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To: Pacific Northwest LNG / GNL Pacific Northwest (CEAA/ACEE)

Cc: Catherine.McKenna@parl.gc.ca; Hunter.Tootoo@parl.gc.ca; Jim.Carr@parl.gc.ca; Bennett, Carolyn: HOC

Subject: Stop Petronas LNG

I wholeheartedly oppose this project and its time for the Liberal government to protect our ecosystems. It's time to say good riddance to dirty energy because ITS 2016!!

The report states that the project would have “irreversible” impacts on the climate, as it would add at least 11 million tonnes of carbon dioxide equivalent to the atmosphere every year. Environment and Climate Change Canada advised that the Project would be amongst the largest single point sources of greenhouse gas emissions in the country, ranked third among emitters in the oil and gas sector (p.36, CEAA draft).

The project is proposed on top of the most important wild salmon habitat in the entire Skeena river estuary. Dr. Jonathan Moore (Simon Fraser University) and the Skeena Fisheries Commission found in 2015 that 20 times more juvenile salmon rely on the Flora Bank eelgrass habitat than any other eelgrass area in the Skeena estuary. A location that poses more risks to Skeena salmon has not been found. Despite this, the CEAA draft report is incredibly superficial in its discussion of risks to salmon, giving only 4 pages to the agency's analysis and conclusions of the risks to marine fish (p. 64, CEAA draft).

Baseline data gaps and scientific inaccuracies still exist in the draft report, despite the extended CEAA process. For example, the report states that “marine habitats around Lelu Island are representative of marine ecosystems throughout the north coast of B.C.” (p. 27, CEAA draft). In reality, science has repeatedly found since the 1970s that the Flora Bank eelgrass area is NOT representative of other areas in the greater Skeena River estuary, but is critical and rare fish habitat, especially for juvenile wild salmon. Risks of the LNG project cannot even start to be assessed without reliable baseline data.

The Lelu Island site was chosen from 5 potential project sites almost exclusively on economic and technical grounds, with no consideration for the fact that the project is on top of extremely sensitive fish habitat (p.17, CEAA draft). The site selection process, within the current CEAA 2012 legislation introduced by Harper, does not require consideration of proximity of the project to important or endangered habitats. This is a major CEAA policy flaw.

The report does not adequately consider the multiple risks to salmon, nor their cumulative effects. Independent scientists have identified multiple risk pathways to salmon that have not been adequately evaluated, such as: dredging of contaminated sediments, blasting, light and high frequency noise pollution, accidental spills, removal of terrestrial salmon food sources from Lelu Island, pipeline dredging, and erosion of Flora Bank. Fisheries and Oceans Canada (DFO) conducted a detailed expert review of only one risk to salmon - erosion - while no such expert review was done for other risks, or for their cumulative effects.

The report does not consider the peer-reviewed science by Dr. Patrick McLaren, published in the Journal of Coastal Research, which concludes that building the LNG facility could cause significant erosion of Flora Bank and damage to the vital salmon habitat. In DFO's expert review of potential erosion effects,

Dr. McLaren's published research is not referenced, analyzed or mentioned. This is a basic scientific error.

The Lax Kw'alaams First Nation already voted 100% against this project in May, despite an offer of \$1.4 billion from Petronas.

The Lelu Island Declaration was signed by First Nations leaders from across the Skeena watershed, as well as Grand Chief Stewart Philip of the Union of BC Indian Chiefs, MLAs Jennifer Rice, Doug Donaldson, and Robin Austin, and MP Nathan Cullen, to protect the proposed site – and its salmon – from LNG development.

Lelu Island has been occupied by Lax Kw'alaams members since August 2015, who have been working to prevent further work on the rejected project.

Madii Lii territory, which the fracked gas pipeline would pass through on the way to Lelu, has been closed to pipeline development by Luutkudziiwus people since Aug. 2014.

Over 100 first nation leaders, scientists, fisherman, and organizations across the province signed a letter from Lax Kw'alaams Hereditary Chief Yahaan to Trudeau requesting the project be rejected.

The Haida Nation passed a resolution banning LNG tankers in their waters in Nov. 2015. The tankers from this project would use this area.

Regards,

Giovanni Perna