

Aboriginal Group	Comment or Concern	Proponent’s Response Summary	Agency’s Response Summary	PNWLNG Proposed Edits
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Preamble: PNWLNG has conducted a thorough review of Appendix 11.6. We have kept our comments/suggestions to only those summarized Aboriginal group consultations where PNWLNG has a concern and a suggestion to address the concern. The balance of Appendix 11.6 is satisfactory from PNWLNG’s perspective.

Lax Kw’alaams Metlakatla	P. 204, Selection of Lelu Island as the location for the Project	Pacific NorthWest LNG Limited Partnership (PNW LNG) chose Lelu Island after detailed analysis of 16 sites and a more detailed analysis of five short- listed sites in the Prince Rupert, Port Simpson, and Kitimat areas. These five sites were assessed based on geo-hazards (such as surface faulting, soil liquefaction risk, tsunami, slope stability, flooding, shoreline stability, and erosion), marine aspects (such as navigation distance, LNG marine terminal length, material offloading trestle length, navigation concerns, and dredging volume), and infrastructure and economic aspects (such as pipeline length, economic infrastructure, proximity to major airports, highway, and rail, and proximity to communities). After eliminating sites that were not technically or	The Canadian Environmental Assessment Agency (the Agency) is satisfied that the detail the proponent provided on the rationale for choosing Lelu Island as the preferred site location is sufficient for the purposes of the <i>Canadian Environmental Assessment Act, 2012</i> (CEAA 2012). The Agency notified the Prince Rupert Port Authority that it received comments from Aboriginal groups expressing concerns about the choice of Lelu Island as the site of a LNG terminal facility. The Agency’s assessment of alternative means of carrying out the Project is in section 3.2 of the draft report.	The Proponent recommends the Agency consider correcting the Proponent’s response summary as follows: <i>Twenty sites</i> (not 16) were assessed.
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		<p>economically feasible, the remaining two sites (Lelu Island and Kitimat) were compared based on environmental considerations: removal of riparian vegetation, removal of terrestrial and marine habitat, and environmental effects of an accident or malfunction. The risks of accidents or malfunctions that could lead to environmental effects were considered to be less for Lelu Island so this site was selected as the preferred option.</p>		
All	<p>P. 206 Concerns regarding the involvement of Aboriginal groups in the various monitoring and follow-up studies post-EA decision</p>	<p>PNW LNG’s environmental management team, which will ensure that the Project is constructed, operated, and decommissioned in compliance with the conditions of EA approval, environmental management plans and required regulatory permits and licenses, will liaise with Aboriginal groups. The below follow-up programs will be developed in consultation with applicable</p>	<p>The potential EA conditions would require that the proponent develop and implement the below follow- up programs in consultation with Aboriginal groups:</p> <ul style="list-style-type: none"> • marine fish, fish habitat and marine mammals • marine country foods • traditional and Aboriginal commercial fisheries <p>Where consultation with Aboriginal groups is a requirement of a follow-</p>	<p>Suggest adding to the Proponent’s response summary the following two bullets:</p> <ul style="list-style-type: none"> • <i>follow-up plan for fish habitat offsetting</i> • <i>follow-up program for the Archaeological and Heritage Resource Management Plan</i> <p>These are not listed at present.</p>

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		<p>regulatory jurisdictions and Aboriginal groups:</p> <ul style="list-style-type: none"> • Aquatic acidification and eutrophication follow- up program • Terrestrial acidification and eutrophication follow-up program • Sediment transport follow-up program • Marine fish and fish habitat follow-up program • Marine traditional country food follow-up program • Vegetation and wetland resources follow-up program 	<p>up program, the proponent would also be required to discuss with each Aboriginal group the opportunities for participation in the implementation of the follow-up program.</p> <p>For the purpose of the potential conditions, “consultation” includes: 1) providing to the party(ies) being consulted a notice of the opportunity to present views on the subject of the consultation; 2) providing sufficient information on the subject of the consultation and a reasonable period of time to permit the party to prepare its views on the matter; 3) providing a full and fair consideration of any views presented; and 4) advising parties that have provided comments on how the views and information received have been considered.</p> <p>Where consultation is a requirement of a condition, the proponent would be required, prior to the initiation of consultation, to communicate with</p>	

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			<p>each Aboriginal group on the most appropriate manner in which to satisfy the consultation requirements. In its annual reporting to the Agency about the implementation of the conditions, the proponent would also be required to indicate how it has considered views and information received during or as a result of the consultation.</p>	
<p>Lax Kw’alaams Metlakatla Gitxaala Kitsumkalum</p>	<p>P. 207 Concerns regarding the extent to which information from traditional use and traditional knowledge studies was considered and incorporated into the proponent’s analysis of environmental effects and extent to which valued</p>	<p>PNW LNG collected and reviewed publicly available information about Aboriginal rights or title to the Prince Rupert Harbour area to better understand the Aboriginal rights and interests that could be affected by the Project at Lelu Island. PNW LNG provided resources to five Aboriginal groups to complete traditional use and traditional knowledge studies. An EA agreement was not reached with Lax Kw’alaams and a traditional use and traditional knowledge study was not completed and submitted by that Aboriginal group. Additional valued</p>	<p>The Agency reviewed the input provided by Aboriginal groups about traditional use and traditional knowledge information and valued components of interest to Aboriginal groups and considered this input as part of the Agency’s information requests to the proponent. In May and August 2014, the Agency asked the proponent to assess the effects of the Project on the current use of lands and resources for traditional purposes, socio-economic conditions and physical and cultural heritage, and the seriousness of impacts of the</p>	<p>The Proponent recommends the Agency consider amending the last sentence of the Proponent’s response summary to read: PNW LNG continues to engage Aboriginal groups to learn about and respond to their interests and concerns regarding the Project and welcomes any information provided by Aboriginal groups regarding the potential impacts of the Project on their interests <i>during permitting, construction and operation of the project.</i></p>

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	<p>components of interest to Aboriginal groups were considered</p>	<p>components suggested for inclusion by Aboriginal groups were considered to be sufficiently addressed by existing valued components. PNWLNG continues to engage Aboriginal groups to learn about and respond to their interests and concerns regarding the Project and welcomes any information provided by Aboriginal groups regarding the potential impacts of the Project on their interests.</p>	<p>Project on Aboriginal rights and interests using information gathered through the traditional use and traditional knowledge studies. In September 2014, the Agency asked the proponent to summarize where and how traditional knowledge acquired since the submission of the EIS has been incorporated into any revised consideration of environmental effects. In June 2015, the Agency asked that information gathered as a result of additional modelling work be considered in the assessment of the effects of the Project on the current use of lands and resources for traditional purposes. The Agency provided comments received from Aboriginal groups on the EIS and Addendum to the proponent for its consideration in the EA process.</p> <p>The Agency recognizes that traditional use and traditional knowledge studies are valuable</p>	

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			<p>sources of information throughout the EA process. Through consultation on the Draft EA Report and potential conditions, the Agency welcomes further input from Aboriginal groups on the extent to which traditional use and traditional knowledge information should be considered in the analysis and conclusions of the EA and the potential conditions (mitigation measures and follow-up requirements) to be considered by the Minister of Environment and Climate Change in reaching the decision under CEAA 2012.</p>	
<p>Lax Kw’alaams Metlakatla Gitxaala</p>	<p>P. 208 Removal of the accommodation camps from the scope of the EA and lack of consultation with Aboriginal groups</p>	<p>The accommodation camps will no longer be located on Lelu Island, and will not be developed, owned or operated by PNW LNG, nor be for the exclusive use of PNW LNG. Therefore PNW LNG is no longer directly responsible for commitments regarding the location, design, or development area of the camp or commitments regarding potential</p>	<p>The Agency has determined that the construction and operation of the accommodation camps is not a component of the Project for the purposes of the federal EA because the camps will no longer be developed, owned, or operated by PNW LNG, nor be for the exclusive use of PNW LNG. The transportation of workers to and from the Project</p>	<p>The Proponent recommends the Agency consider adding a new last sentence to the Proponent’s response summary: The accommodation camps will no longer be located on Lelu Island, and will not be developed, owned or operated by PNW LNG, nor be for the exclusive use of PNW LNG. PNW LNG is no longer directly responsible for commitments regarding the location, design, or development area of the camp or</p>

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		<p>effects of the camp on the environment, heritage, and health. These commitments will now be the responsibility of the third party camp service provider.</p>	<p>site is similarly outside the scope of the Project. The Agency understands that the third-party that will develop the accommodation camps will be responsible for complying with all applicable municipal bylaws and provincial and federal legislation (e.g., the <i>Fisheries Act</i>, <i>Wildlife Act</i>, <i>Migratory Birds Convention Act</i>, <i>Species at Risk Act</i>, and <i>Heritage Conservation Act</i>).</p> <p>The Agency notes that the B.C. Environmental Assessment Office assessed the potential adverse social, economic, and health effects of the work force required during the construction phase of the Project. The provincial EA Certificate includes a condition requiring the development and implementation of a Social and Economic Effects Management Plan to inform the management of potential social and economic effects relating to the Project construction, including interactions with other</p>	<p>commitments regarding potential effects of the camp on the environment, heritage, and health. These commitments will now be the responsibility of the third party camp service provider. <i>PNW continues to engage Tsimshian First Nations to discuss the rationale behind this project change.</i></p>

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			<p>projects in the region, and to address infrastructure and services pressures during construction.</p>	
<p>Metlakatla Gitxaala Kitselas</p>	<p>P. 218 Concerns about the adequacy and completeness of baseline information about eulachon, a species of importance for Aboriginal peoples, and about the effects of the Project on that species</p>	<p>Marine fish species of management concern (such as eulachon) are not likely to be affected by blasting, burial, or crushing, or effects of underwater noise as they are not expected to be found in locations where these effects might occur. Fisheries and habitat studies quantify the relative abundance, distribution, and habitat use of commercial, recreational and Aboriginal species and forage fish that have been identified as important by Fisheries and Oceans Canada, including eulachon. Based on the results, the fisheries assessment program can be amalgamated into the construction monitoring and compliance follow-up program for the Project and continued for a multi- year program as required. Post-construction monitoring will be informed by the</p>	<p>The Agency understands that the proponent is preparing a technical memo on the presence of eulachon in the area for Fisheries and Oceans Canada, and is working with Aboriginal groups on a field sampling program. Fisheries and Oceans Canada advised that the proponent’s baseline study timing and collection method used appear adequate for adult eulachon and none were captured. The proponent’s analysis to identify larval eulachon will be provided at the conclusion of a one year study in advance of any <i>Fisheries Act</i> authorization. These baseline studies will inform the timing windows of least risk, a key mitigation measure to manage effects to fish.</p>	<p>The Proponent recommends the Agency consider adding the following as an Addendum to the Proponent’s response summary.</p> <p><i>Further genetic analysis has identified eulachon as a portion of the larval fish population observed during 2015 surveys on Agnew and Horsey Banks during June and early July eulachon larvae migratory window from the Skeena River. February 2016 marine fish surveys have captured small number of migrating adult eulachon.</i></p> <p><i>Eulachon have not been observed in Porpoise Channel or in areas of the proposed MOF.</i></p>

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		<p>results of pre- construction monitoring. Various mitigation measures have been proposed to protect marine fish and habitat and are listed in appendix 11.5.</p>		
<p>Metlakatla Gitxaala Kitsumkalum Gitga’at</p>	<p>P. 219 Concerns about the lack of information on marine mammals, including marine mammals that are species at risk, and habitat utilization in the assessment area</p>	<p>During the course of the EA process, PNW LNG provided additional information based on historic studies and recent data to characterize the marine mammal habitats at and adjacent to the Project (include Flora Bank and adjacent habitats located within the influence of the Skeena River estuary within Chatham Sound). It considered the physical and biological structures and processes in these habitats, including marine habitat use. Marine surveys undertaken by the proponent to support this characterization are ongoing. Preliminary results of the marine mammal surveys are consistent with information from the literature and other sightings data and show wide use of the waters in the</p>	<p>The Agency reviewed the input provided by Aboriginal groups about impacts to marine mammals; this input informed the Agency’s information requests to the proponent of May, August and September 2014 and February and June 2015. The Agency also provided comments received from Aboriginal groups on the EIS and Addendum to the proponent for its consideration in the EA process.</p> <p>Potential conditions would require the proponent to limit work outside of timing windows of least risk, to implement a marine mammal observation program during construction, and take other measures to minimize effects to marine mammals. The timing</p>	<p>The Proponent recommends the Agency consider adding the following clarification to the Proponent’s response summary:</p> <p><i>The follow-up program for marine mammals has assessed marine mammal relative abundance, density, and spatial and temporal habitat presence in 2015, and studies will continue.</i></p> <p><i>The marine mammal program provided a broader spatial context for marine mammal distribution and abundance beyond the project development area, but does not specifically include reference sites that are outside of the LAA/RAA.</i></p>

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		<p>local assessment area and regional assessment area by all species. PNW LNG committed to implement a follow-up program for marine mammals to verify the predictions and extent of effects and monitor the effectiveness of mitigation measures during construction and operations. The follow-up program will: 1) assess marine mammal relative abundance, and spatial and temporal habitat use on Horsey, Agnew and Flora banks and reference sites; 2) provide pre- and post-construction baseline marine resource information; and 3) confirm and/or refine construction and operations mitigation measure.</p>	<p>windows of least risk would be based on pre- construction marine mammal surveys done to the satisfaction of Fisheries and Oceans Canada. The Agency sought input from Fisheries and Oceans Canada regarding the adequacy of the ongoing baseline study work to inform the determination of work windows of least risk; Fisheries and Oceans Canada advised that the studies were sufficiently rigorous.</p>	

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Lax Kw’alaams Metlakatla Kitsumkalum Gitga’at	P. 220 Concerns about effects on marine mammals due to vessel strikes and underwater noise	It is anticipated that individual marine mammals may exhibit localized behavior for the duration of the construction phase and for short periods of time (i.e., 30 minutes to two hours) during operation but these effects are not expected to result in mortality to species at risk or to affect population viability of any marine species. Suitable alternative habitat has been identified in the event of short-term small-scale displacement. PNW LNG committed to implement a Marine Mammal Management Plan that will minimize any effects on marine mammals resulting from Project construction and operations. Various mitigation measures have been proposed to protect marine mammals and are listed in appendix 11.5.	The Agency reviewed the input provided by Aboriginal groups about impacts to marine mammals; this input informed the Agency’s information requests to the proponent of May, August and September 2014 and February and June 2015. The Agency also provided comments received from Aboriginal groups on the EIS and Addendum to the proponent for its consideration in the EA process. The following potential conditions would require the proponent to implement measures to mitigate adverse environmental effects of the Project on marine mammals:	The Proponent recommends the Agency consider the following a brief Addendum to the Proponent’s response summary: A specific harbour porpoise technical submission has been prepared by the Proponent as additional information for the Agency to consider when finalizing its conclusions as to the significance of any likely adverse effect to harbour porpoise. In Summary: <i>Full year density surface predictions across Chatham Sound and the PDA show high harbour porpoise density areas in the south of Digby Island, around Ridley Island, around Lelu Island and northeast of Stephens Island. The higher densities are observed at these four locations which indicate that these areas are suitable habitat for harbour porpoise.</i>

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	<p>P. 220 Concerns about effects on marine mammals due to vessel strikes and underwater noise</p>		<ul style="list-style-type: none"> • identify timing windows of least risk for construction activities • implement additional mitigation measures if conducting construction activities outside of the timing windows of least risk • mitigate the levels of underwater noise caused by construction activities • implement a marine mammal observation program for all construction activities where underwater noise levels exceed 160 dB • require LNG vessels associated with the Project to respect speed profiles to prevent or reduce the risks of collisions with marine mammals • require LNG vessels and tug operators to report collision with marine mammals 	<p><i>Based on acoustic modelling of standard threshold levels (160 dB re 1 µPa rms SPL), availability of suitable alternative habitat and the Project’s mitigation measures, underwater noise is not expected to affect the viability of the harbour porpoise population. As advised by our consultants, the Proponent believes that the Project is not likely to cause significant adverse environmental effects to harbour porpoise.</i></p>

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			<ul style="list-style-type: none"> monitor the abundance of marine mammals and spatial and temporal use, distribution and composition of habitat potentially affected by the Project <p>[..the Agency’s “significance determination for harbour porpoise”]</p>	

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Metlakatla Gitxaala	P. 221 Cumulative effects assessment for marine mammals is inadequate	Cumulative operations and construction activity from concurrent projects will increase the spatial extent over which marine mammal behaviour could be affected. Cumulative effects on potential marine mammals in the area are expected to be short-term and temporary. These effects are not expected to result in mortality to species at risk and are not expected to affect population viability of any marine species, especially given the large geographic ranges of those species likely to be affected. Suitable alternative habitat has been identified for marine mammal species present within the local assessment area in the event of short-term small-scale displacement.	The Agency concludes that the Project is not likely to result in significant adverse cumulative effects on marine mammals, taking into account the implementation of mitigation measures and follow-up program, as well as the marine mammal management program initiated by the Prince Rupert Port Authority. However, the Agency concludes that the Project is likely to result in significant adverse cumulative environmental effects to harbour porpoise, given the species’ susceptibility to behavioural effects from underwater noise, its current at-risk status, its extensive use of the project area year-round, and uncertainty about the availability of suitable alternative habitat. A potential condition would require the proponent to participate, at the request of federal authorities, in regional initiatives relating to cumulative effects monitoring and	The Proponent recommends the Agency consider the following a brief Addendum to the Proponent’s response summary: A specific harbour porpoise technical submission has been prepared by the Proponent as additional information for the Agency to consider when finalizing its conclusions as to the significance of any likely adverse effect to harbour porpoise. Other projects considered in the cumulative effects assessment may affect some of the areas identified as suitable alternative habitat for harbour porpoises in the Prince Rupert area. However, the timing of these other projects is uncertain and the number and distribution of sites means that potential changes in harbour porpoise behavior are not expected to affect the viability of the population.

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			the management of marine shipping, should there be any such initiatives during the construction and operation phases of the Project.	
Lax Kw’alaams Metlakatla Kitsumkalum Gitga’at	P. 222 Concerns about effects on marbled murrelet	The assessment for threatened or endangered species on the List of Wildlife Species at Risk of the <i>Species at Risk Act</i> was developed based on best available information at the time of submission. The assessment of marbled murrelets is consistent with the federal recovery strategy. No critical habitat for marbled murrelets is expected to be removed from Lelu Island. Marine foraging behavior is not expected to be impacted, since construction and vessel traffic will avoid sections of Flora Bank frequented by marbled murrelets. Additionally, mitigation measures will be put in place to reduce disturbance to terrestrial wildlife and birds, including species listed in the <i>Species at Risk Act</i> , and are listed in appendix 11.5.	The Agency is satisfied with the proponent’s assessment of the environmental effects and factored it into the Agency’s analyses and conclusions that effects on marbled murrelet would not be significant. Potential conditions would require the proponent to implement measures to mitigate and monitor the effects of the Project on marbled murrelet.	For clarity, the Proponent recommends the Agency consider revising the Agency’s response as follows: “...Potential conditions would require the proponent to implement measures to mitigate and monitor the effects of the Project on <i>critical habitat for marbled murrelet.</i> ”

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All	P. 223 Concerns about the contamination of country food due to marine sediment dredging and disposal at sea; personal health or safety when harvesting country food; reduced availability of country foods leading to a change in diet	The EIS indicated that no increase in the concentration of chemicals of potential concern is expected in the marine environment from Project activities. The proposed marine terminal design changes presented in October 2014 reduce the need for dredging and disposal at sea. Substantially lowering the amount of dredged sediment containing <u>polychlorinated</u> dioxins and furans will reduce the geographical range of any suspended sediments but will not change the quality of marine country foods. A marine country food follow-up and monitoring plan will be implemented to confirm the predictions of the EIS that there will be no change to the quality of marine country foods harvested from Porpoise Channel during dredging in the construction phase and 1 year post-completion of dredging. Findings of the follow-up program will be reported to applicable regulatory	The Agency is satisfied with the proponent’s assessment of the environmental effects and factored it into the Agency’s analyses and conclusions that it is unlikely that consumption of marine country foods will lead to increased health risks due to the Project. A potential condition would require the proponent to develop and implement, in consultation with Aboriginal groups, a follow-up program to verify that dredging of marine sediment at the Materials Offloading Facility will not result in increased risk to human health as a result of changes to marine country foods in Porpoise Channel. The potential condition also requires the proponent to report the results of the follow-up program on marine country foods to Aboriginal groups. A potential condition would require the proponent to implement additional mitigation measures if the	Suggest the following correction in the Proponent’s response summary: The term “ <i>polychlorinated</i> ” as it is inaccurate.

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		jurisdictions, Aboriginal groups and the public. Various mitigation measures have been proposed to protect water quality and marine country foods and are listed in in appendix 11.5.	follow-up program for marine country foods shows that there is increased risk to human health from changes to marine country foods in Porpoise Channel resulting from the dredging of marine sediment.	
Lax Kw’alaams Metlakatla Kitsumkalum	P. 224 Concerns about the lack of traditional use and traditional knowledge studies used in the Human Health Risk Assessment	The Human Health Risk Assessment used ingestion rates based on the upper 95th percentile of average daily ingestion rates for <i>Aboriginal</i> people in B.C. This represents a conservative approach for the estimation of contaminant exposure.	The Agency is satisfied with the proponent’s assessment of the environmental effects and factored it into the Agency’s analyses and conclusions that it is unlikely that consumption of marine country foods will lead to increased health risks due to the Project. A potential condition would require the proponent to develop and implement, in consultation with Aboriginal groups, a follow-up program to verify that dredging of marine sediment at the materials offloading facility will not result in increased risk to human health as a result of changes to marine country foods in Porpoise Channel.	Suggest the following correction to the Proponent’s response summary : “...daily ingestion rates for <i>coastal</i> Aboriginal people...”.

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All	<p>P. 224 Concerns about how interference with navigation from Project activities, presence of marine infrastructure and marine shipping may affect access to traditional activity sites and lack of associated mitigation measures</p>	<p>The suspension bridge and the Lelu Island bridge will be designed to enable vessels up to the size of gillnetters to pass unimpeded, at high tide, underneath. This will allow vessels to continue to use the north-south channel along the west side of Lelu Island to and from Flora Bank and Lelu Slough.</p> <p>LNG carriers will comply with all relevant international and Canadian regulations pertaining to conduct of navigation. The Marine Communications and Traffic System will monitor LNG carrier movements in the Prince Rupert area. The Prince Rupert Port Authorities area and its approaches are also subject to mandatory pilotage, which will further increase safety associated with transit in fog and conditions of reduced visibility.</p> <p>The proposed marine terminal design changes presented in October 2014 reduce requirements for blasting, pile</p>	<p>A potential condition would require the proponent to build the suspension bridge and the Lelu Island bridge to allow for the passage of vessels with a minimum air draft of 11.3 m from the highest high water level.</p> <p>A potential condition would require the proponent to develop and implement marine communication protocols for sharing information and facilitating communication between the proponent and the Aboriginal groups and other local marine users, including the location and timing of Project-related construction activities and of traditional activities by Aboriginal groups, Project-related safety procedures, location of areas where navigation may be controlled for safety reasons, speed profiles and schedules of LNG carriers and ways to provide feedback to the proponent on adverse effects related to navigation experienced by Aboriginal</p>	<p>The Proponent suggests the Agency consider amending the first sentence of the Proponent’s response summary as follows:</p> <p><i>Both the suspension bridge and the Lelu Island bridge will be designed to enable vessels up to the size of gillnetters to pass unimpeded, at high tide, underneath with a minimum clearance of 11.3 metres.</i></p>

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		<p>installation, dredging, sediment disposal and associated marine traffic. Relocation of vessel maneuvering to deep water will also reduce the effects of the Project on navigation.</p>	<p>groups and other local marine users. The Prince Rupert Port Authority will continue to integrate safety into Port operations and minimize interference to navigation from Port operations. Final safety zones around Project components will be established pending assessment of final design of the Project in consultation with the proponent, the B.C. Oil and Gas Commission and the Prince Rupert Port Authority. In addition, potentially affected Aboriginal groups will be provided the opportunity to participate in the Prince Rupert Port Authority led Construction Coordination Committee and Port Operations Committee. There will also be a requirement under Transport Canada’s Navigation Protection Program to notify potentially impacted Aboriginal groups of construction activities taking place in navigable waters.</p>	
Lax	P. 225 Concerns	PNW LNG stated that previous studies	The Agency is satisfied with the	Neither the Proponent’s response summary

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Kw’alaams Metlakatla Gitxaala Kitsumkalum Gitga’at	about the effects from vessel wake (including the angle of wave action) on shorelines and marine resources and harvesting (including safety of harvesters) and archeological resources	have shown that the expected LNG carrier traffic, including support vessels, will not generate waves in excess of the ocean swells and wind-generated waves that already affect the shorelines. LNG carrier traffic will be piloted by B.C. coast pilots at safe speeds for ships of their size until they approach the Port of Prince Rupert. Once in Prince Rupert they will be connected to a sufficient number of tugs so that they can approach the marine terminal berths at very slow speeds. Wake erosion of the intertidal areas around Lelu Island is not expected because Project vessels will be travelling at speeds less than 5 knots within the Prince Rupert Port Authority boundaries.	proponent’s assessment of the environmental effects and factored it in the Agency’s analyses and conclusions that wake would not cause significant adverse environmental effects. A potential condition would require all LNG carriers associated with the Project to proceed at a safe speed and respect speed profiles applicable to the operation of the Project, subject to navigational safety.	nor the agency response seems to directly address the “safety of harvesters” concern. Suggest the following sentence be added to the Proponent response summary: PNW LNG stated that previous studies have shown that the expected LNG carrier traffic, including support vessels, will not generate waves in excess of the ocean swells and wind-generated waves that already affect the shorelines. <i>As such, safety of harvesters is not anticipated to be adversely affected.</i>
Metlakatla	P. 227 Concerns about Brown Passage being located within an area that has a moderate to high	Brown Passage is a disposal site approved by Environment and Climate Change Canada and any disposal activities would meet Environment and Climate Change Canada’s criteria for the protection of	For future projects in the area, the Prince Rupert Port Authority has established a Sediment Management Working Group with Aboriginal representatives that would include exploring alternate purposes for	Suggest the following sentence be added to the Proponent’s summary response to add clarity: PNW LNG also intends to dispose some of the dredged sediment on land. <i>The surficial 1 m</i>

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	density of marine-based traditional use sites and lack of specific mitigation measure for disposal at sea related to traditional use	sea life. Various measures have been identified to mitigate the effects of disposal at sea activities on the quantity and quality of marine resources present at Brown Passage and are listed in appendix 11.5. PNW LNG also intends to dispose some of the dredged sediment on land. Given that there would be negligible levels of dioxins and furans in the sediment that would be disposed of at Brown Passage, the risk of adverse effects on sediment quality would be eliminated.	sediment from dredging activities, identifying potential locations for disposal, and exploring alternative dredging or disposal methodologies. Environment and Climate Change Canada and Fisheries and Oceans Canada will contribute to this Working Group.	<i>of sediment will be disposed on Lelu Island (approximately 8,000 m³).</i>
Lax Kw’alaams Gitxaala Gitga’at	P. 227 Concerns about how effects on the visual environment from a relatively pristine natural landscape to an industrialized environment may affect the experience of	Preservation of visual quality is not a principal planning objective in the assessment area according to the Prince Rupert Port Authority Land Use Management Plan. It should be noted that the lighting for the suspension bridge and LNG carriers will be as required by regulations. Various measures have been identified to minimize the visual bulk of the Project and are identified in appendix 11.5.	The following potential conditions would require the proponent to implement measures to mitigate the effects of the Project on visual quality: <ul style="list-style-type: none"> • avoid clearing or developing Lelu Island within 30 m from the high water mark except when required for the Lelu Island bridge, pioneer dock, Materials Offloading Facility, marine terminal and 	The Proponent suggests the Agency consider adding the following to the Proponent’s summary response: These include: <ul style="list-style-type: none"> • <i>Fixtures selected to reduce wasted or stray light</i> • <i>Adherence to lighting design specifications</i> • <i>Use of a centralized lighting control system</i>

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	Aboriginal users		pipeline interconnection, or for safety or security considerations <ul style="list-style-type: none"> design and manage exterior lighting to prevent excessive emanation of light while meeting marine or aviation safety requirements 	<ul style="list-style-type: none"> <i>Maintaining a 30 m no disturbance vegetation buffer around the island</i>
Lax Kw’alaams Metlakatla Gitxaala Kitsumkalum Gitga’at	P. 228 Concerns about the under- or misrepresentation of traditional use information obtained from Aboriginal groups for the assessment of Project effects on current use for traditional purposes and lack of a follow-up program related to current Aboriginal use to	Baseline data sources for the assessment of the effects on current Aboriginal use included information from traditional use and traditional knowledge studies submitted by Metlakatla First Nation, Gitxaala Nation, Kitselas First Nation, Kitsumkalum First Nation, and Gitga’at First Nation, as well as past research conducted in the region; publicly available traditional use and traditional knowledge information; engagement and follow-up interviews with potentially affected Aboriginal groups; and baseline data gathered for the assessments of other valued components. Given the intertwined ethno-history of Lax Kw’alaams First	In its information requests of May 2014 and August 2014, the Agency requested that the proponent include, where relevant, information from the traditional use and traditional knowledge studies that it was receiving from Aboriginal groups in order to assess the effects of changes to the environment caused by the Project on current use of lands and resources for traditional purposes, health and socio- economic conditions, physical and cultural heritage and structures, sites or things of historical, archeological, paleontological or architectural significance. In its Addendum to the EIS (October 2014), the proponent	The Proponent suggest the Agency consider adding the following sentence to the Proponent’s response summary: <i>Tsimshian First Nations will be involved in developing follow-up and monitoring programs.</i>

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	<p>account for uncertainties in the assessment (related to Aboriginal fisheries for example)</p>	<p>Nation and Metlakatla First Nation, current interconnections between the two communities, and their shared strength of claim to shared traditional territory, PNW LNG assumed that the current practices of Lax Kw’alaams First Nation were roughly similar to those of Metlakatla First Nation.</p> <p>The confidence in the predictions of the effects of the Project on current Aboriginal use is not low. Therefore, a follow-up program is not recommended. However, most of the valued component-specific follow-up programs are indirectly linked to current Aboriginal use and one follow-up program in particular (the marine traditional country foods follow-up program) was included specifically to address potential Project effects on current Aboriginal use (by verifying the accuracy of predictions regarding the potential contamination of marine country foods resulting from dredging at the Materials Offloading facility).</p>	<p>submitted its assessment of the effects of the Project on current use of lands and resources for traditional purposes, health and socio- economic conditions, physical and cultural heritage and structures, sites or things of historical, archeological, paleontological or architectural significance based, in part, information received through the traditional use and traditional knowledge studies it received from Aboriginal groups.</p> <p>The Agency notes that Lax Kw’alaams Band and the proponent did not come to an agreement during the EA process on the development of a Project-specific traditional use and traditional knowledge study. The Agency received a considerable number of comments from Lax Kw’alaams Band during the EA process and used information gathered through these comments, in addition to the collective amount of</p>	

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			<p>information received about current Aboriginal use in the area of the Project, to support its analysis and conclusion.</p> <p>Through ongoing consultation on the Draft EA Report and potential conditions, the Agency welcomes further input from Aboriginal groups on the extent to which traditional use and traditional knowledge information should inform the assessment of the environmental effects of the Project and the implementation of mitigation measures and follow-up programs.</p>	
<p>Lax Kw’alaams Metlakatla Gitxaala Kitsumkalum</p>	<p>P. 229 Concerns about the reliance on the assessment of effects on biophysical valued components (and the implementation of associated</p>	<p>Assessment methodologies for valued components included in the EIS are described in the section for each relevant valued component, follow standard scientific methods and meet the Agency and the B.C. Environmental Assessment Office regulatory requirements. In regards to harvested species and other subcomponents that relied on those</p>	<p>The potential conditions recommended by the Agency would require the proponent to implement measures designed to accommodate continued navigation, inform marine resource users of marine traffic associated with the Project, mitigate the effects of the Project on the quality and quantity of resources of importance for Aboriginal users and</p>	<p>The Proponent raises the concern that the Agency response appears to suggest that the Aboriginal groups may continue to specifically identify additional “remaining uncertainties” regarding the assessment. In the Proponent’s view, the proposed mitigations and required conditions and follow-up programs fully address any uncertainties. The sentence reads:</p>

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	<p>mitigation measures) as a proxy to assessing effects on current Aboriginal use and lack of mitigation measures specific to current Aboriginal use</p>	<p>valued components, assessment standards specific to those valued components were followed.</p> <p>Effects of the Project on current Aboriginal use were assessed in relation to each primary current Aboriginal use (valued subcomponents), including: fishing practices; hunting and trapping practices; gathering practices; spiritual and ceremonial practices. For each of these practices, the assessment considered a number of pathways (i.e. key conditions that support these practices):</p> <ul style="list-style-type: none"> • Continued access to preferred current Aboriginal use locations • Sufficient quantity of lands, waters and resources to support current Aboriginal use activities • Resources of sufficient quality to support current Aboriginal use activities • Acceptable sensory environment within which to undertake current 	<p>limit changes to the sensory environment. Through ongoing consultation on the Draft EA Report and potential conditions, the Agency welcomes further input from Aboriginal groups about the extent to which remaining uncertainties regarding the assessment of the Project’s effects related to the current use of lands and resources on access, quantity and quality of resources and sensory environment may be addressed through additional mitigation measures or follow-up programs.</p>	<p>Through ongoing consultation on the Draft EA Report and potential conditions, the Agency welcomes further input from Aboriginal groups about the extent to which <u>remaining uncertainties regarding the assessment of the Project’s effects related to the current use of lands and resources on access, quantity and quality of resources and sensory environment may be addressed</u> through additional mitigation measures or follow-up programs.</p> <p>The Proponent suggests the Agency consider the following sentence as a replacement:</p> <p><i>Through the ongoing review of the Draft EA Report, the Agency will consult with Aboriginal groups regarding the current use of lands and resources on access, quantity and quality of resources and sensory environment may be addressed through additional mitigation measures or follow-up programs.</i></p>

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Lax Kw’alaams Kitsumkalum	P. 229 Concerns about the lack of consideration of the multiple factors and conditions (such as access, perceived contamination, location-specific perceived risk and stigma, noise and other sensory changes to the aesthetic environment) required for Aboriginal users to continue to use lands, waters and resources for traditional purposes	Aboriginal use activities Various measures have been identified to mitigate the effects of the Project on the factors and conditions that are required for Aboriginal users to continue to use lands, waters and resources for traditional purposes (navigation, marine country foods, sensory environment) and are listed in appendix 11.5.	The following potential conditions would require the proponent to implement measures to mitigate the effects of the Project on the sensory environment: <ul style="list-style-type: none"> • avoid clearing or developing Lelu Island within 30 m from the high water mark except when required for the Lelu Island bridge, pioneer dock, Materials Offloading Facility, marine terminal and pipeline interconnection, or for safety or security considerations • incorporate and implement noise and air emission reduction measures in the design of the Project and during all phases of the Project • develop and implement a noise complaint mechanism • design and manage exterior lighting to prevent excessive emanation of light while meeting marine or aviation safety 	From the Proponent’s perspective, the Agency’s response may not address all of the concerns noted in the comment and may miss the concerns regarding access and perceived contamination. PNW has addressed concerns with access in the current design on the bridges as noted in an earlier potential condition: <i>“A potential condition would require the proponent to build the suspension bridge and the Lelu Island road access bridge to allow for the passage of vessels with a minimum aircraft of 11.3 m from the highest high water level.”</i> Likewise, concerns regarding perceived contamination are also addressed by an earlier potential condition that requires the development of a follow-up program for continued monitoring of marine country foods in consultation with Aboriginal groups. The Proponent requests the Agency consider revising their response.

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			<p>requirements The Prince Rupert Port Authority will continue to integrate safety into Port operations and minimize interference to navigation from Port operations. In addition, potentially affected Aboriginal groups will be provided the opportunity to participate in the Prince Rupert Port Authority led Construction Coordination Committee and Port Operations Committee.</p>	