



November 20, 2018

National Energy Board
c/o Sheri Young, Secretary of the Board
via fax: +14032925503

RE: Hearing Order MH-052-2018 and File OF-Fac-Oil-T260-2013-03 59

Dear Ms. Young,

Greetings from Seattle Audubon, Washington State's oldest conservation organization. We are one of the largest and most active Audubon chapters in the United States, leading a local membership of over 4,000 in appreciating, understanding, and protecting birds and their natural habitats. I write to you today on behalf of those members to express our strong opposition to the expansion the Trans Mountain Pipeline. The pipeline expansion presents an unacceptable risk to wildlife and coastal communities that depend on our shared waters and we strongly urge the Canadian government to reject this proposal.

Seattle Audubon's community science programs extend far beyond our urban location. We manage the Puget Sound Seabird Survey, which mobilizes hundreds of Seattle Audubon volunteers, guided by staff, to monitor the nearshore waters of the Strait of Juan de Fuca, the San Juan Islands, and along Puget Sound from Olympia north to the Canadian Border. These waters are critically important habitat for seabirds and waterfowl. Each year we count tens of thousands of geese, swans, ducks, loons, grebes, cormorants, gulls, terns, and alcids that overwinter in the waters across our shared Salish Sea.

Globally, seabirds are one of the most endangered populations of birds. We've seen their numbers as a group decline by 70% in the last 60 years and today a larger percentage of seabirds are listed as threatened or endangered than of any comparable group of birds. Seabirds of the Salish Sea are no exception: the marbled murrelet, for example, has been in precipitous decline in Washington State for decades, and as such is listed as Endangered in Washington and Threatened under Canada's Species at Risk Act. As you can imagine, murrelets and other seabirds are extremely vulnerable to oil spills. The expanded pipeline project would increase tanker traffic through the Strait of Juan de Fuca by 700%, bringing with it a 79-87% likelihood of a major oil spill within 50 years. Should such an event occur, our seabirds could be devastated. In anticipation of such a tragedy, Seattle Audubon has proactively expanded volunteer training for early on-scene reconnaissance in the event of an oil spill. We're developing a geographically distributed and coordinated network of observers who are trained in recognizing and characterizing oil spills so they can report their observations quickly to responsible agencies. We hope we never have occasion to test their training.

Orcas, too, are further threatened by the pipeline expansion. Our Southern Resident Population, protected by both Canada's Species at Risk Act and the United States Endangered Species Act, is in severe decline. Only 74 individuals remain, 25% fewer than in the 1990s. These orcas have not successfully reproduced in three years. The population's decline is attributed to increasing scarcity of Chinook salmon, vessel noise that disrupts hunting, and accumulation of toxins within their fat reserves. Washington State's governor's task force on orca recovery is recommending a \$90 million dollar (USD) recovery effort over two years to help the ailing orca population in the Salish Sea. The Canadian federal government is also working on a recovery strategy for the Southern Resident Population. Allowing the pipeline expansion is out of step with the professed commitments of our governments to safeguard the future of our orcas.

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The Trans Mountain Pipeline expansion also asks coastal communities on both sides of the border to assume significant additional risk. When major spills occur close to human settlements, the economic impacts can be devastating. The Deepwater Horizon spill, for example, was responsible for tens of billions in lost revenue to tourism, fisheries, and real estate across the US Gulf Coast, as well as thousands of jobs. The 50 permanent jobs the pipeline expansion is projected to support is not worth this level of risk.

Finally, we ask you to consider Canada's international commitments to combatting climate change and to respecting indigenous rights. If the expansion is allowed to occur, Canada is unlikely to meet its goal of reducing greenhouse gas emissions 30% below 2005 levels by 2030. Further, as a signatory to UN Declaration on the Rights of Indigenous Peoples, Canada committed to earning the free, prior, informed consent of indigenous peoples before advancing projects such as the Trans Mountain Pipeline expansion. This has not occurred. Over 150 First Nations are signatory to the Treaty Alliance against Tar Sands Expansion. These First Nations explicitly resist the use of their "territories and coasts in connection with the expansion of the production of the Alberta Tar Sands, including for the transport of such expanded production, whether by pipeline, rail or tanker." Without all involved First Nations' consent, it is morally indefensible to proceed with the expansion project.

For all of these reasons, we at Seattle Audubon oppose the expansion of the Trans Mountain Pipeline. We hope that after considering these concerns, the National Energy Board and the Federal Government find that the Trans Mountain Pipeline cannot be expanded.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joshua Morris", with a long horizontal flourish extending to the right.

Joshua Morris
Urban Conservation Manager, Seattle Audubon