

Comment #	Section	Page #	TWN Comment/ Issue Raised
1	1.3.3 Benefits	Page 10	The Cumulative Effects Assessment should include the "40 different infrastructure projects being advanced by the Greater Vancouver 2030 Program to expand existing off terminal road and rail infrastructure."
2	1.5 Applicable Agreements and Policies	Page 11	TWN requests that the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) be included in this section and describe how it will be applied to this project.
3	2.3.1 Construction	Page 17	The location of off-site staging and laydown areas have not been identified. Staging and laydown areas can have potential adverse impacts and must be identified in the Detailed Project Description and their potential impacts assessed as part of the Impact Assessment.
4	2.3.4 Physical Activities Incidental to the Project	Page 22	The effects of marine vessel movements associated with short sea shipping, road, and rail activities should absolutely be considered part of the Project regardless of whether they occur outside of GCT's lease boundary. These activities could result in adverse environmental, social, or economic effects, and adverse cumulative effects on valued components, and need to be evaluated in the Impact Assessment.
5	2.3.4 Physical Activities Incidental to the Project	Page 22	The Impact Assessment should assess marine shipping via international waters up to the 200 nautical mile limit from the coast (not just to the Buoy J). TWN expects that potential impacts of malfunctions and accidents on valued components be evaluated as part of the impact assessment. The proponent will also need to address the cumulative impacts of marine shipping in the Impact Assessment.
6	5.1, Table 12	Page 43	While the environmental assessment process conducted for the DP3 Project may have been considered robust by the Proponent, the environmental assessment for DP3 is now 14 years old. Please do not rely on the baseline information gathered for DP3 as a substitute for new baseline information that should be collected for DP4.
7	5.3	Page 47	<p>"Roberts Bank neighbours one of the main entry channels into the Fraser River for the largest salmon run in BC."</p> <p>TWN is concerned about negative impacts to fish populations (especially salmon), further precluding TWN's ability to harvest these resources and negating TWN's environmental remediation programs aimed at restoring these resources and other now scarce fish (especially herring, sturgeon and eulachon).</p> <p>Sockeye salmon from the Fraser River is the primary traditional food still harvested by TWN. Current TWN fishing practices have been heavily curtailed, including the near-complete or complete absence of herring, eulachon and other small fish and sturgeon from TWN diets. Almost all of TWN's fish now comes from the Fraser River.</p> <p>TWN is also concerned about the potential for further negative impacts to other traditional foods including crab, shellfish, particularly clams, and marine birds, particularly ducks.</p> <p>The reduction in traditional foods could in turn impact TWN cultural and ceremonial activities since salmon, crab, clams, herring and birds are central to such activities. A reduction in traditional foods would also impact cultural transmission, because harvesting and preparing of traditional foods is the primary context for such cultural transmission.</p>
8	5.4.1	Page 49	Increased levels of marine shipping activity including short- sea shipping, which could change accessibility for TWN to the mouth of the Fraser including access to important fishing and crab harvesting sites. Increased levels of marine shipping could also negatively impact TWN member's ability to travel in small vessels in relation to subsistence travel. Increased levels of marine shipping which negatively impact SRKW and other marine mammals results in negative impacts to TWN's cultural health. As seen in the RBT2 panel report, increased development in the area including increased marine shipping will negatively impact TWN's intangible cultural health.
9	5.4.3	Page 49	TWN expects the proponent to conduct an archaeological assessment (Archaeological Overview Assessment/Archaeological Impact Assessment) for DP4.
10	6.3/6.3.1	Page 53	TWN is concerned that increased emissions from marine vessels, cargo handling, and vehicle movements will contribute further to climate change. Tsleil-Waututh members have observed the effects of climate change in our territory for decades. The existing cumulative environmental effects leading to the loss and degradation of biodiversity, traditional food species and habitats in the Fraser River and Burrard Inlet are indicative of ongoing violations against ecological thresholds and TWN laws.

			Impacts of climate change will exacerbate and further contribute to adverse cumulative environmental effects through our territory. Please refer to TWN's Climate Change Vulnerabilities Report detailing how TWN is and anticipates to be impacted by the threats from climate change.
11	6.3	Page 53	TWN expects the proponent to assess how lighting installments will impact marine birds, including high mast lights.
12	6.8	Page 62	TWN holds the Aboriginal rights to practice and preserve their traditional culture, the right to gain economic benefit from the lands and resources of their territory.
13	6.11	Page 67	TWN expects the proponent to carry out a cumulative effects assessment on valued components by applying a pre-contact baseline. Cumulative impacts must also be assessed beyond the life of the project since DP4 will unlikely be decommissioned.
14	7.1	Page 68	TWN has governed, occupied and stewarded the lands and waters surrounding Burrard Inlet, the Fraser River and the broader TWN territory since time out of mind. Table 25: Identified Indigenous Groups, shows the project's distance from TWN administrative offices and reserves lands. This distance has little bearing on our rights. DP4 falls within TWN's consultation area and is thus subject to the conditions of TWN's Stewardship Policy, which outlines TWN's stewardship laws and requirements for meaningful consultation with TWN.
15	7.2.33	Page 91	TWN asks that all reference to treaty process with the Province be removed from this document as it has no bearing on the environmental assessment process for this project.
16	7.3, Table 26	Page 99	TWN would ask that the table be edited to remove the statement "GCT has provided the requested documentation to Tsleil-Waututh Nation" as this is incorrect. This statement does accurately reflect the outstanding items TWN has yet to receive from GCT.