



# Kitselas Lands and Resources Department

2225 GITAUS ROAD, TERRACE, BC V8G 0A9

P: (778) 634-3517 ♦ [WWW.KITSELAS.COM](http://WWW.KITSELAS.COM)

**September 17, 2021**

BC Environmental Assessment Office  
836 Yates Street  
Victoria, BC  
V8W 1L8

**ATTN:** Fern Stockman, Project Assessment Director

**RE: Ksi Lisims LNG Initial Project Description**

Kitselas has reviewed the Ksi Lisims LNG Project Initial Project Description (IPD) and has provided several comments, below.

Initial Project Description		
Section	Topic	Kitselas First Nation Comment
Executive Summary	Environmental Benefits	To conclude that the Project will create “global environmental benefits” is premature and somewhat disingenuous, as it suggests an overall net benefit to the environment. Given the proposed Project lifespan of 30+ years, it may help Asian governments reach climate targets in the short-term, but over the long-term (i.e., the lifespan of the Project), the combustion of LNG as opposed to renewable energy will exacerbate climate change and the myriad related environmental issues. Furthermore, the upstream extraction of natural gas and transportation in pipelines results in the leakage of methane, which is 86 times stronger than CO <sub>2</sub> at trapping heat over a 20-year period (Myhre et al, 2013). Whether the use of LNG has a net benefit on climate change depends on the leakage rate, the time frame, and several other factors.
2.2 Activities and Components	Facility power source	“It is anticipated that the transmission interconnection from the BC Hydro grid to the Site will be provided by a third party who will be responsible for the design, construction and operation of the onshore transmission line and sub-sea electricity transmission cable from the BC Hydro substation near New Aiyansh in the Nass Valley to the Site”. New Aiyansh is approximately 75km from the Project site. While Kitselas understands that Ksi Lisims will not have care and control of the transmission line, it is our perspective that if new infrastructure is needed to facilitate the connection of the Project to the BC Hydro grid, the associated impacts should be assessed as part of the Ksi Lisims Project. At the least, Kitselas expects the BC Hydro connection project to be included in Ksi Lisims cumulative effects assessment.
2.11.3 Electric Power Supply	Electric vs gas power supply	Kitselas would like to see more detail on the use of on-site gas fired power and renewable energy in the Detailed Project Description.
5.2 Assessment Area Definitions	MSAA and CSSC	Kitselas is concerned that creating stand-alone assessment areas such as the Marine Shipping Assessment Area and Construction Support Shipping Corridor may diminish the assessed impacts of

		the Project as a whole. Kitselas would like to discuss the rationale behind the consideration of the stand-alone assessment areas further.
5.4.2 , 5.4.4, 5.4.5	Socio-economic effects, health effects, effects on Indigenous Peoples	Temporary workers, shipping activities, and potential accidents and malfunctions all have the potential to impact community well-being, health, and Indigenous Peoples.
7.4 Preliminary Assessment of Potential Impacts to Indigenous Groups Resulting from Project Activities	Management plans	“Mitigation measures and appropriate management plans will be developed based on comments received from Indigenous Nations through the EA-IA process.” For future reference, Kitselas expects that management plans will be substantially developed and provided for review and comment during the EA-IA if they are to be considered as mitigation measures to reduce or eliminate residual effects.

If you have any further questions regarding the comments above, please do not hesitate to contact me.

Sincerely,

<Original signed by>

Jane Hauser  
Project Assessment Officer, Kitselas Lands and Resources Dept.  
[PAO@Kitselas.com](mailto:PAO@Kitselas.com)

Cc: Stephanie Soebagio, IAAC  
Leith Anderson, BC EAO  
Alli Morrison, BCEAO  
Chris Apps, Director, KLRD