

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
6.1.1	Page 31, para 3	During operations, most air emissions would be land-based and continuous, and generated by three thermal oxidizers, six mixed-refrigerant turbine drivers, six natural gas turbine generators, and three flares.	During operations, most air emissions would be land-based and continuous, and generated by three thermal oxidizers, six mixed-refrigerant turbine drivers, <i>eight</i> natural gas turbine generators, and three flares.	Minor edit
6.1.1	Page 31, para. 4	H ₂ S emissions were also not included in the table because the proponent assumed all H ₂ S directed to the thermal oxidizer would be converted to SO ₂ and that minimal emissions would occur from the flare stacks.	Suggest that the Agency consider amending the text as follows: <i>H2S emissions were also not included in the table because although the feed gas for the LNG facility will contain some hydrogen sulfide (H2S), the proponent assumed most of it will be removed upstream before it enters the Prince Rupert Gas Transmission pipeline. Residual amounts in the feed gas would be directed to the thermal oxidizer and be converted to SO2. Minimal emissions would occur from the flare stacks.</i>	The feed gas for the LNG plant has H ₂ S. This change clarifies that most of the H ₂ S is removed well before reaching PNW LNG and justifies why there would be minimal emissions from the stacks.
6.1.1	Page 32, Table 4	1-hr NO ₂ for baseline + project case is stated as 80 ug/m ³	Correction: 1-hr NO ₂ for baseline + project case is <i>68 ug/m³</i>	The value should be corrected to 68 ug/m ³
6.1.1	Page 32, Table 4	Most stringent 24-hr SO ₂ AAQO is 160 ug/m ³	Correction:	The value should be corrected to 150 ug/m ³ (maximum desirable

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			Most stringent 24-hr SO2 AAQO is <i>150 ug/m3</i>	Canada objective)
6.1.1	Page 32, para. After Table 4	Taking the mitigation measures into account, the proponent characterized the residual effects on air quality as low in magnitude, continuous in duration, and reversible.	Please edit as follows: <i>Taking the mitigation measures into account, the proponent characterized the residual effects on air quality as low/medium in magnitude, medium-term in duration, and reversible.</i>	Edit reflects what was submitted in the EIS documents.
6.1.2	Page 32, para. 2,	Environment and Climate Change Canada commented that the were emissions calculated for LNG carriers under the assumption that ships berthing at the terminal would all be NO _x Tier III compliant ² (or equivalent), as these ships have more stringent emissions standards.	Minor edits suggested: Environment and Climate Change Canada commented that the were emissions <i>were</i> calculated for LNG carriers were under the assumption that ships berthing at the terminal would all be NO _x Tier III compliant ² (or equivalent), as these ships have more stringent emissions standards.	Clarity
6.1.2	Page 32, Footnote,	Last sentence: Not all vessels used by the proponent are expected to meet Tier III standards.	Suggest the following edit: LNG carriers calling upon the LNG terminal are not all under the ownership or control of PNWLNG, <i>and vessels built prior to January 1, 2016 would not necessarily be compliant with NO_x Tier III standards.</i>	LNG carriers calling upon the terminal will be owned by a number of different entities, and some of the LNG Carriers may have been built prior to January 1, 2016. Only ships built after that date must be NO _x Tier III compliant.

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6.1.2	Page 33, para.4,	<p><i>Public</i></p> <p>The proponent reiterated its commitment to implement a suite of mitigation measures to reduce air emissions. It also explained that the air quality assessment adopted worst- case scenario emissions assumptions.</p>	<p>Suggest that the Agency consider the following edit:</p> <p>The proponent reiterated its commitment to implement a suite of mitigation measures to reduce air emissions and <i>indicated</i> that all air emissions will be under permit with the BC OGC as that agency administers that portion of B.C.’s <i>Environmental Management Act applicable to LNG plant air emissions.</i></p>	<p>The concept that air emissions are only allowed from these kinds of facilities in B.C. under permit was missing.</p>
6.1.3	Page 33, para. 1	<p>The Agency further notes that the proponent has committed to integrate best <u>available</u> technology to reduce emissions into the Project design.</p>	<p>Suggest that the Agency consider the following edit:</p> <p>The Agency further notes that the proponent has committed to integrate <i>Best Available Technology</i> to reduce emissions into the Project design.</p> <p><i>Best Available Technology is defined as the technology which can achieve the best waste discharge standards, and that has been shown to be economically feasible through commercial application.</i></p>	<p>Best available technology (BAT) could mean that any technology be applied regardless of feasibility.</p> <p>Proponent has recommended a change to draft Condition 3.1 consistent with the suggested edit.</p> <p>The Proponent is advocating that BAT be defined for the purpose of this EA as defined as Best Achievable Technology in the BC. Ministry of Environment Fact Sheet – 2012.</p> <p>Note: Best Available/Achievable</p>

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				Technology are both used in the report.
6.1.3	Page 33, para. 1	This differs from the proponent’s characterization of residual effects on air quality as low magnitude.	Please correct as follows: This differs from the proponent’s characterization of residual effects on air quality as <i>low/medium</i> magnitude.	Correction
6.1.3	Page 33, bullet bottom of page	Incorporate best available technology into Project design to....	Suggest that the Agency consider the following edit: <i>Incorporate Best Available Technology into Project design to....</i> <i>Best Available Technology is defined as the technology which can achieve the best waste discharge standards, and that has been shown to be economically feasible through commercial application.</i>	Same rationale as above.
6.2.1	Page 35, para. 6	The project would also reduce energy consumption by applying state-of-the-art waste heat recovery systems.	<i>The project would incorporate waste heat recovery into the final design to reduce energy consumption.</i>	Subtle edit that reflects final FEED engineering.
6.3.1	Page 40, para. 4	Based on advice from Environment and Climate Change Canada, the	Suggest the Agency consider rewording this statement as	Clarify the federal lead agency for wetland compensation.

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		<p>compensation plan would favor restoration over enhancement and enhancement over creation of wetlands.</p>	<p>follows: <i>During discussions with Environment and Climate Change Canada, PNW was advised by the Prince Rupert Port Authority (PRPA) that as the federal Land Manager for Lelu Island, the PRPA would be the lead agency with advice from ECCC.</i></p>	
Sec. 6.4	Page 46, para. 1	<p>The proponent proposed several mitigation measures to limit the effects from alteration of movement such as locating shipping lanes away from bird colonies, implementing a noise management plan and limiting nighttime construction activities.</p>	<p>Suggest the Agency consider re-wording as follows: <i>The proponent proposed several mitigation measures to limit the effects from alteration of movement. These include using currently existing shipping lanes which are located away from existing bird colonies, implementing a noise management plan and limiting nighttime construction activities.</i></p>	<p>The proponent has no control over the location of shipping lanes but recognizes that the current location of existing shipping lanes will limit effects of movement to marine birds.</p>
Sec. 6.4	Page 46, para. 5	<p>The proponent responded that the shipping lanes would be located further than 500 m from marine bird colonies in accordance with Environment and Climate Change Canada’s avoidance guidelines</p>	<p>Suggest the Agency consider re-wording as follows: <i>Shipping lanes used for the project are located further than 500 m from marine bird colonies</i></p>	<p>The statement implies that in the future shipping lanes will be located in accordance with guidelines. That was not the intent of the proponents comment as shipping lanes are set and, to the</p>

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		<i>(Guidelines to Avoid Disturbance to Seabird and Waterbird Colonies in Canada).</i>	<i>and are expected to reduce disturbance to breeding and roosting marine birds in accordance with Environment and Climate Change Canada’s avoidance guidelines (Guidelines to Avoid Disturbance to Seabird and Waterbird Colonies in Canada).</i>	proponent’s knowledge, there are no plans to relocate them.
Sec. 6.4	Page 46, para. 6	Emergency flaring is expected to last less than an hour and occur less than ten times a year.	Suggest the Agency consider re-wording as follows: <i>Emergency flaring would occur for less than an hour.</i>	Proponent is prepared for but is not expecting any emergencies.
Sec. 6.4	Page 47, para. 4	...the proponent expects that approximately one vessel per day would transit through the local assessment area due to the Project, the effects due to shipping would be temporary and localised	Suggest the Agency consider re-wording as follows: <i>...the proponent expects that one vessel per day would transit through the local assessment area due to the Project during the operations phase, the effects due to shipping would be temporary and localised.</i>	The proponent’s comment was in the context of operations, not construction.
Section 6.5 - No Comments				
Sec. 6.6.1	Page 54, para. 1	Some species at risk (eulachon and rockfish) were observed adjacent to the proposed disposal site.	Suggest the following edit: <i>Some species at risk (eulachon</i>	No concern, simply a clarification based on recent genetic analysis data.

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			<p><i>and rockfish) were observed adjacent to the proposed disposal site. Larval eulachon were observed in low densities in the Project area.</i></p>	
Sec. 6.6.1	Page 54, para. 3	<p>The proponent stated that water turbidity and suspended sediment (measured as total suspended solids) vary seasonally around Lelu Island, with higher turbidity and suspended sediment in the spring during the Skeena River freshet and in the fall due to rainfall and increased river flow. Activities during construction and operation could disturb seabed sediment leading to higher total suspended solids concentrations in the water. This could result in fish experiencing chronic effects such as reduced capability for foraging, increased susceptibility to disease, reduced growth, and clogged gills.</p>	<p>Suggest the following edit:</p> <p>The proponent stated that water turbidity and suspended sediment (measured as total suspended solids) <i>vary with tidal state and current direction, and seasonally around Lelu Island, with higher turbidity</i> and suspended sediment in the spring during the Skeena River freshet and in the fall due to rainfall and increased river flow. Activities during construction and operation could disturb seabed sediment leading to total suspended solids concentrations in the water above background levels. This could result in fish experiencing chronic effects such as reduced capability for foraging, increased susceptibility to disease, reduced growth, and clogged gills.</p>	<p>Daily tidal state and ebb and flood currents displace sediment and create highly turbid conditions and are an important characteristic of the natural state (normal conditions) of the Project area. These results were presented in the 3D modelling.</p>
Sec. 6.6.1	Page 55,	The proponent plans to dispose of	Suggest the following sentence	Percentage is correct for sediment

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	para. 1.	96 percent of the sediment dredged from the Materials Offloading Facility at a disposal site in Brown Passage, with disposal events approximately every 18 hours over seven months.	<p>be added:</p> <p>The proponent plans to dispose of 96 percent of the sediment dredged from the Materials Offloading Facility at a disposal site in Brown Passage, with disposal events approximately every 18 hours over seven months. <i>This does not include rock, which will be used on land to the extent practical.</i></p>	<p>only.</p> <p>Clarification added to identify that rock is not included in the estimate of sediment to be disposed.</p>
Sec. 6.6.1	Page 55, para. 3	...conditions sediment could be re-suspended by the wash of the tug propellers during maneuvering of LNG carriers.	<p>Suggest the following edit:</p> <p>...conditions sediment could be <i>re-suspended by the wash of LNG carrier propellers while being assisted on and off their berths by tugs...</i></p>	The Voith-Schneider tugs which the project will use for operations have negligible effect upon seabed sediments; only LNG carrier propeller wash is capable of mobilizing seabed sediments
Sec. 6.6.1	Page 55, para. 5	The proponent proposed mitigation measures to reduce the potential for water quality effects, including monitoring turbidity during in-water construction activities, adapting work when modelled predictions for total suspended solids are exceeded, using silt curtains to exclude fish from work areas, and <u>using tugs with horizontally powered</u>	<p>Suggest the following edit:</p> <p>The proponent proposed mitigation measures to reduce the potential for water quality effects, including monitoring turbidity during in-water construction activities, adapting work when modelled predictions for total suspended solids are exceeded, <i>employing mitigations</i></p>	<p>Tugs with horizontally powered propulsion systems are the norm for general purpose work such as marine construction; tugs with vertically mounted propulsion would be used to support LNG carrier operations but are not suitable for shallow water marine construction work.</p> <p>Silt curtains generally are</p>

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		<u>propulsion systems</u> to minimize sediment disturbance.	to exclude fish from work areas, and <i>using tugs with vertically mounted propulsion (e.g., Voith-Schneider tugs) during operations to minimize sediment disturbance.</i>	ineffective in excluding fish from marine work areas. This change clarifies that the Voith-Schneider-type tugs are for operations only, not construction.
Sec. 6.6.1	Page 57, para. 5	...sediment could be re-suspended from the ocean floor by <u>the tug</u> during the maneuvering of LNG carriers.	Suggest the following edit: ...sediment could <i>be re-suspended from the ocean floor by the wash of LNG carrier propellers while being assisted on and off their berths by tugs.</i>	The Voith-Schneider tugs which the project will use for operations have negligible effect upon seabed sediments; only LNG carrier propeller wash is capable of mobilizing seabed sediments
Sec. 6.6.1	Page 57, para. 5	The proponent expected that such re-suspended sediments <u>could be deposited on Flora Bank.</u>	Suggest that CEAA consider the following edit: The proponent expected that most re-suspended sediments <i>will deposit seaward of the LNG terminal and a minimum fraction of the sediments would deposit on the southern edge of Flora Bank.</i>	The original draft text does not accurately reflect the conclusion of the Hatch propeller scour study (EIS Addendum Appendix G.16)
Sec. 6.6.1	Page 59, para. 3	...to characterize the <u>propeller wash scour from tug boats during LNG vessel maneuvering and berthing</u> (e.g. resulting total suspended solids concentrations, extent of sediment plume, when scour	Suggest the following edit: ...to characterize the <i>propeller wash scour of LNG carrier propellers while being assisted on and off their berths by tugs.</i> (e.g.,	The Voith-Schneider tugs which the project will use for operations have negligible effect upon seabed sediments; only LNG carrier propeller wash is capable of mobilizing seabed sediments

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		equilibrium is reached).	resulting total suspended solids concentrations, extent of sediment plume, when scour equilibrium is reached).	
Sec. 6.6.2	Page 60, para. 5	Furthermore, the modelling was done before ocean current data from field monitoring at Brown Passage became available, data which suggest <u>that ocean currents</u> were stronger than initially predicted	Suggest the following edit: Furthermore, the modelling was done before ocean current data from field monitoring at Brown Passage became available, data which Suggest the following edited <i>that near bottom ocean currents</i> were stronger than initially predicted	ECCC has not raised questions about the currents in the top 90 metres. The concerns were about near-bottom currents.
Sec. 6.6.2	Page 61, para. 2	Environment and Climate Change Canada questioned the accuracy and appropriateness of monitoring effects to water quality by measuring turbidity in the field and then converting to total suspended solids using a calibration curve as there is no indication of how the accuracy of the curve would be verified in the field or any literature to support this approach.	Please consider revising based on the rationale [right].	The use of turbidity monitoring for instantaneous monitoring of sediment levels is commonly used in the freshwater environment, and was proposed for use during disposal of dredged sediment. The use of the TSS-turbidity relationship to facilitate monitoring of sediment-generating activities has been described in DFO documents (Birtwell 1999; Birtwell et al. 2008) and published literature (Low et al. 2011, Hanouche et al. 2011). Also, the approach is consistent with guidance provided by the U.S. Army Engineer Research and

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				<p>Development Centre for dredging and other activities (Thackston and Palermo 2000).</p> <p>This approach was proposed because it provides a practical tool for interpreting the modelled (TSS) sediment levels in the field, in time to adjust the rate of sediment disposal. The time required for laboratory analysis of TSS (days for sample collection, shipping from vessel to lab, and analysis) would not allow for the modification of disposal rates in response to sediment levels.</p> <p>Results for both turbidity and calculated TSS would be compared to Canadian and BC water quality guidelines. Accuracy of the curve could be verified periodically during the disposal period by sending samples to the laboratory for analysis of both parameters.</p> <p>References: Birtwell, I.K. 1999. The effects of sediment on fish and their habitat. Fisheries and Oceans Canada,</p>

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				<p>Canadian Stock Assessment Secretariat Research Document 99/139</p> <p>Birtwell, I.K., M. Farrel, and A. Jonsson. 2008. The validity of including turbidity criteria for aquatic resource protection in Land development guideline (Pacific and Yukon Region). Can. Man. Rep. Fish. Aquat Sci. 2852.</p> <p>Hannouche, A., C Ghassan, G. Ruban, et al. Relationship between turbidity and total suspended solids concentration within a combined sewer system. Water Science and Technology, IWA Publishing, 2011, 64 (12), pp.2445-52.</p> <p>Low, H.X.D, D.U. Handojo, and Z.H.K. Lim 2011. Correlation between turbidity and total suspended solids in Signapore Rivers. J. Water Sustainability: 1, 313-322</p> <p>Thackston, E.L. and M.R. Palermo. 2000. Improved methods for correlating turbidity and suspended</p>

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				solids for monitoring. DOER Technical Notes Collection (ERDC TN-DOER-E8), U.S. Army Engineer research and Development Centre, Vicksburg MS. www.wes.army.mil/el/dots/doer
Sec. 6.6.3	Page 66 8th bullet	Use coffer dams to isolate the south-west tower block and anchor block work areas during in-water construction activities and place scour protection around the coffer dams. Design the coffer dams be shaped in a manner that minimizes sediment erosion and deposition.	Suggest that The Agency consider the following amended condition: <i>The Proponent shall use coffer dams to isolate the south-west tower block and anchor block work areas during in-water construction activities and scour protection around the coffer dams shall be incorporated as required when monitoring reveals the potential for unacceptable scour. The coffer dams shall be shaped in a manner that minimizes scour and turbulence around the south-west tower block and anchor block of the suspension bridge.</i>	New wording for draft Condition 6.6 has been suggested in the PNWLNG comments on the Draft Conditions. Temporary coffer dams may not need scour protection. The installation and use of temporary scour protection (rip rap being the conventional measure) may itself result in unnecessary and avoidable environmental impacts. The coffer dam structures are temporary and the application of scour protection may not be necessary for a short time. Monitoring can be used to determine if it is required. It can then be applied as necessary.
Sec. 6.6.3	Page 66 11th bullet	Use vibratory hammers for all pile installation to the extent feasible. Use impact pile installation methods only when seating piles	Suggest the Agency consider the following amended condition: The Proponent shall use impact	New wording for draft Condition 6.8 has been addressed in the PNWLNG comments on the Draft Conditions.

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		into bedrock. Construct impact hammers of sound absorbent material.	installation methods only when seating piles into bedrock <i>or when the use of vibratory hammers is not otherwise technically and economically feasible</i> . Impact hammers shall be shrouded with sound absorbent material.	The Condition acknowledges that impact pile driving is necessary when seating piles in bedrock. However, there are other circumstances where the use of vibratory hammers may not be feasible. Consequently, impact pile driving may also be necessary in other circumstances.
Sec. 6.7	Page 68, para. 1	The Agency considered marine mammals such as porpoises, whales, seals, and sea lions, and focused its assessment on direct mortality or injury to marine mammals, and on behavioural change.	Suggest the Agency consider the following edit: The Agency considered marine mammals such as porpoises, whales, seals, and sea lions, and focused its assessment on direct mortality or injury to marine mammals (as a consequence of vessel strikes and underwater noise produced by project activities), and on behavioural change (as a consequence of underwater noise produced by project activities).	Increased clarity. Behavioural change assessment was specific to underwater noise from project activities. Assessment on direct mortality or injury was specific to vessel strikes and underwater noise.
Sec. 6.7.1	Page 69, para. 2 bullets	The proponent’s analysis considered a significant effect to be one that exceeded either of the following thresholds:	Suggest: The proponent’s analysis considered a significant effect to	Increase clarity. Mammals of any listing would be considered to have a significant

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		<ul style="list-style-type: none"> for marine mammals not listed under the Species at Risk Act, any residual effect with a high likelihood of affecting population viability (likely high magnitude and permanent); for marine mammals listed under the Species at Risk Act, any residual effect with a high likelihood of causing mortality to an individual of a federal species at risk. 	<p>be one that exceeded either of the following thresholds:</p> <ul style="list-style-type: none"> <i>for any marine mammal, any residual effect with a high likelihood of affecting population viability (likely high magnitude and permanent);</i> <i>for marine mammals listed under the Species at Risk Act, any residual effect with a high likelihood of causing mortality to an individual of a federal species at risk.</i> 	<p>residual effect if there was a high likelihood of affecting the population viability.</p>
Sec. 6.7.1	Page 70, para. 1	The proponent indicated that the probability of lethal vessel strikes occurring is very low, and therefore determined no significant effects on marine mammals, including species at risk.	<p>Please correct:</p> <p>The proponent indicated that the probability of lethal vessel strikes occurring is very low, <i>but could result in injury or potential mortality to marine mammals. The project design and mitigation measures will reduce the risk of this unlikely event from occurring.</i></p>	Vessel strikes to marine mammals was not included in the marine resources effects assessment, it was described in the Accidents and Malfunctions section. The proponent, therefore, did not make a significance determination, so the statement ‘determine ‘no significant effects on marine mammals, including species at risk’’ is incorrect.
Sec. 6.7.1	Page 70, para. 2	For whales, dolphins, and porpoises, these distances are up to 0.75 km from the Materials Offloading Facility, 2.6 km from the	<p>Suggest the Agency consider the following edit:</p> <p><i>For whales, dolphins, and</i></p>	<p>Increased clarity.</p> <p>There are a variety of thresholds used based on the published</p>

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		<p>marine trestle over shallow water, and 4.1 km from the marine terminal berths over deeper water. For seals, these distances are 1.1 km from the Materials Offloading Facility, 21 km from the marine trestle over shallow water, and 16 km from the marine terminal berths.</p>	<p><i>porpoises, these distances (based on the Southall et al. 2007 thresholds, which are non-regulatory) are up to 0.75 km from the Materials Offloading Facility, 2.6 km from the marine trestle over shallow water, and 4.1 km from the marine terminal berths over deeper water. For seals, these distances (based on the Southall et al. 2007 thresholds, which are non-regulatory) are 1.1 km from the Materials Offloading Facility, 21 km from the marine trestle over shallow water, and 16 km from the marine terminal berths.</i></p>	<p>literature.</p>
<p>Sec. 6.7.1</p>	<p>Page 70, para. 4</p>	<p>Furthermore, a marine mammal observation program would be implemented to avoid more noisy activities when marine mammals are in the area.</p>	<p>Suggest the following edit:</p> <p>Furthermore, a marine mammal observation program would be implemented to <i>reduce potential effects to marine mammals by monitoring a safety zone and stopping or delaying activities at certain times.</i></p>	<p>Increased clarity:</p> <p>The MMO program is intended to reduce the potential effects on marine mammals within a certain safety radius (based on the 160 dB threshold).</p>
<p>Sec. 6.7.1</p>	<p>Page 70, para. 5</p>	<p>Some seals may still be exposed to sound levels capable of causing permanent hearing loss at</p>	<p>Suggest the Agency consider the following edit:</p>	<p>Increased clarity.</p> <p>The thresholds are non-regulatory</p>

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		distances (5.0 km) beyond those covered by the marine mammal observation program (starting with a 500 m to 1.0 km safety radius).	Some seals may still be exposed to sound levels which may be capable of causing permanent <i>threshold shifts (based on non-regulatory thresholds), at distances 5.0 km from the sound source, and beyond the potential area covered by the marine mammal observation program (starting with a 500 m to 1.0 km safety radius).</i>	and are based on estimates from temporary changes in auditory thresholds.
Sec. 6.7.1	Page 71, para. 6	During construction, vibratory pile driving with mitigation measures in place is expected to exceed behavioural thresholds for most marine mammals up to 3.6 km from the sound source, up to 5.3 km for harbour porpoises, and up to 15 km for killer whales.	Suggest the following edits: During construction, vibratory pile driving with mitigation measures in place is expected to exceed regulatory behavioural thresholds (<i>i.e., 120 dB re 1µPa rms SPL</i>) for marine mammals up to 3.6 km from the sound source. <i>Sounds levels are expected to exceed non-regulatory thresholds up to 15 km for killer whales, and when extrapolated to harbour porpoise, up to 5.3 km.</i>	Increased clarity. There is a variety of thresholds used based on published literature. Please note that the non-regulatory thresholds applied were based on research on killer whales, but were extrapolated to harbour porpoise based on the similar shape and level of audiograms between the species.
Sec. 6.7.1	Page 72, para. 2	LNG carriers are expected to travel for approximately 1.5 hours at an average of 12 knots between Triple Island and Lelu Island.	Suggest the following edit: LNG carriers are expected to travel for approximately 1.5	Increased clarity. The vessels are not travelling right to Lelu Island, rather to the deep

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			hours at an average of 12 knots between Triple Island <i>and the deep water terminal off of Lelu Island.</i>	water terminal in Chatham Sound off of Lelu Island.
Sec. 6.7.1	Page 72, para. 2	Acoustic modelling shows exceedances of behavioural thresholds for marine mammals up to 8.9 km from vessels travelling at 12 knots in deep waters, and up to 2.2 km for vessels travelling at 9 knots.	Suggest the following edit: Acoustic modelling shows exceedances of behavioural thresholds for marine mammals up to 8.9 km from vessels (<i>i.e., one LNG carrier and two tugs</i>) travelling at 12 knots in deep waters, and up to 2.2 km for vessels travelling at 9 knots.	Increased clarity. The vessel scenario resulting in referenced acoustic modelling is for one LNG carrier and two tugs.
Sec. 6.7.1	Page 72, para. 2	Acoustic modelling indicated that behavioural thresholds would be exceeded as a result of tug engine noise up to 5.6 km away for harbour porpoises and up to 18 km away for other marine species.	Suggest an edit be considered: Acoustic modelling indicated that behavioural thresholds would be exceeded as a result of tug engine noise up to 5.6 km away for harbour porpoises (<i>based on a non-regulatory threshold for killer whales</i>) and up to 18 km away for other marine mammals	Clarity on thresholds.
Sec. 6.7.3	Page 75, para. 5	When considering how to manage these potential effects, the Agency understands that the proponent can influence a vessel’s conduct by developing operational limits or other conditions that a vessel must	Suggest the Agency consider deleting this sentence.	Operational limits for berthing or loading cargo at the terminal have, in PNWLNG’s view, no bearing on marine mammal collision risk.

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		observe for it to be allowed to load or unload at the terminal.		
Sec. 6.7.3	Page 76, para. 2 Page 78, para. 2 Page 79, para. 5	<p>Fisheries and Oceans Canada indicated that there is still some uncertainty as to whether and how much adequate suitable alternate habitat is available for all affected species, in particular for harbour porpoise.</p> <p>The Agency also notes that Fisheries and Oceans Canada have stated that mitigation measures would not be enough to reduce the potential significant adverse effects to harbour porpoise.</p> <p>...however the Agency concludes that the Project is likely to cause significant adverse environmental effects to harbour porpoise, given its susceptibility to behavioural effects from underwater noise, its current at risk status, its extensive use of the Project area year-round, and the uncertainty of suitable alternative habitat.</p>	PNWLNG respectfully requests the Agency consider the Harbour Porpoise information submitted under separate cover and consider revising text in the report as necessary.	<p>The new information on Harbour Porpoise leads PNW to conclude:</p> <p>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.</p> <p>Other projects considered in the cumulative effects assessment may affect some of the areas identified as suitable alternative habitat in the Prince Rupert area. However, the timing of the projects is uncertain and the number and distribution potential sites means that potential changes in harbour porpoise behavior are not expected to affect the viability of the population. Therefore, we remain confident that cumulative effects on harbour porpoise are not likely to be significant.</p>

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Sec. 6.8.1	Page 80, para. 1	For terrestrial species, the proponent described potential effects from direct habitat loss, alteration of movement, and mortality.	Suggest the following edit: For terrestrial wildlife and marine bird species, the proponent described potential effects from direct habitat <i>loss or alteration, alteration of movement, and change in mortality risk.</i>	May not accurately capture the extent of project-related effects that were assessed, and the species groups that were considered within this valued component.
Sec. 6.8.1	Page 80, para. 5	The two species of bat, little brown myotis and Keen’s long-eared myotis have been determined by the proponent to have a high likelihood of using the local assessment area for roosting, breeding, and foraging.	Suggest minor edit: The two bat species <i>at risk</i> , little brown myotis and Keen’s long-eared myotis have been determined by the proponent to have a high likelihood of using the local assessment area for roosting, breeding, and foraging.	Slight edit
Sec. 6.8.1	Page 80, para. 5	...The proponent determined that it is unlikely that Keen’s long-eared myotis hibernates in the local assessment area, but noted that little brown myotis could possibly hibernate in the local assessment area although no hibernacula had been identified.	Suggest: ...The proponent determined that it is unlikely that Keen’s long-eared myotis and little brown myotis <i>hibernate in the local assessment area. Both species are expected to use the LAA for feeding, breeding, and rearing of young.</i>	Habitat functions for bat species at risk are characterized in Appendix F of the EIS addendum. This statement does not accurately characterize PNW LNG’s assessment of how habitats available in the LAA support life history requirements (feeding, breeding, and rearing of young for these species). Habitats in the LAA were considered unlikely to support hibernation based on available information.

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
Sec. 6.8.1	p. 80, para. 6	The proponent conducted detailed habitat suitability modelling for three bird species listed as threatened that are likely to experience the most habitat loss (i.e. marbled murrelet, olive-sided flycatcher, and northern goshawk)...(see table 7). The proponent determined that marbled murrelet would lose 30 percent of suitable habitat available in the local assessment area either through direct vegetation removal or through indirect disturbance such as noise and light. Olive-sided flycatcher would lose 34 percent of suitable habitat in the local assessment area and northern goshawk, 30 percent (see table 7).	Suggest the following edit: <i>The proponent conducted detailed habitat suitability modelling for three bird species listed as threatened or endangered on SARA. The proponent determined that less than half of the modelling limit represented preferred habitat for marbled murrelet, olive-sided flycatcher, and northern goshawk. Of this, 30 percent of suitable habitat for marbled murrelet would be lost or altered within the modelling limits either through direct vegetation removal or through indirect disturbance including noise and light. Also, 34 percent of suitable habitat for olive-sided flycatcher within the modelling limit would be removed or altered, and 30 percent for northern goshawk would be removed or altered (see Table 7).</i>	Wildlife habitat suitability was modelled to characterize the abundance and availability of suitable habitat for species designated as Threatened or Endangered on Schedule 1 of SARA with potential to occur within the modelling limits (as noted in Appendix H of the EIS). Species selected for modelling were not considered, necessarily, to be expected to experience the greatest habitat loss. For clarity, summaries of preferred habitat removed or altered by the PDA are based on the habitat modelling limit boundary, which is a subset within the LAA. Suggested edits also provide clarity that percentages of habitat removed or altered are based on preferred habitat, and not the entire habitat modelling limit area (which is 888.5 ha).
Sec. 6.8.1	Page 81, para. 1	Three bird species, band-tailed pigeon, great blue heron, and western screech-owl, would lose 44 ha, 53 ha, and 87 ha respectively. The remaining species	Suggest the following edit: <i>Table 8 presents the species associated with each habitat type that would be removed by the</i>	The EIS applied ecological community modelling to assess the extent of habitat removed by the PDA and does not assume species use any one community exclusively,

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		would see their habitat reduced by less than 10 ha.	<i>Project. Species associated with old coniferous forest, shrub-dominated bog, and treed swamp or bog would lose 44 ha, 76 ha, and 43 ha respectively. The remaining terrestrial ecosystem communities would be reduced by less than 10 ha each.</i>	although they may be more strongly associated with particular community types. Accordingly, changes in habitat availability by species are restricted to those for which habitat suitability models were completed.
Sec. 6.8.1	Page 81, Table 8	Species associated with habitat type (4 th column of Table 8)	Suggest that the Agency consider updating all of the Species associated with habitat type (Column 4 - Table 8).	Habitat associations for species in this column do not necessarily reflect those identified by PNW LNG. A description of species at risk likely to use each ecological community is described in Appendix H of the EIS and response to IR 3 and 5 in Appendix F.3 of the EIS addendum.
Sec. 6.8.1	Page 82, para. 2	In addition, federal species at risk have access to a large amount of alternative habitat in the local assessment area and the regional assessment area.	Suggest the following edit: In addition, federal species at risk have access to a large amount of <i>alternatively suitable</i> habitat within the local assessment area and the regional assessment area.	The EIS considers availability of alternate suitable habitat (based on availability of similar ecological communities available within the LAA and RAA compared to those expected to support federal species at risk within the PDA. The cumulative effects assessment (Section 11.6 of the EIS) provides a summary.
Sec. 6.8.1	Page 83, para. 2	Noise and physical disturbances in the local assessment area have the	Suggest the following edit:	Suggest removing the word “most”, as it is a subjective characterization.

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		potential to disturb most species and alter their movement.	Noise and physical disturbances within the local assessment area have the potential to disturb <i>wildlife species</i> and alter their movement.	The EIS provides a description of species whose movements are most likely to be altered by the Project.
Sec. 6.8.1	Page 83, para. 2	Northern goshawk (<i>laingi</i> subspecies), olive-sided flycatcher, and western screech-owl (<i>kennicotti</i> subspecies) are also species sensitive to disturbance and could be potentially affected by noise and physical disturbances.	Suggest the Agency consider adding the following sentence: Northern goshawk (<i>laingi</i> subspecies), olive-sided flycatcher, and western screech-owl (<i>kennicotti</i> subspecies) are also species sensitive to disturbance and could be potentially affected by noise and physical disturbances. <i>Effects from sensory disturbance were considered in the habitat suitability models developed for each species.</i>	Inclusion of the final sentence provides clarity that the potential sensory disturbance from the Project was assessed.
Sec. 6.8.2	Page 83, para. 5	With respect to marbled murrelet, Environment and Climate Change Canada commented that Lelu Island, including the 30 m buffer, would not be suitable for the species after construction. As such, the impact could be greater than estimated but it would not likely significantly affect the regional population. Environment and	Suggest the Agency consider the following edits: With respect to marbled murrelet, Environment and Climate Change Canada commented <i>that forested habitat on Lelu Island, including the 30 m buffer, would not represent suitable habitat for nesting for</i>	Suggested edits provide clarity on the type of habitat on Lelu Island that has potential to support marbled murrelet. Respectfully recommend removing “in addition to habitat that would be offset through the wetland compensation proposed”, as the following sentence describes three

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		<p>Climate Change Canada recommended options to offset habitat loss for marbled murrelet in addition to habitat that would be offset through the wetland compensation proposed.</p>	<p><i>this species after construction. As such, the impact could be greater than estimated; however effects are restricted to moderately suitable habitat and are unlikely to support nesting activity. Hence, it would not likely significantly affect the regional population.</i> Environment and Climate Change Canada recommended options to offset the loss of nesting habitat identified for marbled murrelet that are consistent with the proponent’s currently proposed mitigation measures.</p>	<p>offsetting options, including coordinating with implementation of the wetland compensation plan.</p>
<p>Sec. 6.8.2</p>	<p>Page 84, para. 1</p>	<p>While the single greatest threat to the species is white-nose syndrome in the areas already affected by it, the significance of other threats (e.g. industrial development) to the three species of bats is heightened because the mortality of a small number of the remaining individuals (particularly adults) could have the ability to impact the survival of local populations, their recovery, and, perhaps, the development of resistance to the fungus that causes white-nose syndrome.</p>	<p>Suggest the following edits: While the single greatest threat to the species is white-nose syndrome in the areas already affected by it, the significance of other threats (e.g. industrial development) to the three species of bats is heightened <i>in all parts of their range</i> because the mortality of a small number of the remaining individuals (particularly adults) could have the ability to impact the survival of local populations, their</p>	<p>Need to provide rationale for the importance of mitigating Project effects to the extent feasible for little brown myotis in light of recovery objectives for the species, as a whole.</p>

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			<p>recovery, and, perhaps, the development of resistance to the fungus that causes white-nose syndrome. <i>Ensuring the viability of western populations is also considered important to recruitment and recovery of eastern populations of the species from white-nose syndrome.</i></p>	
Sec. 6.8.2	Page 84, para. 2	<p>Studies suggest that mid-September to mid-October is the period with the lowest risk of bat use of Lelu Island for roosting or hibernating. Environment and Climate Change Canada recommended, therefore, that clearing activities be restricted to the period from mid- September to mid-October to reduce impacts to little brown myotis.</p>	<p>PNWLNG respectfully request the Agency fully consider extensive edits to this text and the subsequent draft condition as follows:</p> <p><i>Preliminary studies conducted by the proponent suggest that mid-September to mid-October is potentially the period with the lowest risk of bat use of Lelu Island for roosting or hibernating; however, this period will potentially be refined following a detailed review of a full suite of acoustic data collected by the proponent. Environment and Climate Change Canada recommended, therefore, that clearing activities in forested regions of the PDA be completed,</i></p>	<p>Note that this text is part of comments from “Government authorities” (in this case ECCC).</p> <p>PNW has advanced a suggested change to this potential CEAA Condition 8.1 (e.g., clearing activities be restricted to the period from mid- September to mid-October) as currently drafted.</p> <p>The Proponent optimally requires full access to the period Sep 15 through to April 1 for tree clearing. The draft condition does not allow enough time to clear the trees safely or with due regard to the co-management of extensive CMTs, and their potential removal, with Aboriginal groups.</p>

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			<p><i>to the greatest extent feasible, within a period to be confirmed pending complete acoustic data analysis and agency consultation in order to reduce impacts to little brown myotis.</i></p>	<p>The suggested timing window is based, presumably, on preliminary acoustical monitoring results presented to ECCC by the proponent.</p> <p>The proponent understands that tree clearing activities in forested areas of the PDA should optimally be scheduled to coincide with the least-risk period for bats to the extent “technically and economically feasible”. A 30 day least risk window for tree clearing is not feasible.</p> <p>Actual “least risk” windows for tree clearing could be informed by a review of the full suite of acoustical data collected by PNW LNG and through further consultation with PNWLNG and Aboriginal groups.</p>
Sec. 6.8.3	Page 85, para. 1	Although the habitat loss in the local assessment area for some federal species at risk is high, the proponent has committed to mitigate effects on habitat through wetland compensation, fish habitat	<p>Suggest the Agency consider the following edit:</p> <p><i>Although the habitat loss within the local assessment area is expected to be negligible to</i></p>	Section 11.5.2.3 of EIS describes the magnitude of change in habitat as being negligible to moderate for terrestrial wildlife and marine birds; the magnitude of change in habitat is not considered by the proponent

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		offsetting, and installing roosting structures for bats.	<i>moderate for some federal species at risk, the proponent has committed to mitigate effects on habitat through wetland compensation, fish habitat offsetting, and installing roosting structures for bats.</i>	to be high for any species, including species at risk.
Sec. 6.8.3	Page 85, para. 1	...The Agency agrees with Environment and Climate Change Canada that the additional marbled murrelet habitat loss should be compensated.	Suggest the following edit: ...The Agency agrees with Environment and Climate Change Canada that the additional marbled murrelet <i>nesting</i> habitat loss should be compensated.	For clarity, consider adding “nesting” to indicate the type of habitat for marbled murrelet that the Agency considers is important for mitigating.
Sec. 6.8.3	Page 85, 1 st bullet	Restrict clearing activities to mid-September to mid-October so that they occur outside of the breeding season and other critical periods (e.g. hibernation) for terrestrial birds and bats.	Suggest the Agency consider the rationale and align with the wording of draft CEAA condition amendment recommendation.	PNW has advanced a suggested change to this potential CEAA Condition 8.1 (e.g., clearing activities be restricted to the period from mid- September to mid-October) as currently drafted. The Proponent optimally requires full access to the period Sep 15 through to April 1 for tree clearing. The draft condition does not allow enough time to clear the trees safely or with due regard to the co-management of extensive CMTs, and their potential removal, with Aboriginal groups.

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				<p>The suggested timing window is based, presumably, on preliminary acoustical monitoring results presented to ECCC by the proponent.</p> <p>The proponent understands that tree clearing activities in forested areas of the PDA should optimally be scheduled to coincide with the least-risk period for bats to the extent “technically and economically feasible”. A 30 day least risk window for tree clearing is not feasible.</p> <p>Actual “least risk” windows for tree clearing could be informed by a review of the full suite of acoustical data collected by PNW LNG and through further consultation with PNWLNG and Aboriginal groups.</p>
Sec. 6.8.3	Page 85, 3 rd bullet	In accordance with the <i>Operational Framework for Use of Conservation Allowances</i> , compensate for habitat loss for marbled murrelet not	Suggest the following edit: In accordance with the <i>Operational Framework for Use of Conservation Allowances</i> , compensate	Change in the availability of nesting habitat for marbled murrelet on Lelu Island is restricted to moderately suitable habitat located within 500 m of shore and is unlikely to support nesting activity. Accordingly, recommended options

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		<p>already included as part of the wetland compensation plan.</p>	<p>for <i>nesting</i> habitat loss for marbled murrelet not already included as part of the wetland compensation plan.</p>	<p>to compensate for the loss of marbled murrelet nesting habitat are consistent with the proponent’s currently proposed mitigation measures.</p> <p>Consistent with previous recommendations, consider adding “nesting” to the bulleted item to provide clarity on the type of habitat for marbled murrelet for mitigation.</p>
6.9	Page 89, 2 nd para.	<p>During construction, daytime noise levels were modelled to reach a maximum of 54.4 dBA at the closest human receptor location, 9.4 dBA above the measured baseline level.</p> <p>Nighttime construction would be limited to low noise activities, and therefore noise was not expected to be an issue at night.</p>	<p>Suggest the following edit:</p> <p>During construction, daytime noise levels were modelled to reach a maximum of 54.4 dBA at the closest human receptor location, 9.4 dBA above the measured baseline level.</p> <p><i>Nighttime construction will limit loud activities to the extent practicable.</i></p>	<p>It may not be possible to limit some noisy activities at night during the construction period.</p> <p>The BC OGC LNG Facility permit will require that noise be monitored and thresholds be met.</p>

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6.9	Page 91, para. 3	Lax Kw’alaams Band requested that a species of prawn be included in the follow-up program for marine country foods, as well as Dungeness crab and a species of groundfish. They also requested that country foods sampling occur during dredging activities, as well as before and after, and that the sampling radius be expanded from 500 m around the dredge site to 3 km.	Consider adding context to the Lax kw’alaams request prawn sampling.	<p>The Lax Kw’alaams Band may have asked for the inclusion of prawns in future country food surveys – however the context around that request was likely the larger dredge originally proposed on Agnew Bank.</p> <p>That dredge is no longer part of the project. The dredge at the MOF area leads to a requirement to sample country foods.</p> <p>The area at the MOF is too shallow for prawn surveys – and although they can be conducted – it is unlikely that any prawns will be caught in the MOF area.</p> <p>PNWLNG has recommended a slight wording change to draft Condition 9.4.1 to address this issue.</p>
6.9	Page 93, Bullet 1 in 1 st para.	<ul style="list-style-type: none"> Limit nighttime construction activity to low noise activities. 	<p>Suggest:</p> <p><i>Limit nighttime construction noise to low noise activities where practicable.</i></p>	It may not be possible to optimally limit some short-term high noise activities at “night” during the construction period.
6.9	Page 93, Bullet 4 in 1 st	<ul style="list-style-type: none"> Use vibro-hammer piling equipment for piling 	Suggest:	Consistency with 6.6 and 6.7

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	para.	operations.	<i>Use vibro-hammer piling equipment for piling operations where technically and economically feasible.</i>	Impact piling equipment will be needed.
6.10.1	Pages 93, 97 and 99	<u>Stapleton</u> Slough	Should be <u>Stapledon</u> Slough	The island is noted on CHS charts as Stapledon Island.
6.10.1	Page 93, para. 6	<p><i>Access to Waters and Resources Used for Traditional Fishing and Marine Harvesting</i></p> <p>According to the proponent, construction, operation, and decommissioning activities may <u>interfere</u> with accessibility to fishing and marine harvesting sites in the Project area, particularly sites located in the waters surrounding Lelu Island or those accessible by navigating through Porpoise Channel, Lelu and Stapleton Sloughs, and Flora Bank. Navigation through Porpoise Channel is of particular concern because the average width of the channel is approximately 300 m.</p>	Suggest that the Agency consider changing to “...decommissioning activities may alter....”	Interfere suggests that accessibility may not be possible. “Alter” is also more consistent with usage throughout the rest of the section.
6.10.1	Page 95,	However, Aboriginal users may	Suggest the Agency consider	In PNWLNG’s view, “Fear” is a

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	para. 4	forego consumption of marine country foods harvested near the Project area <u>if they fear</u> that marine resources may be contaminated. Perceived changes in the quality of marine resources could also lead to avoidance of use of the area and increased efforts to reach alternate fishing and marine harvesting sites.	changing the phrase “if they fear” to “ ...”if they <i>perceive</i> ...”	loaded word. “Perceive” is more objective and consistent with the rest of the section.
6.10.1	Page 98, para. 3	The follow-up program proposed by the proponent for marine fish, fish habitat and marine mammals would verify the predictions and extent of effects on marine mammals and would determine the effectiveness of mitigation measures to be implemented for marine mammals. <u>The proponent committed to sharing monitoring results with Aboriginal groups.</u>	Suggest the Agency consider changing the last sentence to read: <i>The proponent committed to Aboriginal Groups to consult on developing the follow-up program including monitoring and sharing of results.</i>	More accurate description of commitment.
6.10.1	Page 99, para. 3	<i>Traditional Use Plant Gathering</i> The proponent inventoried traditional plants commonly used by Aboriginal users in the region including: trees, such as hemlock, Sitka spruce, and cedar; shrubs, such as	Suggest the Agency consider adding the following sentence: The proponent inventoried traditional plants commonly used by Aboriginal users in the region including: trees, such as hemlock, Sitka	More accurate description of how information was gathered.

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		various berries, juniper, and Labrador tea; and herbs.	spruce, and cedar; shrubs, such as various berries, juniper, and Labrador tea; and herbs. <i>The proponent also gathered information on plants used by Aboriginal users from Traditional Use Studies received from Metlakatla First Nation, Gitxaala Nation, Kitselas First Nation, and Kitsumkalum First Nation.</i>	
6.10.1	Page 99, para. 3	Traditional Use Plant Gathering The proponent inventoried...	Suggest adding the following: <i>The proponent also gathered information on plants used by Aboriginal groups from Traditional Use Studies received from Metlakatla First Nation, Gitxaala Nation, Kitselas First Nation and Kitsumkalum First Nation.</i>	More accurate description of how information was gathered.
6.10.1	Page 99, para. 4	<i>Access to Lands and Resources Used for Traditional Use Plant Gathering</i> The proponent noted that Lelu Island would be completely removed as a gathering site during	Suggest that the Agency consider making a minor edit as follows: The proponent concluded that construction, operation, and decommissioning activities <i>may somewhat reduce the marines</i>	To better reflect how this was stated in the EIS Addendum (ref appendix C – Cha 21 p 21-34 para. 4)

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		<p>the life of the Project because the entire island would be under federal lands lease.</p> <p>The proponent concluded that construction, operation, and decommissioning activities may reduce the marine access to other traditional use plant gathering sites reachable by navigating through Porpoise Channel, Lelu and Stapleton Sloughs, and Flora Bank. Other than Lelu Island, the Project is not expected to interfere with land access to traditional use plant gathering sites.</p>	<p><i>access to other traditional use plant gathering sites reachable by navigating through Porpoise Channel, Lelu and Stapleton Sloughs, and Flora Bank.</i></p>	
6.10.3	Page 105, para. 3	<p>In the event that the Prince Rupert Authority eventually restricts passage under the bridges due to safety and security concerns the Agency is of the view that it <u>must</u> do so in consultation with affected users.</p>	<p>Suggest the Agency consider changing this sentence to read:</p> <p><i>If the Prince Rupert Port Authority restricts passage under one or both of the bridges for safety and security, it might have to consult with affected users, and the duty to consult Aboriginal groups might be triggered by that decision.</i></p>	<p>Current statement, with “must”, may be read by some as the Agency saying that any restriction on the passage of marine vessels under the bridges requires consultation with affected users.</p> <p>Such a statement could be considered unduly prejudicial to both the PRPA and PNW LNG, when the facts and circumstances of any such future decision are currently unknown.</p>

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6.10.3	Page105, para.5	Many of the Aboriginal groups provided traditional use studies to the proponent. <u>The Agency requested that the proponent consider information from these reports in their assessment,</u> including an analysis of preferred or alternate locations and timing of traditional uses within the area of the Project, through iterative information requests.	Suggest the Agency consider incorporating the following change: <i>The proponent considered this information in the assessment, including an analysis of preferred or alternate locations and timing of traditional uses within the area of the Project, through iterative information requests.</i>	More accurate description of how information was gathered – the proponent worked with the Aboriginal groups to have TUS & SEAs completed to assist with the Assessment. However much of this work was not incorporated until the EIS addendum as it took Aboriginal groups time to complete the studies.
6.10.3	Page 106, para. 2	To address these concerns, the Agency <u>considers</u> that the Proponent <u>should</u> implement a follow-up program to verify that the Project does not result in decreased opportunities for traditional fisheries opportunities.	Suggest the Agency consider changing this sentence to read: To address these concerns, the Agency <i>has concluded</i> that the Proponent should implement a follow-up program to verify that the Project does not result in decreased opportunities for traditional fisheries opportunities.	The sentence construction used throughout this sentence (and section) uses words like “considers” and “should”. It may not be considered grammatically correct and could be interpreted as meaning the Agency is still considering an issue.
6.10.3	Page 106, para. 2	The Agency considers that such a follow-up program should be distinct from the	Suggest the Agency consider changing this sentence to read: The Agency <i>concludes</i> that such a follow-up program <i>shall</i> be distinct from the	Suggest: See rationale above.
6.10.3	Page106,	The Agency considers that....	Suggest the Agency consider	

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	para. 3		changing this sentence to read: The Agency <i>concludes</i> that...	See rationale above.
6.10.3	Page 106, para. 5	Lelu Island would not be accessible for traditional use for the life of the Project. Given that this would be for longer than a human generation, the Agency considers this a permanent loss for Aboriginal users. There are no mitigation measures possible for this loss. However, the Agency agrees that other locations, where the same traditional activities that are currently being practiced on Lelu Island can be practiced and the same terrestrial resources exist and can persist, would remain available and unaffected by the Project.	Suggest the Agency consider changing this sentence to read: <i>Although the loss of access to Lelu Island would be permanent, the Agency agrees that accessible locations with the same terrestrial resources will persist unaffected by the Project and that traditional activities currently practiced on Lelu Island can continue to be practiced by in accessible locations.</i> However, the Agency agrees that other locations, where the same traditional activities that are currently being practiced on Lelu Island can be practiced and the same terrestrial resources exist and can persist, would remain available and unaffected by the Project.	Such an unequivocal statement may be used to challenge the finding of no significant adverse effects.
6.10.3	Page 107,	The Agency considers that	Suggest the Agency consider	Same rationale as above.

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	para. 1	mitigation	modifying the sentence as follows: The Agency <i>concludes</i> that mitigation.....	
6.10.3	Page 107, para. 1	The Agency considers that compensating for...	Suggest the Agency consider modifying the sentence as follows: The Agency <i>concludes</i> that compensating for.....	Same rationale as above.
6.10.3	Page 107, para. 2	The Agency considers that the amount....	Suggest the Agency consider modifying the sentence as follows: The Agency <i>concludes</i> that the amount.....	Same rationale as above.
6.10.3	Page 107, para. 3	The Agency also considers that reporting	Suggest the Agency consider modifying the sentence as follows: The Agency also <i>concludes</i> that reporting.....	Same rationale as above.
6.10.3	Page 107, para. 4	Effects on visual quality would be minimized....	Suggest the Agency consider modifying the sentence as follows: <i>Effects on visual quality would be somewhat mitigated by not clearing vegetation.</i>	More accurate description of visual quality mitigation commitment

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6.10.3	Page 107, para. 4	The Agency considers that effects on visual quality <u>would be minimized</u> by not clearing vegetation or developing Lelu Island within 30 m from the high water mark around the island, by controlling exterior lighting from all Project components to prevent excessive emanation of light, subject to regulatory and safety requirements, and by implementing noise reduction measures and a noise complaint mechanism.	Suggest the Agency consider a minor edit: The Agency considers that effects on visual quality <i>would be mitigated by</i> not clearing vegetation.....	More accurate description of Visual Quality mitigation commitment
6.10.3	Page 108, para. 3 (bulleted list, second bullet)	<ul style="list-style-type: none"> • Develop and implement marine communication protocols for all phases of the Project to be approved by the Prince Rupert Port Authority. At a minimum, the communication protocols would be developed for the purposes of communicating the following to Aboriginal groups and other local marine users: <ul style="list-style-type: none"> ○ location and timing of Project-related 	Suggest the Agency consider adding a new sub-bullet at the end of the sub-list that reads: <ul style="list-style-type: none"> ○ <i>but, without jeopardizing the safety and security of the Proponent's personnel or equipment.</i> 	Given the potential for civil disobedience, protocols communicating potential movement and location of workers and equipment should be considered with a view of maintaining safety and security.

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
		<p>construction activities, including temporary restrictions due to construction, routing advisories and alternate routes;</p> <ul style="list-style-type: none"> ○ Project-related safety procedures, such as navigation aids and updated navigational charts; ○ location of areas where navigation may be controlled for safety reasons; ○ speed profiles applicable to the operation of the Project and general schedules regarding the operation of LNG carriers 		

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
		<p>associated with the Project; and</p> <ul style="list-style-type: none"> ○ ways to provide feedback to the proponent on adverse effects related to navigation experienced by Aboriginal groups and other local marine users. 		
Section 6.10.3	Page 109, para. 1	The Agency considers that the involvement of...	<p>Suggest the Agency consider modifying the sentence as follows:</p> <p>The Agency <i>concludes</i> that the involvement of....</p>	Same rationale as above.
6.10.3	Page 109, para. 2	The Agency considers that the sum....	<p>Suggest the Agency consider modifying the sentence as follows:</p> <p>The Agency <i>concludes</i> that the sum....</p>	Same rationale as above

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
6.11.1	Page 111, para. 6, first sentence	Access to recreational activities on Lelu Island would be restricted for at least the life of the Project as the entire island would be subject to a federal lease.	Suggest the following edit: Access to recreational activities on Lelu Island, <i>of which none were identified during the environmental assessment process</i> , would be restricted for at least the life of the Project as the entire island would be subject to a federal lease.	Accuracy: While there some current uses for lands and resources by Aboriginal peoples were identified throughout the EIS process, no recreational activities were specifically identified or defined by baseline studies or consultation.
6.11.1	Page 111, para. 6, third sentence	Recreationists navigating through these areas to reach recreation sites could experience temporary and localised interference because of Project activities and the presence of Project infrastructure.	Suggest the following edit: Recreationists navigating through these areas to reach recreation sites <i>beyond Lelu Island</i> could experience temporary and localised interference because of Project activities and the presence of Project infrastructure.	Clarity: There are no documented recreation sites on Lelu Island, though several are proximal.
6.11.1	Page 112, para. 2	The proponent stated that use and enjoyment of Lelu Island, its surrounding waters, and other islands used for recreational and tourism purposes, such as Kitson Island and the ferry and cruise ships routes to and from Prince Rupert, could be affected by changes to visual quality because	Suggest the following edit: The proponent stated that use and enjoyment of <i>Lelu Island's surrounding waters</i> , and other islands used for recreational and tourism purposes, such as Kitson Island and the ferry and cruise ships routes to and from Prince	Clarity: There is no recreation or marine-based tourism on Lelu Island itself

Section 6	Page Number Paragraph	CEAA Original Draft Text	PNWLNG Suggested New Text or edit	PNW LNG Concern or Rationale
		people may be less likely to frequent sites where visual quality is degraded.	Rupert, could be affected by changes to visual quality because people may be less likely to frequent sites where visual quality is degraded.	
6.11.3	p. 115, last series of bullets	<p>Develop and implement marine communications protocols for all phases of the Project to be approved by the Prince Rupert Port Authority. The communication protocols developed would be used to communicate the following information to marine users:</p> <p>2nd sub-bullet</p> <ul style="list-style-type: none"> ○ location and timing of traditional activities by Aboriginal groups and of activities by other marine users; 	Suggest the Agency consider removal of this sub-bullet.	<p>PNWLNG is not in a position, not the appropriate party, to publicly disseminate potentially sensitive information on traditional harvesting practices and locations.</p> <p>Further the concern of Aboriginal groups being able to communicate concerns is covered by the last sub bullet “</p> <ul style="list-style-type: none"> ○ ways to provide feedback to the proponent to the proponent on adverse effects related to navigation experienced by Aboriginal groups and other local marine users.
6.12 – No Comments				