

From: Jim Pojar [<email address removed>]
Sent: March 10, 2016 7:58 PM
To: Pacific Northwest LNG / GNL Pacific Northwest (CEAA/ACEE)
Subject: comments on draft environmental assessment of PNW LNG project

My wife and I have lived in Smithers since 1978. I am an ecologist with decades of field experience in northwestern BC and specifically in Skeena watershed.

I am one of the scientists who signed the recent letter of concern about the draft assessment of environmental risks from the proposed Pacific NorthWest Liquid Natural Gas facility at Lelu Island, Skeena River estuary, British Columbia. Therefore I will not repeat the points articulated in that letter. Instead I offer some personal and political perspective.

In the early 1970s and shortly after receiving my Ph.D. from University of British Columbia, I worked for a few years as an ecological consultant. One of my first jobs was as a member of a team studying the environmental attributes of the Skeena River estuary, assessing potential environmental impacts of a proposed super-port in the Prince Rupert area, and evaluating possible locations for that port. We looked at several locations, from Port Simpson all the way to Smith Island and the mouth of the Skeena River. From that work and from existing studies up to about 1975, it became clear that Flora Bank was a core ecosystem in the Greater Skeena Estuary, and was one of the areas that industrial developments should avoid.

This technical assessment has been well known for 40 years, and you could say that the ecological importance of Flora Bank has been known and appreciated for 8-10,000 years. Imagine my dismay to hear two years ago that Lelu Island and adjacent Flora Bank had been selected as the location for a huge LNG facility.

How did this happen? That is one of the most important questions for you to consider, although I realise it isn't entirely within your writ.

Apparently Petronas was guided (or directed) to Lelu Island by the Prince Rupert Port Authority. Given the obvious and well-known red flags about the Lelu-Flora Bank area, why would the Port Authority do that? No doubt partly because the project would be "located on federal lands and waters administered by the Prince Rupert Port Authority". But also because the Port Authority's mandate is strictly **economic** development, and the Board of Directors is politically appointed. According to their website <http://www.rupertport.com/> :

- "The PRPA, in its role as a market development agency, ensures that port assets are used efficiently and works to enhance Canada's opportunities in trade and transportation. The PRPA develops partnerships with other organizations to build facilities such as the new container port.
- The PRPA is a financially self-sufficient organization accountable to a Board of Directors.
- The Port Authority owns ... docking facilities, water lots, and islands in both the inner and outer harbour areas of Prince Rupert.
- The PRPA owns ... a 26.57 hectare parcel on South Kaien Island. **The PRPA also owns Ridley Island, Coast Island, Lelu Island, Kinahan Islands, and Kitson Island.**"

Moreover, according to this excerpt from the *Canada Marine Act*:

14 (1) The directors of a port authority shall be appointed as follows:

- (a) the Governor in Council appoints one individual nominated by the Minister;
- (b) the municipalities ... appoint one individual;
- (c) the province or provinces ... appoint one or two individuals; and
- (d) the Governor in Council appoints the remaining individuals nominated by the Minister.

All potential LNG locations in the Greater Skeena Estuary should have been subjected to a regional study—a strategic, high-level, environmental & economic assessment—before sites were recommended or selected. Much as was done back in the 1970s in advance of super-port developments.

Sincerely yours,

Jim Pojar, Ph.D., RPBio (BC), Senior Ecologist (Ecological Society of America)