

Preamble to Appendix 11.5: With respect to the last sentence: *“Note that these do not include the additional measures identified by the Agency, which are described in Appendix 11.4.”*

PNWLNG General Comment: There is overlap between those mitigations proposed by PNWLNG and the draft Conditions proposed by the Agency.

Valued Component	CEAA Draft Sec 11.5 – Committed PNWLNG Proposed Mitigation Measure	PNW LNG Response and Suggested Edit or Action
Vegetation	<p>P. 191, 1st bullet:</p> <p>Develop and implement a wetland compensation plan in consultation with Environment and Climate Change Canada (Canadian Wildlife Service) and Aboriginal Groups.</p>	<p>A wetland compensation plan is required; however, it is our understanding that Prince Rupert Port Authority is the lead federal agency as they are the federal land manager.</p>
	<p>P. 191, 1st bullet 2nd sub-bullet:</p> <p>Secure, restore or create 120 ha of wetlands through a legally binding agreement between Pacific Northwest LNG and Ducks Unlimited Canada.</p>	<p>It is our understanding that the legal agreement will be between PNWLNG and the Prince Rupert Port Authority.</p>
	<p>P. 191, 1st bullet 3rd sub-bullet:</p> <p>Fund the immediate research and restoration priorities of the Burns Bog Management Plan and Burns Bog Ecological Conservancy Area Management Plan.</p>	<p>This PNWLNG Proposed Mitigation measure is no longer valid.</p> <p>The concept has been removed from the current compensation plan at the request of the Prince Rupert Port Authority.</p>

		Wetland offsets and restoration programs are to occur as close to those Lelu Island wetlands impacted by the Project as practical.
	<p>P. 193, 3rd bullet:</p> <p>Speed limit of 16 knots for all LNG carriers, tugs, and barges within the local assessment area. Ensure construction, operations, and decommissioning vessels will adhere to speed limits of 5 knots in Prince Rupert Harbour and Porpoise Channel and Harbour to reduce potential for marine bird collision or disturbance from vessel wake and underwater noise.</p>	PNWLNG believes draft condition 6.17 and the associated wording in Appendix 11.4 (3 rd bullet – page 186) has been endorsed by the Coast Pilots and PRPA as more appropriate than setting defined vessel speed limits.
Marine Fish and Fish Habitat and Marine Mammals, including species at risk and marine plants – Changes to Sediment/Water Quality	<p>P. 194, 5th bullet:</p> <p>Use tugs with less powerful propulsion systems (i.e., Voith Schneider tugs).</p>	<p>PNWLNG’s commitment to the use of tugs that limit propeller scour of seabed sediments was developed and meant to apply to the safe maneuvering of LNG Carriers during operations.</p> <p>Draft Condition 6.16 captured this comment. PNWLNG has suggested a change to this wording accompanied by a rationale.</p>
Marine Fish and Fish Habitat and Marine	P.195, - Underwater Noise – 5 th bullet:	PNWLNG suggests an amendment to this

<p>Mammals, including species at risk and marine plants – Direct Mortality/Physical Injury to Fish and Marine Mammals</p>	<p>Use pile within pile installation techniques should monitoring suggest that the use of bubble curtains is not sufficient mitigation during pile installation.</p>	<p>PNWLNG Proposed Mitigation Measure. Suggest rewording to “... Use of bubble curtains <u>or other mitigations</u> are not sufficient during pile installation.”</p>
<p>Marine Fish and Fish Habitat and Marine Mammals, including species at risk and marine plants- Injury or mortality from Vessel Collisions</p>	<p>P. 196, Injury or Mortality From Vessel Conditions, 1st bullet, 2nd sub-bullet: The Proponent Expects:</p> <ul style="list-style-type: none"> • Speed profiles will be established for different route segments. Vessel speeds expected to be reduced during transit to and from the pilot station to reduce the likelihood of serious injury to large cetaceans from a vessel collision. 	<p>After further consideration, PNWLNG does not support the development of speed profiles and agree with the CEAA that: <i>“the speed of the vessel is ultimately at the discretion of the pilot” (CEAA Draft EA Report, Section 6.7.3, page 75).</i></p>
<p>Marine Fish and Fish Habitat and Marine Mammals, including species at risk and marine plants- Change in Behavior of fish or marine mammals</p>	<p>P. 196, Change in Behavior of Fish and Marine Mammals, 2nd bullet, 1st sub-bullet: The Proponent Expects:</p> <ul style="list-style-type: none"> • LNG carriers, tugs and barges will not exceed a speed of 16 knots within the local assessment area for LNG carriers, tugs, and barges. 	<p>PNWLNG believes draft condition 6.17 and the associated wording in Appendix 11.4 (3rd bullet – page 186) has been endorsed by the Coast Pilots and PRPA as more appropriate than setting defined vessel speed limits.</p>
<p>Human Health - Noise</p>	<p>P. 197, Noise, 1st bullet:</p>	<p>The wording in the Proposed PNWLNG</p>

	<p>Schedule most construction activity between the daytime hours of 7:00 AM to 10:00 PM. Limit nighttime construction activity to low noise activities (no impact type pile driving or blasting activities).</p>	<p>Mitigation Measure is somewhat arbitrary.</p> <p>Suggest deleting first sentence and go with:</p> <p><i>Limit nighttime construction activity to low noise activities as required by the BC Oil and Gas Commission LNG Export Facility permit.</i></p>
<p>Effects of the Environment of the Project</p>	<p>P. 203, 3rd bullet:</p> <p>Ensure that LNG carriers undertake transit, maneuvering and berthing activities only within the environmental limits established specifically for the Project. Environmental limits include criteria for wind and significant wave height as applicable to each activity type.</p>	<p>This PNWLNG proposed Mitigation Measure is redundant to the PNWLNG Mitigation Measure which precedes it herein (correction added since PRPA does not specify pilotage areas):</p> <p><i>In accordance with Pacific Pilotage Authority regulations,-each LNG carrier will be piloted between Triple Island and the marine terminal berths. This increases the safety associated with transit in fog and conditions of reduced visibility. Bring LNG carriers into the marine terminal only in safe weather conditions, and in compliance with Terminal operations limits that will be set for wind and wave height.</i></p>
	<p>P. 203, 7th bullet:</p>	<p>PNWLNG will not be implementing the former PNWLNG Proposed Mitigation</p>

	Refuse pilotage to LNG carriers that do not have the capability to let go and retrieve their anchor because of ice formed on the LNG carrier deck or bow.	Measure and request deletion
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