14 2021

George Geatros  
Manager Special Projects  
Port Of Vancouver  
100 The Pointe, 999 Canada Place  
Vancouver, BC, V6C 3T4

Dear George Geatros:

As a local stakeholder in our marine industry, I am writing to express our full support for the Vancouver Drydock Expansion Project.

We currently own and operate a fleet of 6 tugs and 20 barges, hauling aggregates and miscellaneous cargo up and down the coast.

As issues arise and vessels age the importance of reducing downtime while in the shipyard is key. We believe that this project will help by expanding the capacity to provide service to ourselves and the rest of the local maritime industry. We also believe it will be greatly beneficial for the local economy and workforce by creating 100 new jobs.

We urge you to move forward with the decision to allow Seaspan the additional space for expansion.

Yours Sincerely,

Lucas Waterton

Operations

---

**TUG & BARGE SERVICE**



July 15, 2021

To Whom it may Concern,

I am writing to voice my support for Vancouver Drydock Company's (VDD) proposed water lot extension and the addition of two new smaller floating drydocks.

Although it may appear that a diving company specializing in underwater ship repair and maintenance would view a dry dock as a competitor, our relationship with VDD is very symbiotic. Subsea Global Solutions (SGS) and VDD have had a long and mutually beneficial business relationship for decades.

VDD contracts SGS to assist with underwater repairs for vessels in their yard but not in drydock as well as for topside technical work for which SGS is certified for by the original equipment manufacturers such as stern seal replacement and propeller repairs. VDD also provides lay berth accommodation for vessels requiring our underwater services such as stern seal and thruster replacement.

An expanded VDD will also benefit the ship repair and maintenance industry as a whole by keeping the Port of Vancouver a "go to" port for not only local vessel operators but the entire Pacific Northwest.

The expansion will also provide much needed secure, well paying jobs that will keep families in the area and further stimulate the economy.

The shipyard has been in this location for over a hundred years, and it wasn't too many years ago, as I recall, that it's footprint extended all the way to Lonsdale Ave. A relatively small water lot extension with the addition of two smaller, low profile drydocks may have some minimal impact on relatively few folks who live just west but in my opinion the benefits far outweigh these minor impacts on a few. After all the drydock was here first!

Sincerely  
Mark Morgan

A handwritten signature in black ink, appearing to read "Mark Morgan", written over a horizontal line.

Vice President / General Manger  
Subsea Global Solutions  
North America – Northwest Territory



SGS Vancouver Diving ULC  
1458 Rupert Street  
North Vancouver, BC  
V7J 1E9

Main: +1-604-980-9613 (24h)  
Fax: +1-604-980-9223

SUBSEA GLOBAL SOLUTIONS  
[www.subseaglobalsolutions.com](http://www.subseaglobalsolutions.com)  
[Vancouver@sgsdiving.com](mailto:Vancouver@sgsdiving.com)



[REDACTED]

July 18, 2021

DELIVERED BY EMAIL

**Seaspan Shipyards**  
[infodrydock@seaspan.com](mailto:infodrydock@seaspan.com)  
[ggeatros@seaspan.com](mailto:ggeatros@seaspan.com)

**Jonathan Wilkinson, MP North Vancouver**  
[Jonathan.Wilkinson@parl.gc.ca](mailto:Jonathan.Wilkinson@parl.gc.ca)

**Vancouver Fraser Port Authority**  
[Community.Feedback@portvancouver.com](mailto:Community.Feedback@portvancouver.com)

**Bowinn Ma, MLA North Vancouver**  
[Bowinn.Ma.MLA@leg.bc.ca](mailto:Bowinn.Ma.MLA@leg.bc.ca)

**Mayor and Council  
City of North Vancouver**  
[mayor@cnv.org](mailto:mayor@cnv.org)

**John Horgan, Premier of BC**  
[premier@gov.bc.ca](mailto:premier@gov.bc.ca)

**Prime Minister of Canada, Justin Trudeau**

Dear Sirs/Mesdames:

Re: Follow-up re Seaspan Vancouver Drydock Proposed Water Lot Project

Further to our letter of July 13, 2021 and subsequent attendance at the two virtual community consultation meetings (July 13 & 15, 2021), we have the following comments/questions/concerns:

1. Many of the questions posed by Attendees were not responded to in a forthright manner and led to some frustrated chat comments by those in attendance. In particular:
  - Where is the eastern boundary of the waterlot;
  - What actual efforts were made by Seaspan to locate the proposed drydock in that eastern portion of the waterlot, away from the children's park, Burrard Wharf, Spirit Trail, several condo buildings, Shipyard Commons (ice rink/water park, outdoor stage), Lonsdale Quay, and numerous businesses?
  - Revelation that the intrusion to the west is more than 60 metres, rather than the 40 metres stated in the applicant's materials.

2. Is the Applicant required to post a bond and/or set up a contingency fund for future mitigation of environmental impacts or adversely affected parties?
3. The Seaspan representative was adamant that the proposed drydock expansion could not take place to the east (towards Richardson/Cargill), on the basis that barge access is required to the large “W Building” for the transportation of parts/materials to the Pemberton site - and allegedly because their existing pier to the east does not meet load requirements and/or is being used for other purposes. We remain unclear as to what the smaller “white building” and other buildings on the eastern portion of the Shipyard property are used for and whether they could be re-purposed, moved or demolished/rebuilt to support floating drydock(s) on that eastern side – perhaps on a smaller scale than the existing application. **Was any alternative plan considered at all by Seaspan for presentation to the Port Authority or did Seaspan choose to take the cheapest/easiest route, thereby disregarding all the negative consequences on the adjacent community.**
4. Our understanding is that the proposed drydock expansion is required so that Seaspan can undertake repairs to smaller vessels. **There is already an existing shipyard with two floating drydocks: Allied Shipbuilders (“Allied”), in Burrard Inlet, located east of the Ironworkers’ Memorial Bridge in an industrial area with no residential properties nearby.** The following is an excerpt taken from their website – [www.alliedship.com](http://www.alliedship.com)

*“Unlike many of Allied’s BC competitors that closed, Allied expanded the utility of its shipyard plant and equipment in order to pursue repair and conversion work on commercial vessels. In the early 1980s, Allied designed and built two floating drydocks which enabled the firm to take on significant repair work to balance the decline in domestic shipbuilding. The drydocks are designed to suit the majority of commercial and government vessels on the west coast.”*

5. It has been noted that some of the ships repaired at Allied have been Seaspan tugs. Thus it would appear that one of Seaspan’s objectives may be to eliminate any North Shore competition repairing smaller vessels. **Is it only Seaspan that receives preferential treatment by moving forward with a project adjacent to a thriving residential/recreational/entertainment development initiated by the City of North Vancouver - despite all the negative impacts resulting therefrom? Has the Port Authority or Seaspan considered any sort of partnership or joint venture with Allied due to its more favourable location within an industrial area with no residential complexes nearby, or in the alternative, scaling down the proposal in view of the pre-existing drydocks at Allied and the staggering negative impacts of this proposal on our Shipyards Community?**

6. Questions were posed regarding the workforce and whether the 100 “new jobs” would come primarily from the North Shore and/or within BC/Canada. It is our observation that, on occasion, The Trophy has been temporary home to out-of-country/out-of-province “contract employees” for Seaspan. **Will Seaspan continue this practice or will Seaspan commit to new concerted efforts to hire trained competent Canadian/BC residents for the 100 new jobs? What guarantees do we have?**
7. Finally there was much discussion regarding noise and air pollution. The Seaspan representative advised that the drydock runs shifts from 7:00 am to 10:30 pm but, in our experience (since taking up occupancy at The Trophy in August 2016), this is not always the case – earlier starts, later end times and sometimes 24/7 of continual noise and dust. We were also advised that the current location of the noise monitor is somewhere near St. Georges and Esplanade. **How can these readings accurately reflect existing noise levels at the shoreline/drydock, let alone be the baseline for the expected additional noise levels resulting from the expansion?**

Again, we are not against developing a strong shipbuilding or ship repair industry on the North Shore and the added jobs related thereto but the two public consultations thus far have not allayed our concerns or answered all of our questions, **including whether Seaspan may in the future re-apply for another expansion of their current water lot lease before it expires in 2058, further ignoring the health, welfare and safety of the adjacent community.**

We hope that you will consider our comments/questions/concerns before a final decision is rendered. A decision that will affect the quality and enjoyment of life of the residents, businesses and visitors to The Shipyard Commons and surrounds.

Yours truly,

████████████████████  
████████████████████  
████████████████████  
████████████████████

[REDACTED]

*Family Practice*

---

[REDACTED]

[REDACTED]

[REDACTED]

July 19, 2021

Dear Mr. Ma,

I strongly oppose the expansion of Seaspan to the West.

Three years ago my wife and I sold our family home of 40 years and moved into our dream home on the water front in the East Cascade (185 Victory Ship Way). At the time we purchased this unit we were well aware that Seaspan was already present there, but we were willing to tolerate some increased noise, bright lights, and some effects on air quality in a tradeoff for the wonderful view and location. North Vancouver has done a wonderful job of creating an environment on the old ship yards that has been so positive to the community involving all age groups from young children, teenagers, young adults with growing families and seniors.

We see many people in the community both local and tourists in the Ship Yards enjoying the beautiful views and the fresh air that the waterfront setting provides. That along with the water park, skating rink, entertainment, festivals, music, and the many restaurants with their patios looking out onto the ocean. The idea that Seaspan is trying to infringe on this beautiful area to create a mere 100 jobs will not only affect the views, but even more importantly will affect the air quality and increase the noise and lights from the shipyards for the many thousands of people using the area now and in the future.

1



There are many groups of preschoolers and school children regularly spending time in the small park in front of Cascade East and Trophy buildings, which is right where the Seaspan expansion is going and is a health risk to them. The Spirit Trail runs right by the Seaspan expansion as well so all the runners, bikers, and skateboarders will also be affected by the expansion.

The Shipyards' creation is a jewel that would be the envy of any city around the world. If the expansion goes ahead, there will be no turning back in the future. This Seaspan expansion proposal is being pushed through quickly with little time for all the people that it will affect really knowing about it. I strongly believe Seaspan has done this on purpose.

We all know that if the people using the shipyard were asked their opinion about the Seaspan expansion, it would be strongly rejected by everybody presently using the area including all the businesses, restaurant owners and their staff, and all people living in the area. Don't let the Seaspan rush this through. Please reject this expansion on behalf of all the people.

Sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]

July 20<sup>th</sup>, 2021

To: The Port Authority

Re: Seaspan Drydock Expansion Proposal

To the members at the City of North Vancouver, & Port Authority,

Certainly, you have received many email and letters in outrage concerning the expansion of the Seaspan docks along the residential housing along the Victory Ship Way in Lower Lonsdale. I would like to point out **three** significant reasons as to how this not part of any sensible, good or considerate community planning. The reasons being **acoustics, visibility and air quality control of toxic VOCs** emitted into the near and immediate neighbourhoods.

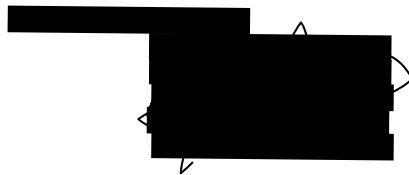
The type of acoustic pollution that is caused by the Seaspan docks is not a type of white noise, but it varies a large range, from jarring noises of tons of mass being dropped from high distances, to squalling alarms. These noises are and can be caused by Seaspan's operations 24 hrs per day, 7 days per week. The Official Community Plan that has been developed by and approved by urban planners and council members should be inclusive of equity for ALL, not a single corporation. The building adjacent to the existing Seaspan docks, 'Trophy' at 199 Victory Ship Way is designed so that all units face away from the docks, thus having a solid concrete mass wall to buffer the noise between the community of residences and the docks. This thoughtful design consideration would be completely ignored if the docks bypass that wall condition. The noise would effectively reverberate through the water front buildings and effectively making it an unbearable place to live, sleep or raise a family.

The argument for visibility should be the easiest to understand. The predominant reason that the Lower Lonsdale revitalisation has been so successful in the last 5-10 years, is due its vantage points down the harbour to the City's downtown 'postcard' view. To deny the community of this by deliberately blocking this, is effectively the complete antithetical means to the Official Community Plan's entire intention for creating any means of density in this neighbourhood.

Lastly, toxic fumes and VOCs would off-gas directly in the direction of resident's homes and balconies. There is no reason that people's homes, health and safety should be put at risk at the cost of a corporation's capital gain. The density that was intended by the OCP, will now be at a complete health risk with this decision to move forward with the expansion.

Overall, the neighbourhood's intended use was never to be blocked by the shipyard work, despite its local history and heritage. We can all acknowledge that this place is special for all the events that have taken place before it, however, we can not let it supersede the community that has now become established here. Thank you for understanding.

A concerned resident, neighbour, urban designer,

A large black rectangular redaction box covers the signature area. The box is irregularly shaped, following the outline of the signature and name. There are small white arrowheads pointing outwards from the corners of the redaction, suggesting it was placed over the original text.



Vancouver Drydock  
203 East Esplanade  
North Vancouver, BC V7L 1A1  
ATTN: George Geatros

July 20, 2021

#### Proposed Water Lot Extension Project

We are aware of the proposed plan for Vancouver Dry Dock to extend their water lot and increase its docking capacity by adding two new floating dry docks. We are in full support of the extension and increased docking capacity.

Vancouver Dry Dock provides critical service to the BC coast and the entire North American West coast with its world class repair facilities and people. The dry-docking service and increased docking capacity are needed now and will be in even greater need as local coastal projects like CanadaLNG, Woodfibre, Kitimat LNG, BHP, DP World etc. take shape. The local tug and barge fleet will continue to grow, and foreign tug operators will increasingly be working in our waters. All to support those projects and the future day to day operations at those facilities. We need the docking capacity to follow suit. Without the increased ability to dock and maintain the local and foreign vessels working in our waters, we risk losing those dockings to Alaska and Washington State. That would be a significant loss of economic activity and stimulus.

An increase in dry-dock capacity equates to more employment and development of skilled workers here in BC and importantly here in the Metro Vancouver region. It is not only skilled workers at Vancouver Dry Dock, this increased capacity means all the suppliers, vendors, and partners (including academic institutions and trade schools) will have a need for increasing employment. Shipyards, especially repair yards, require large local supply networks of both materials and human capital for them to be successful. As one of those suppliers in the network our local team directly sees the benefits of increased investment in the local ship repair and building infrastructure. We added two new full-time staff and made the commitment to keep our local distribution center open when NSPS was confirmed and will continue to right size and support the marine industry here in BC as it grows.

Canada, BC, and Vancouver are in the middle of a resurgence of marine investment in new construction, but the heart of the industry has always been the repair and maintenance business. This pillar of the marine business is even more critical now as new vessels and tonnage comes online; we need new and more local capacity to maintain and repair it. Losing out on maintenance of vessels built in Canada and/or working in Canada would be a real shame. Not only does the increased capacity support the domestic customers it opens doors to competing for more foreign flag dockings and building our marine industry even stronger.

North Vancouver is the epicenter of shipbuilding and ship repair in BC and it only makes sense to continue to grow it there. Vancouver Dry Dock in our experience has always been respectful to the neighboring areas and works hard with its suppliers and network to invest in ways to be more efficient and sustainable. The proposal reads to be well thought-out and it makes sense for the industry, the region, and the province for it to be approved. We are always excited to see companies invest in the local marine industry and continue to support generations of workers for BC and Canada.

Sincerely,

*Keegan Gemmill*

Keegan Gemmill, MBA  
Regional Sales Manager-Western Canada  
Marine and Protective Coatings



July 22, 2021

Vancouver Drydock Company Ltd.  
203 East Esplanade  
North Vancouver, BC  
V7L 1A1

Attention: Mr. George Geatros, Manager, Special Projects  
Via Email: [infodrydock@seaspan.com](mailto:infodrydock@seaspan.com)

Dear Mr. Geatros:

**Re: Vancouver Drydock Water Lot Project**

On behalf of BC Ferries, I am writing to express our support for the proposed Water Lot Expansion project at your Vancouver Drydock location on the North Shore of Vancouver. This project would increase the availability of dry dock capacity, adding 100 new highly skilled positions to the regional marine industry and provide a significant economic lift to the local economy just when it needs it most.

Access to expert ship repair services is strategically important for BC Ferries operations, vessel reliability and our desire to keep the BC coast connected at affordable prices. BC Ferries supports shipyards in British Columbia with significant annual spending on maintenance, repair and re-fit on our vessels.

Vancouver Drydock has been a valued ship repair partner of ours for many years and the addition of two new dry docks will increase the local docking options available to our vessels. BC Ferries supports this proposal and we look forward to the increased ship repair capabilities this project will bring to British Columbia.

Sincerely,  
BRITISH COLUMBIA FERRY SERVICES INC.



Frank Camaraire,  
Executive Director, Engineering

/sj  
cc: S. Jones, Director, Fleet Project Management Office, British Columbia Ferry Services Inc.  
A. Bertens, Director Business Development, Vancouver Drydock



July 22, 2021

Seaspan Shipyards  
2 Pemberton Avenue  
North Vancouver, BC V7P 2R2

Attn: Kris Neely, Senior Manager, Corporate Affairs

**Re: Vancouver Drydock Waterfront Project**

Dear Kris,

On behalf of Fibreco Export Inc., please accept our endorsement of the Seaspan Shipyards Drydock Waterfront Project.

Seaspan has always been a valued member of the waterfront community and is a world class model for ensuring the community at large is contemplated when planning all operations. Seaspan is known to demonstrate the highest level of care when considering projects and growth by showing consideration for the environment and respect for neighbours and the business functions of others.

This project emphasizes the continued effort to maintain sustainability in our industry by providing local access for much needed vessel repairs while also providing precious well-compensated local jobs.

I hope that every consideration will be made in order to approve this project.

Sincerely,

A handwritten signature in blue ink that reads 'Megan Owen-Evans'.

Megan Owen-Evans – President

FIBRECO EXPORT INC. • 1209 MCKEEN AVENUE • NORTH VANCOUVER, BC • CANADA • V7P 3H9  
Telephone: 604-980-6543 • Facsimile: 604-984-2593 • email: feedback@fibreco.com • Website: www.fibreco.com



SeaBus: 2 Chesterfield Place, North Vancouver, B.C. Canada V7M 3G1

July 23, 2021

George Geatros  
Manager, Special Projects  
Port of Vancouver

Subject: Letter of Support for proposed water lot extension - Vancouver Drydock Company Ltd.

---

Dear George,

SeaBus is a marine division of Coast Mountain Bus Company Ltd and a vital link for the Translink public transit network within the Greater Vancouver Regional District (GVRD). SeaBus operates passenger ferries from North Vancouver to the City of Vancouver daily. SeaBus service reliability rating is 99.9 % and is very proud of this accomplishment. A good state of repair is a key aspect to accomplishing this high level of reliability. SeaBus has a fleet of 4 aluminium catamaran vessels and they require routine shipyard maintenance works in order to provide this high standard of operational reliability for the public transit.

SeaBus management is aware that Vancouver Drydock has proposed an expansion plan to add 2 more floating Drydocks to their existing Drydocks.

SeaBus has been a customer of Vancouver Shipyard and Drydock since 1977. They have provided SeaBus with excellent service and repairs to ensure the fleet is ready to meet the high level of service demands each year. The existing inner harbour shipyards and dry dock facilities' location is also another essential aspect for SeaBus due to the Transport Canada regulatory limitations ~~the~~ that certify SeaBus vessels to only operate within Burrard Inlet waters (Canadian Sheltered Waters), therefore existence of Drydocks and Shipyards within the close distance from SeaBus will help us to oblige to our regulatory restrictions when one of the SeaBuses should go out of service for repairs at Drydock. It is also very important for SeaBus that Vancouver Drydock can put into place smaller drydocking facilities to accommodate smaller vessels. This will allow Vancouver Drydock to provide SeaBus with quick placement onto a drydock and accomplish a timely turn-around in order to minimize down time for the SeaBus vessel fleet.

Furthermore, we believe expansion of Drydocks will as well create more jobs in the region. More travelling of workers may also increase SeaBus ridership too.

For all the above reasons SeaBus strongly supports the proposed water lot project at Vancouver Drydock Ltd.

Sincerely,

A handwritten signature in blue ink that reads "Saeid Zabihirad".

Saeid Zabihirad  
Manager, SeaBus Engineering  
2 Chesterfield Place, North Vancouver, BC V7M 3G1

Coast Mountain Bus Company Ltd. is an operating subsidiary of Translink

## MAVERICK HYDRODEMOLITION SERVICES INC.

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18101 – 94th Avenue, Surrey, British Columbia Canada V4N 4A3  
Tel: (604) 882.1566 / 1 800 665.7772 • Fax: (604) 882.0031 / 1 800 661.1178  
Email: [info@macandmac.com](mailto:info@macandmac.com)

July 23, 2021

George Geatros  
Manager Special Projects  
Seaspan

Re: Vancouver Drydock Water Lot Project

George,

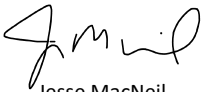
We write in support of Vancouver Drydock Company Ltd. Partnership's ("VDC") application to expand the drydock capacity at Vancouver Drydock.

We are a long-time local supplier of high-pressure surface prep services to VDC. We understand that the application proposes 2 additional floating drydocks and a work pontoon and we have considered those plans (and the corresponding need for an extension to the water lot). The added capacity and work space holds the promise of a more efficient, modern and professional facility with more room to account for safety, risk mitigation and workflow management. Each of those benefits Maverick in the work we do for VDC and they benefit the facility itself.

As the expansion means greater capacity for VDC, the enhanced immediate and long-term economic benefits for the Lower Mainland are obvious. The immediate benefits include greater employment and revenue for VDC and the longer-term economic benefits come from increasing Vancouver's profile as a shipbuilding and ship maintenance hub.

We look forward to the application advancing to approval in due course. If we can answer any questions in the meantime, please don't hesitate to contact us.

Thank you,



Jesse MacNeil  
Principal

Cell 604 290 3141  
Email: [jesse@macandmac.com](mailto:jesse@macandmac.com)





3GA Marine Ltd.

1525-3777 Kingsway  
Burnaby, BC V5H 3Z7  
Canada

Phone +1 250 920 9992  
Fax +1 250 483 6301

July 26, 2021

**Vancouver Drydock**  
**203 East Esplanade**  
**North Vancouver, BC V7L 1A1**

Attention: **George Geatros | Manager Special Projects**  
Re: Vancouver Drydock Co. Expansion  
Subject: **Letter of Overwhelming Support from Local Business – 3GA Marine Ltd.**

Dear Mr. Geatros,

I am writing this letter to voice 3GA Marine Ltd.'s and my personal **overwhelming support** for the expansion of Vancouver Drydock Corporation's (VDC) new drydock infrastructure. Our support for this expansion is driven primarily from a local small business owner's perspective and extends to a national level where major economic impact can be felt across Canada.

Since our inception in 2012, 3GA has worked on 100's of projects for Seaspan and VDC providing engineering services to solve complex ship design and repair problems for local, national and international marine vessels. As one of the leaders in ship design/repair in Canada, 3GA can attribute much of our success to Seaspan. These complex projects have encouraged 3GA to innovate which has led to advances in 3D laser scanning, naval architecture, and engineering and marine design practices.

3GA recognizes Seaspan as a responsible, environmentally conscious company who is a pillar for small and medium sized businesses in the marine industry. The success of our business, and other small companies, continue to be linked to Seaspan; this expansion increases business to the area and helps small businesses survive in today's fast paced competitive industry. This project not only affects the economic and job outlook at VDC, within BC and across Canada but also attracts worldwide business leading to future work for all stakeholders. Another major benefit is the long-term impact to the local marine industry. This extends from future professional and trades post secondary programs to advances and innovation in technology that essentially drives our economy.

I remember my childhood growing up in the lower mainland where my uncle, whom has worked for Seaspan for over four decades, used to take me to the shipyard and show me all the interesting projects. My passion for the industry was created by Seaspan 30 years ago and continues to grow. I hope that the Vancouver Port Authority can recognize the benefits of this project both from a local and national perspective. The impact to local business and our industry is significant and positive, something that will drive businesses and the economy for decades to come.

Kind Regards,

A handwritten signature in black ink, appearing to read 'Daniel McIntyre', is written over a light blue horizontal line.

Daniel McIntyre, P.Eng., | Vice President | 3GA Marine Ltd



July 26, 2021

**Subject: Vancouver Drydock Water Lot Project**

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To: Mr. Geatros

Lafarge Canada Inc. fully supports the proposed Water Lot Expansion project. Our tugs and barges are the main method of delivering aggregate to our ready mix and asphalt plants which in turn supply product to a significant number of infrastructure jobs in the lower mainland. The addition of the dry dock on the North Shore will help reduce maintenance and repair downtime for us and the marine industry as a whole, as we work together to supply local infrastructure projects.

Lafarge has ambitious environmental initiatives in regards to zero waste and reducing emissions. The construction of the dry dock will help us get that much closer to our climate action goals. The convenient location will help facilitate our barge repairs closer to our operations rather than looking at options in the US or Mexico.

The addition of this dry dock will also be an economic boon for the local economy and more specifically the marine industry. This project will provide numerous skilled jobs and increase the capacity to service marine assets locally.

Sincerely,  
**Harry Sidhu**  
Marine Coordinator

p.p. **Lance Dexter**  
Senior Manager, Marine Division  
Lafarge Canada Inc.

LAFARGE CANADA INC.  
[www.lafarge.ca/en](http://www.lafarge.ca/en)

Page 1 of 1

A MEMBER OF  
 **HOLCIM**



July 26, 2021

Attention:  
George Geatros, Manager Special Projects  
Seaspan Vancouver Drydock  
203 East Esplanade  
North Vancouver, B.C.  
V7L 1A1

**RE: VANCOUVER DRYDOCK WATER LOT PROJECT**

The purpose of this letter is to communicate Northstar Access’s enthusiastic support of the proposed Vancouver Drydock Water Lot Project. As an active, responsible, and growing corporate citizen in B.C.’s Lower Mainland, Northstar firmly believes that this project will provide multiple benefits for the Vancouver community, for the local economy, and for Northstar and its employees.

**Why We Support the Vancouver Drydock Water Lot Project:**

1. *Economic Diversification:* We are strong advocates for the need to maintain a diverse Vancouver economy, and agree with the Metro 2040 philosophy that diverse and balanced economic activity promotes “complete communities”. The Drydock Water Lot Project, and projects like it, are critical to ensuring that our local economy does not become overly dependent on sectors like Tech, Retail, and Distribution services. Manufacturing and Industrial services, like those offered by Seaspan, will help Vancouver maintain a vibrant and resilient economy for decades to come.
2. *Workforce Diversification:* Economic diversification is a critical element to driving diversity within the Vancouver community/population. In this case, further expansion of Seaspan’s Vancouver Drydock will provide well-paying jobs for individuals from a wide variety of educational, cultural, racial, and economic backgrounds and interests (including new Canadians). Northstar is an excellent example of the type of diverse, inclusive company that stands to benefit from this potential project (see Page 2).
3. *Direct Benefits to Northstar Employees:* Seaspan Vancouver Drydock is Northstar’s largest customer across Canada. At Seaspan we have roughly 10-12 fulltime, skilled workers supporting ongoing activities with our scaffolding services. Those 10-12 workers are in turn supported by 4-5 yard/warehouse staff, 1 project manager, and 2 office staff. These are all well-paying jobs, stable jobs. The Vancouver Drydock Water Lot Project would further expand this workforce by an additional 50-200%.
4. *Supporting Local Companies/Investment:* Northstar is focussed on long-term growth within B.C. and Canada overall. We reinvest the vast majority of our profits (millions of dollars each year) in B.C. via capital expenditures (new equipment and vehicles), as well as new facilities (we are currently moving from Burnaby to Port Coquitlam and investing hundreds of thousands of dollars in this new, larger location). Our growth



has come at the expense of U.S.-based/owned competitors, and given Seaspan’s commitment to working with local suppliers, this will continue to be the case. Any benefits Northstar receives from this project will stay within the local economy.

**About Northstar Access, Our Mission, and Employee Diversity & Inclusivity:**

We are a 100% Canadian owned, operated, and headquartered private company with over 250 employees across Canada. We have been in business in B.C. since 1968 (formerly known as Sky-Hi Scaffolding). Northstar provides scaffolding, shrink wrap (environmental hoarding), and swing stage installation, rental, and supply services to Seaspan and other industrial and commercial construction customers throughout B.C., supported by dedicated facilities in Vancouver and Vancouver Island.

Our company has grown significantly since 2012 by prioritizing customers like Seaspan by focussing on safety, reinvesting in our operations and local communities, and by building a diverse, well-paid, and engaged workforce. Our Vision is: “We Build Canada - Better, Safer, Stronger.”

We also take pride in leading our industry in terms of diversity and inclusivity. Specifically, 13.3% of our workforce identify as First Nations, 11.0% are woman (15.7% in B.C.), and 36.4% identify as belonging to a racial minority group. These are all industry leading statistics within Canada’s construction industry. In addition, 85.1% of our employees believe that Northstar provides equal opportunities to all employees regardless of their background, and 83.0% believe we have an inclusive culture (Note that average scores were even higher from employees from minority groups). Northstar’s 2021 Employee Satisfaction & Diversity Survey is available upon request.

We are proud to be longtime partners of Seaspan Drydock, given our shared values and its positive impact to the Vancouver community. The Vancouver Drydock Water Lot Project will only add to this positive impact for generations to come.

Sincerely,

**PAUL ZVONAR** | President & CEO

T: 416-200-5580  
215 Milvan Drive, Toronto, ON M9L 2A3  
[www.scaffolding.ca](http://www.scaffolding.ca)  
**YOUR BUILD. OUR BUSINESS.**





Novarc Technologies Inc.  
Unit 6 - 1225 East Keith Road  
North Vancouver -V7J1J3

July 26, 2021

To whom it may concern,

We are submitting this letter of support for the proposed water lot extension by Vancouver Drydock Company Ltd. .

Novarc Technologies is a North Vancouver based robotics company specializing in the design and commercialization of collaborative welding robots for industrial applications. Novarc is a Canadian pioneer in the field of collaborative robotics. Novarc's main product is the Spool Welding Robot ("SWR"), the first-of-its-kind in pipe welding application. Novarc has won many awards including TIA impact awards and ranks among the top 10% in Canada's fastest growing companies.

Novarc provides robots to shipyards to make them more productive . Vancouver Drydock is an early adopter of the SWR technology and we are proud of the role our relationship has played in their success.

As we collaborate with the Vancouver Drydocks on product development, their growth and success helps us with growing our relationship with them on product development and testing.

Vancouver Drydock's success is absolutely essential for growing the shipbuilding industry in BC and in Canada and is aligned with the Federal Government's National Shipbuilding Strategy to rebuild this industry in Canada. This project will enable them to win more projects, creating even more jobs in shipbuilding, and innovative robotics for North Vancouver and for Canada.

Regards,  
Soroush Karimzadeh  
CEO, Novarc Technologies Inc.

July 26<sup>th</sup>, 2021

To whom it may concern;

**Re: Seaspan Drydock – Proposed Waterlot project**

On behalf of the North Vancouver Chamber, I am writing to provide input on the Seaspan Drydock – Proposed Waterlot project development proposal.

The NV Chamber’s Policy Committee monitors urban planning and development in our region and at times, we are asked to provide our input or support for projects. The NV Chamber has an established process that requires project proponents to provide detailed information outlining all the economic and community benefits of the project before support is considered. We received a development support request for the Waterlot project proposal by Seaspan.

The NV Chamber has reviewed the submission and supports the approval of this project on the basis of the following key project attributes:

1. Long term, stable capital investment in NV
2. Creation of 100 new “well paying” jobs
3. Jobs / investment are close to public transit investment (Seabus & Rapid Bus line)
4. Jobs / investment are close to housing and other commercial community amenities

Based on our outreach, we do not believe this project will have any negative impact on the businesses in the proximity of The Shipyards area, which draws it’s name from the working heritage of this site, and could potentially lead to increased business with more employees working in the area.

We encourage support of this project.

Respectfully submitted,



Patrick Stafford-Smith MBA, P.Eng.  
CEO - North Vancouver Chamber

July 26, 2021

To Whom It May Concern:

**Re: Support for Vancouver Drydock Proposed Water Lot Project**

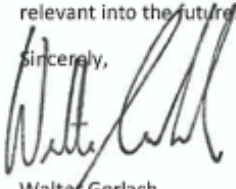
I am writing today, on behalf of the Vancouver Shipyard Poly Party Council of Unions, consisting of Marine and Shipbuilders Local 506, International Association of Machinists and Aerospace Workers Lodge 692, International Brotherhood of Electrical Workers Local 213, United Association of Pipefitters Local 170 and MoveUP (Canadian Office and Professional Employees Union Local 378).

We are in support of the application made by Vancouver Drydock to the Vancouver Fraser Port Authority, to allow changes to the on-water operations of the Shipyard, for a great many reasons:

- The proposed plan, will allow for the repair work previously performed at Vancouver Shipyard, that has been displaced in an effort to focus on Shipbuilding, to remain being performed locally here in British Columbia and not being performed abroad.
- By keeping the repair work here on the Northshore within Seaspan, many of the workers who were performing this repair work at Vancouver Shipyard, will have the ability to transfer to Vancouver Drydock, to be part of the 100 new job opportunities created by the proposed change. This is crucial, as ship repair relies on highly skilled workers to maintain a high degree of competency, to perform the quality of work that retains customers in this highly competitive industry.
- We support initiatives, that are inline with maintaining and growing the Shipbuilding and Repair industry, which has seen its share of challenges, over the last 100 years here on the Northshore. What can not be lost in this conversation, is that these jobs pay family supporting wages, that in turn, give back much to the community and to British Columbia as a whole.

In closing, we want to acknowledge the importance of Vancouver's historic working waterfront, which very much remains vibrant today and that we want to see this powerful economic driver remain relevant into the future.

Sincerely,



Walter Gerlach  
Chair of the VSY Poly Party Council of Unions

/ah  
moveUP





HOUSE OF COMMONS  
CHAMBRE DES COMMUNES  
CANADA

Jonathan Wilkinson, MP North Vancouver

July 28, 2021

Tim Blair, Planning Supervisor  
Port of Vancouver

Hello, Tim.

In my capacity as the Member of Parliament for North Vancouver, I have received a significant number of emails and calls from concerned constituents regarding the proposed Seaspan drydock expansion. I am sure the Port has also received such representations.

In the communications that have been directed to me, none of the concerned constituents have objected to an expansion of the drydock operations. However, their concerns have centred around the proposal that has been made by Seaspan to expand to the west of the existing operation, as opposed to east, into the existing industrial waterfront operations of Seaspan.

I am aware that there is presently a review underway. I would request that, in the context of this review, the Port of Vancouver seriously consider the important concerns of residents of the neighbourhood. Specific concerns would include:

- Increased noise pollution, posing a threat to the peaceful enjoyment of tourists, cultural entities, service providers, owners and renters in the LoLo area;
- Increased particulate matter caused by the proposed additional drydock facilities;
- Increased potential for water pollution with increased careen activity;
- Potential negative impact on real estate values in the neighbourhood;
- Impacted viewscales.

The waterfront community, which has proven to be an attractive, productive and vibrant contributor to this municipality and has seen vast improvements over the course of the past 20 years or so, has taken what was an entirely working waterfront and melded the grit and gumption of shipbuilding, railway activity and industrial operations with a lively, compact residential sector and an accessible waterfront around Lonsdale Quay and the Shipyards.

The delicate balance required to maintain the desirability of the residential area with the functioning of the port, shipbuilding and railway operations is something that should be the subject of your consideration during the review process.

Please keep me informed of any updates as the process proceeds.

Sincerely,

Cc: Chris Bishop, Kate Grossman, Port of Vancouver  
Kris Neely, Seaspan  
Linda Buchanan, Mayor, City of North Vancouver  
Bowinn Ma, MLA, North Vancouver

201-310 East Esplanade, North Vancouver, BC V7L 1A4    Confederation Building 358, 229 Wellington, Ottawa, ON K1A 0A6  
P: 604-775-6333    P: 613-995-1225



July 28, 2021

Vancouver Drydock  
203 East Esplanade  
North Vancouver, BC V7L 1A1

Attention: George Geatros | Manager Special Projects

**Re: Letter of Support Vancouver Drydock Co. Expansion**

Dear Mr. Geatros,

This letter is to express Island Tug and Barge (ITB) 's full support of the Vancouver Drydock's planned addition of the two new docks and required water lot extension. Vancouver Island receives all its gasoline, diesel and jet fuel by barge. ITB has been an integral part of this supply chain for almost 50 years – ensuring the Vancouver Island keeps moving. We also provide fuel to ships in one of the busiest Ports in North America and provide exclusive subsea cable laying services for BC Hydro – ensuring all Islands in British Columbia have power.

Our industry is heavily regulated, and all our tugs and barges require frequent mandatory drydocking. We also often need the drydock for emergency repairs. If drydock space is not available we are not able to operate until space becomes available and these delays put tremendous strain on the various supply chains we serve. The cost of downtime is very punitive to us and our customers. Dry Dock capacity is extremely limited and frequently we must look to the US to provide this critical service. We desperately need increased drydock capacity in our local market and therefore this expansion project is fully endorsed by ITB. Moreover, this project will provide increased jobs for skilled labour in this space and will compound economic value through increased demand for support services and supplies. It will also help position Vancouver market as a viable choice for international ship repairs.

We look forward to this expansion coming to fruition and the benefits it will bring to the local marine industry.

Kind regards,

Adrian Samuel,  
President, Island Tug and Barge

800 Glasgow Ave · Burnaby · British Columbia · Canada · V5C 0C9 · 604 984 8383 · www.islandtug.com





**P.S.I. Fluid Power Ltd.**  
Calgary Edmonton Red Deer Vancouver

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July 28, 2021

Vancouver Drydock  
203 East Esplanade  
North Vancouver BC  
V7L 1A1

Attn: George Geatros  
Manager, Special Projects

Proposed Water Lot Extension Project

Mr. Geatros:

PSI Fluid Power is a Richmond base company that services, designs, and builds complex Hydraulic systems. We take care of marine based clients all over the world. Some of these clients are in the Cruise Ship Industries, Private Yachts, Tugboats and Fishing Vessels as well as Passenger Vessels.

We as a company support this expansion. We feel this will bring our clients closer to Vancouver and will boost the local economy. Companies that we service need to drydock their ships so we can work on the steering and propulsion equipment and this cannot be done with out the means of a drydock.

Having more options for customers will greatly improve the economy of the North Vancouver area with hotel rentals, restaurants, and the local repair facilities around Vancouver. The opportunity for PSI is increased by being able to access companies visiting the drydock for sales, service, and repair with this expansion.

We are in the middle of expanding our business in Canada, we need service technicians for hydraulic service and repair. This expansion allows us to train our technicians on the job close to home. As an expanding business the keeps the cost down and help the drydock by having more highly train technicians in our local market.

Sincerely,  
Kristian Johnson  
PSI Fluid Power  
Marine Sales and Service

Jotun Paints Inc.



Date:  
29.07.2021

### Expansion Plans Vancouver Drydock Company

Dear Mr. Geatros,

On behalf of Jotun Paints Inc., I want to share our strong support for the planned expansion of Vancouver Drydock. Jotun is the world's largest manufacturer of Marine Coatings, and although we do not have a large presence in Canada, we do supply a lot of Projects at your facility.

Expanding the Drydock will be beneficial to not only the local Marine industry, but to the countless subcontractors and suppliers that are directly and indirectly affected by your business. As an example, we have several Technical Service Staff spending many months in North Vancouver every year, always staying at local hotels, eating at local restaurants etc.

The expansion of the Drydock will also mean that companies such as us will look at increasing our own presence in North Vancouver. In Jotun's case, this is another reason for us to establish a legal entity in Canada and hire permanent staff here.

Best regards

Per O. Hoem  
Regional Manager Canada  
Jotun Paints, Inc.

Jotun Paints Inc.  
9203 LA 23, Belle  
Chasse, LA 70037

[www.jotun.com](http://www.jotun.com)



July 29, 2021

RE: Letter of support for proposed water lot project at Vancouver Drydock Company Ltd. (“VDC”).

To Whom It May Concern:

Ross Rex Industrial Painters Ltd. strongly supports the proposed water lot project at VDC. We do so because this project will:

1. Provide long-term employment opportunities for British Columbians;
2. Create long term spin-off opportunities for contractors, such as Ross Rex Industrial Painters;
3. Allow VDC to successfully win more international work, thereby increasing Canada’s GDP;
4. Increase VDC’s competitiveness, which will ensure long-term and recurring benefits to the economy, VDC, contractors, British Columbians, and all other stakeholders.

Based on my experience with VDC, I can confidently say they are committed to community, safety, and the environment. I have seen it in their policies and procedures and in their core values. I know that VDC will execute this expansion and the long-term operation of the project properly and professionally.

Please give me a call at 604-308-2643 if you have any questions. I will gladly meet in person to discuss this at any time.

Sincerely,

Greg Bertram  
President  
Cell: 604-308-2643  
Email: greg@rossrex.com

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Unit 2A - 20097 92A Avenue, Langley B.C. V1M 3A5 604-888-2826



July 30, 2021

Vancouver Drydock  
203 East Esplanade  
North Vancouver, BC V7L 1A1

**Re: Seaspan Proposed Expansion Response**

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### **Introduction**

Shipbuilding is an essential industry for the west coast of British Columbia, employing several thousand people, drawing on the supply chain of BC-based businesses, and contributing to Canada's GDP. The North Shore of Burrard Inlet has a long history of shipbuilding and, to this day, Vancouver Drydock Co. supports the shipping industry in the province and throughout the Pacific North West. While the City of North Vancouver recognizes that the vessels Seaspan services connects our remote communities and carries our people and goods, the proposed drydock expansion at 203 East Esplanade Avenue is not without economic, environmental and social impacts. By way of this submission, the City wishes to provide our feedback as a stakeholder to ensure that Seaspan may realize its goal, while also ensuring that the public is heard. We wish to enter into a continued dialogue with Seaspan to better understand the company's long-term business expansion plans, which will lend context for the City's future transportation and land-use planning.

Attached to this submission are:

- Attachment A: Letter from Mayor Linda Buchanan on behalf of Council;
- Attachment B: Public feedback received by the City of North Vancouver vis-à-vis the Seaspan expansion;
- Attachment C: Letter to the Port of Vancouver requesting an extension of the public consultation process.

### **Background**

The City's waterfront area between Seaspan's drydocks and the City's Waterfront Park is one of the most economically and culturally vibrant areas of the City of North Vancouver, incorporating residential, commercial and recreational uses. Seaspan's water lot project proposal aims to improve the land use and space within the water lots, which will lead to economic benefits.

Document Number: 2078406 V1

Page 1 of 5

However, many stakeholders, especially residents of nearby high-rise and condominium communities, may experience negative externalities of the project.

Stakeholders, including City residents, have voiced their comments and concerns related to project details. The most common concerns are related to noise, air and light pollution, as well as obstruction to views of downtown Vancouver and the Burrard Inlet. This submission outlines technical considerations, safety and process concerns, and economic, social and environmental impacts of the proposed expansion.

### **Social Impacts**

The project currently proposes an expansion of the water lot by 40m to the west, which will have a direct impact on residents and local businesses in the area, specifically those residing in Cascade at the Pier and Trophy at the Pier. In addition to impacting local residents, the proposed expansion will directly impact how community members use public spaces. The proposal as currently designed will negatively impact the children and people who play at the south end of the Spirit Trail in front of the Trophy building. Although Seaspan has documented several reasons as to why it is challenging consideration of the building expansion to the east, the City is recommending that Seaspan reconsider this option, as fewer people reside, work and recreate in this area.

When the City conceived and planned the Shipyards Development, an acoustic study was commissioned to ensure the orientation and design of the buildings worked to reduce the noise impact of Port activities. These measures have generally been successful to date, with few issues arising from the close industrial interface. Most significantly, the eastern-most residential building (nearest to Seaspan) was designed in consultation with an acoustic engineer to mitigate the impacts of industrial noise with measures including no windows or other openings on the eastern most wall, and adhering to the CMHC's noise attenuation requirements (beyond the BC Building Code). These investments in acoustic design were contemplated to shield residents from industrial related noise from the active port activity to the south and east. Moving the contemplated Seaspan expansion activities as far east as possible, builds on the current neighbourhood design and maximizes the compatibility between land uses at this industrial/residential interface.

### **Traffic Impacts**

The City suggests that Seaspan expand upon transportation considerations in the proposal, as both phases of the expansion are likely to affect traffic levels. Although the existing transportation network is adequate, the City requests more information regarding expected worker traffic and parking, including how many workers will arrive on site and how workers are expected to arrive (i.e. in personal vehicles, on foot or bicycle, by transit, etc.). To mitigate potential traffic concerns, the City requests that construction traffic enter and exit the site from the east side, if possible. Regarding vessel traffic, the City requests assurance that the



expansion project would not limit the access of large, substantial vessels to the Burrard Dry Dock.

### **Economic Impacts**

Growing the shipbuilding industry expands the tax-base, provides jobs and contributes to Canada's overall economy. Economic activity stimulated by the Seaspan shipyards generates revenues for both federal and provincial governments; the annual government revenue for British Columbia in 2018 was \$41 million. Although Seaspan's contributions as a ship builder is an important economic driver for Canada, the expansion proposal is not without economic repercussions.

Stakeholders – such as residents and local businesses at the Shipyards – are concerned about project-associated economic consequences. Although the economic impacts of the proposed project are difficult to quantify, there are potential negative externalities that have not been defined in the proposal, such as a reduction in property enjoyment by way of increased noise.

### **Environmental Impacts**

From an environmental standpoint, it is known that construction activities may create short-term adverse impacts arising from changes in habitat use by fish due to increased noise during construction and accidental fuel/oil spills to water during work. Transport Canada and the Vancouver Fraser Port Authority are inviting comments from the public respecting the determination of whether or not the proposed water lot expansion is likely to cause significant adverse environmental effects. While Lonsdale Energy Corporation (LEC) has reviewed Seaspan's proposal, LEC would like confirmation that there will be no appreciable oceanographic impacts – including currents and circulation patterns – to the City's water lot, given the future increase in vessel activity, particularly in regards to the potential for ocean energy technology in the nearby area. Although Seaspan contracted Hatfield to conduct a marine habitat assessment, it is still unknown whether this expansion will cause other adverse environmental effects, such as poor air quality.

### **Safety and Technical Considerations**

City staff from Engineering, Planning and Development, Community and Partner Engagement, Communications, Fire and the City Solicitor have reviewed the proposal and offer several technical considerations related to safety precautions and emergency planning.

Residents and businesses at the Shipyards already observe noise from the operations of industry and there are concerns that the project will further intensify the sound pollution. A contractor – BKL Consultants – predicted an increase in the Total Noise Level for the future scenario of 3dBA or less with the project operating at full capacity, as well as a likelihood of noise-induced rattles. However, it is unclear from a safety standpoint how noise levels impact human beings over time. Further, the contractor references that the project can result in a 3.8%

increase in Highly Annoyed Persons, which is significant given the already close proximity of industry to neighbours.

To assist with monitoring noise levels (and air quality), it would be appropriate to add noise and air quality monitoring between the water lot and residential buildings. Once noise and air quality monitors are implemented, sharing this data would help alleviate concerns of nearby residents.

Other safety concerns of the expansion include light and air pollution and the impact of construction on buildings. Expanding to the west may result in an increase in dust and other air pollutants in residential and commercial areas. With respect to construction, the City recommends that Seaspan provide additional information about the short-term and long-term impact of pile-driving on nearby buildings. Next, the proposed illumination levels at the new facility will be significant and, in turn, the City would like to see the following implemented to reduce the impact on adjacent neighbours:

- Reduce pole height to 7.5m in favour of providing more lamps;
- Maximize amount of shielding on proposed lamps; and
- Lower temperature of the lights from 4,000K to 3,000K

With respect to emergency planning, the Fire Department suggests that the proposal include a robust Emergency Plan to respond to fire and rescue response, worker safety, hazard and hazardous material mitigation, evacuation planning, confined space, accountability for employees, training and more. It is recommended that a contingency plan with North Shore Fire Departments be included, so that staff are in a position to quickly respond. Seaspan will also require a revised Fire Safety Plan to include the new floating pier and drydock facilities.

It is imperative that a detailed Fire Departmental Response Plan be developed so that the department is easily able to access the floating pier and drydock to gain access to ships in emergency situations. Additionally, details of the fire and life safety systems within the proposed drydocks and piers should be shared. Ships under construction will require an adequate fire detection system until permanent systems within the vessel are available including:

- Systems to notify workers of an emergency;
- Fire suppression systems, such as the FM-200, deluge sprinkler or foam system; and
- Emergency lighting within the ship in case of power loss

Lastly, Seaspan must ensure that there is adequate water supply and that the supply is in close proximity to and on the drydocks due to increased hazards. Seaspan must also ensure that a Fire Department Connection is provided on both the land and water sides. This may result in the potential installation of additional fire hydrants.

#### **Public Engagement Considerations**

The expansion project as proposed by Seaspan is required to undergo the Port of Vancouver's (PoV) 6 Step Project and Environmental Review process. Currently, the project is in Step Four,

which requires engagement with the local municipality, as well as with the public. While early discussions with Seaspan provided a high level overview of its expansion proposal, the detailed reports were only made available to City staff once the public engagement process was launched in late June. This allows the City only one month to review the detailed reports, read comments and offer feedback and evaluation prior to the July 30 cut-off.

The City has recently received submissions from the public related to the project's process of engagement. The public is concerned about the notification, disclosure and overall transparency of this proposal. Please find examples of email correspondence (Attachment B) the City has received from community members.

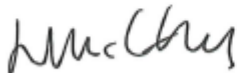
Finally, to ensure that the public is informed and engaged on the water lot expansion, the City recommends that the project website is updated on a regular basis with the latest project news and opportunities for engagement.

### **Recommendations**

The well-being and safety of City of North Vancouver residents and businesses is of paramount concern to us. In light of the concerns discussed throughout this submission, the City requests that Seaspan:

- Extend the public submission period to ensure a fulsome public engagement process, so that local residents and businesses can provide their comments and concerns;
- Consider all resident and business comments received on the expansion process;
- Shift the new drydock eastward to minimize noise and lights impacts on neighbouring residential lands and the Shipyards public space; and
- Enter into a good neighbor agreement with the City, committing Seaspan to work with local businesses and residents to minimize the impacts of late nights and holiday observances.

Thank you,



Leanne McCarthy, CAO  
City of North Vancouver

pc: Mayor and Council  
Port of Vancouver



July 28, 2021

**Attachment A**

ATTN: Vancouver Drydock Co. (Seaspan)

**RE: Proposed Expansion of Seaspan Drydock**

As Mayor of the City of North Vancouver please accept this letter on behalf of Council as part of the submission from Chief Administrative Officer Dr. Leanne McCarthy regarding Seaspan's proposed drydock expansion.

The City has a long and proud history of being a people-oriented port community where businesses can prosper and families can live. Council has recognized this through the priorities and work detailed in our 2018-2022 Strategic Plan. This plan is our roadmap to making the City of North Vancouver the 'Healthiest Small City in the World.' Healthy cities are complex, and require careful balancing. We are delivering a range of infrastructure, policy, and programming to ensure that the City works for everyone.

Bringing this vision to life in the Shipyards District – our historic waterfront that has undergone over a decade's long transformation – has been met with careful coordination and investment. This diverse neighbourhood is home to families, the largest transit hub in the City, a vibrant commercial area, recreation, tourism destinations, and more. As Seaspan looks to expand it is my hope that Seaspan continues to value this community as any good neighbour would.

As details of the proposed expansion westward have become clear Mayor and Council have received concerns from the community regarding the impact on livability, local businesses, the environment, and more. These are concerns that Council shares. To date my office has received approximately 50 calls and/or emails about the expansion which are included in Attachment B.

Concerns include but are not limited to:

- Health impacts on people from increased noise, pollution, and lights;
- Lack of trust and questions around transparency due to rushed public consultation;
- Loss of business in the Shipyards District following the COVID-19 pandemic and related economic impacts;
- Harmful environmental and wildlife impacts; and
- Creating a hazardous environment for children.

I have every expectation that community feedback will play a critical role in the evaluation of the options before you. Council takes all feedback from the public very seriously and has accordingly directed the CAO, via a motion passed at Council's regular meeting on July 19 2021, to correspond with Seaspan to ensure the liveability, safety, and health of residents be made a priority.

The active clauses of the motion are as follows:

“PURSUANT to the verbal report of the Chief Administrative Officer, dated July 19, 2021, entitled “Seaspan Proposed Expansion”:

THAT the CAO be directed to prepare a full response regarding the Seaspán Proposed Expansion, including:

- A request to extend the public submission period to ensure a fulsome public engagement process so that local residents and businesses can provide their comments and concerns;
- Consideration of all resident's and business comments received on the expansion process;
- A recommendation to shift the new dry docks eastward to minimize noise, lights and view impacts on neighbouring residential lands and the Shipyards public space;
- A recommendation to enter into a good neighbour agreement, working with local businesses and residents to minimize the impacts of late nights and holiday observances;

AND THAT staff be directed to complete a technical evaluation, including safety, construction, transportation, noise, light and view impacts, for submission to Seaspán, and report back to Council before the submission deadline."

In a previous conversation with representatives from Seaspán I urged that an eastward expansion be analyzed and considered. This will mitigate the majority of concerns. The past Council was intentional and strategic in the land use planning of the community. The building farthest to the east was designed with a solid wall of concrete to mitigate noise and lights from the neighbouring industrial area.

Seaspán provides family-supporting jobs throughout the region, and has been a generous giver to local organizations. That is why I was happy to advocate to senior levels of government that the Polar Icebreaker contract be returned. I ask you continue cultivating a good relationship with the community through a meaningful and in-depth review of feedback. I look forward to engaging with Seaspán and the Port Authority further on this matter.

If you have any questions or require any follow up please email my staff at [mayor@cnv.org](mailto:mayor@cnv.org).

Sincerely,



Linda Buchanan  
Mayor of the City of North Vancouver



July 29, 2021

Dear Sirs/Mesdames

Please accept this letter opposing the Seaspan Shipyard (Seaspan) application to the Vancouver Port Authority (Authority) to expand its Vancouver Drydock operation and water lot lease by adding two smaller dry docks west of the current existing ones. We accept that Seaspan has operated dry docks in this location for a significant period of time and residents who have bought homes in the area have learned to deal with some level of disruption and accept some impedance to their sightlines. However, this does not mean that Seaspan should receive approval to take steps which create further disruption and noise and make the unsightly dry dock the primary visual focal point of the Lonsdale Key area. Thus, while we do not oppose the idea that some level of expansion may be necessary we do not consider the proposal put forward by Seaspan to be in the public interest and falls well short of promoting a harmonious relationship with current and future residents.

Specifically, we have two concerns with what is being proposed and would like to briefly outline them to the Vancouver Port Authority. The first of these relates to increased noise levels while the other relates to the potential impacts to residential sight lines in the immediate area.

**1. Increased Noise**

As we understand it, the reason for the application is to consolidate all of the company's ship repair work at the Vancouver Drydock site thereby allowing a second site at the foot of Pemberton to be fully dedicated to building large ships like those recently contracted for. We also understand that Seaspan claims that collectively, the Pemberton and Vancouver Drydock have been operating at full capacity and regularly are turning work away.<sup>1</sup> Therefore, the expansion, if approved, would mean that all repair work would be completed at the Vancouver Drydock and which, will likely more than double the work that is currently being undertaken at this location. Yet, in spite in what amounts to a large increase in the amount of work being planned at this location, Seaspan has claimed that a noise study conducted confirms that the additional noise from the expanded operation will amount to somewhere between one and three decibels.<sup>2</sup>

As residents we are located directly west of the current worksite right next to ICBC but have a direct sightline. As a result, we are able to hear and, for the most part, see repair work that is currently being undertaken. In our experience there are

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<sup>1</sup> North Shore News Website

<sup>2</sup> North Shore News Website

times when work is being done 24/7 and in such cases it is not uncommon for the noise to be very disruptive and continue all night. Thankfully, cases such as these are not frequent. More frequently there appears to be minimal activity at the site and the noise level is relatively moderate. I point out that this is our experience. I am less than certain that residents of the Pinnacle and Cascades would concur with our view of typical noise levels.

Put simply, our major concern is the fact that Seaspan has proposed a large expansion in capacity to handle repairs at the Vancouver Drydock and intends to move all of the work currently being done at Pemberton to this one location. In addition to the expansion in floating dock space in closer proximity to residents, it has been reported that four new cranes will be added. This will increase the total number of cranes from two to six thereby tripling the number. Seaspan has taken the position that this will cause minimal disruption and is an appropriate solution to their problem as there are no other viable alternatives. It is difficult to believe that the increase in the number of dry docks and the large increase in the number of cranes will not result in anything less than exponential growth in the amount of work being done and the noise associated with it. Therefore, the frequency and intensity of those periods of high noise levels can be expected to increase with increased community disruption. In addition, it is also difficult to believe that other viable but perhaps more expensive alternatives don't exist.

In our submission, it is important for the Authority to consider the amount of work that will be performed at this expanded site and whether the claim to an increase in noise of one to three decibels is credible.

#### *Consolidation of all work at one site*

Seaspan has proposed to move all of its repair work to one location at the Vancouver Drydock. Once completed this will give Seaspan the ability to handle all the current demands from the two existing sites plus allow them to accept additional business that is currently being turned away. It is therefore reasonable to expect the level of activity to increase significantly and the number of incidences where there are high noise levels to also increase. This sustainment of high noise levels would severely impact nearby residents and possibly some of the commercial outlets who rely on outside decks to serve customers outside.

#### *One to three decibel increase*

Seaspan has been reported to have conducted expert studies and claim that based on these, there will be a minimal increase in noise with estimates in the range of one to three decibels. On the surface this sounds like a relatively small increase. However, it is unclear what this means and the question also arises as to whether this can be relied upon? This is because they have not explained the base has been calculated and what the current decibel base is. If, for instance, they have established a base relying on the average noise level over the course of a defined

period it will lead to one number. Depending on the workload this could vary substantially. If, on the other hand, they have established the decibel base relying only on periods of maximum noise it will be a much higher number. Not knowing how the base decibel level was established and what the established decibel base level is makes it impossible to determine whether the reported one to three decibel increase is significant or even a relevant measure regardless of whether it is achievable.

## **2. Residential/Commercial Sight lines**

The City of North Vancouver has worked hard to develop a vibrant neighbourhood in and around the Lonsdale Quay area. In doing so they have been instrumental in fostering the creation of a harmonious relationship between residential and commercial interests in the area. This has worked very well because the City has carefully developed their waterfront area with an eye to maintaining its natural beauty and providing an outlook that is unparalleled for residents and visitors alike.

It is noteworthy that the one detracting element to what has been created in lower Lonsdale is Vancouver Drydock. No matter how one chooses to look at it, Vancouver Drydock is not a pretty site. More accurately it is an “eyesore”. That said it is acknowledged that ship work has been done there for years and it represents an important source of jobs for the community. But does that mean that it makes sense to expand this area on the west side and further block the view to Burrard Inlet and the City of Vancouver beyond? The addition of new dry dock space and the addition of four cranes as proposed by Seaspan will have a significant impact on the views enjoyed by residents directly adjacent as well as the numerous other North Vancouver residents who frequent the area on a regular basis. Allowing this to occur would be a shame and an insult to the residents of North Vancouver.

In considering the Seaspan application we would ask the Authority to consider the following in their deliberations:

1. The veracity of the studies presented with respect to anticipated changes in the level of noise. In doing so please consider the potential impact to residents of their being too optimistic or completely inaccurate.
2. The current incidence of high noise levels and whether the occurrence of high noise is likely to will increase or worse still, continue at this high level on a sustained basis following completion of the work.
3. Whether it is worth further blighting the views of North Vancouverites by adding to what is currently a significant eyesore.
4. Whether there are other viable alternatives such as moving the expansion to the east side rather than on the west side as proposed. It is acknowledged that costs are important and must be considered. However, it might be worth downplaying their importance in this case given the implications of what has been proposed by Seaspan.

**July 30, 2021**

Attn: George Geatros  
Vancouver Drydock Company  
Pier 94, 203 East Esplanade  
North Vancouver, BC  
V7L 1A1

Dear Sirs and Mesdames

**North Arm Transportation Ltd. Letter of Support for Vancouver Drydock Proposed Water Lot Project**

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North Arm Transportation Ltd. ("North Arm") would like to provide its support to the Vancouver Drydock Company ("VDC") and its proposed water lot project as we know this project to be a necessary expansion of critical marine infrastructure in British Columbia. It is often overlooked that Canada is a maritime nation and support of maritime infrastructure is necessary on the international as well as domestic/coastal stage.

North Arm is a local, family-owned, tug and barge company based in Vancouver with a satellite office in Masset, Haida Gwaii that has provided fuel supply and freight delivery services to remote communities, power generating stations, forestry operations, infrastructure projects, mining operations, and tourism businesses for over 60 years. In addition to our fuel and freight delivery service we provide a short sea shipping service that, in partnership with container terminals in the Port of Vancouver, takes thousands of trucks off of our roads each year and we have supported the development, improvement and maintenance of coastal infrastructure throughout our history.

General access to shipyard and drydock services and capacity is severely limited in the province but most acutely in the Lower Mainland. We rely on the services provided by VDC to refit our Lloyds Class A double-hulled fuel and freight barges North Arm Genesis and North Arm Pioneer that provide Transport Canada compliant fuel delivery to Haida Gwaii, Bella Bella, Klemtu, Bella Coola, Lax Kw'alaams and a number of other locations. We also rely on VDC to refit our Lloyds Classed freight barge NA 5501 which is dedicated to short sea shipping container transport.

Marine transportation has supported the people of British Columbia throughout the history of the province and the development of Vancouver as a significant Port City. Ensuring ongoing access to shipyard and drydock services and capacity in the Lower Mainland is essential to the ongoing viability of the industry and to the people, communities and businesses it supports on the BC Coast. The VDC project is necessary to achieve this.

In addition to highlighting North Arm's need for the services provided by VDC we also support the proposed water lot project as an initiative that will create a number of good, highly skilled, family supporting jobs that are critical in a region where living costs are high and we are working through the harsh economic impact of the Covid-19 pandemic.

Kind regards,



Mathew Stradiotti, CPA CA, CIRP  
General Manager



Cc: Tim.Blair@PortVancouver.com





August 10, 2021

Kris Neely  
Senior Manager, Corporate Affairs  
Seaspan Shipyards  
10 Pemberton Avenue  
North Vancouver, BC, Canada  
V7P 2R1

Dear Kris Neely,

I'm writing to express the support of The Polygon Gallery for Seaspan's proposed expansion of its water lot lease area and addition to its Vancouver drydock directly to the east of our facility.

The long and storied history of shipbuilding in North Vancouver is very much part of the fabric of our community, and its continuation and growth is critical to sustaining the vibrancy of the Shipyards area, and with it the animated mix of residential, commercial and industrial uses in our neighbourhood.

Lower Lonsdale is emerging as a commercial and cultural heart of our City, and its health will be sustained by an energetic cross-pollination of tourists, local residents, and local jobs. This is what makes the Shipyards unique, and what in my view, sets it apart as a place that will continue to thrive well into the future.

Seaspan is a critical part of this mix. The company has proven to be an important partner and supporter, not just of the Gallery, but our entire community. I support Seaspan's work to expand its presence at its Shipyards location and fully encourage its approval.

Sincerely,



Reid Shier  
Director

Vancouver Fraser Port Authority  
Project and Environmental Review  
100 The Pointe, 999 Canada Place  
Vancouver, B.C. Canada V6C 3T4

Aug 10 2021

per@portvancouver.com

Impact Assessment Pacific Region  
Transport Canada  
Suite 600 – 800 Burrard St.  
Vancouver, B.C., V6Z 2J8

[PACEnvironment-environnement@tc.gc.ca](mailto:PACEnvironment-environnement@tc.gc.ca)

**Re: Submission for public comments regarding Seaspan Vancouver Drydock Waterlot Expansion**

To whom it may concern:

I am very concerned about the proposed expansion of Seaspan Vancouver's dry docks in my neighbourhood and potential adverse environmental impacts on human health (including air quality and noise) and on aquatic and terrestrial receiving environments.

This expansion project represents yet another Port of Vancouver (POV) expansion project occurring in my neighbourhood since 2013. Based on previous projects that occurred during the extensive Low Road Expansion project, it appears likely that this project will rapidly be approved by the POV through internal regulatory processes without:

- adequate and objective third party review and input on assessment of environmental and human health risks and monitoring and mitigation requirements,
- objective scientific studies to support the assessments of there being no adverse environmental impacts,
- inventory of contaminants of concern and exposure pathways,
- requirement for ongoing environmental monitoring programs to validate or confirm assessments that state projects will have no adverse environmental impacts, and/or
- adequate consultation of community and local environmental groups about abovementioned potential health and environmental risks, and

- development of community environmental quality data portal to alert community of events like high wind events, which constitute emergencies, because they increase pollution dispersion, inform them of monitoring and mitigation findings, and provide a community forum for complaints or information sharing

The federal government recently released Bill C-28 asserts that “every individual in Canada has a right to a healthy environment,” and **compels the government to protect that right**. This bill was created for communities like mine located right next to the POV operations and are considered under this bill to be “vulnerable communities” that are exposed to multiple contaminant sources from a coal terminal, 2 grain terminals, railyards with diesel emissions and shipyards, all which have expanded without proper environmental studies supported by a federal government agency, the Port of Vancouver (POV).

### Impacts on Air Quality

#### **Overview and Background Information**

As a resident of this neighborhood for the past 20 years and a retired aquatic toxicologist, I am very concerned about the cumulative impacts of expansion of every industrial operation on POV land located along the waterfront of North Vancouver, which has occurred since 2013. We and resident biota in the receiving environments are exposed on a chronic basis to:

- fugitive dust and gaseous emissions from a coal terminal, which recently doubled its capacity to 20 million tonnes of coal annually and includes extensive open stockpiles. This operation also discharges effluent comprised of water sprayed onto coal piles, that likely contains high concentrations of dissolved metals, that is collected and discharged into the Burrard Inlet (It is noteworthy a new coal terminal that was approved a year after this expansion was approved initially with 1/5 capacity of open stockpiles then later had those removed after adverse environmental and human health effects were identified through a full environmental assessment)
- Fugitive dust emissions from two expanded grain terminals;
- Particulate and gaseous emissions from expanded rail yards and other equipment, and,
- Particulate and gaseous contaminant releases from expansion of the shipyard.

In 2014, in response to the POV’s Low Road expansion project, Dr. Patricia Daly, who is Vice President and Public Health and Chief Medical Health Officer for Vancouver Coastal Health and a clinical professor in the School of Population and Public Health in the Faculty of Medicine at the University of British Columbia, and the City of North Vancouver requested that a cumulative human health assessment be conducted to assess potential impacts of acute and chronic risk of exposure to metal and organic contaminants released by heavy industry operating on POV land. The POV refused this request (NSN 2014). Instead, to address their and the community’s concerns, Metro Vancouver conducted a poorly designed 9-month study on air quality in my neighbourhood, which included assessing particulate matter and percent coal dust content, at a single station selected for flatness of ground, lack of power lines, and access to electricity – not its environmental relevance and proximity to the coal terminal (Metro Vancouver 2016). The station is almost 700 m from the

nearest and over 1 km from farthest coal piles. Despite this, moderate to high percentages of coal dust were found in all samples, with 63 to 96% coal dust observed in the fine particulate matter, which poses the greatest health risk (WHO 2018). There was also an exceedance of the 24-h inhalable particulate guideline at this station that was up to almost double that observed at other stations measured across North Shore and Burnaby. Despite these findings, there was no follow up study to investigate the magnitude and extent of coal dust and other contaminants of concern in the surrounding neighbourhood, including monitoring at a closer near-field location, or assessment of concentrations of metals and PAHs in particulate matter, as well screening those against guidelines for human health protection. In fact, the only follow up, was to discontinue the measurement of coal dust at this station. Now the Port is looking at adding another expanded operation to our neighbourhood without addressing the existing impacts on air quality. We don't know what the impacts are on human health from chronic exposure to multiple metal and organic contaminants in both particulate and gaseous forms and we don't know if there are any synergistic toxicological effects. In fact, the Port, who should be considering Bill C-38 for all of its projects, didn't deem it necessary to do an air quality study for this project, once again dismissing concerns of Dr. Daly, City of North Vancouver, who is trying to protect its citizens, and community about health impacts. Likewise, even though this project is taking place in a marine ecosystem, there was no assessment of air quality impacts on water and sediment quality and related impacts on biota.

#### **Need for an Air Quality Assessment**

Dry dock operations, which involve the construction, maintenance, and repair of ships, can result in release of metal and organic contaminants into the air, which also disperse into terrestrial and aquatic receiving environments (OECD 2010). Construction activities can release toxic contaminants to the surrounding aquatic receiving environment. For example, metal working activities including cutting welding and grinding can release metal and organic contaminants into the air impacting human health and aquatic receiving environments. Maintenance activities can result in release of organic contaminants from materials including engine fluids, hydraulic fluids, lubricants, and anti-freeze. Likewise, fuelling activities can release metal and organic contaminants in gaseous forms. Blasting, coating and painting conducted during construction and maintenance can release particulate matter containing metals and organic contaminants into air and surrounding environment (OECD 2010)

I identified a number of key issues related to air quality for this project, which illustrate a clear need for a comprehensive air quality assessment and ongoing post-construction monitoring programs (as it stands due to this omission the community consultation process is incomplete):

- There was no detailed information shared with a community on air quality for existing or expanded operations in the project information guide provided by POV. There was a very short paragraph that identified three groups of contaminants associated with the existing dry dock and their sources.
- Information on the existing permit that I was informed has been undergoing a renewal process since 2013 was not shared with the community. The 2008 permit shows that there are up to 102 tonnes of pollutant emissions permitted annually. There is no information on how emissions would increase for each group of contaminants with the expansion.

- There is no detailed information on which specific metals and organic compounds, which are contaminants of concern, and found in emissions or their potential impacts on human health and other biota in receiving environments. For example, Health Canada indicates that volatile organic compounds (VOCs), which represent the largest source of emissions for the existing operation (permit allows up to 72 tonnes/yr ), cause the following short-term health effects: breathing problems, irritation of the eyes, nose, throat and headaches. Effects will be more pronounced in people with asthma and other respiratory conditions, which may be more more prevalent in population with Covid impacts, and in sensitive receptors like seniors and children. There's a paucity of data on long-term impacts of exposure to VOCs. Increased incidence of cancer has been observed in industrial workers exposed to VOC emissions. The specific VOC analytes released by Seaspan's dry docks and effects caused by those contaminants have not been identified.
- There's no information provided on existing and expanded air quality monitoring programs including the study design, monitoring equipment used, and/or contaminants measured. There is also is no information provided on which provincial guidance documents for air quality monitoring are being followed.
- There were no air quality data presented or screening of those data against guidelines for human health protection to show absence of effects for existing operations
- There is no information presented on methods used to reduce emissions and adoption of current best technologies. Approaches used in 2008, when existing permit was last updated, will differ from those used in 2021. What new approaches are being used for the existing operation and expansion to limit release and dispersion of contaminants?
- There is no information on the provincial guidance for air quality management that is being followed for the existing operation and which guidance will be followed for the expanded operation as well. For example, the 2018 provincial Fugitive Dust Management Programs for Industrial Operations should be implemented to manage fugitive dust emissions (Ministry of Environment and Climate Change Strategy 2018 and 2020)
- As an aquatic toxicologist, I am also very concerned that the Port's rationale document for air quality assessments doesn't even include examining impacts on environmental quality and biota in receiving environments (Port of Vancouver 2015). This project is taking place over open water in a diverse and productive marine ecosystem. There are no baseline studies provided on existing sediment and water quality or benthic invertebrate community health in the inlet, where expansion will occur. There are no monitoring studies looking at the impacts of the existing operation on these same metrics in the Burrard Inlet. There are also no details provided on any monitoring programs being conducted post-construction to evaluate the effects of airborne pollutants on the aquatic receiving environment and biota.

#### **Regulatory Issues with Air Quality Monitoring for Port Projects**

It is my understanding from communications with Andrea Kwasnicki with the Port of Vancouver (Kwasnicki, pers. comm. 2021) that the Port of Vancouver does not conduct any air quality monitoring along the waterfront in our area and relies solely on Metro Vancouver to conduct monitoring. This regulatory approach is highly problematic. Due to a lack of responsible regulation by the POV and a perceived lack or limitation of jurisdiction on POV projects by Metro Vancouver, there have been no cumulative assessments of particulate and gaseous emissions on human health

of residents in the community requested or conducted by Metro Vancouver as a permit requirement. The population in this already dense area has grown substantially with densification and redevelopment of this area. Likewise, there have been no cumulative assessment of air quality-related impacts on aquatic and terrestrial receiving environments. All these projects border the Burrard Inlet and can impact environmental quality and marine life. Nor was the POV required to carry out any mitigation for the hundreds and hundreds of large diameter trees it removed for the Low Road Expansion project to allow expansion of all its partners by Transport Canada, by its internal regulatory processes, or by Metro Vancouver, which greatly impacts air quality and results in health costs for our community due to reduced binding of particulate matter and absorption of gaseous pollutants (Nowak et. al. 2018)

Environmental assessments for air quality conducted by Port or their consultants lack basic information, including identifying contaminants of concern associated with each operation, potential exposure pathways, or include requirement of comprehensive monitoring programs with adequate spatial coverage to assess presence of contaminants of concern in the receiving environments and evaluate their effects. Despite the Province of BC, who gives Metro Vancouver authority to regulate and manage air pollutant releases under the BC Environmental Management Act, developing Fugitive Dust Management Plans for Industrial Operations in 2018, Metro Vancouver has not required any of the Port's operators to implement this up-to-date science-based program to monitor, manage, and mitigate the multiple fugitive dust emissions in our neighbourhood.

As an example, if we examine the Neptune coal terminal expansion, we can see how the current regulatory framework for air quality protection is inadequate and how expansion projects are not being monitored for impacts after construction phase is complete (which does involve comprehensive monitoring). I am hopeful this feedback will lead to more comprehensive review and requirements for this expansion project. Currently, as part of the expansion permit requirements, Metro Vancouver only requires the coal terminal to monitor 2 off-site stations for coarse and fine particulate matter (contaminants of concern including metals and PAHs in particulate matter are not measured). As mentioned, one station (Moodyville) is located 680 m from the nearest coal pile and 1100 m from farthest coal pile located in a residential area was added in 2014 due to the pending expansion of the coal terminal and was chosen based on flatness of land and availability of electricity rather than environmental relevance (proximity to terminal). The only other station (Neptune Headquarters) is 610 m from the nearest coal pile. and 1100 m from farthest coal pile and is located in a commercial area. In between the coal terminal and the Moodyville Monitoring station (# = distance from nearest coal pile), there is a road-side bike path (130 m), a recreational/commuter trail in adjacent park (220 m), large children's playground (360 m), sports court (380 m), 4 condo buildings (380 m), and community gardens and orchards, all in much closer proximity to the coal terminals and representing multiple chronic exposure pathways including sensitive receptors (children). Metro Vancouver will not request the coal terminal move the Moodyville station due to cost and state they consider data continuity (since 2014) more important than a scientifically defensible study design, which does not avoid sampling in close proximity to the terminal, as well as concerns about health of the surrounding community. Despite the air quality model, which was used to approve the expansion of the operation, identifying under both pre-expansion and post expansion scenarios, the site of the most frequent air quality



exceedances due to fugitive dust emissions is the SW fence line located along the Burrard Inlet, there is and has not been over 52 years been any air quality monitoring of coal dust entering the Burrard Inlet nor has there been any monitoring of impacts to aquatic and terrestrial receiving environments (which are required under the province's fugitive dust management plan). Metro Vancouver, despite being informed that the province rescinded use of dustfall monitoring in 2006 and clearly stating in guidance released in 2020 that it is not appropriate and severely underestimates air pollutant releases, especially with high winds that occur along the water, and has no relationship to metal movement and bioavailability, continues to allow Neptune to use this as a primary method of air quality monitoring. As someone who designed and conducted monitoring studies for industrial operations to assess impacts on aquatic receiving environments, I am appalled at the lack of comprehensive scientifically defensible monitoring being conducted to assess effects on human health in our community and complete absence of monitoring of impacts on terrestrial and aquatic receiving environments. This is just the coal terminal and does not consider impacts of adjacent grain terminals, rail yards, and shipyards. Likewise, the dust fall guidance also clearly indicates that coal dust would not be classified as a nuisance dust, yet Metro Vancouver, views its deposition on properties, such as the nearby playground, where children, who exhibit unique hand to mouth behavior and can ingest coal dust deposited on playground equipment, as a nuisance dust.

#### **Impacts on Marine Environment:**

Dry dock operations, which involve the construction, maintenance, and repair of ships, can result in release of metal and organic contaminants into terrestrial and aquatic receiving environments (OECD 2010). Construction activities can release toxic contaminants to the surrounding aquatic receiving environment. For example, metal working activities including cutting welding and grinding can release metal and organic contaminants into the air impacting human health and aquatic receiving environments. Maintenance activities can result in release of organic contaminants from materials including engine fluids, hydraulic fluids, lubricants, and anti-freeze. Likewise, fuelling activities can release metal and organic contaminants in liquid and gaseous forms. Repair activities and tank cleaning can involve release of bilge and ballast waters containing metal and organic contaminants including oil, solvents and other hazardous substances into aquatic receiving environments. Blasting, coating and painting conducted during construction and maintenance can release particulate matter containing metals and organic contaminants into air and surrounding environment (OECD 2010).

#### **Impacts on Marine Biota**

This area east of the Burrard Pier and west of existing dry dock appears to be highly productive in the pelagic zone. There is a diverse range of biota that are found between the Burrard Pier and existing dry dock year-round, feeding in this area east of the pier. There are large flocks of resident aquatic birds including western glaucous winged gulls, that feed in this section of the inlet and which also nest on the roof of large building used for filming to the east (i.e., they reside in this area and are not temporarily visiting this area and are exposed to contaminants in the area on a chronic basis). There are also Canada

geese, goldeneyes, pigeon guillemots, cormorants, and great blue herons, which also reside and feed in this area. There is a resident pairs of bald eagles and peregrine falcons who feed and perch in the Shipyards area. The very recent death of two seal pups in the pier immediately to west of the existing dry dock shows harbour seals are breeding and raising their young in this area. There are otters that live under the docks between the Quay and Victory Shipyards and harbour seals you can often see feeding to the east of the pier. You can see schools of various species of pelagic fish from the pier. Impacts of construction, dry dock operation impacts including noise, light, and contaminant releases on **all** key biota that reside in the area should be assessed.

In addition, there were no baseline studies of benthic community health conducted as part of the marine habitat assessment. Likewise, there were no data presented showing that existing operations have no impact on benthic invertebrate community health. The benthic habitat was described as being of poor quality based on presence of vegetation, sediment grain size and macroinvertebrates observed during a diver survey focused on the sediment/water interface. Pre-expansion benthic invertebrate community sampling and analysis should be conducted to determine if community metrics like total abundance, taxa richness, taxa abundance and diversity decline post-expansion due to construction disturbance, physical disturbance from dry dock operations and/or contaminant releases. Impacts on benthic invertebrates, which are an important food source for benthic fish like English sole, which reside in the inlet, and other marine organisms, and important indicator of ecosystem health and should be assessed

#### **Impacts on Sediment Quality**

Contrary to the section on fish habitat quality, in the section on the environmental impacts of contaminants, impacts on sediment quality were left out and were limited to air and water quality sampling. Baseline and regularly scheduled post-expansion monitoring of sediment impacts should be assessed through sediment quality triads. These studies use a weight-of-evidence approach to assess contaminant concentrations in sediments, which can be screened against guidelines for protection of aquatic life, the bioavailability of contaminants assessed through marine sediment toxicity testing, and benthic invertebrate community analysis.

#### **Impacts of Pile Driving**

Sediments in the adjacent Versatile Shipyards site and boatways are highly contaminated, so much so that some sediments had to be capped due to high concentrations of contaminants present. What impacts will pile driving have on adjacent capped sediments and on releases of contaminants from sediments in this area when they are disturbed. I understand you are using a method that reduces but does not eliminate disturbance.

What impacts will pile driving have on biota noted above. Kastelein et al. (2018) studied effects of pile-driving sounds on harbor seal (*Phoca vitulina*) hearing and found seals exposed to intense sounds may suffer hearing loss. We now know baby seals are being found in immediate vicinity. How are they impacted by pile driving in comparison to the adult seals? Are DFOs guidelines protective. Hearing loss

will affect ability of a seal to survive. Why isn't monitoring being conducted for the duration of the pile driving?

What monitoring will be conducted during pile driving to assess impacts on other biota?

#### **Impacts of Shading**

The shading assessment focused on benthic environment. I did not see data for shading studies, like those conducted by Golder for the Shipyards project? What impacts will the shade have on the primary productivity of the pelagic zone that attract the abovementioned biota and on food resources for these organisms and ecosystem as a whole?

#### **Impacts of Wastewater Discharges**

I watched the video on dry dock operation and read the sections on waste water collection and treatment and was concerned about the absence of any analytical chemical analyses and toxicity testing to test quality of water being released directly to the inlet. Water released directly to the Inlet should be analyzed for chemical contaminants of concern and tested for toxicity using lethal and sublethal marine toxicity tests for multiple receptors on a regular basis (e.g., monthly) prior to release to the Inlet to identify possible ongoing impacts. I question why the water that is collected from high-pressure paint removal and cleaning of ships, etc. which will contain mixtures of total and dissolved metal and organic contaminants, isn't analyzed for contaminants post filter and tested for toxicity to aquatic life before being discharged at a regularly frequency, to ensure there aren't impacts to aquatic life. It's important to recognize filtering systems may become degraded over time and no longer be effective. I discovered this while doing research at Freshwater Institute when carbon filters that were regularly used were found to be compromised and polluting ultrapure filter water used for sample analysis. Pre and post filter tests using analytical chemistry and toxicity testing should be implemented every month to ensure these systems are working effectively. Toxicity tests are very important addition to analytical chemistry because there can be interactions occurring among chemicals or chemicals present that are not included in analytical suite that result in toxicity. Toxicity testing should include sublethal and lethal endpoints for a range of marine organisms.

#### Noise Impacts:

Permanent noise monitoring stations should be set up and made available to the community. If complaints come in, Seaspan can review data and acknowledge the issue and take steps to mitigate the cause. Noise data should be screened against guidelines for human health and this information should be shared with community so we can make informed choices about having windows open, wearing ear protection, and whether we want to stay in this community

I appreciate the opportunity to comment on this proposed expansion project. I submitted these comments because I am deeply concerned about the lack of science-based decision-making and ongoing monitoring and mitigation being carried out in my neighbourhood. Monitoring should also not be limited to on-site impacts. The Port's findings of "no (predicted) impacts" have not been confirmed or

validated with real world monitoring. Furthermore, the lack of requirement for ongoing monitoring and mitigation in surrounding community and receiving environment is no longer acceptable to the community, in accordance with development of Bill C-38. We along with the Inlet are exposed to multiple sources of metal and organic contaminants including coal dust, grain dust, diesel emissions, and particulate matter from shipyards operation daily. The Port needs to be a responsible and balanced regulator and not just focused on economic growth. There are real people and animals living in this area being exposed everyday. The lack of adequate science backing up “no impact” statements and requiring adequate ongoing monitoring and mitigation to back up the “no impact” conclusions routinely drawn for Port projects is not acceptable. Our community and the Burrard Inlet should not suffer further deteriorated health to ensure maximum profits and a minimum and low standard of environmental monitoring. There has to be balanced and responsible industry adjacent to such a dense community and such an important marine ecosystem.

Regards,

████████████████████

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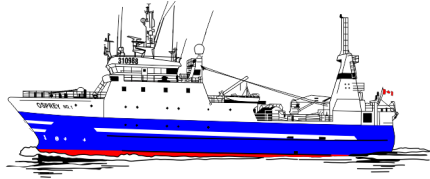
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# OSPREY MARINE

2295 Commissioner Street, Vancouver B.C., V5L 1A4  
Phone: 604-215-7808 fax: 604-215-7806  
Email: [operations@marinerseafoods.com](mailto:operations@marinerseafoods.com)

August 11, 2021

Vancouver Drydock  
203 East Esplanade  
North Vancouver, BC  
V7L 1A1

ATTN: George Geatros, Manager Special Projects

We are writing to you today in support of the planned expansion of the Vancouver Drydock.

Osprey Marine Ltd. is a family owned and operated fishing company located in Vancouver and has been using the Vancouver Drydock for many years.

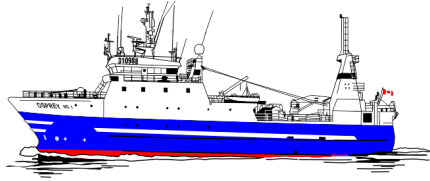
Due to the size of our vessel there are no other options locally that could perform emergency repairs, scheduled maintenance and class surveys.

Given the solid bookings for dry dock access Vancouver Drydock has experienced for many years in the past short notice access for a Drydock became very difficult if not impossible.

The fishing business like many others is very time sensitive and not having short notice access to a competent service provider can be detrimental to our business and the crew members working for us.

Utilizing a local business rather than considering alternatives located abroad has very many benefits for all parties involved. Vancouver Drydock, our local preferred suppliers and subcontractors as well as our company do economically benefit from it.





# OSPREY MARINE

2295 Commissioner Street, Vancouver B.C., V5L 1A4

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Aside from any economic benefits necessary time frames for completing the above-mentioned tasks is equally or even more important. Organizing and managing such projects abroad in the same time frame as local is simply not possible.

In conclusion having additional Drydock space available would be very valuable for our and certainly many other local companies working in the local and international maritime industry.

Please feel free to contact us in the event we can be of further assistance supporting the project.