

Appendix X
Nisga'a Nation

**Application for an Environmental Assessment
Certificate**

**Appendix X-1
Nisga'a Lisims Government (NLG) Comments on Draft
Aboriginal Consultation Reports**

A.1 NISGA'A LISIMS GOVERNMENT (NLG) COMMENTS ON DRAFT ABORIGINAL CONSULTATION REPORTS

The following table provides a summary of comments received by NLG on the draft Aboriginal Consultation Reports. NLG provided comments on the first draft Aboriginal Consultation Report, however no comments were received on the second draft Consultation Report. Comments provided by NLG were carefully considered and incorporated into the Aboriginal Consultation Reports by PRGT. Aboriginal Consultation Reports are available on the EAO project website:

http://a100.gov.bc.ca/appsdata/epic/html/deploy/epic_project_home_403.html

Aboriginal Consultation Report	Date	Section	Comments by NLG
1	December 4, 2013	Cover letter	"We would like to emphasize that the assessments of the proposed Project required under the provisions of the Nisga'a Final Agreement are still at the early stage, significantly more information in respect of the impacts of the proposed Project is still required and it is our perspective that the draft Aboriginal Consultation Report should accurately convey that message to the BC Environmental Office."
1	December 4, 2013	All sections	Suggested language revisions including but not limited to the following: <ul style="list-style-type: none"> • Change "the Nisga'a Lisims Government" to "Nisga'a Lisims Government" • Change "minimize" to "mitigate" • Change "community members" to "Nisga'a citizens"
1	December 4, 2013	1.2 Purpose of the Consultation Report	Changed "...and identify proposed measures to avoid or minimize these potential effects" to "...and identify proposed measures to avoid or mitigate these potential effects."
1	December 4, 2013	2.0 Aboriginal Groups in the Project Area	Removed "the": "...represented by the Nisga'a Lisims Government (NLG)" to "...represented by Nisga'a Lisims Government (NLG)"
1	December 10, 2013	4.1 Working Groups	In respect of the comments at section 4.1 of the draft ACR (Aboriginal Consultation Report) regarding the Working Groups, we cannot agree to the reference to the Employment and Contracting Working Group. Contacts in NCG and within NLG were provided to PRGT so that PRGT could gather information related to NLG capacity and to discuss NLG's experience in respect of other projects. All formal discussions regarding contracting and employment should be discussed with NLG.
1	December 4, 2013	4.1 Working Groups	Removed the Employment and Contracting Working Group.

Aboriginal Consultation Report	Date	Section	Comments by NLG
1	December 4, 2013	4.1 Working Groups	Changed "PRGT is also consulting with the Nisga'a Village Governments of..., as approved by NLG" to "As agreed to by NLG, PRGT is also consulting with the Nisga'a Village Governments of...in respect of possible use of Nisga'a Village Lands."
1	December 4, 2013	4.1 Working Groups	Added specific chapter of the Final Agreement, rather than a reference to meaningful consultation.
1	December 4, 2013	4.2 Information Exchange	Asked for clarification on section 4.2 under fieldwork on what the additional notifications are referring to.
1	December 4, 2013	4.2 Information Exchange	Asked for clarification on section 4.2 under fieldwork on what the weekly field program summaries are referring to.
1	December 10, 2013	4.2 Information Exchange	In respect of the comments at section 4.2 regarding Information Exchange, we note that several meetings and issues are not detailed. In particular, the draft ACR does not mention: the meeting on May 31, 2013 in Victoria, wherein value-added baseline studies and pre-impact studies were tabled; the meetings on October 4, 30 and 31, 2013; and the matter pertaining to the Kwinamass Conservancy and the need to correct the omission of Nisga'a Interests.
1	December 10, 2013	4.2 Information Exchange	In respect of the comments at section 4.2 regarding Fieldwork and Permitting, there is no mention of the comments submitted by NLG regarding work plans for terrestrial and marine work, nor the dialogue between NLG and the Proponent regarding tailed frog surveys. Additionally, while the draft ACR references weekly field program summaries, NLG has not received any of these pertaining to terrestrial or marine ecological baseline.
1	December 4, 2013	4.3 NLG Permitting	Lengthened the sub-section title to "NLG Permitting in respect of Nisga'a Lands"
1	December 10, 2013	4.3 NLG Permitting	In regards to the comment at section 4.3 regarding NLG Permitting, we wish to correct the reference to the application and issue of the License of Occupation (LOO) to support Geotechnical Investigation on Nisga'a Lands. The application was made in July 2013 and NLG granted the LOO in July 2013, however, the Proponent did not sign the LOO until September 2013.
1	December 4, 2013	4.4 Routing	Changed "the best route" to "possible routes that would result in fewer impacts on Nisga'a interests under the NFA.
1	December 4, 2013	4.4 Routing	Removal of routing information in section 4.4.
1	December 10, 2013	4.4 Routing	In regards to the comments at section 4.4 regarding Routing, the reference to the first Route Selection Working Group meeting on July 18, 2013 should include references to all key issues discussed. In particular, we note that the following matters, which were discussed, are not listed; the importance of spiritual areas, wetlands, and salmon-bearing streams and avoiding impacts thereto.
1	December 10, 2013	4.4 Routing	The reference to a September 24, 2013 meeting of the Route Selection Working Group is not accurate. This reference should be amended to note the July 18, 2013 meeting.

Aboriginal Consultation Report	Date	Section	Comments by NLG
1	December 10, 2013	4.4 Routing	The reference on page 12 of the draft ACR to the dates of the Open House meetings Nisga'a Villages is not accurate. The meeting at Gingolx took place in early October.
1	December 10, 2013	4.4 Routing	The draft ACR notes at page 12 some of the concerns of the NLG regarding routing, however, several key concerns from NLG are not listed. The following concerns have been raised by NLG and should be referenced in the ACR: a. concerns regarding the Gingit Creek watershed b. concerns regarding the Zolzap watershed and Zolzap Slough Area c. concerns regarding spiritual locations d. concerns regarding the route crossing the Laxgalts'ap bisecting the bivalve harvesting areas at Nasoga Gulf e. concerns regarding the Haines Flats f. concerns regarding the Quilgaww Creek Area g. concerns regarding the Seaskinnish Creek h. concerns regarding sediment contamination in Alice Arm
1	December 10, 2013	4.4 Routing	The reference at page 13 to the Nasoga Gulf Route as NLG's preferred route should be removed. We are not at a stage in the proposed project to conclusively identify a preferred route.
1	December 10, 2013	4.4 Routing	The draft ACR references at page 13 a SharePoint folder created by the Proponent. This method of communication has not been at all effective as NLG has not been able to access the site.
1	December 4, 2013	4.4 Routing	Added text "NLG has requested additional information with respect to proposed routing options including, but not limited to, any temporary use areas required for pipeline construction and maintenance (camps, laydown areas, access roads, etc.)"
1	December 10, 2013	4.5 Environmental Interests	The section regarding Environmental Interests at 4.5 is cursory and does not provide sufficient detail. The ACR should at the very least reiterate what is set out in the Section 11 Order. The ACR also needs to include the spatial characterization of the Treaty Rights and Interests.
1	December 4, 2013	4.5 Environmental Interests	States that the NFA includes the following as interests: mushrooms, edible plants and medicinal plants.
1	December 10, 2013	4.6 Draft Application Information Requirements	The draft ACR notes at section 4.6 that no comments were received from NLG on the dAIR. NLG requests that the Proponent review their files to ensure this is the case, as comments were prepared by NLG.
1	December 4, 2013	4.9 Nisga'a Knowledge	Removes "At the direction of NLG," from "At the direction of NLG, Stantec is planning a meeting with the Council of Elders..."
1	December 4, 2013	4.10 Economic,	Changed the perspective of the description of interviews held with the NLG, correcting the role of interviewees, and

Aboriginal Consultation Report	Date	Section	Comments by NLG
		Social and Cultural Interests	re-affirming that NLG considers topics discussed to be possibilities, not decisions.
1	December 10, 2013	5.0 Summary of Nisga'a Nation Treaty Interests	The table at section 5.0 of the draft ACR does not list the Treaty Interests of the Nisga'a Nation and is more properly characterized as a list of issues raised by NLG with respect to the proposed Project. Additionally, further explanation of the content of section 5.0 of the draft ACR is required. The list of interests and issues provided in section 5.0 should be a complete list, not a summary of a few selected points raised.
1	December 10, 2013	5.0 Summary of Nisga'a Nation Treaty Interests	<p>In addition to the above comments regarding section 5.0 of the draft ACR, NLG wishes to note the following in regards to the content of the table at 5.0:</p> <ul style="list-style-type: none"> a. Environment – in relation to adverse effects, it is not the river movement that is the concern, but rather the parent material of the fan itself (as pushed about by high-flow events). Additionally, there are many alluvial fans in the Nass, which one is being referenced in regards to the proposed mitigation measures? b. Harvesting fish and aquatic plants – in relation to mitigation, it should be noted that NLG expects that compensation will be required, at least for riparian loss. c. Harvesting wildlife – the concerns noted in these adverse effects due to increased human access to areas associated with wildlife are also a concern for fisheries, due to increased angling pressure. There mitigation measures proposed in this section should include minimizing the linear distance of new roads, avoiding construction of circuit roads (dead-end roads are preferred), and reclaiming temporary roads with vegetation. d. Harvesting wildlife – the draft ACR notes the potential effects on grizzly bears, moose and mountain goats. While these species are Designated Species under the Treaty, there are many other species that are of concern to the Nisga'a Nation. The list provided in the table should be expanded to include a complete list of species of key concern to the Nisga'a Nation. Additionally, the mitigation measures reference a Wildlife Species of Concern Contingency Plan. We request that this plan be provided to NLG. The Access Management Plan noted in the mitigation measures should aim to reduce the potential for increased access from all people and their vehicles, and not just hunters. Increased vehicle traffic and road kill is of particular concern to NLG. e. Cultural – the potential adverse effects should also address effects on the places where the Spirit lives. f. Economic – this section should clarify that PRGT is required to assess the economic benefits and impacts of the proposed Project (as opposed to merely a discussed of possible economic benefits) and that discussions in that respect are ongoing. g. Social – table 5.0 should also reference that the social effects of the proposed Project are also being assessed and will be discussed further in subsequent versions of the consultation report.

Aboriginal Consultation Report	Date	Section	Comments by NLG
1	December 4, 2013	5.0 Summary of Nisga'a Nation Treaty Interests	Changes/comments include: <ul style="list-style-type: none"> • Text added: "NLG has not yet fully considered or commented on the proposed mitigation measures." • Wording "preferred option" removed and "option that may result in fewest impacts based on information currently available." • Qualified that route is under "assessment." • Requested clarification on a sentence under "harvesting wildlife" • Changed "Socio-Economic Benefits" to "Economic Effects" and removed all content, replacing with a single statement that ongoing discussions are underway. • Added a mitigation under Archaeology to "comply with requirements of the NFA in respect of heritage and archaeology." • Under cultural, removed "PRGT communicated concerns raised by the Village Government and NCG to NLG." • Also specified that "certain" route changes have been made. • There "should be a section describing approach to addressing NFA requirements in respect of assessing social effects of the proposed Project."
1	December 4, 2013	7.0 Next Steps and Concluding Remarks	"Nothing in this section regarding Nisga'a Nation – is this section in addition to or separate from section 6.0?"

Application for an Environmental Assessment Certificate

Appendix X-2 Issues Summary Table (Section 34.17)

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Nisga'a Interests Identified in NFA – Chapter 10, Paragraph 8(e)			
Effects on Nisga'a Land Interests			
34.5.6	Nisga'a Nation owns and has jurisdiction over Nisga'a Lands, including mineral and forest resources.	<ul style="list-style-type: none"> The route will avoid or minimize areas of known forest and mineral resources on Nisga'a Lands. PRGT will develop and implement a Nisga'a Access Management Plan and a Traffic Management Plan. Consultation with NLG will continue to further identify areas used for hunting, trapping, fishing, plant gathering sites, and habitation sites; trails and travel ways, gathering places and sacred sites that warrant mitigation. PRGT will consult NLG with respect to the timing of construction, clean-up and post construction reclamation activities on Nisga'a Lands. Engage with NLG regarding forestry operations on Nisga'a Lands overlapping with the project footprint and coordinate project construction activities with forestry operators in the area. PRGT will consult with NLG to identify timber salvage opportunities. PRGT will consult NLG with respect to the timing of pipeline maintenance and vegetation management activities on Nisga'a Lands. In collaboration with NLG, PRGT will continue to implement the Nisga'a Access Management Plan. PRGT will consult NLG with respect to the timing of pipeline maintenance and vegetation management activities on Nisga'a Lands. 	The creation of new access and a linear ROW could reduce the availability of Nisga'a Lands for the management and harvest of mineral, timber and non-timber forest products or for other purposes of benefit to Nisga'a citizens.
34.5.6	Nisga'a Nation owns Nisga'a Fee Simple Lands - Category A Lands and Category B Lands – which are outside of Nisga'a Lands.	As above	The creation of new access and a linear ROW could reduce the availability of Category B Lands for the benefit to Nisga'a citizens.
Other Nisga'a Land-Related Interests			
34.6.5	Nisga'a citizens have the right to traditional use of lands and resources within Nisga'a Memorial Lava Bed Provincial Park and Gingietl Creek Ecological Reserve.	<ul style="list-style-type: none"> PRGT will continue to consult with Nisga'a regarding Nisga'a Memorial Lava Bed Park to confirm that activities related to construction and operation will be carried out in a manner that will preserve the heritage, cultural, geological and recreational values of the Park under the terms of the NFA Treaty. PRGT will ensure that the ROW parallels the Nisga'a Highway to the extent possible. PRGT will develop, in consultation with NLG, mitigation plans to minimize visual impacts associated with the Project PRGT will consult NLG with respect to the timing of construction, clean-up and post construction reclamation, pipeline maintenance and vegetation management activities on the ROW in the vicinity of the Park. PRGT will continue to work with BC Parks and NLG to determine specific Project mitigation including construction, timing, reclamation and Park enhancements. In collaboration with NLG, PRGT will continue to implement the Nisga'a Access Management Plan (Section 36) PRGT will consult with NLG with respect to the timing and planning of maintenance activities 	<p>Construction of the Project within the Park could:</p> <ul style="list-style-type: none"> Reduce the area of land within the Park (0.3%) Change the visual, geological, vegetation, and heritage resources of the Park Change in the ability of Nisga'a citizens to exercise their right to traditional use of lands and resources within the Park
34.6.5	Commercial Recreation Tenure	<p>Should commercial recreation activities be developed in close proximity to the Project during construction or operation phases, PRGT could:</p> <ul style="list-style-type: none"> Consult NLG with respect to the timing and methods of Project activities to avoid overlap with commercial recreation activities as much as possible. Continue to implement the Nisga'a Access Management Plan (Section 36). 	<p>The Project is not expected to cross any sites that are currently utilized under the Nisga'a Commercial Recreation Tenure.</p> <p>No potential effects on the tenure as it is currently utilized are expected from construction and operation of the Project</p>

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
34.6.5	Traplines	<ul style="list-style-type: none"> PRGT will consult with the registered holders of traplines to discuss maintaining access to traplines or moving trapline equipment, as necessary PRGT will continue to consult with NLG to confirm trapping and habitation sites, trails and travel ways. PRGT will continue to consult with NLG to confirm trapping and habitation sites, trails and travel ways PRGT will consult with the registered holders of traplines to discuss maintaining access to traplines or moving trapline equipment, as necessary PRGT will consult Nisga'a trapline tenure holders with respect to the timing and planning of construction, operation and maintenance activities that will impact them. PRGT will explore the following measures with the registered holders of these traplines during pre-construction consultation: <ul style="list-style-type: none"> maintaining access to the trap line movement of trap line equipment by the trapper prior to construction alternative site-specific strategies recommended by NLG losses will be paid as per the Trapper Compensation Schedule to registered trappers for demonstrated economic losses related to construction of the Project In collaboration with NLG, PRGT will continue to implement the Nisga'a Access Management Plan (Section 36) Consult with NLG and trapline tenure holders with respect to the timing and planning of maintenance activities that will impact them 	<p>The project footprint and operation of the project could require the relocation of traplines and/or compensation for losses</p> <p>If illegal and unregulated use of the Nass Wildlife Area can be effectively deterred through access management, then no other residual effects of the Project on this Nisga'a interest are anticipated.</p>
34.6.5	Angling guide licenses	<ul style="list-style-type: none"> PRGT will implement mitigation measures identified within the EMP related to fisheries habitat. In collaboration with NLG and Nisga'a angling guide tenure holders, PRGT will develop and implement a Nisga'a Access Management Plan (Section 36). NLG and Nisga'a angling guide tenure holders will be consulted with respect to the timing and planning of construction activities that will impact them. NLG and Nisga'a citizens will be informed of the timing of construction activities, potential access restrictions and noise disturbance in recreational areas to mitigate potential effects on traditional fishing activities. NLG and Nisga'a angling guide tenure holders will be consulted with respect to the timing and planning of operation and maintenance activities that will impact them. 	<p>Some angling guides – and Nisga'a citizens – may be required to avoid certain fishing areas (e.g., in close proximity to water crossings) during the construction period for safety reasons.</p> <p>The presence of the ROW could provide improved access to areas used by angling guides, and could lead to increased unregulated harvesting pressure.</p>
34.6.5	Any guide outfitter's certificate and licence issued to Nisga'a Nation	<p>If NLG obtains a guide outfitter's certificate and licence, PRGT will:</p> <ul style="list-style-type: none"> Develop and implement a Nisga'a Access Management Plan in collaboration with NLG and guide outfitter tenure holder(s) (Section 36). Consult Nisga'a guided outfitting tenure holder(s) with respect to the timing and planning of construction, operation and maintenance activities where it may affect them. 	<p>The Nisga'a Nation does not currently have a guide outfitting licence or certificate, the Project is therefore not expected to affect the ability of Nisga'a to utilize such a license.</p> <p>No potential effects on the tenure as it is currently utilized are expected from construction and operation of the Project</p>
34.6.4	Water reservation from the Nass River and other streams wholly or partially within Nisga'a Lands for domestic, industrial and agricultural purposes.	<ul style="list-style-type: none"> PRGT will utilize best management practices and will comply with provincial and Nisga'a regulations and requirements related to the construction and maintenance of stream crossings. Flows are not likely to be interrupted for more than 3 or 4 days for the construction of watercourse crossings. PRGT will consult with NLG regarding the timing of construction activities and operational plans. 	No residual effects of the Project on this Nisga'a interest are anticipated.
34.6.4	Water reservation from all streams, other than the Nass River, that are wholly or partially within Nisga'a Lands for the purpose of investigating their potential for generating hydro power.	<ul style="list-style-type: none"> PRGT will utilize best management practices and will comply with provincial and Nisga'a regulations and requirements related to the construction and maintenance of stream crossings. Flows are not likely to be interrupted for more than 3 or 4 days for the construction of watercourse crossings. PRGT will consult with NLG regarding the timing of construction activities and operational plans. 	No residual effects of the Project on this Nisga'a interest are anticipated.
34.6.4	Certain sites outside of Nisga'a Lands were designated as provincial heritage sites and BC to manage these in order to preserve their heritage value.	The Project will not cross any of the heritage sites outside of Nisga'a Lands that are identified in Appendix F-1 of the NFA, or the heritage sites within Nisga'a Lands that are identified on Map B of the Nisga'a Land Use Plan.	If illegal and unregulated use of the Nass Area can be effectively deterred through access management, then no residual effects of the Project on this Nisga'a interest are anticipated.

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Nisga'a Access to Other Lands			
34.7.5	Agents, employees and contractors of the Nisga'a Nation, Nisga'a Villages, Nisga'a Corporations and members of the Nisga'a Police Service and Nisga'a Institutions have access to non-Nisga'a Lands to carry out their responsibilities.	<ul style="list-style-type: none"> NLG will be consulted with respect to the timing of construction activities, potential access restrictions and noise disturbance in recreational areas in an effort to limit disruptions and the ability of Nisga'a citizens to access the Nass Area. PRGT will develop and implement a Traffic Management Plan (Section 36) in collaboration with NLG to limit disturbances and to minimize and handle safely any necessary interruptions in traffic. 	No residual effects of the Project on this Nisga'a interest are anticipated.
34.7.7	Nisga'a citizens have reasonable access to Crown lands to allow for the exercise of Nisga'a rights and for the normal enjoyment of Nisga'a interests set out in the NFA.	<ul style="list-style-type: none"> NLG will be consulted with respect to the timing of construction activities, potential access restrictions and noise disturbance in recreational areas in an effort to limit disruptions and the ability of Nisga'a citizens to access the Nass Area. 	No residual effects of the Project on this Nisga'a interest are anticipated
Freshwater Resources			
34.8	<p>Nisga'a citizens have the right to harvest fish and aquatic plants, including:</p> <ul style="list-style-type: none"> Nass salmon Nass steelhead Oolichan Nass non-salmon species Freshwater aquatic plants 	<p>General mitigation measures to control potential effects on critical habitat during construction and operation include:</p> <ul style="list-style-type: none"> Avoidance—relocation or redesign of the Project to completely avoid potential effects; specific timing of works may also effectively avoid harm to fish and fish habitat. When serious harm to fish cannot be avoided, mitigation measures will need to be undertaken. Mitigation—implementation of specific measures to reduce the spatial scale, duration, or intensity of effects to acceptable levels. Offsetting—residual effects remaining after mitigation and which are deemed to cause serious harm to fish will require an authorization under the Fisheries Act and would normally require an offsetting plan designed to counterbalance residual effects. <p>The project-specific EMP will provide standardized mitigation measures and Best Management Practices (BMPs) designed to protect fish habitat during construction. Mitigation measures and BMPs considered within the EMP include, but are not limited to, the following:</p> <ul style="list-style-type: none"> PRGT will acquire appropriate permits and notifications PRGT will reduce riparian disturbance and maintain riparian buffers PRGT will adopt an Erosion and Sedimentation Control Management Plan (Section 36.2) The ROW will be narrowed in sensitive areas where possible PRGT will adopt Nisga'a Access Management Plan (Section 36.2) PRGT will adopt a Directional Drilling Procedures and Instream Drilling Mud Release Contingency Plan (Section 36.3) PRGT will post signage in environmentally sensitive areas PRGT will restore and reclaim the bed and banks. 	Overall, a limited number of crossings proposed for mainstems and tributaries have the potential to adversely affect freshwater fish and fish habitat. With the implementation of proposed mitigation measures, residual effects on the productive capacity of freshwater species harvested by Nisga'a citizens are not expected.

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Marine Resources			
34.9	<p>Marine Assessment</p> <p>Nisga'a citizens have the right to harvest salmonids, oolichan, intertidal bivalves, aquatic plants, non-salmon species of fish or marine mammals for domestic purposes anywhere in the Nass Area</p>	<p>In addition to the general mitigation measures for marine resources listed in Section 34.9.5, PRGT commits to the following measures specific to the Nass Area:</p> <ul style="list-style-type: none"> • PRGT will schedule construction activities to reduce the likelihood of harm during sensitive life stages of fish species associated with Nisga'a interests. PRGT will consult with DFO and NLG regarding least risk window for species-specific sensitive life stages during Project permitting. • Routing and related construction and operations works relevant in Nasoga Gulf will avoid direct effects on the Nasoga Gulf Bivalve Harvesting Area (i.e., the Project will not overlap geographically) by routing directly south of the area (Figure 34-18). • The duration and timing of the required construction window within the marine portion of the Nass Area will be limited as much as practical to help reduce disturbance to fishing activities. • The duration and timing of construction within the marine portion of the Nass Area will be limited as much as practical to help reduce disturbance to fishing activities. • A Marine Access/Traffic Management Plan will be developed, which will include the Nass Area (Section 36.2). The plan will be developed based on consultation with regulatory agencies, NLG, and stakeholders as planning for marine construction activities proceeds. The plan will include BMPs and project-specific mitigation measures to limit the adverse effects of marine construction vessels and activities on current marine use. The plan will include the following objectives: <ul style="list-style-type: none"> • Identify and respect existing and traditional navigational routes, fishing areas, harvesting areas, and timing windows • Recognize the importance of and minimize disruption to current marine use including fishing, recreational use, commercial and shipping activities, tourism, and marine-based transportation • Facilitate ongoing access for Nisga'a citizens to fish and harvest marine resources • Maintain a balance between safe construction operations and minimal disruption to current use • The Marine Access/Traffic Management Plan will also include detailed information on: communication strategies; safety zones; construction and support vessel requirements; timing and duration of construction activities; and regulatory requirements. • In deeper waters (i.e., greater than 20 m water depth), the pipeline will be lowered below the existing seabed in areas where there is a concern of damage due to vessel anchors or fishing equipment. These areas will be identified pending the results of an ongoing pipeline risk assessment. In areas where the pipeline is not lowered below the seabed, the concrete-coated pipe will sit on the seabed (Section 11.4.2). • A management plan will be developed in consultation with NLG to address the protocols involving possible interaction of fishing activities with pipeline-related construction activities and works in the marine component of the Nass Area. Considerations for the proposed management plan could include the following aspects: <ul style="list-style-type: none"> • A consultation and planning process for aspects of the construction works related to the pipeline installation within the Nass Area. • Information on fishing and harvesting practices within the Nass Area will be incorporated into the planning process, where applicable. Understanding of aspects related to the construction of the submerged pipeline is mutually beneficial for the safety of fishing equipment and the safe operations of the Project. • An adaptive management program will be developed for tracking and responding to issues related to Nisga'a fishing activities and possible interactions with the submerged pipeline during construction and operations. 	<p>There is a potential residual effect on change in habitat, harm to fish, change in access to fishing and harvesting areas and damage or loss to benthic fishing gear. However, these changes are not expected to have an adverse effect on the ability of Nisga'a citizens to exercise their right to harvest salmonids, oolichan, intertidal bivalves, aquatic plants, non-salmon species of fish or marine mammals.</p>

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Wildlife			
34.10	Nisga'a citizens have the right to harvest wildlife (including wildlife fish) for domestic purposes throughout the Nass Wildlife Area, including specific allocations for: <ul style="list-style-type: none"> grizzly bear moose mountain goats 	In addition to the wildlife-related mitigation measures listed in Table 34-72, PRGT commits to: <ul style="list-style-type: none"> consultation with NLG in the development of the vegetation management of the permanent pipeline corridor during operations and reclamation of temporary workspaces in the NWA continued consultation with NLG to identify sensitive ecosystems and harvesting areas that require additional site-specific or situational mitigation measures. notify Nisga'a citizens of access restrictions during construction as required for safety purposes, prior to construction activities, to allow citizens to plan for alternative hunting locations. use existing roads and linear corridors, where practical avoid construction of circuit roads (dead-end roads are preferable) reclaim temporary roads develop and implement the Nisga'a Access Management Plan. 	There are potential project effects on habitat, mortality risk, and access to harvesting areas that may have residual effects on the ability of Nisga'a citizens to exercise their right to harvest wildlife.
Migratory Birds			
34.11	Nisga'a citizens have the right to harvest migratory birds for domestic purposes anywhere in the Nass Area	In addition to the general mitigation measures for migratory birds listed in Section 34.11.5, PRGT commits to the following measures specific to the Nass Area: <ul style="list-style-type: none"> PRGT will consult with NLG in the development of the vegetation management of the permanent pipeline corridor during operations and reclamation of temporary workspaces in the Nass Area to mitigate changes in habitat. PRGT will continue to consult with NLG to identify sensitive ecosystems and harvesting areas that require additional site-specific or situational mitigation measures. PRGT will develop and implement the Nisga'a Access Management Plan in consultation with NLG. 	There are potential project effects on bird habitat, bird mortality risk, and access to migratory bird harvesting areas that may have residual effects on the ability of Nisga'a citizens to exercise their right to harvest migratory birds.

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Non-Timber Forest Resources			
34.12	Nisga'a interests related to the harvest of non-timber forest resources in the Nass Area.	<p>Mitigation measures to reduce the effects of construction and operation of the Project on habitat suitability for non-timber forest resources, include:</p> <ul style="list-style-type: none"> • PRGT considered potential route options to avoid important mushroom areas as identified in the Nisga'a Land Use Plan (NLG 2002) • PRGT will restrict vegetation removal to within the approved construction pipeline footprint and temporary workspace • PRGT will implement natural recovery methods for the reclamation of temporary work space, where practicable • PRGT will implement environmental and operational management plans, including a project specific EMP, Invasive Plant Species Management Plan, and Plant Species and Ecological Communities of Concern Discovery Contingency Plan (Section 36). • In consultation with NLG, PRGT will restrict the general application of herbicide near identified traditional-use species and rare plant communities. Spot spraying, wicking, mowing or hand-picking are acceptable measures for weed control in these areas (BC MOE 2012c). • PRGT will implement invasive species mitigation measures listed in Section 13 and in the Invasive Plant Species Management Plan. <p>The primary mitigation to reduce access-related effects from the Project is the development and implementation of the Access Management Plan.</p> <ul style="list-style-type: none"> • The Nisga'a Access Management Plan for the Nass Area (as a component of the overall Access Management Plan, Section 36) during the construction and operation phase of the Project will be developed in consultation with NLG and other appropriate regulatory agencies and stakeholders. Access management measures could include the following: <ul style="list-style-type: none"> • provide notification of pre-construction periods to allow for plant harvesting along the pipeline footprint prior to construction activities • provide advance notification of access restrictions during construction for safety purposes to allow citizens to plan to use alternative harvesting locations • coordinate post-construction control of off-road vehicles with the appropriate authorities until disturbed areas have been reclaimed. Possible measures include using woody debris as rollback, mounding, placing boulders across the corridor, installing gates and signs, and planting trees or shrubs at select locations. Locations for site-specific measures will be determined prior to construction based on site conditions and consultation with the appropriate regulators and NLG. • deactivate and reclaim temporary construction access roads; implement measures such as mounding, berms and tree felling to prevent human access • temporary work spaces and the edges of the ROW will be allowed to regenerate naturally with trees and shrubs with the exception of a 10 m operational corridor. • encourage rapid regeneration of natural vegetation by planting native tree seedlings and shrubs in selected temporary work spaces (e.g., lay down areas, stockpile and storage areas, temporary workspaces, turnarounds, construction camps, and new access roads) • when using rollback to manage access, retain sufficient timber or slash (e.g., stumps) of appropriate size onsite for spreading over disturbed areas during the final clean-up • limit additional clearing for construction access using existing access or corridors and use existing disturbances as temporary work space whenever possible. 	There are potential project effects on habitat suitability for focal species, and changes to access that may have residual effects on the ability of Nisga'a citizens to harvest non-timber forest resources.
Nisga'a Interests Identified in NFA – Chapter 10, Paragraph 8(f)			
Nisga'a Economic Interests			
34.14.6	Nisga'a citizens' employment and income	<ul style="list-style-type: none"> • work with contractors to identify and address employment participation barriers for Nisga'a citizens and to increase opportunities to participate on the project workforce • provide qualified Nisga'a citizens and businesses the opportunity to participate in project construction, and not set and work to achieve quotas or targets that may lead to wage competition with other employers • Maintain sustainable project costs by offering fair wages in line with market conditions. 	<p>Potential residual effects of the project include:</p> <ul style="list-style-type: none"> • Labour shortages • Wage inflation

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
34.14.7	Nisga'a citizens' business activities	<ul style="list-style-type: none"> • PRGT considered potential route options to avoid important mushroom areas as identified in the Nisga'a Land Use Plan (NLG 2002) • PRGT will consult with NLG and Nisga'a resource users. Reasonable efforts will be made to schedule construction activities to limit interference with forestry, fishing, commercial mushroom harvesting, tourism and other business activities • PRGT will develop a Nisga'a Access Management Plan for the Nass Area during the construction and operations phase of the Project in collaboration with NLG and other appropriate regulatory agencies. The plan will consider access for Nisga'a businesses to resource harvesting areas during pre-construction, construction and operation where feasible. Access management measures could include the following: <ul style="list-style-type: none"> • Provide notification of pre-construction periods to allow plant harvesting along the pipeline footprint prior to construction activities • Provide advance notification of access restrictions during construction • Facilitate access for Nisga'a businesses, where feasible and safe to do so, during construction to resources areas that may be temporarily restricted by the project ROW safety zone. This would include roads or other routes used by Nisga'a businesses to access natural resource harvesting that may be temporarily restricted during construction. 	<p>Potential residual effects of the project include:</p> <ul style="list-style-type: none"> • Disruption to Nisga'a citizens' business activities as a result of restricted access during project construction
34.14.8	Natural resource activities and related earnings or values	<p>Forestry</p> <ul style="list-style-type: none"> • PRGT will engage with NLG regarding forestry operations on Nisga'a Lands overlapping with the project footprint and coordinate project construction activities with forestry operators active in the area • PRGT will prepare and implement a Timber Utilization Plan in consultation with NLG for use of merchantable timber <p>Botanical and Agricultural Use</p> <ul style="list-style-type: none"> • The Nisga'a Access Management Plan for the Nass Area will be developed in collaboration with NLG and other appropriate regulatory agencies, and will include strategies to minimize disturbances to botanical and agricultural activities during the construction and operation phases of the Project. Access management measures could include the following: <ul style="list-style-type: none"> • Provide notification of pre-construction periods to allow plant harvesting along the pipeline footprint prior to construction activities • Provide advance notification of access restrictions during construction for safety purposes to allow Nisga'a citizens to plan to utilize alternative harvesting locations <p>Pine Mushroom Harvesting</p> <ul style="list-style-type: none"> • PRGT considered potential route options to avoid important mushroom areas as identified in the Nisga'a Land Use Plan (NLG 2002) • PRGT will consult with NLG on the location of other pine mushroom harvesting areas potentially affected by the Project and identify specific mitigation measures, which may include project re-routing. <p>Harvesting of Fish and Wildlife</p> <ul style="list-style-type: none"> • PRGT will adhere to species-specific timing constraints during construction where possible • PRGT will consult with the registered holders of traplines to discuss maintaining access to traplines or moving trapline equipment, as necessary • PRGT will consult Nisga'a trapline tenure holders with respect to the timing and planning of construction, operation and maintenance activities that will impact them • In collaboration with NLG and Nisga'a trapline tenure holders, PRGT will develop and implement a Nisga'a Access Management Plan • PRGT will reduce the amount of land disturbance by using previously disturbed areas where feasible for access, stockpiles and temporary construction camp sites • PRGT will compensate registered trappers as per the Trapper Compensation Schedule for demonstrated economic losses related to construction of the Project <p>Nisga'a Memorial Lava Bed Park</p> <ul style="list-style-type: none"> • PRGT will parallel the Nisga'a Highway to the best extent possible • PRGT will consult with NLG and BC Parks with respect to the timing and planning of construction activities, to avoid overlapping with traditional uses of the Park by Nisga'a citizens. This will include the distribution of construction schedules, maps and other relevant information on anticipated trail, road and area closures to NLG and Nisga'a Villages and potential user groups to inform them of the presence of construction activity, potential access restrictions, and noise disturbance in recreational areas. 	<p>Potential residual effects of the project include:</p> <ul style="list-style-type: none"> • Loss of land base identified for natural resources as a result of land clearing for project construction

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
34.14.9	Nisga'a Lisims Government Expenditures	<p>While no specific monitoring is identified by NLG at this time, PRGT will continue to consult with NLG to identify ways to assist with monitoring efforts, which may include the following:</p> <ul style="list-style-type: none"> • Assist NLG to monitor project-related education, training, employment and procurement opportunities • Assist NLG to develop and implement an economic development strategy or initiatives related to project employment, procurement, and capacity building/training <p>Capacity funding for project-related expenditures are being discussed between PRGT and NLG.</p>	<p>Potential residual effects of the project include:</p> <ul style="list-style-type: none"> • Costs incurred by NLG to monitor project-related employment, training, contracting and mitigation to address effects may negatively affect NLG's ability to participate in monitoring activities, which could also affect overall effectiveness of mitigations
Nisga'a Social Interests			
34.15.6	Migration and population effects in the Nisga'a Nation communities	<ul style="list-style-type: none"> • PRGT will house workers in camps located outside of Nisga'a Villages. During camp setup stage, workers will be housed in Terrace. • PRGT will manage the movement of workers into Nisga'a Villages by discouraging use of vehicles for personal use, and providing other means of transport. • PRGT will provide amenities for workers in camps, for example, providing Wi-Fi connectivity in all construction camps in the Nass Area. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> • Increase in permanent Nisga'a population seeking employment • Temporary in-migration of workers into Nass Area for construction phase
34.15.7	Infrastructure and services in the Nisga'a Nation communities	<ul style="list-style-type: none"> • PRGT will purchase potable water from a bulk vendor and make the contract for potable water needs in the Nass Area available to Nass Area businesses. • PRGT will transport sewage out of the area, or make an arrangement with Nisga'a Nation to use local sewage infrastructure. • PRGT will provide adequate housing in construction camps for all workers during construction phases. During the construction camp setup stage, workers will be housed in Terrace. <p>Traffic and Road Management</p> <ul style="list-style-type: none"> • PRGT will consult with NLG to determine where road upgrades are needed most, based on existing and anticipated demand. • PRGT will incorporate driving limitations and carpooling into camp policies and practices to reduce unnecessary use of road infrastructure. • Heavy vehicles travelling through Nisga'a Villages will adhere to the policies and procedures in the Traffic Management Plan (See Section 36.2). <p>Emergency and Social Services</p> <ul style="list-style-type: none"> • PRGT will provide project information to NLG, Nisga'a Villages, and service providers so they can prepare for potential additional demands on services. • PRGT will communicate updates with NLG and Nisga'a citizens before any major infrastructure developments occur. • PRGT will have at least two first aid medics housed in construction camps, and supply camps with Emergency Conveyance Vehicles. • PRGT will record all worker medical incidents requiring Nisga'a Village emergency infrastructure or services during the construction phase. Incident numbers will be shared with the Nisga'a Valley Health Authority. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> • Increase in wear-and-tear on roads from project-related traffic • Increase in demand on emergency and social services • Increase in demand on local infrastructure, including water and sewage systems, and housing

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
34.15.8	Occupational and non-occupational health risks	<p>Quality of Air, Water, and Traditional Foods</p> <ul style="list-style-type: none"> PRGT will reduce idling of equipment, keep equipment well-maintained, and where practical and applicable, use multi-passenger vehicles for the transport of crews to and from job sites. Where project activities create a hazardous or irritating level of dust to nearby residents, dust control on existing access roads will be completed through the application of calcium chloride (or equivalent) or water. Only water will be used for dust control on the right-of-way. During construction, if air quality complaints are received, the environmental inspector will evaluate and implement measures to address the particular concern. PRGT will collect all construction debris and other waste materials and dispose of daily at an approved facility and in accordance with the Chemical and Waste Management Plan and the Spill Contingency Plan (Section 36.2) unless otherwise authorized by the Environmental Inspector(s). PRGT will obtain applicable permits prior to wood burning, inform NLG of burn plans, and follow applicable regulations. In the event that contaminated soils are encountered during construction, the TransCanada Waste and Hazardous Materials Management Manual will be followed. In consultation with NLG, PRGT will restrict the general application of herbicide near identified traditional use species and rare plant communities. Spot spraying, wicking, mowing, or hand-picking are acceptable measures for weed control in these areas (BC MOE 2012c). PRGT will prohibit the use of herbicides within 30 m of an open body of water. PRGT will develop and implement water quality monitoring plans for sediment events during in-stream construction activities in accordance with the applicable regulatory approvals. Bulk fuel trucks, service vehicles, and pick-up trucks will be equipped with box-mounted fuel tanks and will carry spill prevention, containment, and clean up materials that are suitable for the volume of fuels or oils carried. Spill contingency material carried on bulk fuel and service vehicles will be suitable for use on land and water. Fuel, oil, or hazardous material storage will not be allowed within 100 m of a watercourse or water body except where secondary containment is provided. In the event of a spill, the Spill Contingency Plan will be followed (Section 36.3). Equipment to be used in or adjacent to a watercourse or water body will be clean or otherwise free of external grease, oil or other fluids, mud, soil and vegetation. PRGT will use silt curtains or other mitigation measures during trenching and any related construction in specified waterbodies to minimize the transportation of suspended sediments, where appropriate and practical. PRGT will communicate with property owners (and any other relevant parties) to inform them in advance (1) when, where, and what type of activities will be undertaken, (2) what kind of disturbances they can expect, and (3) how they can contact PRGT to discuss their concerns. <p>Noise</p> <ul style="list-style-type: none"> PRGT will maintain noise abatement equipment on machinery in good working order. PRGT will keep vehicle idling times during all phases of the Project to a minimum. Vehicles will only be permitted to idle during the cold weather months unless idling is required for safe operation of a vehicle. A vehicle idling policy will be developed which will be enforced as part of compliance monitoring and communicated to all employees and contractors. PRGT will respond and take action to responsibly manage the issue, in the event of a complaint from Nisga'a citizens during construction. The complaint and response mechanism will be communicated to NLG for circulation in Nisga'a Villages. PRGT will use select protocols as described in section 3.1.1 of the British Columbia Noise Control and Best Practices Guideline including: <ul style="list-style-type: none"> Where practical, construction and operation activities will be scheduled during daytime hours. Construction traffic to and from the site will be restricted to approved access routes, including consideration of alternative routes to minimize travelling near residences. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> Change in traditional foods quality Change in drinking water quality Change in air quality Increase in noise

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
34.15.9	Occupational and non-occupational accident risks	<p>Traffic Safety -</p> <ul style="list-style-type: none"> Crews and drivers will follow the Traffic Management Plan (Section 36) at all times. The plan addresses driving policy, including: maximum work hours, use of seatbelts, speed limits, equipment (including use of winter tires), distracted driving, drug and alcohol use, and pre-trip inspections. All construction activities will be restricted to the approved surveyed right of way and approved temporary workspace, Project facility site boundary, and existing roads and approved shoo-flies. All construction traffic will adhere to safety and road closure regulations. PRGT will consult with NLG to determine where road upgrades are needed most, based on existing and anticipated demand. <p>Marine Safety -</p> <ul style="list-style-type: none"> PRGT will comply with the Navigable Waters Protection Act. PRGT will employ guard vessels around the pipelay barge and other construction vessels to control vessel traffic nearby. Pipelay activities and the movement of associated construction vessels will follow all local regulations and procedures including, but not limited to, those set by the Canadian Coast Guard and the Prince Rupert Port Authority. PRGT will communicate with the Prince Rupert Port Authority and with the Marine Communications and Traffic Services to encourage the safety of all marine vessels in the area, and to minimize the potential disturbances from pipeline construction activities. Details of the construction activities (timeline, positioning, vessel description etc.) will be given to NLG ahead of time, and a Notice to Mariners will be issued. This will allow all mariners in the area to be aware of the activities, understand the safety zones, and be provided with navigation alternatives if necessary. A marine communication system will be used to communicate with other vessels in the area, and to help avoid any conflicts. AIS Transmitters may also be used as a safety tool to allow other mariners to see the location, course, and speed of the various construction vessels. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> Increased risk of marine accidents from project-related congestion Increased risk of traffic accidents
34.15.10	Crime	<ul style="list-style-type: none"> PRGT will house all non-local workers in camps outside of Nisga'a Villages. During camp set-up stage workers will be housed in Terrace until camps are ready. PRGT will implement TransCanada's Drug and Alcohol Policy, which applies to all PRGT employees, contractors, and workplaces. PRGT will communicate worker in-migration schedules to RCMP to encourage adequate policing resources. PRGT will work with RCMP to record project-related crime incidents. These incidents will include worker-related incidents and any theft of, or damage to, PRGT property. Incident numbers will be shared with NLG if requested. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> Decreased policing capacity in the Nass Area Increase in incidents of crime
34.15.11	Family and community well-being	<ul style="list-style-type: none"> PRGT will house all non-local workers in camps outside of Nisga'a Villages. During camp set-up stage, workers will be housed in Terrace until camps are ready. PRGT will manage the movement of workers into Nisga'a Villages by discouraging use of vehicles for personal use, and providing other means of transport. PRGT will implement TransCanada's Drug and Alcohol Policy, which applies to all PRGT employees and workplaces. PRGT will collaborate with NLG to provide counselling services, including money management training, to Nisga'a citizens employed by the Project interested in attending. PRGT will work with contractors to address cultural and family obligations through culturally sensitive workplace policies. PRGT will develop protocols to maintain communication between workers and their families. PRGT will develop strict requirements for workers to emphasize respectful behaviour while inside and outside of camp. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> Increase in substance misuse or gambling Social consequences of an infusion of income Change in Community Well-Being index scores, which include income, labour participation, housing, and educational attainment

Table X-2-1: Summary of Potential Project Interactions, Mitigation Measures and Residual Effects Related to the NFA (cont'd)

Section	Nisga'a Interests	Mitigation Measures	Potential Residual Effect
Nisga'a Cultural Interests			
34.16.6	Effects of environmental impacts on the cultural activities and practices of Nisga'a citizens	<ul style="list-style-type: none"> • Based on consultation with NLG, PRGT has undertaken adjustments to minimize and/or avoid areas identified socially and culturally important (e.g., Pine Mushroom Polygon) • PRGT will consult with NLG to post signs during construction to clearly identify sensitive environmental features • PRGT will develop a Heritage or Paleontological Resource Discovery Contingency Plan and Traditional Land Use (TLU) Sites Discovery Contingency Plan (Section 36.4) and implement if culturally important sites are found during construction • PRGT will complete an archaeological impact study to locate and characterize cultural and heritage sites along the project footprint before initiating any project-related ground disturbing activities • PRGT will develop and implement a Nisga'a Access Management Plan in consultation with NLG (Section 36.2) • Heritages sites such as burial grounds and gravesites were considered and avoided during route development. New finds will be managed in accordance with the Heritage or Paleontological Resource Discovery Contingency Plan (to be developed, see Section 36.4) to minimize adverse effects • PRGT will engage the Nisga'a Wildlife & Fisheries Department to help with the dissemination of information to trappers, hunters, fishermen, guides, and hunters about the project construction schedule so they can plan around these activities. <p>All other mitigation measures that pertain to reducing project-related environmental effects on cultural activities and practices are listed in Sections 34.8-34.12.</p>	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> • The permanent removal of Park land may affect access and disrupt the ability of Nisga'a citizens to engage in cultural activities and practices. • Special Management Areas such as the Nass Bottomlands will be affected by the project footprint by approximately 3.5% • Site preparation activities could result in a loss of 1.6 km², or 4.10% of high-value habitat for pine mushroom • Potential decrease in access to harvesting areas due to project construction activities
34.16.7	Effects of changing work patterns and income on Nisga'a cultural activities and practices	<ul style="list-style-type: none"> • PRGT will work with successful subcontractors to develop human resources (HR) policies that recognize and accommodate cultural practices.. HR policies may include a Cultural Leave Policy, flexible work schedules to accommodate hunting/mushroom picking, or permission to take unpaid leave for a reasonable amount of time to attend funerals or cultural events. 	<p>Potential residual effects of the project include;</p> <ul style="list-style-type: none"> • For Nisga'a citizens who are employed by the Project, they may be at some risk of missing out on key harvesting times if they happen to be on shift at the time • Changing work patterns could result in more time away from family 'a • Employment in the Project could enable Nisga'a citizens to purchase equipment and supplies (e.g., boats, firearms, traps, fishing gear) and thereby enhance capacity to participate in cultural activities