



# Metlakatla Stewardship Society

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## EMAIL TRANSMISSION

October 18<sup>th</sup>, 2019  
Meghan Gilgunn, Senior Consultation Analyst  
Impact Assessment Agency of Canada  
Meghan.Gilgunn@canada.ca

### **RE: Request for Comments on the Potential Federal Environmental Assessment of the Proposed Cedar LNG Project in Kitimat, BC**

Dear Meghan Gilgunn,

This letter is in response to the communication received by Chief Councillor Harold Leighton from the Impact Assessment Agency of Canada (IAAC) on September 19<sup>th</sup>, 2019. In the letter, the IAAC outlined that the Cedar LNG Export Development Ltd. (the "Proponent") has submitted a Project Description for their proposed Cedar LNG Project (the "Project"). The IAAC requested that 1) Metlakatla provide their initial views on the potential impacts of the Project on the community and 2) whether Metlakatla supports a substituted Environmental Assessment (EA) process by the BC Environmental Assessment Office (BC EAO).

#### **Initial views of Project Impacts:**

The Metlakatla Stewardship Society (MSS) staff have conducted a preliminary technical review of information contained in the Project Description Summary. Based on that review, the MSS expects that the Project will adversely affect Metlakatla people and territory. A number of potentially significant adverse environmental effects have been identified, including potentially significant cumulative effects, which could result in impacts and changes to Metlakatla's health and socio-economic conditions, Metlakatla's current use of lands and resources, and Metlakatla's Aboriginal title, rights and interests. Using available information and knowledge, the MSS has identified initial concerns regarding Project-related impacts below.

#### **Air quality and greenhouse gases**

As is highlighted in the Project Description, the construction, operation and decommissioning of the Project is expected to generate a number of atmospheric emissions including greenhouse gases, sulfur and nitrogen oxides and particulate matter. Metlakatla is very concerned about the impact of project emissions on climate change, human health and water quality. Acidification and eutrophication can adversely impact vegetation, fish, wildlife, and human health. Given that the Kitimat/Terrace airshed already has above-threshold emission levels from current industry, additional concerns exist about any incremental impacts to air quality. Metlakatla's Territory extends to Terrace and the Lakelse area and beyond, where many wetlands, streams and freshwater bodies stand to be impacted by the project. It is also expected that there will be an increase in emissions along the shipping route from marine vessel traffic during both construction and operations, which will require a full assessment.

### Freshwater withdrawal/alteration to groundwater

One of the components of the Project is the withdrawal of groundwater and/or surface water required for construction and operations. Metlakatla wishes to better understand potential impacts of the proposed water withdrawal (if any) on watersheds within Metlakatla territory. At this time, it is unclear to what extent groundwater recharge and discharge will be altered due to construction and operations.

### Socio-economic impacts

Metlakatla's wellbeing (food, livelihood, spirituality and health) is inextricably tied to the wellbeing of the natural environment. The development the Project could have significant impacts on the day-to-day lives of Metlakatla members living in the territory, including in Terrace, Kitimat, Prince Rupert and Metlakatla. The Project may contribute to an influx of workers in the Kitimat and Terrace area, which could result in increased service and housing pressures in Northwest BC towns and even in the Village of Metlakatla. Projects such as this one could create a labour and service shortage resulting in increased costs of construction and transportation of materials and could also adversely impact the social fabric, health and wellbeing of Metlakatla members.

### Use of lands, waters and resources

Metlakatla expects that the Project activities during construction, operations and decommissioning could impact the quality and quantity of resources that are used for traditional purposes and could also impact members' ability to access preferred locations for harvesting or recreation, particularly in the marine environment. The Project may impact members' use of the area due to the sensory experience (noise, light, visual impacts) as well as safety or perceived safety concerns. This could have reverberating impacts on intergenerational knowledge transfer and health and wellbeing of members.

### Cumulative effects

Though not discussed in any detail in the Project Description, a number of past, existing, and reasonably foreseeable future projects already occur or are now planned in the Project area. Given the potential cumulative effects arising from this Project and other projects taking place on or around Metlakatla Territory, all of which have the potential to significantly alter the terrestrial, aquatic and marine environment in Metlakatla Territory, and to impact Metlakatla rights and title in a serious way, it is that essential cumulative effects are fully assessed in the current context of the region.

Please note that the above list is only preliminary; the MSS expect the federal and provincial governments as well as the Proponent to continue to consult with Metlakatla to ensure that all potential impacts to Metlakatla Aboriginal title, rights and interests are fully assessed and that meaningful measures that will avoid, mitigate and address those impacts are identified throughout a regulatory review.

**Substitution by BC EAO:**

In response to the IAAC's question regarding the acceptability of a substituted EA process lead by the BC EAO, Metlakatla is supportive of the regulatory review being substituted if the following is carried out:

- Any rail activities associated with the Cedar LNG Project are fully scoped into the regulatory review, so that the environmental impacts and risks in their entirety can be considered, assessed and mitigated;
- Marine shipping associated with the Project is fully scoped into the regulatory review, so that the environmental impacts in their entirety can be considered, assessed and mitigated. Metlakatla predicts shipping will have adverse project-specific and cumulative impacts that require full assessment;
- Accidents and malfunctions of all project activities (i.e. inclusive of rail, trucks and marine shipping) are assessed in the regulatory review;
- Cumulative effects of the Project are fully assessed using the current context for development in Northern BC;
- The IAAC ensures that the Crown Consultation Coordinator remains involved in the assessment by the BC EAO and attends Working Group meetings and bilateral meetings as appropriate throughout the EA process;
- All relevant federal agencies participate fully in the regulatory review and at Working Group meetings; and
- The federal and provincial governments each engage deeply with Metlakatla to review and seek feedback on all draft project conditions.

Metlakatla looks forward to engaging with the IAAC, the BCEAO, and the Proponent going forward to ensure that the EA application, review, and associated consultation are done in a fulsome, complete, and accurate manner. Should you have any questions regarding this letter or our comments above, I can be reached at [emutrie@metlakatla.ca](mailto:emutrie@metlakatla.ca) or 250-628-3315 ext 2035.

Kind regards,  
<original signed by>

Erin Mutrie  
Environmental Assessment Manager  
Metlakatla Stewardship Society

Cc: Harold Leighton, Chief Councillor, Metlakatla First Nation  
Ross Wilson, Executive Director, Metlakatla Stewardship Society  
Fern Stockman, Project Assessment Director, BC EAO