

From: Janine MacLeod [<email address removed>]
Sent: March 11, 2016 3:17 PM
To: Pacific Northwest LNG / GNL Pacific Northwest (CEAA/ACEE); Catherine.McKenna@parl.gc.ca
Cc: Hunter.Tootoo@parl.gc.ca; Jim.Carr@parl.gc.ca; Bennett, Carolyn: HOC; premier@gov.bc.ca
Subject: Public Comment on the Proposed Pacific NorthWest LNG Terminal

Dear Minister Catherine McKenna,

I am writing to urge you, with all my heart and mind, to reject Petronas's application to build an LNG terminal on Lelu Island.

It was a moment of great relief and celebration for me when the Lax Kw'alaams First Nation voted to reject the facility despite a \$1.4 billion offer from Petronas. Their decision strengthened my faith in the collective capacity of human beings to recognize our responsibilities to, and vital interconnections with, other species and the fresh and salt waters on which our lives depend.

I am beyond furious that the BC government and the Canadian government would continue to entertain this proposal from Petronas when the most directly affected First Nations community has so clearly indicated their opposition. The Lax Kw'alaams First Nation depends on the life in the Skeena estuary for their cultural survival and physical well being. **To forcefully dispossess this community of their livelihoods and their millennial relationship with creatures like the wild salmon would be an act of colonialism in its most naked form.**

The Lelu Island Declaration – a document vowing to protect the Flora Banks site from LNG development – was signed by First Nations from across the Skeena watershed, Grand Chief Stewart Philip of the Union of BC Indian Chiefs, as well as several MLAs, an MP, and many other Canadians. The Haida Nation passed a resolution in November 2015 banning LNG tankers in their waters. Since August 2015, members of the Lax Kw'alaams have been occupying Lelu Island to prevent further work on the project that they rejected. Despite their efforts, damage has already been done to the Flora Banks during preparatory work for the project. Further, at another location on the pipeline route, members of the Luutkudziiwas people have occupied their land to prevent the construction of the pipeline.

If the current Canadian government approves this project in the face of all of this loud and clear opposition from directly affected First Nations, it will forfeit any chance of building legitimacy as an historical agent of reconciliation.

Both scientific research and traditional knowledge have confirmed **the critical importance of the Flora Banks to the viability of the wild salmon populations who spawn in the Skeena River watershed**. The Skeena River salmon run is the second largest wild salmon run in this country. Dr. Jonathan Moore and the Skeena Fisheries Commission found in 2015 that the Flora Banks eelgrass habitat hosts 20 times more juvenile salmon than any other eelgrass bed in the Skeena estuary. In other words, the proposed LNG facility is sited in the most damaging location possible.

Among many other flaws and omissions in the current Canadian Environmental Assessment Agency draft report, it fails to consider **cumulative effects on salmon** from noise pollution, the dredging of contaminated sediments, blasting, light pollution, high frequency noise pollution, accidental spills, pipeline dredging, loss of terrestrial food sources on Lelu Island, and erosion. Of these impacts, the Department of Fisheries and Oceans only considered erosion effects in detail. Even here, however, the science was flawed, as the DFO report did not reference or analyze the peer reviewed study on this matter published in the Journal of Coastal Research by Dr. Patrick McLaren. Dr. McLaren's study found that the construction of the facility would cause significant erosion to Flora Bank. What kind of analysis neglects input from peer reviewed science focused precisely on the topic at hand?

Further, the current CEAA legislation that was introduced in 2012 by the Harper government does not require consideration of the proximity of proposed projects to important or endangered habitat. [1][1] As such, this legislation has no legitimacy as a means of maintaining the viability of Canada's vital ecosystems.

Finally, even without this project's projected impact on salmon habitat or its rejection by local Indigenous communities **it must be dismissed based on its unacceptable contribution to global climate change**. The draft assessment found that this project would increase BC's GHG emissions by 8.5%, and that it would be among the largest point sources of GHG emissions in Canada. This estimate did not even take upstream emissions into consideration. Calculating the estimated emissions from associated fracking operations, as well as LNG transport and processing, Environment and Climate Change Canada calculates an additional 6.5 to 8.7 million tonnes of GHG emissions associated with the project's footprint. These upstream emissions

[1][1] Please see the information on fisheries impacts collected by the Skeena Watershed Conservation Coalition:

http://skeenawatershed.com/getinvolved/petition/support_wild_salmon_no_lng_on_lelu_island_and_flora_bank

exceed the combined emissions associated with all residential and commercial/ institutional buildings in the province of BC.

Moreover, none of these estimates take into account the leakages of methane associated with fracking operations – a GHG 86 times more potent than CO₂.^{[2][2]} A 2015 summary of empirical research on fugitive methane emissions from hydraulic fracturing, conducted by Dr. Robert Howarth, found methane leakage rates of between 3% and 9.5%.^{[3][3]} Given all of these associated emissions, the construction of this project would render it virtually impossible for BC to meet its GHG reduction targets. **The proposed Pacific North West LNG terminal is radically incompatible with the promises that Canada made at COP 21.**

First Nations across BC are standing up against this project. As a Canadian settler who hopes for real reconciliation – both with Indigenous nations and with the lands and waters that offer us all so much beauty and sustenance – I will be standing with them.

Sincerely,

Janine MacLeod

<personal information removed>

^{[2][2]} For more information on GHG emissions associated with this project, and for sources, please see the research conducted by the Canadian Centre for Policy Alternatives: <http://www.policynote.ca/petronas-pacific-northwest-lng-profile-of-a-carbon-bomb/>

^{[3][3]} Howarth, R.W. “Methane emissions and climatic warming risk from hydraulic fracturing and shale gas development: implications for policy,” Energy and Emission Control Technologies, Oct. 8, 2015. <https://www.dovepress.com/methane-emissions-and-climatic-warming-risk-from-hydraulic-fracturing--peer-reviewed-article-EECT>