

**Application for an Environmental Assessment
Certificate**

**Appendix C-3
Working Group Comment Tracking Table**

19.3.3	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"Discussing the quality and reliability of these data sources and how they are used to support the assessment incorporating available traditional ecological knowledge (TEK) into the Application, in addition to information collected through field studies, surveys, and other research methods"</p> <p>SFC Comment: SFC advocates adding an additional element: collecting more data via additional fieldwork as required.</p>	<p>PRGT believes that Section 3.3 of the Application provides sufficient information to undertake an effective assessment of the potential effects of the proposed Project. However, additional fieldwork may be undertaken, if an environmental assessment certificate is granted, for permitting and pre-construction assessment purposes.</p> <p>No changes to the dAIR are required.</p>	<p>Inadequate response. Lax Kw'alaams repeats the request for the inclusion of an additional element of collecting more data via additional fieldwork as required" in the dAIR. This is a critical matter to ensuring that impacts can be adequately/property assessed.</p> <p>Takla Lake First Nation comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Takla strongly agrees with the WG member's statement.</p>	<p>PRGT reiterates that additional fieldwork may be undertaken, if an environmental assessment certificate is granted, for permitting and pre-construction assessment purposes. Field work conducted to date is adequate to undertake an effective assessment of the potential effects of the proposed Project.</p>	<p>Lax Kw'alaams (Skeena Fisheries Commission) comment on response to Round 2 Lax Kw'alaams comment: Although the granting of an EAC (environmental assessment certificate) to a project proponent does not mean that the project granted an EAC is a "fait accompli"; it does limit/preclude discussions on making drastic changes to project designs and/or siting locations in light of environmental concerns. The proponents response in this case along with the BCEAD allowing the EA to be a proponent driven process highlights some disturbing trends with the current EA landscape in BC. If the proponent is unwilling to address key data gaps as they are identified by WG until they acquire their EAC, then what does this ultimately say about the culture of work and ethics one should expect from PRGT? There needs to be a sufficient baseline of data on all environmental aspects potentially affected by the PRGT project as well as the Petronas LNG facility on Lulu Island before an EAC is granted. The aforementioned baseline data needs to be presented in its entirety to the WG for objective discussion and deliberation before the normal BCEAD 180 day EA review is conducted. PRGT being unwilling to commit to more essential data collection before the EAC stage is reached is troubling. Who/what organization reached the conclusion: "Field work conducted to date is adequate to undertake an effective assessment of the potential effects of the proposed Project" and by what rationale?</p> <p>Kitsumkalum Band Council comment on response to Round 2 Lax Kw'alaams (Skeena Fisheries Commission) and Takla Lake First Nation comment: We request that the EAO explain to the WG how situations like this will be resolved when, for example, PRGT states that "Field work to date is adequate..." when two WG members just stated that they have concerns about this. What is the process when there is a gridlock in opinion, or when PRGT thinks no change to dAIR is needed but the WG thinks there is?</p> <p>Kitsumkalum supports Lax Kw'alaams' and Takla Lake's request for the inclusion of: "collecting more data via additional fieldwork as required."</p>	<p>PRGT maintains that the baseline data collected to date will allow for an effective assessment of the potential effects of the proposed Project. This conclusion has been reached following review of the data by PRGT's environmental assessment team, composed of professional environmental scientists, and based on the information collected for the environmental assessment of other, similar projects. WG members will have another opportunity to provide comments on the complete Application and accompanying baseline data during the 180 day review period. PRGT is also willing to collect additional data, as required, following the granting of the environmental assessment certificate in support of permitting and pre-construction activities. PRGT has directed the request on how conflicting opinions between WG members and the proponent will be resolved to the EAO.</p>
20.3.5	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"The effectiveness of the proposed mitigation measure(s) will be described, and where possible, expressed in terms of the expected change in the measurable parameter(s) for the effect, including the time required for the mitigation to be effective. In some cases, mitigation measures may incorporate monitoring to verify results and adaptive management. A description of the mitigation measures that have been incorporated into the site selection and design of the Project will be provided in the Project Description section of the Application; these measures will not be reiterated in the VC assessments."</p> <p>SFC Comment: Why are not all mitigation measures to be monitored for their respective effectiveness? Why exactly will mitigation measures "not be reiterated" in the VC assessments? Mitigation measures for a given VC should be described alongside a VC that is potentially adversely affected by a given projects activities.</p>	<p>In general, mitigation measures specific to each VC will be presented alongside each VC being assessed. Only those mitigation measures that relate to site selection and design (e.g., adjusting the pipeline ROW to avoid sensitive landscape features or modifying the design of infrastructure to reduce the size of the footprint) will not be reiterated in the VC assessments to reduce repetition.</p>	<p>Inadequate response. Lax Kw'alaams remains critically concerned about the lack of a requirement for monitoring for all mitigation measures? Lax Kw'alaams requests that such a requirement be included in the dAIR. Monitoring is essential to ensure mitigation is effective.</p>	<p>The requirement for ongoing monitoring and follow up programs will be prescribed by the EAO and tied to the PRGT environmental assessment certificate, if issued.</p>		
21.3.2.1	Don Roberts	Kitsumkalum Band Council	<p>Kitsumkalum expects that spatial boundaries will reflect the nature of the marine environment. This needs to be a holistic approach, taking into account marine species that migrate, at different life stages, impacts on the marine system through currents, migrating fauna, and atmospheric impacts just to mention a few.</p> <p>The dAIR explains that Appendix A Sections 4 to 8 will list the spatial boundaries for the VCs. This information is not attached yet. Once Kitsumkalum receives the information, we will conduct a knowledge gap analysis to assess if these boundaries are satisfactory.</p>	<p>Aspects of the scope of the proposed Project will be captured in the spatial and temporal boundaries described for each VC.</p> <p>PRGT looks forward to receiving additional information from Kitsumkalum during Application review to help ensure that Kitsumkalum's interests and concerns are identified and addressed.</p> <p>Changes to the dAIR are not required.</p>			<p>The response is not adequate. Please see above suggestion to have a WG meeting regarding scope. (above refers to comment 15, see below for comment 15)</p> <p>The response that Kitsumkalum was provided the opportunity to comment on the spatial and temporal scope of the VC baseline report is misleading. The baseline report was extremely general. Our response at the time was: "We anticipate that we will have opportunity to comment on the geographic and temporal scope of studies and assessments and monitoring programs before they are finalized." We request that we have a WG session where PRGT walks us through all spatial and temporal scopes of all VCs in detail. Please see our comments on 3.2.1 Comment D.21 as well. Please note that comments were made by Don Roberts, not Don Harrison.</p> <p>Comment directed to the EAO.</p>	
22.3.6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"The Application must identify the residual adverse effects for each VC. For each residual effect, the likelihood of its occurrence must be discussed based on the causal activity and effectiveness of mitigation."</p> <p>SFC Comment: What about baseline data on a given VC pre-disturbance? How will the effectiveness of a given mitigation measure be quantitatively ascertained before a given VC is to be adversely affected?</p>	<p>When selecting mitigation measures for a particular potential effect, PRGT would first consider proven mitigation measures whose effectiveness is well documented and understood. If after application of proven mitigation there is a residual effect then additional mitigation measures may be added. A discussion surrounding prediction confidence will also be presented. In some cases Follow-up monitoring may be needed to confirm this prediction (refer to Section 15.0 of the dAIR).</p>	<p>Lax Kw'alaams (Skeena Fisheries Commission) comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project). Relevant factors to be considered in baseline conditions include current condition of the VC, and the current and future sensitivity and resilience of the VC to change caused by the Project.</p> <p>Inadequate response. Lax Kw'alaams requested information on how the effectiveness of a given mitigation measure will be quantitatively ascertained before a given VC is to be adversely affected. Further, Lax Kw'alaams reiterates the need to use trend-over-time data in establishing baselines. In Lax Kw'alaams opinion, it is essential to identify existing cumulative effects loads as part of the context of the receiving environment. The dAIR must be revised to establish appropriate expectations for backcasting in baseline condition profiling.</p>	<p>As described in section 3.5 of the dAIR, mitigation measures will be identified with an explanation of how these measures will help alter or reduce the potential effect of concern. The effectiveness of the proposed mitigation measure(s) will also be described, using examples from projects of a similar nature and published literature where appropriate.</p> <p>It is noted that pipeline construction is a well regulated and well understood activity with most mitigative measures specified by codes of practice and/or years of development as best management practices employed by TCC and other industry leaders. These standard mitigation measures will be described in the Application. It is also noted that a key approach to mitigation has taken place in the careful selection of the pipeline route to reduce environmental and social effects, and in consideration of consultation and engagement; the route selection process and input received from consultation will also be detailed in the Application.</p> <p>Baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project).</p>	<p>The potential cumulative effects of where the PRGT Project meets the Petronas LNG facility are being considered as part of the cumulative effects assessment (see Table 3-4 in the December 2013 version of the dAIR).</p>	
23.3.6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"Reversibility—the likelihood that a measurable parameter will recover from an effect (i.e., reversible or irreversible)."</p> <p>SFC Comment: How is reversibility empirically quantified?</p>	<p>Reversibility is often tied to the physical work or activity that causes the disturbance, and as such includes the duration of the project or a specific project phase (e.g., construction) as a point of reference. Reversibility can also be tied to a critical life stage of a VC (e.g., reproductive lifespan) if that is more relevant in terms of describing the reversibility of a potential effect. These factors will be considered and included in the definition of reversibility, where applicable.</p>	<p>Sufficient response.</p>	<p>No additional response required.</p>	<p>Given that the success or failure of PRGT's proposed mitigation measures will hinge on the reversibility of the environmental degradation caused from their project activities, a better quantifiable definition of what the BCEAD and PRGT consider reversibility to be still needs to be provided.</p>	
24.1.2	Adrienne Fitzpatrick	Nak'adzi Band	<p>"The EA must assess the maximum capacity project design, not simply phase one (i.e. the full build out of the Project to maximum gas transportation potential). Revise language as follows: "The Application must provide an overview of the Project with a focus on the main features of the pipeline, compressor stations, metering stations, total labour force required during construction and operation, worker accommodations and other requirements, and estimated capital and operating costs. Additionally, the description must include the design to maximum capacity, including all additional compressor stations and associated construction activities."</p>	<p>Although the initial buildout of the proposed Project will be constructed to meet the requirements of 1.2 Bcf, the scope of the environmental assessment will include a future expansion scenario of 3.6 Bcf, including the requirement for additional compressor stations and associated construction activities and associated requirements.</p>	<p>Lax Kw'alaams (Skeena Fisheries Commission) comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Lax Kw'alaams requests to be specifically consulted on significance criteria and that requirements for the incorporation of First Nations' perspectives on significance criteria be set out in the dAIR. Lax Kw'alaams requests that the Working Group convene to discuss significance criteria before the AIRs are finalized.</p>	<p>OK. But why isn't this included in the AIR? What is the purpose of the AIR if commitments to the scope of the EA are captured in discrete documents such as these tracking tables? This practice is not acceptable. The EAO should require that all commitments made by a Proponent in relation to the EA scope be captured in the AIR. This casual approach does not create a strong foundation of trust between all parties. Now, if this commitment is already captured, PRGT should direct Nak'adzi to the relevant section of the AIR. It is not evident that this commitment is made in the AIR.</p>	<p>The scope of the project is defined in the section 11 Order. Specifically, item A on page 4 of the section 11 Order states: "Depending on the finalized route, the pipeline system would be up to 900 km long with a diameter of up to 48 inches and include up to nine compressor stations." This description of the Project encompasses the 3.6 Bcf maximum build-out. In addition, Part B - Scope of the Proposed Project lists all the discrete aspects and components of the Project that need to be considered in the Application (see page 7 of the Order). As this information is defined in the section 11 Order, PRGT is legally required to assess the full build-out scenario and therefore it does not need to be reiterated in the AIR.</p> <p>PRGT has directed this comment to the EAO to provide clarity on the purpose of the AIR. It is PRGT's understanding that responses, including commitments, provided in tracking tables such as these become part of the official record for the EA process and therefore will be adhered to.</p>	<p>(Submitted by Nak'adzi in tracking table and in letter) In response to comments 24, 25, 54, 77, 87, 98, 118, 145, 149, 155, 157, 181, 188, 191, 201, 204, 205, 207, 500, the dAIR should be updated to reflect concerns that were raised through the electronic tracking system facilitated by the EAO. Despite the fact that PRGT states that the "Working Group including Nak'adzi was provided with multiple opportunities to provide input through review and discussion of the VC document and dAIR", the vast majority of comments made by Nak'adzi has been dismissed (see comments 60, 62, 86, 96, 113, 124, 127, and 189 for exceptions). At minimum, the dAIR should reflect the commitments made in the tracking table and the Section 11 Order. The final AIR is meant to be a terms of reference document, commonly defined as a document that describes the purpose and structure of an assessment agreed upon by a collection of people working together. This document should act like a charter guiding the entire process and should reflect the shared objectives of working group members. At the present time, the dAIR does not reflect the objectives of Nak'adzi and nearly all comments have not resulted in changes to the dAIR. Furthermore, if commitments are distributed in various places, like the Section 11 Order and in the tracking tables that include over 6,400 substantive comments (composed of 6 comment columns after round 3) and over 1,072 rows), the process of evaluating the Application for completeness becomes even more difficult, costly, and may result in a delay of the 30-day timeline for review. It is in the interest of all parties to ensure the dAIR is complete so subsequent phases are conducted in an organized manner.</p>
25.3.6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"...Where standards or thresholds do not exist, significance criteria will be defined, and justifications for the criteria will be provided."</p> <p>SFC Comment: Who defines the significance criteria? The Proponent? Statist?</p>	<p>Thresholds for residual effects significance rely, in the first case, on published regulatory guidance or criteria (e.g., air quality, water quality, noise, soil quality standards). Where standards or thresholds do not exist, significance criteria will be proposed by PRGT based on professional, scientific experience, subject to review by the Working Group, input from formal public consultation and approval by the EAO.</p>	<p>Takla Lake First Nation comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Takla adds that PRGT must include a list of peer reviewed literature prior to review by the WG. Secondly, this material must be given to WG members well in advance of comment period (to allow for ample dialog and review)</p>	<p>As directed by the EAO, the PRGT Technical Working Group will also be actively engaged in the review of the PRGT Application including the significance criteria used to determine potential Project effects.</p>		
26.3.3	Don Roberts	Kitsumkalum Band Council	<p>Kitsumkalum expects that the proponent will submit all and any background information we request to help us in assessing if the baseline information is sufficient to inform us on the project.</p>	<p>PRGT looks forward to collaborating with Kitsumkalum on the sharing of information to inform the effects assessment.</p>	<p>Takla requests same.</p>	<p>PRGT thanks Takla Lake First Nation for their response and looks forward to collaborating on this.</p>	<p>Kitsumkalum has requested on numerous occasions to be provided with a reference list of documents used in assessments. The response to collaborate is nice but inadequate. Please send the list.</p>	
27.1.2	Adrienne Fitzpatrick	Nak'adzi Band	<p>Revise language as follows: "The location of the Project within a provincial, regional, and local context, including the Project's proximity to nearby communities, First Nations reserves, land use planning zones, and important environmental and/or Aboriginal cultural areas."</p>	<p>The requested information will be covered in other parts of the Application, including Sections 6.5 and 11.</p> <p>No changes to the dAIR are required.</p>	<p>Nak'adzi is aware these items are covered elsewhere. The absence of this information was not the concern. The concern was raised as it appears as though PRGT places less importance on these values in the landscape where the Project is proposed. This response, again, does not encourage trust-building.</p>	<p>The presentation and location of information in the dAIR as well as in the subsequent Application report does not carry with it a deliberate attempt to emphasize or de-emphasize the importance of the information. The content of the dAIR follows the guidance provided by the EAO Application Information Requirements Template. In no way does PRGT mean to convey that they place less importance on the values of First Nations or any other stakeholder concerned with this Project.</p>		
28.3.8	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"The level of confidence is based on scientific information, statistical analysis, professional judgment, effectiveness of mitigation, and assumptions made. This will be provided by describing the "prediction confidence" based on: Scientific certainty relative to quantifying or estimating the potential effect, including the quality and/or quantity of data and the understanding of the effect mechanisms"</p> <p>SFC Comment: Does this mean that if there is a data gap (whether it is a quantitative or qualitative data gap) that the given gap will be rectified prior to completion of the Confidence and Risk Assessment? This must be the case if the EAO is to conduct a defensible assessment.</p>	<p>Where data gaps do exist, PRGT will state its confidence in the effects prediction based on expert judgment and characterizes the level of uncertainty associated with the significance determination. In some cases uncertainty may need to be resolved through commitments to undertake monitoring or other studies. These commitments are often expressed in the Application or as permit conditions.</p>	<p>Takla Lake First Nation comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Takla agrees with WG statement. Takla requests "expert judgment" is coupled with a fulsome peer review literature to back proponents' "expert judgement".</p>	<p>As directed by the EAO, PRGT will actively engage the Technical Working Group in a review and discussion of proposed mitigation strategies and monitoring programs during the Application review process.</p>		
29 Section 3.4	Hurrian Peyman	Analyst, Climate Action Secretariat	<p>Readily available information about climate change expected in the region of the project should inform the analysis of meaningful project-environment interactions, especially for later temporal stages of the project. The Proponent's description of current or baseline conditions will include natural and/or human-caused trends (e.g. climate change) that may alter the environmental or socio-economic setting irrespective of the changes that may be caused by the proposed Project or other projects and activities in the local area. This may include trends that are important for understanding how the sensitivity of the VC to the effects and cumulative effects of the proposed Project may change over time.</p>	<p>Section 10 of the dAIR (Effects of the Environment on the Project) will include an assessment of how future climate scenarios may potentially affect the Project. This will include a presentation of the baseline conditions and potential future conditions associated with climate change. The primary focus would be on the climate change effects related to precipitation, air temperature and the frequency and severity of extreme weather conditions.</p>	<p>Takla Lake First Nation comment on response to Round 1 Analyst, Climate Action Secretariat comment: Takla strongly agrees with WG member statement and identifies proponents answer to be insufficient. Climate Change will have impacts on VCs of concern to Takla members, including habitat availability and how this relates to fish and wildlife habitat. We recommend climate change is incorporated into fish and wildlife habitat mapping as a measure. In particular, since the majority of this pipeline is through forested landscapes it is critical to view changes in forests and forest health through the lens of climate change over the temporal scope of this project.</p>	<p>Incorporating climate change into fish and wildlife habitat mapping is beyond the scope of the effects assessment for the Project. PRGT will be looking at climate change in the context of how it could potentially affect the Project with consideration for environmental effects on relevant VCs. The emphasis on this effects assessment (i.e., resulting from effects of environment on the project) will be on design measures to accommodate predicted climate changes.</p>		
30.3.9.1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	<p>"If the Project is expected to result in any residual adverse environmental, economic, social, heritage or health effects, the Application must assess potential cumulative effects of the Project."</p> <p>SFC Comment: How are the cumulative effects described? In the context of the PRGT project only? Or in the context of all projects listed in Table 3-4? Need clarification.</p>	<p>The methodology to conduct the cumulative effects assessment is described in sections 3.9.1 and 3.9.2 of the dAIR.</p>	<p>Response does not answer the question. Establishing the current cumulative effects context is critical to understanding the baseline and trend-over-time status for all VCs. Salmon stocks today, for example, are useless for the purposes of proper effects assessment without an understanding of how they have changed over time. The Proponent appears to be rejecting the need for longitudinal depth in baseline characterization and as a result is planning a largely context-less EA. Lax Kw'alaams again requests further clarification that the proponent will be taking into account trend-over-time data in the cumulative effects assessment.</p> <p>Takla Lake First Nation comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Takla has made numerous comments on the concerns with the EA assessment. Takla reiterates that Forestry, and predicted forestry harvesting in the ESA of the pipeline needs to be included in EA assessment. Takla has recommended using AAC, TNE and merchantability of remaining primary forest to be part of the spatial assessment and predictability of where forest harvesting will occur.</p>	<p>Baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project). Relevant factors to be considered in baseline conditions include current condition of the VC, and the current and future sensitivity and resilience of the VC to change caused by the Project.</p> <p>Based on feedback from the Technical Working Group, forestry activities, including existing or known future cut blocks will be considered as part of the cumulative effects assessment.</p>	<p>Data collected for the PRGT Project is focused on the assessment of potential effects to fish and fish habitat. As the potential Project effects are anticipated to be of a localized nature and any adverse effects will be offset, trend data are not required for this assessment. Information on trends may be considered, where appropriate, in a qualitative manner through the review of existing background literature and studies for the description of the baseline conditions; however, the specific assessment of trends over time will not be undertaken.</p>	

52.3.0	Adrienne Fitzpatrick	Nak'adii Band	The figure does not include all of the process steps. Most notably is the absence of Baseline and trend over time Conditions. Baseline must include change-over time conditions to establish ecological trends so that more accurate project effects may be predicted. It is important for Nak'adii to compare the incremental project-related effects with longer-term effects on land and resources.	The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.	To understand current conditions, historic patterns, trends, and changes must be understood to effectively predict future effects. Overlaying potential project effects on a single year of data will not help us understand potential project effects. How will anadromous fish species like salmon be understood under a "current condition" if we do not know they return to the same streams every year (depending on the population and species). Trends do not have to be detailed or cumbersome. They require good research, strong analytical rigour, and a clear commitment in the AIR to ensure that baseline trend-over-time are provided. This is not outside of the scope. It is very much a central part of the EA process. The AIR does not adequately guide PRGT. It is of utmost concern to Nak'adii that the Application does not yet provide clear guidance to PRGT on characterising baseline conditions. Because of this lack of organization and relaxed language in the AIR, additional information will be requested during the Application Review Stage instead.	This concern is understood. The baseline conditions for the biological VCs will be established through a combination of a literature review (which includes a review of the natural history of the indicator) and project-specific field studies. This information will allow the assessors to have a strong understanding of the baseline conditions and conduct a rigorous and defensible effects assessment for both Project-specific effects and cumulative effects.	[Comment submitted by Nak'adii in tracking table and letter] in response to comments 52, 87, 147, and 164 the baseline conditions for all dynamic VCs must include historic information. Currently, the dAIR does not reflect what PRGT has stated as "understood". Section 1.2 must be revised to reflect this understanding and include a historic temporal boundary as part of the EA process guiding the Application. To clarify, "dynamic VCs" are those that vary over time, such as certain species of fish that have variable populations both over long periods of time (decades), in addition to their seasonal (within year) and life cycles (multi-year). However, they also include human-related VCs that are, arguably even more dynamic and even more difficult to find patterns for, requiring more detailed baseline data to decipher a useful trend. It is not clear why PRGT will only focus on the "natural history" of "biological" VCs. Several "non-biological" VCs are also dynamic and must be considered over a historic time period to establish a trend necessary to result in an effects assessment prediction that has any sort of accuracy.
53.4.3.2	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	Summary of Project-related field studies, including fish and fish habitat surveys, large river surveys, and overwintering habitat surveys. A summary of species of management concern that might interact with the Project, including species with provincial (red- and blue-listed) and federal (COSEWIC and Schedule 1 of the Species at Risk Act) status designations. A list of freshwater aquatic species of cultural, spiritual, or traditional importance to Aboriginal groups with potential to occur in the assessment area. Any TC, where relevant and available.	We fully recognize the importance of estuarine habitat, which will be assessed within the context of our potential effect of "Change to fish habitat".	Lax Kw'Alaams remains concerned that the effects on estuarine habitat, which is a critically sensitive habitat, are properly considered. Lax Kw'Alaams requests that consideration of estuarine habitat be specifically set out in the dAIR.	Estuarine habitats (such as Flora Bank) will be properly considered within the environmental assessment. Estuarine habitats will be considered within the existing Indicators and Potential Effects, which are intentionally broad to capture the wide range of species and habitats with which the Project will potentially interact.	Updated response to Round 2 working group comment
54.3.1	Adrienne Fitzpatrick	Nak'adii Band	PRGT indicates that VCs and indicators selected in this dAIR are the result of "consultation with Aboriginal groups... between August 2013 and January 2014". It is not clear how this selection process involved Nak'adii's concerns exactly. Also, Nak'adii was not provided access to the consultation record. This record may help Nak'adii identify how their concerns were used to shape the VC and indicator selection process. This record must be shared.	The VC document was provided to the Working Group, including Nak'adii, to obtain input on the VCs prior to their inclusion in the Application. Nak'adii's comments on the VC document have been considered and the VCs revised as required. Responses to the issues raised by the Working Group are included in this tracking table.	This response highlights clear lack of progress on agreement over the meaning and intent of "consultation". The most fundamental critique is that circulating an electronic document for comments is not consultation. Request revising language to "electronic documents were circulated for comment within the specified time period" to be clear.	The Working Group including Nak'adii was provided with multiple opportunities to provide input through review and discussion of the VC document and dAIR.	
55.3.1 Environment - GHG	Vanessa Foord	Ministry of Forests Lands and Natural Resource Operations	Add Valued Component: Greenhouse Gas Emissions (GHG) Add Key Indicators: Carbon Dioxide, methane, nitrous oxides, and synthetic fluorinated gases	Please see Standard Response 23. The GHG assessment will include the following key indicators: carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O) and synthetic fluorinated gases (hydro fluorocarbons-HFCs, perfluorocarbons-PFCs and sulphur hexafluoride-SF6). The synthetic fluorinated gases are referred to as "high global warming potential gases" and are typically emitted in smaller quantities. They are emitted through a variety of industrial processes such as aluminum and semiconductor manufacturing. Sulfur hexafluoride is used in electrical transmission equipment, including circuit breakers. HFCs can be released through leakage of refrigerants used in vehicle air-conditioning systems.	response satisfactory.	No additional response required.	comments adequately addressed
56.3.1	Adrienne Fitzpatrick	Nak'adii Band	The Air Quality VC must include the indicator "changes to perceivable sensory criteria". This can include tastes, smells, textures, sights (visible attributes of the environment), and noises. This is an important method for determining the sufficiency of resources and the quality of the environment available to First Nations for meaningful practice of Aboriginal rights. Scholarship on psychosocial factors affecting human behavior is documented in Canada (Candler et al., 2010). Sensory criteria must be included for this VC in order to ensure adequate consideration is given to the effects of the Project on the meaningful practice of Aboriginal rights. These should be assessed from both a Project-specific and cumulative perspective. Candler, C., Rachel Olson and Steven DeBois. (2010). As long as the rivers flow. Athabasca River Knowledge, use, and change. Edmonton, AB: Parkland Institute, University of Alberta.	The air quality VC is primarily concerned with parameters that can be measured ("Criteria Air Contaminants") and not sensory responses that are highly subjective. For example, each person has a different tolerance or annoyance level for odours and taste. The Criteria Air Contaminants can be measured and the provincial and federal governments have thresholds ("ambient air quality objectives") to determine whether or not there is concern for human health or the environment. Noise is addressed separately in the Acoustic Environment VC and visual effects are addressed separately in the Visual Quality VC.	Where available, Traditional Knowledge (TK) and Traditional Land Use (TLU) information will be used to inform relevant VCs.		
57.4.6	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"Change in mortality risk -> Estimated number of dead and moribund fish that are associated with commercial, recreational or Aboriginal fisheries." SFC Comment: The change in fish mortality risk is only being evaluated in terms of fishing activities? Or are other considerations factored in here as well? Kitsumkalam expects to be provided with detailed assessments of why or why not each VC meets the three conditions listed under this heading.	The potential change in fish mortality risk is being assessed for fish indicator fish species listed in Table 4-5. These are endangered species or species that are part of an Aboriginal, recreational, or commercial fishery. That said, the assessment looks at the interactions between project activities and fish and fish habitat, and assesses the potential change in fish mortality risk associated with those interactions.	Response does not answer the question. The question asks how the change in fish mortality risk is to be evaluated? Lax Kw'Alaams asks that requirements for information on the assessment methods for mortality rates of fish be set out in the dAIR.	An update to the dAIR is required.	
58.3.9	Don Roberts	Kitsumkalam Band Council	The EAO approach to assess cumulative effects is not satisfactory to Kitsumkalam. We propose to have an environmental assessment for the proposed coastal natural gas industry as a whole. We are looking forward to discussing this further.	PRGT will be required to address all information requirements outlined in the final AIR, pending finalization by the EAO. Rationale for items addressed in the cumulative effects assessment will be provided in the Application. Kitsumkalam's request for further information and dialogue are directed to the EAO.			
59.4.0	Vanessa Foord	Ministry of Forests Lands and Natural Resource Operations	Add a section for an assessment of Greenhouse Gas (GHG) emissions generated by the construction and pipeline operations should also be included. If it could be included, I see the forest carbon piece as part of an overall GHG assessment that would also include emissions associated with pipeline construction and materials as well as emissions from any potential flaring or compressor stations along this project's proposed pipeline route. GHG emissions should be defined as (e.g. carbon dioxide, methane, nitrous oxides, and synthetic fluorinated gases) and more information of BC's GHG emissions and reporting can be found at: http://env.gov.bc.ca/ca/mitigation/gov_investor/#1	See Standard Response 23.	response satisfactory.	No additional response required.	comments adequately addressed
60.3.1	Adrienne Fitzpatrick	Nak'adii Band	Key missing VC is "Greenhouse Gas Management". Indicators include (a) contributions to provincial GHG emission levels and (b) ability for BC to meet its legislated reduction targets.	See Standard Response 23.		Table 3-1 in the November 2013 dAIR has already been updated to include the GHG VC and indicator(s).	Concern addressed.
61.4.3.3	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	In general all of the aforementioned sections do not have enough specific and meaningful description and details to allow a thorough analysis to be conducted.	The dAIR has been developed based on regulatory requirements, consultation with regulators, professional experience on other recent similar projects, and based on feedback from the VC Selection Document. The application itself will contain full details and description of work including field results, laboratory findings, and findings of the assessment.	Inadequate response. Lax Kw'Alaams has brought to the attention of the proponent and BCEAD a number of issues with the approach to the EA for this project, and the development of the dAIR in particular. These issues include: lack of consultation and engagement of First Nations, inadequate spatial scope of the project, lack of consideration of trend-over-time data, constraint of the temporal scope of the assessment until the end of operations, inadequate cumulative effects assessment and inadequate identification of VCs. Lax Kw'Alaams position is that the dAIR as they currently stand will result in an inadequate Application that does not capture or deal with Lax Kw'Alaams concerns. Lax Kw'Alaams requests that the dAIR be amended in line with their concerns as set out in this chart and that further consultation and engagement with First Nations occurs before the AIRs are finalized.	Lax Kw'Alaams concerns are noted. It is PRGT's intention to consider all EA issues raised by consultation and engagement of First Nations. PRGT has engaged with and continues to engage and consult with First Nations on the Project. Based on guidance provided by the EAO and amendments made to the dAIR based on comments received from the Technical Working Group, PRGT feels that the approach described in the dAIR will result in a full and robust environmental assessment and an EAC Application that supports informed decision making while meeting the requirements of the BC Environmental Assessment Act.	
62.3.1	Adrienne Fitzpatrick	Nak'adii Band	The Water Quality VC should be separated from the Fish and Fish Habitat VC. The values for drinking water or other water uses is distinct from that of fishes. In addition, as discussed at the October 17 Working Group meeting, salmon and salmon habitat should be treated as a separate VC with appropriate indicators.	See Standard Response 8.	Standard response reads, "Water will be assessed separately as two VCs: Hydrology and Water Quality. This change will be reflected in the updated dAIR." Thank you.	No additional response required.	Concern addressed.
63.4.7	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"Habitat forming marine vegetation of cultural significance or at risk" SFC Comment: What about water quality and other types of fish habitat? These indicators need to be included.	See Standard Response 8 and Standard Response 14.	Inadequate response. Lax Kw'Alaams reports its request that other types of fish habitat need to be considered not just what the proponent determines to be "ecologically important marine vegetation".	In addition to the explicit habitat-forming marine vegetation indicator, "general" marine habitats will be considered via the Fish indicator, including non-vegetation based habitats, such as (but not limited to) rocky reefs (which support numerous CRA species), mud (which supports CRA bivalves) and bedrock (which supports sponges etc. that in turn support CRA taxa).	Minor quibble, but given that "standard responses 8 and 14" are two lines each, wouldn't it have been easier to cut and paste these responses directly into this section of the tracking table? Also MS Excel is much better used for "numerical analyses" than "written word analyses". How exactly fish habitat issues are going to be effectively dealt with particularly at Lela Island still needs to be more comprehensively described.
64.3.11	Richard Hebba / Elisabeth Deom	Ministry of Forests Lands and Natural Resource Operations	Add Key Indicator: Paleontological Resources	Comment acknowledged. PRGT to discuss with MFLNRO.			
65.3.1	Adrienne Fitzpatrick	Nak'adii Band	For the Economic, Social, Heritage, and Health VCs, the indicators must clearly show the difference between Aboriginal and non-Aboriginals. It is widely established in the SEIA literature that First Nations experience more employment barriers and suffer exposure to greater adverse socio-economic effects from industry on the land and in the communities, and, thus, are more vulnerable to the negative effects of developments. The impact equity for each potential effect must be measurable. This also allows Nak'adii to evaluate the tradeoffs associated with the proposed Project. Also missing from these VCs is any indicator on crime and disease/morbidity or, in general, any community health and well-being considerations beyond access to infrastructure and services. This is unacceptably deficient and revisions to the dAIR are essential.	Specific economic, social, heritage and health issues raised by Aboriginal groups will be discussed in section 11.2.4 of the Application. In addition, socio-economic baseline studies are planned for all Aboriginal groups listed in Schedule B of the section 11 Order. Where available, this information, including education, employment and socio-economic community data, will inform the Application. The response provided is still not clear if the Application will in fact present the information in the disaggregated format how will impact equity be measured? Furthermore, if PRGT would like to provide Aboriginal groups with "opportunities to provide supplemental community data", how will this take place exactly? Will full funding be provided to undertake a full, independent socio-economic assessment? Or, is this a meagering commitment? Nak'adii has minimal community level information at its fingertips. There are several other projects proposed within Nak'adii's territory. How might socio-economic data be collected that could meet requirements for other EA?	PRGT will not be presenting socio-economic data in a disaggregated format. Where the information has been made available, impacts of the Project on the Aboriginal communities identified in Schedule B of the section 11 Order will be discussed separately in 11.2.4 of the Application. PRGT has been actively engaged with First Nations to acquire community information to support the effects assessment for the Application.	[Comment submitted by Nak'adii in tracking table and letter] in comments 65, 182, 192, and 755, Nak'adii raises the concern over how the socio-economic impact assessment adequately reflects the specific and unique socio-economic concerns of First Nations. Given that PRGT has dismissed Nak'adii's suggestion to disaggregate Aboriginal and non-Aboriginal populations, how can these concerns be addressed? If specific First Nations socio-economic concerns will be addressed in Schedule B of the Application, Nak'adii clearly requires that the EA methodology (i.e. VCs, key indicators, assessment boundaries, cumulative effects, and significance thresholds) be clearly presented for review and comment in the dAIR.	
66.7.2	Richard Hebba / Elisabeth Deom	Ministry of Forests Lands and Natural Resource Operations	Add Paleontological Resources.	See Standard Response 39.			
67.3.1	Adrienne Fitzpatrick	Nak'adii Band	For Health VC, an indicator on perceived risks associated with country foods should be considered. Recommend adding indicator: "Consumption of Country Foods and Perceived Risks"	The potential human health risks from consumption of marine country foods will be based on risk assessment guidance from Health Canada.	The Supplemental Guidance on Human Health Risk Assessment for Country Foods (2010) outlines biophysical exposure to contaminants measured in very particular ways. The ability to exercise an Aboriginal right (e.g. harvesting of plants in the vicinity of a large construction project or operation) can be affected by other pathways. Such as social factors that can be measured through perception of contamination. It appears as though social scientific disciplines are being relegated as secondary throughout this EA. Human perception of risk is just as important as chemical changes. The variable we are measuring results in the same outcome. Again, for a good example of how perception can be measured effectively in an EA, see http://www.craa-see.gc.ca/505/documents_statipos/59540/81917/MCFN_Indigenous_Knowledge_Report.pdf	The objective of the BC environmental assessment process is to conduct a transparent, scientifically rigorous, and defensible assessment. This is accomplished through the AIR development process, open houses and public comment periods on the draft AIR, and the rigorous Application review process. In doing so, the process addresses perception concerns for all aspects of the Project.	
68.4.8	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"Measurable Parameters -> Area of habitat permanently altered or destroyed (measured in square meters) -> Total suspended solid concentrations (mg/L)" SFC Comment: What about habitat productivity measures? Water quality considerations? These should be included.	Habitat productivity is captured within the metric of area, as per DFO's standard. Following this standard will ensure the habitat compensation can be appropriately calculated. Total suspended solids is a water quality metric. Thank you for your comment. The statement in the dAIR will be changed to "A separate marine bird RAA will include a 30 km wide band centered on the Project coastline, but will not extend above the high-tide line." The updated dAIR will reflect this change.	Sufficient response.	No additional response required.	PRGT is adhering to DFO's standard metric of productivity, which is defined within the Fisheries Act and widely used as a basis for productivity. The use of differences among habitats in numbers of fish produced by unit area (or grams of Carbon, or similar metric) is considered during the offsetting process via DFO's request for like-for-like compensation of habitats. The TSS has been included as a measurable parameter of water quality that is being used to capture changes to fish habitat. This parameter has been selected because changes in TSS can impact the capacity of benthic habitats to photosynthesize. In turn this could affect habitat quality.
69.4.5	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"A separate RAA of similar width will be used for the marine bird assessment, but will be constrained by the high-tide line where it would otherwise go beyond." SFC Comment: The logic or lack thereof presented in the sentence above is far from intuitively obvious. What point exactly is trying to be conveyed here?	The potential human health risks from consumption of marine country foods will be based on risk assessment guidance from Health Canada.	Sufficient response.	No additional response required.	
70.1.2 - Proposed Project Description	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	It is not clear that the project description will include all portions of the project including initial and all future phases not identified in the initial construction for commissioning. All components of the project must be included here and assessment of impact must be completed and submitted for the entire project in the Certificate Application.	Consistent with AIA permit, all areas where construction is proposed are to be assessed prior to development - HCA permit explicitly includes provision for revision of study area to include new areas identified for routes and/or addition of as yet undefined ancillary components.	I do not understand the proponent response. Additional clarity is required		comments adequately addressed
71.4.5.2	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"Summary of Project-related field studies, including surveys for nesting bald eagle, osprey and great blue heron, waterfowl (breeding and fall staging), breeding songbirds, breeding amphibians, American bittern and yellow rail (using remote acoustic recorders), ungulates, carnivores and meso-carnivores (using remote cameras), and incidental observations of wildlife or wildlife sign." SFC Comment: What exactly is a 'meso-carnivore'? An omnivore?	A meso-carnivore is not an omnivore. A meso-carnivore is a type of carnivore that consumes mostly animal protein, but also plant foods. Coyote, fox, and members of the weasel family (mustelidae) are examples of meso-carnivores. The 1 in 2,475 year seismic event corresponds to the predicted ground motions with a 2% chance of being exceeded in a 50 year period. These ground motions vary across the route. They are determined by National Research Council Canada and documented in the National Building Code of Canada.	Sufficient response.	No additional response required.	
72.10	Daive Latremouille	Lax Kw'Alaams (Skeena Fisheries Commission)	"A one in 2,475 year seismic event" SFC Comment: How exactly was the 2,475 figure arrived at?	The potential human health risks from consumption of marine country foods will be based on risk assessment guidance from Health Canada.	Lax Kw'Alaams requests that the requirement for how the calculation of the 2,475 year seismic event is arrived at be included in the dAIR.	The Application will provide the detail needed to understand how the 2,475 year seismic event figure was determined and additional clarity around the rationale for including a 2,475 year seismic event in the PRGT environmental assessment.	
73.1.2 - Proposed Project Description	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	In the paragraph outlining the description of Land Use activities, please include the terminology "including but not limited to" as this allows for inclusion of additional land use designations that may have been overlooked. One such example are Government Actions Regulation designations like Ungulate Winter Range.	Comment noted. The dAIR will be updated to include the change.	Proprietary response satisfactory. Issue resolved	No additional response required.	comments adequately addressed

74.3.1	Adrienne Fitzpatrick	Nak'asdi Band	An additional VC is required related to ability to meaningfully exercise Aboriginal Rights. This includes consideration of available resources, as determined through environmental indicators presented above. Recommend adding VC "Aboriginal Rights" with following indicators, "Sufficient quantity and quality of resources", "Perceived quality of resources", "Access to resources including by water".	See Standard Response 4. No changes to the dAIR required.	Standard response reads, "The discussion of Aboriginal Interests (including rights and title) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application, informed by the analysis of relevant VCs and available TK and TR information. As a result, PRGT does not propose to identify separate VCs with respect to specific Aboriginal interests or concerns. However PRGT would like to assure Aboriginal groups that it treats their interests and concerns seriously, and would welcome further discussions to more fully explore these matters." The proposal to inform the Aboriginal rights and title section from information derived from other VCs assumes that the scientific approach adopted in the Key Indicators to measure the VCs is somehow better or more accurate. This treatment of TK and Aboriginal rights and title as an appendage, rather than a fundamental, core component, of the EA is alarming. See above responses on good examples of using TK in EAs.	PRGT sees Aboriginal Rights and TK as a core component of the EA. All of the VC assessments will consider relevant information from section 11, including TK and TR information provided by Aboriginal Groups as well as concerns and interests expressed by Aboriginal Groups, during working group meetings, consultation and in other forums.			
75	1.3 - Applicable Authorizations	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	Please include "Assessment" as a project phase that will need to be considered for permits and authorizations. Currently, "Construction and Operation" are the only phases included.	Proponent response satisfactory. Issue resolved.	No additional response required.	comments adequately addressed		
76	11.2.2	Daive Latremouille	Law Kwa'Alaams (Skema Fisheries Commission)	"Views of Aboriginal groups, if provided, regarding proposed mitigation measures." SFC Comment: Will comments from Aboriginal groups go directly to the proponent? Or be routed through the BCEAO?	During the environmental assessment, Aboriginal groups will have multiple opportunities to comment on proposed mitigation measures and to suggest new ones. During the stage of the environmental assessment before submitting an Application to EAO, PRGT welcomes comments from Aboriginal groups on mitigation measures for incorporating into the Application. However, at any time during the environmental assessment, Aboriginal groups can provide comments on mitigation measures directly to EAO. No changes to the dAIR are required.	PRGT acknowledges the request from Law Kwa'Alaams and will be including First Nations' inputs into mitigation and monitoring programs; however, documentation specific to each First Nation will not be provided in the Application.	What exactly is the rationale for... documentation specific to each First Nation will not be provided in the Application?	To clarify our round 2 response, views of Aboriginal Groups on the mitigation measures that relate to Aboriginal Interests will be included in table format in the Application if provided in a timely fashion.	
77	3.2	Adrienne Fitzpatrick	Nak'asdi Band	The dAIR indicates that PRGT may change boundaries between the AIR and the Application. Fundamental changes to the assessment methods such as this must be subject to review by the EAO and Working Group. Ensure this guidance is clear in the revised AIR.	Major changes to assessment methods and boundaries not captured in the AIR will be subject to review by the Working Group and approval by the EAO.	For clarification, major changes to assessment methods and boundaries not captured in the AIR will also be clearly described in the Application (as per the final paragraph in Section 3.2 in the dAIR), in addition to being reviewed by the Working Group and EAO.			
78	1.4 - Alternative Means of Undertaking the Proposed Project	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	One of the criteria listed to be considered during the selection process is "Environmental Constraints". It is unclear what this is relating to as the only one that comes to mind is Geography and this is likely covered by Terrain. The application must include how each criteria is defined and applied in the consideration of major alternatives.	As outlined in Section 1.4 of the dAIR, descriptions of the major alternatives considered will be provided in the Application as well as the methods and criteria used to evaluate each alternative. Environmental constraints include, but are not limited to, Ungulate Winter Range, Wildlife Habitat Areas, Old Growth Management Areas and other sensitive habitats. Where possible, the route has been selected to avoid these areas. The preferred alternative and the rationale for its selection will be described in the Application, including a description of the environmental constraints considered. An update to the dAIR is not required.	The response to the previous Round 1 comment provides clarification on the environmental constraints that are being considered. The commitment to address "alternative means of carrying out the proposed Project", including the criteria taken into consideration is described in Section 1.5 of the dAIR.	comments adequately addressed		
79	12.2	Daive Latremouille	Law Kwa'Alaams (Skema Fisheries Commission)	"Elargement on wildlife thresholds and ZOI" SFC Comment: What exactly are ZOIs? Zones of Influence? The ZOI acronym is not defined anywhere within the current AIR document.	ZOI is an abbreviation for Zone of Influence. For the assessment of effects on Wildlife and Wildlife Habitat, the zone of influence is used to define areas that might be affected indirectly by disturbances. Indirect effects may be related to noise, odour, or visual cues. The use of zones of influence in the assessment will be supported through literature and expert opinion. For consistency ZOI term will be removed from dAIR.	Sufficient response.	No additional response required.		
80	Table 3-1 - Proposed List of Valued Components for the PRGT Project	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	Please include water quantity as an indicator in the Freshwater Aquatic Environment VC. The project will be applying for temporary water use permits for withdrawal for hydrostatic testing, camp activities, dust control etc. An assessment on the effects of this use must be completed and submitted in the application.	See Standard Response 8.	No additional response required.	comments adequately addressed		
81	14.1.2	Daive Latremouille	Law Kwa'Alaams (Skema Fisheries Commission)	"Effects of climate change will be assessed in the Environmental Assessment Certificate (EAC) Application in the section relating to "Effects of the Environment on the Project." This will include a brief description of the projected changes in climate expected over the lifecycle of the proposed project." SFC Comment: SFC notes that the converse of the logic presented above is highly likely for a natural gas project; implementation of the PRGT project could also lead to climate changes.	See Standard Response 23.	Comment directed to the EAO regarding a Working Group discussion with the BCEAO on the specifics of the GHG VC assessment methodology.	And when might we expect BCEAO's response?	Comment directed to the EAO.	
82	4.1	Don Roberts	Kitsumkalum Band Council	The 20 km squared area is unacceptable. The minimum geographic scope needs to be determined through the dispersion model. We have requested to see the reports of this modeling. Kitsumkalum expects to have all areas included that show to be affected by any of the measurable parameters, including the added parameters below. The indicators need to include CO2, CH4 and N2O as it would be reasonable to expect significant emissions from fossil fuels that will drive the construction phase. These two VCs are interrelated with several of the other VCs. For example, acid rain will affect wetlands, insects and most other parts of the ecosystem we depend on. Kitsumkalum expects that the proponent clearly shows these interrelationships. We will do our own analysis once we receive the reports from the proponent and then determine if the information meets our requirements. We expect that our review period timeline does not start until we have received all the information or have requested from the proponent.	The results of the air dispersion modeling study will be included as a Technical Appendix to the Application. The isopleth maps in the air quality Technical Appendix will show the zone of influence from the Project's air emissions (aka measurable parameters). The air dispersion model receptor grid includes approximately 3,700 receptors within the 50 x 50 km RAA. Hence, the geographic area covered by the air dispersion model is 50 x 50 km. Response to the GHG comments: see Standard Response 23. The pipeline will transport sweet natural gas and as such the absence of Sulfur preclude the generation of acid rain.				
83	3.2	Adrienne Fitzpatrick	Nak'asdi Band	Good practice of EIA requires that temporal boundaries for any VC must include the time from when a residual effect is first measured to when a residual effect is no longer measurable. This is not the temporal boundary adopted in the dAIR. Recommend revising to, "The temporal boundaries will encompass the construction, operation, decommissioning, post-construction reclamation until the point at which the residual effect is no longer measurable."	It is acknowledged that some effects can last beyond project operation and decommissioning. Enduring effects are identified using the "duration" criterion in the residual effects characterization phase.	OK. Where is this in the revised AIR? See critique above on the purpose of the AIR.	The duration criterion (described under the fourth bullet of Section 3.6 of the dAIR) will be applied to any effects that last beyond Project operations and decommissioning and will be described in the Application.	[Comment submitted by Nak'asdi in tracking table and letter] Comment 83 highlights the "duration" criteria used to evaluate residual project effects. It is not clear how any residual project effect may be found if the temporal boundaries of the assessment in Section 3.2 of the dAIR are limited to considering only the "construction, operation, and decommissioning phases of the Project". That is, if the assessment only considers this temporal scope, it is logically not possible to include any effects that may occur outside of this temporal scope. This again highlights the need to revise the Section 3.2 of the dAIR to reflect a broader temporal scope.	The EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects (2013) states that residual effects remaining after the implementation of mitigation must be characterized using the criteria of context, magnitude, extent, duration, reversibility, and frequency. The duration characterization will ensure that there is a fulsome discussion and assessment of all residual effects, regardless of interpretation of the temporal boundaries definitions.
84	18	Daive Latremouille	Law Kwa'Alaams (Skema Fisheries Commission)	SFC notes that there currently are no Appendices with the latest version of the dAIR. Presumably this means the appendices will be developed before the AIR is finalized?	The Appendices 1A and 1B were included in the dAIR. Technical Appendices referred to in the dAIR will be included as appendices in the Application. Clarification will be provided in Section 18.0 of the dAIR.	Sufficient response.	No additional response required.		
85	Table 3-2 - Potential for Substantive/Meaningful Project-VC Interactions	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	The dAIR does not indicate that the project will have an interaction with Marine Resources for Terrestrial Pipe placement. If the project is considering a marine component then every entry and exit to the marine environment from or to the terrestrial environment must be considered in the effects assessment and presented in the application. Compressor station construction metering stations will also have an impact on Wildlife and Vegetation VCs and must also be included and presented in the assessment and Application.	Entry and exit points into the marine environment will be included in the effects assessment for the marine resources VC. Compressor and metering stations will also be included in the effects assessments for wildlife and wildlife habitat VCs and for the vegetation and wetland resources VC.	The proponent has responded that the requested information will be included in the effects assessment but have not suggested that the d-AIR will be changed to reflect this. Please edit the d-AIR to include this comment	Table 3-2 and Section 4.5.1 both refer to the inclusion of entry and exit points between marine and terrestrial environments and are thus included in the dAIR for consideration. The assessment of potential effects on Wildlife and Wildlife habitat resulting from compressor and meter stations will also be included.	comments adequately addressed	
86	3.3	Adrienne Fitzpatrick	Nak'asdi Band	All references to baseline conditions must make clear that a characterization of change-over time conditions is required. Trends are required to show both natural and human-induced environmental dynamics. This will improve the accuracy of the impact predictions. It is also important for Nak'asdi to compare the incremental project-related effects with longer-term effects on land and resources.	The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.	As outlined in Comment 52, this notion of "current conditions" must be clarified. It is not logically possible to make an impact prediction about the future without understanding some historical trend-over-time.			
87	3.3	Adrienne Fitzpatrick	Nak'asdi Band	Reference to "modeling exercises" places weight upon this methodology. If a quantitative model is not possible because there is insufficient data, it is important to supplement with other methods, such as scenario development, case studies and/or qualitative descriptions.	Modeling is referenced as one potential option for describing existing conditions, however, no particular weight has been given to this option. Other options, such as scenario development, use of case studies, and qualitative descriptions, will be utilized where available and appropriate. See Standard Response 16.	OK. Where is this in the revised AIR? See critique above on the purpose of the AIR.	An update to the dAIR is required.		
88	Table 4.9 - Indicator Species for assessment of Wildlife and Wildlife Habitat	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	Please include Wolf as an indicator species. The wolf is an important predator across the entire project footprint. The potential changes to the predator/prey dynamic between wolves and ungulates must be assessed given the nature of wolves to utilize linear development features. The application must include proposed mitigation.	Change in linear density (i.e., an increase) is known to affect wolves by improving access, mobility, and encounter rates with preferred (e.g. deer, moose) and alternate prey (e.g. caribou). Change in linear density will be assessed in all caribou ranges intersected by the Project footprint. Mitigation measures will be prescribed to reduce effects of increased access on predator-prey relationships.	Proponent response satisfactory. Issue resolved.	No additional response required.	comments adequately addressed	
89	3.4	Adrienne Fitzpatrick	Nak'asdi Band	This list should be reviewed at the next Working Group Meeting (ACTION ITEM).	EAO to respond as they are responsible for the Working Group Meeting Agenda.	OK. Where is EAO's response?	The project and activity inclusion list (table 3.4) was updated and raised at technical working group meetings.	Concern addressed.	
90	Table 4.11 - Indicators for Assessment of Vegetation and Wetland Resources	T. Van Spengen	Ministry of Forests Lands and Natural Resource Operations: Omineca	Stand level retention (Wildlife Tree Retention) is an important component for maintaining/representing stand level biodiversity, along with being a legal requirement of forest licenses under FAPA. Oil and gas activities may impact WTR. Please include Wildlife Tree Retention as a key indicator and address potential adverse effects on this value in the application.	The indicator "Ecological communities at risk" will be changed to include 'or of special management interest'. The best available information will be used to incorporate Wildlife Tree Retention in the assessment within this indicator. Change to the dAIR required.	FLNRO Omineca comment on response to Round 1 FLNRO Omineca comment: I am satisfied with the proponent's response and very appreciative that WTR is included as an indicator. However, I would like to provide additional comments for clarity, as I am not sure that my issue has been fully communicated and therefore completely addressed. The measurable parameter for how the "change in abundance or condition of ecological communities of interest" is being measured is merely a reporting of hectares (change in area). It will be important in the assessment of the potential effects to know more than the quantity (ha) of wildlife tree retention being impacted. It will be important to know the resultant integrity of the wildlife tree patches being impacted and where this impact to WTR is occurring along the linear disturbance. Please respond to the additional clarification provided. Oil and Gas Commission comment on response to Round 1 FLNRO Omineca comment: Note: Wildlife Tree Retention for the proposed project is managed through the Oil and Gas Activities Act and not FRPA. That said, the value of the retention is the same across industries.	PRGT appreciates the clarification. Both the location and potential effects to Wildlife Tree Retention will be described within the Application.	comments adequately addressed	
91	4.6.2 Existing Conditions for Vegetation and Wetland Resources	T. Van Spengen	Ministry of Forests Lands and Natural Resource Operations: Omineca	Please add to existing baseline conditions the amount of old forest and interior old forest by geographic units as identified in the Old Growth Orders. This is to address spatial Old Growth Orders in geographic units where Old Growth Management Areas have not been spatially identified and mapped.	I am not satisfied that this issue has been appropriately addressed. The proponent's response has not indicated how the interior old forest conditions will be assessed in the baseline conditions in areas where old growth is managed with spatial targets. The Prince George TSA Biodiversity Order has legally established objectives for interior Old Forests as measure to maintain quality old growth (intact, large patches) and manage landscape fragmentation. The impact of a linear disturbance from a pipeline corridor has the potential to be an additional impact to Interior Old Forest (from a biological/ecological perspective) as well as impact to the forest biomass compliance and monitoring of the Interior Old Forest objectives. The Interior Forest Condition should be assessed in baseline and included in the indicator parameters for old forest. Please address this issue.	PRGT appreciates the clarification and will be including Interior Old Forest as a component of the old forest measurable parameter in the Application. Spatial data will be required defining the area of interior Old Forest and the natural disturbance type subunits for the Prince George TSA for a spatial analysis. If these data are not available, PRGT will conduct an spatial analysis.	Satisfied with the response provided by the proponent. Issue resolved with some final clarification specific to the LAA of the pipeline effects assessment. Please ensure that the analysis or assessment of the Old Interior Forest Condition is consistent with the direction provided in the 2004 PG TSA Landscape Biodiversity Implementation Strategy where a 200m buffer is applied to disturbance edges to determine interior forest condition.	Updated response to Round 2 working group comment	
92	Table 4.11 - Indicators for Assessment of Vegetation and Wetland Resources	T. Larden, T. Van Spengen	Ministry of Forests Lands and Natural Resource Operations: Smithers	Please add parameters to the Old Forest indicator to include management of spatial and a-spatial targets and existing and proposed Old Growth Management Areas.	Old forest, including Old Growth Management Areas are indicators for the assessment of impact to Vegetation and Wetland Resources. The assessment will include regional and provincial spatial and a-spatial old forest retention targets as well as existing (legal) and proposed (non-legal) Old Growth Management Areas. No changes to the dAIR required.	I am satisfied with the proponent's response, however, need to provide additional comments for clarity and understanding of expectations specific to the assessment of impacts regarding the spatial old growth orders in the Omineca Region. The proponent is suggesting that the effects of old growth forests will be measured by hectares and monitoring against the old growth target levels in management units of the various old growth orders. As the reporting must also include where the effects on old growth is occurring on the landscape from the linear disturbance (spatial location of old). Please respond to the additional clarification provided.	PRGT appreciates the clarification. PRGT will be reporting on the location of impacted old forest as well as the area.	comments adequately addressed	
93	3.5	Adrienne Fitzpatrick	Nak'asdi Band	The dAIR currently states, "Mitigation is defined as actions to prevent or reduce to an acceptable level potential adverse Project effects". For this sentence to make sense to the reader, the notion of "acceptable level [of] potential adverse Project effects" needs to be defined. Recommend adding a section on the process by which PRGT will determine these thresholds. For the next Working Group Meeting, thresholds for each VC should be presented for inclusion in the second draft of the dAIR (ACTION ITEM).	Thresholds for the acceptable level of potential adverse Project effects (i.e., significance thresholds for residual environmental effects) will be developed and defined on a VC by VC basis. These thresholds are based on regulatory standards and guidelines, where they exist as thresholds for acceptability. These thresholds can be discussed at Working Group meetings, as required.	FLNRO comment on response to Round 1 Nak'asdi Band comment: I am satisfied with the proponent's response. Many VCs do not have established thresholds identified in regulatory standards and guidance. We look forward to discussing the use of thresholds for traditional land use, cumulative effects, and other VCs of central importance to Nak'asdi's way of life.	This comment will be referred to EAO.		
94	4.7 Soil	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	The LAA for soils should be expanded to include areas that may be altered due to changes in soil wetness. This may be greater than the proposed 50m band. Linear developments (pipes and roads) have the potential to change hydrology through interception and redirection of both surface and subsurface water. This in turn can change soil characteristics leading to changes in vegetation composition, animal and plant communities. Guidance appears to downplay the value of qualitative information: "When residual effects cannot be characterized quantitatively, characterization will be completed using qualitative terms". High quality information that present accurate and reliable aspects of the effect should be used, whether it is measurable by numbers or ideas. Both scientific, social scientific, and traditional forms of knowledge can be qualitative or quantitative. In most cases, using both kinds of information provides for a more fulsome description and a stronger evidence base for any characterization of residual effects.	Given the implementation of best management practices for soil handling during pipeline construction and reclamation activities, indirect effects are not expected to extend beyond the 50 m buffer of the Footprint. However, the application must include an assessment of the potential residual effects associated with this issue. If this will be covered under the newly established Hydrology VC, PRGT believes this approach will address all potential residual effects on the VCs. The proponent has suggested that a mapping exercise is sufficient to address this effect. I disagree. The application must include an assessment of the potential residual effects associated with this issue. If this will be covered under the newly established Hydrology VC, then it must be stated clearly there. Please revise the d-AIR to include this assessment.	The soils VC has been established to address the requirements of the ALC and ensure appropriate soil conditions will remain after construction to permit reclamation of temporary work spaces and the ROW on non-AIR lands. In addition, the assessment will consider potential effects of construction and operation on wetlands (Vegetation and Wetlands VC) and drainage patterns (Hydrology VC). PRGT believes this approach will address all potential significant adverse environmental effects associated with this matter. PRGT is not aware of any examples where construction of a buried natural gas pipeline has had significant adverse environmental effects as a result in minor changes to soil wetness. PRGT welcomes further discussion with FLNRO.	Section 3.6 of the dAIR will be rephrased with respect to the use of quantitative and qualitative in the characterization of residual effects.	comments adequately addressed	
95	3.6	Adrienne Fitzpatrick	Nak'asdi Band	This will be addressed in conjunction with the Land and Resource Use, Freshwater and Aquatic Resources, and Wildlife VCs. Cross referencing between these VCs will be used to maintain consistency and facilitate integration. Change in mortality risk for caribou and grizzly bear will be assessed specifically in relation to change in access (i.e., incremental contribution to motorized vehicle access or predator access). Project mitigation measures, as well as an Access Management Plan, will be developed to reduce adverse residual or cumulative effects.	PRGT fully intends to use both quantitative and qualitative information, as appropriate, in the characterization of residual effects. This information will include traditional knowledge where available and appropriate. No changes to the dAIR required.	OK. Where is this in the revised AIR? See critique above on the purpose of the AIR.	An update to the dAIR is required.	Concern addressed.	
96	3.3 Potential Effects on Transportation and Access	T. Larden	Ministry of Forests Lands and Natural Resource Operations: Smithers	Please include an assessment of the effects on Wildlife and Fish as a potential Adverse Project effect. Increased access can have negative effects on populations of fish and wildlife as they relate to both regulated and unregulated harvest and incidental mortality through disturbance and collisions.	Proponent response satisfactory. Please edit the d-AIR to reflect this comment	It is PRGT's understanding that responses, including commitments, provided in tracking tables such as these become part of the official record for the EA process and therefore will be adhered to.	comments adequately addressed		

973.7	Adrienne Fitzpatrick	Nak'adzi Band	Nak'adzi has already highlighted the need for a Working Group meeting to develop significance thresholds for each VC. These thresholds must be determined for inclusion in the final AR. Language in the dAIR reads, "Where standards or thresholds do not exist, significance criteria will be defined, and justifications for the criteria will be provided." This is not acceptable to Nak'adzi. Thresholds are based upon the way First Nations, the public, and stakeholders place value upon various interrelated elements of our environment. It is not up to PRGT to determine these thresholds. Even for thresholds that are clearly defined in government policy and law (e.g. water quality indicators for human consumption), there may be locally-held values that make these thresholds less relevant. These thresholds must be defined in the Working Group and communicated by EAO to the Proponent.	Significance thresholds will be developed and defined on a VC by VC basis. Existing regulatory standards and guidelines are generally accepted as thresholds for significance. PRGT welcomes input from the Working Group on supplemental means to establish thresholds of significance for VCs.	Many VCs do not have established thresholds identified in regulatory standards and guidance. We look forward to discussing the use of thresholds for traditional land use, cumulative effects, and other VCs of central importance to Nak'adzi's way of life.	This comment will be referred to EAO.			
Table 6-8 Potential Project effects on Land and Resource Use, 6.5.2 Existing Condition for Land and Resource Use	T. Van Spengen	Ministry of Forests Lands and Natural Resource Operations; Omineca	Provincially developed Land and Resource Management Plans (LRMP) and Sustainable Resource Management Plans (SRMP) provide strategic level direction and land use designations for compatible and highest/best use of Crown land. In is not clear in the application how and if these specific strategic level plans will be considered and assessed. Please include these LRMP or SRMP in the assessment of existing conditions (6.5.2) and potential adverse effects (Table 6-8).	The VC will assess change or incompatibility with land use plans including (where relevant): • Regional Scale Strategic Land Use Plans; • District land use context; • Land and Resource Management Plans (LRMPs); • Resource Management Zones (RMZs); • Official Community Plans (OCPs); • Regional growth strategy; and • Regional land use context.			comments adequately addressed		
99 General comment	Adrienne Fitzpatrick	Nak'adzi Band	The use of the word "significance determination" implies the Proponent has decision authority over significance. Nak'adzi recommends revising this language so it is clear that the final decision is issued by the Crown, based upon the Crown's consultation and accommodation with First Nations. Recommend replacing all instances of "determination" with "estimation". See 3.8 Confidence and Risk, p. 3-12 for an example.	Significance determination is a term used in environmental assessment. PRGT will provide their assessment of significance in the Application. The EAO also provides an independent determination of significance in the Environmental Assessment Report.	Significance determination is a term used in environmental assessment to denote the decision-makers final decision on significance of effects. All other inputs on significance are preliminary estimates and subject to consideration by the Crown alongside other estimations of effects. The use of the term determination in relation to anything other than the final decision-makers decision is inappropriate and reflects a rigid unwillingness by the Proponent to revise its language in the dAIR, which we hope is not reflective of the prospects for cooperative working relationships moving forward in the EA.	PRGT appreciates the Nak'adzi Band's comments on determination of significance. PRGT is following EAO guidance, which was provided through the 2013 Guideline for the Selection of Valued Components and Assessment of Potential Effects which states: "It is crucial for the assessment to clearly articulate whether or not the residual effect is expected to be significant, and provide the rationale for that determination in sufficient detail. While the proponent provides their assessment of significance in the Application, EAO will make an independent determination of significance in its Environmental Assessment Report."			
1003.8	Adrienne Fitzpatrick	Nak'adzi Band	The basis for confidence in predictions is based upon "scientific certainty," a notion that must be defined for the logic of this method. "Professional judgment" must also be defined with reference to the credentials of the professional making the judgment and what the judgment is based upon (e.g. case study). What is most troubling for Nak'adzi is that no reference is made here (or anywhere for that matter) to TK or values/worldviews of First Nations. This must be a central consideration in determining confidence in effects predictions. Furthermore, in any determination of risk, risk perception must be included. Perception of risk affects human behaviour just as much as a risk that is identified through engineering design or scientific experiment. It is highly recommended that references to TK is included as a consideration in confidence determinations and that risk perception is included as a consideration in risk associated with the assessment.	See Standard Response 2. If an Aboriginal group provides their perception of risk, it will be considered as part of the EA process. Information prepared by professionals and provided under their professional seal will be identified in the Application and the related sealed studies will be included in an Appendix. No changes to the dAIR required.	There are several kinds of experts. Those with a "professional seal" apply to several well established disciplines. This is important and valuable. However, there are other kinds of experts that have several lifetimes' worth of training as well that appear to be unrecognized as experts in this EA. TK can apply to all phases and aspects of the EA if it was designed to accommodate for this. Conventional EAs are designed around the kind of expertise that issues a professional seal, there must be an adequate forum provided for collecting perception of risk, such as one-on-one interviews, public meetings, etc. Funding for independent TLU studies can provide this, but these studies should feed into developing significance thresholds, confidence determinations, etc.	PRGT would welcome traditional knowledge and traditional land use information from the Nak'adzi Band to help further understand how the proposed Project may adversely impact Nak'adzi Band's Aboriginal interests and concerns, to help identify potential mitigation measures to reduce such adverse impacts, and to seek ways to enhance potential benefits of the proposed Project in favour of the Nak'adzi Band. PRGT would like to meet with the Nak'adzi Band to discuss how this information could be obtained in a timely manner to inform the environmental assessment.			
Table 6-8 Potential Project effects on Land and Resource Use	T. Larden	Ministry of Forests Lands and Natural Resource Operations; Smithers	Due to the Mountain Pine Beetle infestation across much of the interior portions of the project, the forest industry is having to deal with a predicted Mid-term timber supply shortage. The conversion of previously forested land base to permanent early seral stage will also contribute to this shortage. The proponent must include this assessment and analysis in their application.	The Mountain Pine Beetle infestation and the related effects on timber supply and forestation will be considered in the application.	I am not asking the proponent to include an analysis of the MPB infestation of timber supply. I am asking that the proponent include an analysis of the projects effects of the conversion of forest cover to permanent early seral and its impact on future timber supply. ie - removal of the project footprint from productive forest land base. This has to also include an analysis of permanent new road development.	The amount of mature forest removed as a result of the Project footprint (including permanent new road development) will be detailed in the Application under the Vegetation and Wetland Resources and Land and Resource Use sections. The resulting implication of removal of the Project footprint on timber supply will be discussed in the Land and Resource Use section.	comments adequately addressed		
16.2 Summary of Residual Effects	T. Larden	Ministry of Forests Lands and Natural Resource Operations; Smithers	Given the magnitude of the project and the potential for residual effects that will require compensation, it is requested that the proponent include a heading specific to compensation activities proposed. This should be separated into aquatic and terrestrial and grouped by affected VC. Fisheries compensation for altered habitat and terrestrial compensation for early seral stage conversion are a couple of examples but not a complete list.	Proposed mitigation and conceptual compensation plans will be summarized by VC in the application in the format of Table 16-1 of the dAIR.	Proponent response satisfactory. Issue resolved	No additional response required.	comments adequately addressed		
1033.9.1	Adrienne Fitzpatrick	Nak'adzi Band	The method used to develop the Project and Activities Inclusion List must be clearly presented. Are all Projects that overlap with the wildlife VC (extent of range of all species) or just watercourse boundaries? This method must correspond with the Cumulative Effects Assessment methods. It is expected that the Proponent will add all projects within the forestry sector, shale and tight gas sector, and Site C Dam to this list (ACTION ITEM).	The list of proposed projects and activities (Table 3-4) that will be considered in the cumulative effects assessment is based on a major projects inventory available at the time of dAIR development. This list will be refined by PRGT subject to review by the Working Group and confirmation from the EAO. The process and methodology for conducting the cumulative effects assessment is described in section 3.9.2.	There are other LNG projects that adopt a much more rigorous CEA methodology and project list selection process. For example, the LNG Canada dAIR refers to the major projects inventory, exactly how the major projects were selected, and a description of the ranking scale adopted to explain why some would be included and others excluded. This is very clear so that Working Group members may offer clear advice and input. The fact that this methodology is unclear in PRGT's dAIR, simply creates confusion and lack of trust in the proponent. As outlined above, this response should be captured in the AIR.	Section 4.5 of the LNG Canada Project dAIR (November 8) and the dAIR for PRGT describes the same methodology for selecting other projects and activities in the cumulative effects assessment. The PRGT dAIR refers to the Major Projects Inventory (page 3-15) and states the list may be refined by the Proponent, subject to confirmation from the EAO.	[Comment submitted by the Nak'adzi in tracking table and letter] in response to comment 103, Nak'adzi incorrectly referred to LNG Canada. Sincere apologies. Rather, Section 5.3 "Steps in Developing the Project Inclusion List" for the Prince Rupert LNG outlines an eight-step process for developing a project inclusion list. Despite the flaws of this dAIR, there are several sections in this dAIR that would provide a useful starting point for PRGT to adopt in their dAIR and improve upon, including Section 2.5 "Alternative Means of Undertaking the Proposed Project" and the decision to include "Aboriginal Cultural Activities" (p.40) raised as a concern by Nak'adzi in comment 200). The general suggestion, then, is that by sharing the approach, methods, and steps that will be undertaken by PRGT in developing the Application, the working group members may comment on these steps and have influence over how they are changed in the dAIR so they may be meaningfully engaged in the process.	The Nak'adzi's comment regarding methods is acknowledged. PRGT believes that the list includes all projects and activities that may contribute to adverse cumulative effects on the VCs.	
1043.4 Potential Effects	John Rex	Ministry of Forests Lands and Natural Resource Operations	Water can be influenced during "operations and maintenance" phase and should be noted as such in table 3-2	Changes to freshwater or marine habitats during operation and maintenance are not anticipated to be substantial with the application of standard mitigation and best management practices, including post-construction monitoring. They will be briefly addressed in the environmental assessment. Changes to the dAIR are not required.			no further comments		
1054.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	The VC for fresh water aquatic resources should include "water" as its own VC rather including water as a KI in support of fisheries. Other water resource users such as potable supply, livestock, recreation, and industrial uses have been ignored. Potential significant oversight given the large number of stream crossings required to complete the project.	See Standard Response 8.	The 2 km wide pipeline study corridor does not pass within 500 meters of a community watershed, and therefore they are not delineated on project maps.		no further comments		
1064.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	In support of preceding point, water licenses and community watersheds should be identified along planned route.	See Standard Response 8	The nearest pipeline corridor passes near a water diversion point for a water license is 150 m, and the nearest pipeline corridor crosses a watercourse is greater than 2.5 kilometres upstream from a diversion point for a water license. This is outside the expected zone of influence for impacts on water quality.		no further comments		
1074.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	Turbidity and sedimentation from road construction and maintenance as well as pipeline installation are significant water quality issues. Consequently, quantitative assessments of water column and streambed fine sediment content should be assessed before, during, and after construction. Other water quality parameters are going to be measured by handheld meters, why turbidity visual? Turbidity monitors are also available so they should be used to collect single or continuous sample information. Further, streambed fine sediment content should be quantified pre-post construction to assess any change in habitat condition.	RSC standards (which include a visual assessment of turbidity) were used at the time of baseline surveys to assess the general quality and characteristics of fish habitat. At the time of construction, a qualified environmental professional will be on site with an approved turbidity meter to measure background TSS and ensure levels remain within approved provincial and federal standards for allowable increases in TSS. We anticipate that by following these guidelines, any fines deposited in downstream pool habitats will be minor and will be removed through flushing flows during the next freshet.		no further comments			
1084.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	Riparian clearing at crossings should be minimized and/or avoided if possible to moderate water temperature effects, particularly around streams with temperature sensitive fish species.	Riparian clearing will be minimized and riparian setbacks maintained where practicable as per standards outlined in the Environmental Protection and Management Guidelines under the Oil and Gas Activities Act, and as described in measures described in DFO's Operational Statements at applicable watercourse crossings.			no further comments		
1093.9.2	Adrienne Fitzpatrick	Nak'adzi Band	The following statement highlights a critical concern for Nak'adzi: "There is a reasonable expectation that the contribution (i.e., addition) of the Project's residual effects to the residual effects from past, present and likely future projects would cause a change in cumulative effects in a manner that could adversely affect the quality or sustainability of the VC." There are instances where a particular VC has already been assessed on the quality and/or sustainability of the VC (e.g., streams that were once salmon-bearing areas where ungulates are recently extirpated or extirpated). It is of the utmost importance that cumulative effects be seriously considered prior to the development of LNG pipelines. It is not clear what kind of tradeoffs are being made without a more strategic level assessment. What will be left of the land and resources used by Nak'adzi? What will its physical and perceived quality be? If these questions are not adequately addressed by the Crown, infringements upon Aboriginal rights can never be justified.	The determination of PRGT's contribution to potential significant adverse effects and infringement upon Aboriginal rights will be determined by the EAO. Comment directed to the EAO.	The EAO has a duty to consider this, but the Proponent should also be considering this in their assessment process. Other LNG proponents are very clear including this as part of their assessment. Why is PRGT not able to? This is an important technical exercise that draws upon social science, TK, and scientific evidence and is meant to feed into the EAO Project Assessment Lead's conclusion of "seriousness of potential impacts on Aboriginal interests". Specifically, the EAO commits to reviewing substantial amounts of information provided by the proponent, including cumulative effects on Aboriginal interests. This information must be provided to the EAO. If the PRGT is not able to include this requirement in the AIR, Nak'adzi will raise this with the provincial government.	EAO response to Round 1 comment: The impacts of past and present activities are already considered in the assessment of a Project's potential residual effects. In most cases these effects would be discussed in the presentation of baseline conditions (and trends). Where the project is found to have a residual effect, the influence of past and present activities and projects is typically an important factor in characterizing the context (i.e. sensitivity and resiliency) of the valued component. This methodology is outlined in the project's AIR, as well as in EAO's VCO Guideline.			
1104.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	No discussion of water quality monitoring over life of project. Crossing maintenance and road use may influence water quality in future e.g. sediment, temperature, and perhaps pesticide application.	See Standard Response 8.	A qualified environmental professional will be on site during construction to monitor baseline and downstream TSS levels, and will ensure the proper sediment and erosion control measures are implemented to ensure TSS levels remain within federal and provincial guidelines.		no further comments		
1114.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	Sediment releases to water courses are identified in chapter 9 under accidents/malfunctions. Chronic sediment addition can occur at crossings as a matter of construction, water quality monitoring will quantify and qualify statements about suspended sediments.	See Standard Response 8.	In the event of sediment releases or chronic sediment additions due to an accident or a malfunction at a crossing location, water quality monitoring upstream and downstream of the sediment introduction location will be used to quantify and qualify the effects of such releases. It is expected that standard sediment and erosion control measures, and air remediation at all fish-bearing stream crossings will minimize the potential for additional introduction of sediments.	Oil and Gas Commission comment on response to Round 1 FLNRO Comment: During the permitting process, PRGT is required to meet the requirements relating to sedimentation in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	no further comments	
1123.9.2	Adrienne Fitzpatrick	Nak'adzi Band	Where the dAIR states, "The Application will provide an assessment of the adequacy of existing data in conducting the cumulative effects assessment", more information is required. It is not clear what the consequences of an adequate assessment is. Recommend adding "Additional research will be undertaken when an information source is considered to be inadequate. When it is considered unreasonable to collect more information, this will be documented and justified. When information is deemed inadequate the following steps will be taken: the confidence level of the prediction will be decreased, the likelihood of significance is increased, mitigation measures will be strengthened, and/or additional monitoring will be required".	Where an information source is required to support the effects assessment, and the level of information is considered inadequate, PRGT will conduct additional research where possible. Where additional research is not possible, the effects predictions will include an assessment of confidence and risk. The level of confidence is based on scientific information, statistical analysis, professional judgment, effectiveness, and assumptions. Prediction confidence is described in section 3.8 of the dAIR.	The language presented here is still unclear. How is adequacy determined? When is additional research considered not possible? Academic journals, case studies, interviews with experts (e.g. leading researchers in a relevant field) can lead to more information. In most cases, research can continue and lead to good quality results without much expense. It is not clear that this is taken seriously in the dAIR.	Oil and Gas Commission comment on response to Round 1 FLNRO Comment: During the permitting process, PRGT is required to meet the requirements relating to sedimentation in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	Adequacy of the baseline information and data needed to conduct the assessment is made by the assessors preparing the Application and by the Working Group in their review of the Application/preparation of the Environmental Assessment Report that will be submitted to the Ministers. Based on the experience of the PRGT team and generally well understood effects from pipeline construction, it is estimated there is sufficient information to conduct defensible assessments for Project-specific effects and cumulative effects. Should some key data be considered inadequate, the confidence levels and monitoring and adaptive management commitments would be adjusted accordingly.	In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	no further comments
1134.3 Aquatic Resources	John Rex	Ministry of Forests Lands and Natural Resource Operations	Chapter 14 does not identify consideration of erosion and sediment control plans at crossings specifically, are these in the construction plan?	Yes, sediment control plans are part of the construction plan and will be referenced in the environmental assessment.	PRGT will consider ATV access management strategies at crossings. All vehicle crossings of watercourses will be designed to minimize disturbances to fish habitat. In general, at fish bearing streams, clear span structures or ice and snow bridges will be installed in accordance with the measures and guidelines described in DFO's operational statements for vehicle crossings.		no further comments		
1144.3 Aquatic Resources	Chelton van Geloven	Ministry of Forests Lands and Natural Resource Operations	Consider ATV access management strategies at crossings as well. Don't attempt to restrict it but design crossings so that impacts of ATV access are prevented through design.				no further comments		
1153.9.2	Adrienne Fitzpatrick	Nak'adzi Band	Good practice of EA requires a higher standard for cumulative effects assessment. It is critical that the characterization of residual cumulative effects consider the total effect load on the VC in relation to the thresholds. A previous comment highlighted the need for the determination of these thresholds in the next Working Group Meeting. The measures of direction, magnitude, geographic extent, frequency, duration, reversibility, and context are not relevant unless you are only considering the incremental effect directly attributable to the Project. It is not possible to characterize the effect pathways of all past, present, and reasonably foreseeable projects and activities. It seems that this dAIR is vulnerable to the critique published in Duniker & Greg (2006). They suggest that proper cumulative effects assessment requires focusing on the object being impacted and all the things impacting on it, not the contribution of one individual. "In other words, instead of focusing on whether a single project may have unacceptable impacts on a specific VC (valued ecosystem component), the sustainability of that VC can be understood properly only by examining the full range of human-generated stresses on the VEC. It must be recognized that VEC conservation depends on ensuring that the total effects of all stresses are kept within tolerable and acceptable levels. This, in our view, is where CEA (cumulative effects assessment) comes in" (p.154). Duniker, P.M. & L.A. Greg. 2006. "The Impotence of cumulative effects assessment in Canada: Aims and ideas for redemptiveness". Environmental Management, 37(2), pp. 153-161. Accessed at http://res-management.dal.ca/Files/Impotence_of_CEA_in_Canada.pdf .	PRGT acknowledges the comment and looks forward to engaging the Working Group in a dialogue on appropriate thresholds for VCs.					
116 General	Chelton van Geloven	Ministry of Forests Lands and Natural Resource Operations	Has there been any operational discussion about what is actually possible for minimizing Riparian disturbance to smaller streams. (I understand you are not going to horizontal drill an 5-3 or 5-4 and possibly even some 5-2s - What are the best practices for pipeline crossings?)	See Standard Response 35.			no further comments		
1174.1	Adrienne Fitzpatrick	Nak'adzi Band	The Air Quality VC must include a temporal scope. What is the period of time included in the past and future? How far back in time? What are initial estimates for when the length of time into the future will not be measured. Add new paragraph at end of section. "The Application must consider the following temporal boundaries for air quality: Backcast to [year] when air quality is considered to be pristine and forecast to [year] when residual air quality effect from Project is predicted to no longer be measurable".	For the purposes of the Application the definition of the baseline ambient air quality conditions depends primarily on data from regional air quality monitoring stations operated by BC MOE. This data will be used in the environmental assessment to establish baseline conditions for air quality. The latest available full year of data is normally used to define the baseline, unless there were gaps or problems with the instruments. To determine the Project effects the baseline air quality is added to the air dispersion model predictions. The air dispersion modeling is conservative in that it assumes the full build-out of the pipeline at 3.6 bcf/day.	OK. Where is this commitment in the revised dAIR? See critique above on the purpose of the AIR.	Section 4.1 of the dAIR will be updated to describe the use of regional air quality monitoring data in the Air Quality VC. Update to the dAIR required.			

118.4.1	Adrienne Fitzpatrick	Nak'adli Band	include "work camps" in list of activities that are included within the Project Footprint area.	Work camps are included in the definition of Project Footprint in Section 3.2.1. This definition will be applied for each VC in Sections 4.8. The assessment of potential effects related to the work camps will be included in various VCs.	OK. Where is this commitment in the revised AIR? See critique above on the purpose of the AIR. In addition, Nak'adli notes that the EAO has listed up to nine compressor station sites in its final 5.1.1 Order, where originally eight were proposed. Based on maps printed for the presentation on preliminary reports, the Proponent has planned a new compressor station has been included in Nak'adli territory. The location of this, and all other permanent and temporary infrastructure must be shown in detailed map sheets and be subject to meaningful consultation with Nak'adli prior to issuance of the Application.	Work camps have been included in each section of the dAIR that describes the Project Footprint as described in the Introduction of each VC. PRGT is developing detailed map sheets that show proposed permanent and temporary infrastructure within each traditional territory and will be consulting on them with Aboriginal communities, including Nak'adli, prior to filing of the Application.		Updated response to Round 2 working group comment. After the EAO's review of the dAIR, the following bullet has been removed from the series of bullets in Section 1.3 (formerly 1.2): • Provincial Resource Management Objectives (including those set under the Forest and Range Practices Act and the Government Actions Regulations) The bullet was removed because Provincial Resource Management Objectives are covered under the preceding bullet in the dAIR (which is provided below). • Provincial land use plans and land use designations and other land use plans and designations, including those provided by Aboriginal groups.
119	General	Perry Griz	Ministry of Forests Lands and Natural Resource Operations	Please include Range Act in Provincial Legislation.	The Range Act will be included in the list of Provincial Legislation in the Application.	Oil and Gas Commission comment on response to Round 1 FLNRO comment: Note: The Environmental Protection and Management Regulation addresses some elements of Range and will be considered at the time of permitting.	Comment acknowledged.	
120.4.1	Adrienne Fitzpatrick	Nak'adli Band	Reference to "emissions from approved and reasonably foreseeable projects" must include all reasonably foreseeable activities to develop new gas resources to supply proposed pipelines. Therefore, the assessment must consider the full capacity for each pipeline, not simply initial phases.	The air quality assessment will be based on the PRGT pipeline at full build-out (i.e., 3.6 bcf/day) and the definition of a reasonably foreseeable project was provided in section 3.9.1 Project Inclusion List (see page 3-14 of the dAIR). To be considered for cumulative environmental effects, there must be a reasonable prospect that the other projects and activities will have residual environmental effects that will overlap in a measurable way with the same Project-related environmental effect.				
121	4.6 Vegetation and Wetland Resources (and/or Section 6.5 Land & Resource Use Table 6-8)	Perry Griz	Ministry of Forests Lands and Natural Resource Operations	Environment (Terrestrial): "Changes vegetation from forest to grassland on ROW". Please include Loss of Natural Range Barriers as a Potential Effect on Range Tenures. This can result in a loss of livestock, inability to control livestock (Natural Range Barriers protect riparian areas) and public safety when livestock get onto public roads.	Change in agricultural and range land use is an identified effect and area of range locations is a measurable parameter for this effect. The Land and Resource Use VC will cross-reference other VC chapters (e.g., Vegetation and Wetland Resources) to acquire technical information required for the completion of the assessment.	Oil and Gas Commission comment on response to Round 1 FLNRO comment: Note: The Environmental Protection and Management Regulation addresses natural range barriers and will be considered at the time of permitting.	Comment acknowledged.	ok
122	1.2 Proposed Project Description	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	The proposed description should include the temporary works, such as access.	The bullet in Section 1.2 "description of onsite and offsite components of the Project and associated supporting infrastructure" includes the temporary works, such as access.	response is satisfactory.	No additional response required.	comments adequately addressed
123	Table 3-2 - Potential for Substantive/Meaningful Interaction of Project-VC Interactions	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	The table indicates that there is no interaction between vegetation management and freshwater aquatic resources during the Operations and Maintenance. As riparian habitat is often considered a component of fish habitat it is unclear if the effects assessment would consider this interaction or if it would be captured under the Vegetation VC.	No interaction between vegetation management and freshwater aquatic resources is expected during the Operations and Maintenance. No clearing of riparian vegetation during this phase is proposed. The DFO Operational Statement: Maintenance of Riparian Vegetation in Existing Rights-of-Way would apply.	Oil and Gas Commission comment on response to Round 1 FLNRO Omineca comment: During the permitting process, PRGT is required to meet the requirements relating to riparian management in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	Comment acknowledged.	comments adequately addressed
124.4.1	Adrienne Fitzpatrick	Nak'adli Band	As outlined in Comments above, baseline conditions must be characterized as a trend-over-time throughout the AIR. As pointed out earlier, it is recommended that all instances of baseline conditions include references to trend-over-time.	The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.	OK. Where is this commitment in the revised AIR? See critique above on the purpose of the AIR.	Section 4.1 of the dAIR will be updated to describe how regional air quality monitoring data will be used to define baseline ambient air quality conditions. Update to the dAIR required.		
125	Table 3-4 - Preliminary Project Inclusion List	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	Proponent should consider potentially including First Point Minerals Corp.'s De-car Nickel Project	PRGT will consider adding the De-car Nickel Project near Fort St. James to the cumulative effects assessment. It will be added if it has a meaningful potential to have overlapping environmental effects with the PRGT project.	response is satisfactory.	No additional response required.	comments adequately addressed
126	Table 4-5: Indicator Species for Assessment of Freshwater Aquatic Resources	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	The indicators in table 4-5 are inconsistent with those in table 3-1. Table 4-5 should be updated to include fish habitat and water quality	Water quality and fish habitat will be removed from the indicator list in Table 3-1. "Change in water quality" and "change in fish habitat" are potential adverse effects. The indicators are the important fish species (part of a fishery or species of concern) that rely on intact habitat and adequate water quality to complete their life-cycles. The dAIR will be updated to reflect this change.	response is satisfactory.	No additional response required.	comments adequately addressed
127.4.3.1	Adrienne Fitzpatrick	Nak'adli Band	The terminology is inadequate regarding the local assessment area. Freshwater effects can happen in parallel areas to water courses as well. It is recommended that the text be revised as follows: "includes an area extending 100 m upstream of the crossing or waterway proximate physical work or activity location and a minimum of 300 m downstream of the proposed crossing or waterway proximate physical work or activity location. Waterway proximate locations are anywhere that a Project physical work or activity will come within [redacted] to insert appropriate metric X metres] of a waterway, for example where the pipeline runs parallel to a waterway in a steeply incised valley area."	See Standard Response 18.	Standard response reads, "Design and routing of the pipeline considers establishing buffers to adjacent watercourses. Efforts will be made to locate temporary workspace outside of any riparian areas, where possible. Assessment of all affected riparian fish habitat will be undertaken. The LAA definition of the Freshwater Aquatic Resources VC LAA will be amended to: "includes an area extending 100 m upstream of disturbed instream or riparian habitat and a minimum of 300 m downstream of disturbed instream or riparian habitat." Thank you.	No additional response required.		
128.4.5.1	Introduction	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	In some cases a static band for the Regional Assessment Area may be sufficient; however, in other cases the Regional Assessment Area should be more reflective of the indicator species, such as the known herd range of a caribou herd or the population unit range of grizzly bears.	Specific to Grizzly Bear and Caribou, PRGT will consult with regulatory agencies (i.e., BC MOE or BC MFNR) on the use of appropriate assessment boundaries.	response is satisfactory	Comment closed.	comments adequately addressed
129	General Comments	Karen Spence	Oil and Gas Commission	The BC Oil and Gas Commission (Commission) appreciates the opportunity to provide comment on the draft Application Information Requirements (dAIR) for the proposed Prince Rupert Gas Transmission Project. Overall the Commission finds the document to be a high quality, well-written and thorough and we do not have any comments on specific content. We would, however, like to provide general comments with regards to potential future permitting by the Commission. To ensure an efficient permitting process, in the event that the proposed project receives an Environmental Assessment Certificate, the final dAIR and selection of Value Components should be consistent with the requirements of the Oil and Gas Activities Act and associated regulations where it is within the jurisdiction of the Commission. Utilization of guidance that is available from the Commission on methodologies relating to the assessment of potential environmental impacts specific to oil and gas activities is encouraged; however, permitting level information and decisions should not be incorporated into the Environmental Assessment application.	PRGT appreciates the input from the OGC and looks forward to further discussions and guidance on methodologies relating to the assessment of potential environmental impacts specific to oil and gas activities.			
130.4.4	Don Roberts	Kitsumkalum Band Council	The LAA is especially unacceptable in this case, the minimum LAA needs to include important estuaries such as the Nass Estuary and the Kwinamass River Estuary. Kitsumkalum is extremely concerned about the insufficient geographic and temporal scope of the baseline studies based on what we have seen so far. We are also concerned that species which we consider indicator species or species that are essential to our food supply and culture are not represented in the baseline studies. We anticipate that our review of this VC, including the knowledge gap analysis, will take a substantial amount of time and resources. Table 4-8 Not only permanent changes in fish habitat need to be assessed, but temporary or seasonal changes due to the proposed project need to be addressed. The definition of harm needs to include the change in the system. For example, the project could result in a certain species moving out of Noosa Bay and relocating to some other locations. This would result in changes to our culture and science of space and history, as well as impacting our food security, which should be added under "measurable parameters".	The Marine Resources LAA will include brackish areas, such as Nass Bay and Skeena River. Expected freshwater effects on Kwi Xwimza (Kwinamass River) include potential alterations of fish habitat at the pipeline crossing location and potential increases in total suspended solids within the zone of influence, extending approximately 1,000 metres downstream from the crossing location (approx. 24 kilometres upstream of the Kwinamass River estuary). The goal of our baseline studies is to document and characterize pre-construction conditions, rather than to document longitudinal trends. We are confident that the field methods meet this objective. PRGT is adhering to DFO's new terminology regarding effects on fish habitat, which will consider "permanent alteration, or destruction". The indicators selected encompass all fish species of commercial, recreational and Aboriginal importance – the latter of which includes subsistence, cultural and commercial uses (see Standard Response 13). Relocation of fish would occur either as a consequence of change in their habitat, or as a result of underwater noise; consequently, this would be considered within the potential effect of change to fish habitat and change in behaviour as a consequence of underwater noise. PRGT is confident that the EA framework and methodology will fully address the concerns raised. The focus of the Marine Resources section is on the marine species and habitats themselves, which underpin food security. The proposed measurable parameters will provide insight into the effects of the project on marine species and habitat and, hence, provide insight into food security. Potential effects on fisheries will be further assessed in the land and resource use VC. The discussion of Aboriginal interests (including rights and title) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application informed by the analysis of relevant VCs and available TK and TEK information. (See Standard Response 4).			Thank you for the explanation. Please note that Kitsumkalum has not concluded our TUS, so PRGT cannot possibly know marine species important to Kitsumkalum yet. PRGT looks forward to reviewing Kitsumkalum's TUS when available. Relevant issues coming out of the TUS will be addressed by PRGT during the EA process.	
131.4.3.1	Adrienne Fitzpatrick	Nak'adli Band	In regards to the Regional Assessment Area, it is recommended that the text be revised as follows: "Regional Assessment Area includes a 1.1 km section of the stream that extends 100 m upstream and 1,000 m downstream from the pipeline ROW, new access roads, or any other waterway-proximate Project physical works or activities."	See Standard Response 17.	Standard response reads, "The RAA definition will be amended as follows: "includes relevant fish habitats in the sub-basin upstream of disturbed instream or riparian fish habitat and extending 1,000 m downstream from disturbed instream or riparian fish habitat." The change will be reflected in the updated dAIR." It is not clear what "relevant fish habitats" are. What makes some fish habitat relevant and some fish habitat not relevant?	"Relevant fish habitats" are those habitats upstream of the potentially affected habitat which may be utilized or contribute to the health of fish species and fish populations that occur within the project footprint. The RAA defines the area in which other development activities may cumulatively interact with potential residual effects from this project. In that way, these areas are "relevant" to this assessment.		
132	5.2.2 Existing Conditions for Land and Resource Use	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations; Omineca	provincial staff, particularly in the Fish and Wildlife section of FLNRO would be a potential source of information relating to non-commercial hunting and fishing.	FLNRO staff have been identified as a resource for this information.	response is satisfactory.	No additional response required.	comments adequately addressed
133.4.3.2	Adrienne Fitzpatrick	Nak'adli Band	It is recommended that the text be revised as follows: "This section of the Application must describe and characterize the existing freshwater aquatic conditions in the LAA and the RAA with a focus on the freshwater aquatic resource indicators identified in Table 4-5. The following information will be used to characterize these baseline conditions." The current term "along the pipeline corridor" is not a defined term in the dAIR.	PRGT will update the text within the dAIR. Environmental conditions within the RAA will be characterized through the summary of available literature and other information, while those in the LAA will be described by field studies. For consistency, this edit will also be made for the marine resources (Section 4.4.2), wildlife and wildlife habitat (Section 4.5.2), and vegetation and wetland resources (Section 4.6.2) VCs. Comment notes: The summary in the application will fully capture all salient points of this chapter. Additional technical detail will be provided in an appendix to the Application.				
134.4.4.4	Don Roberts	Kitsumkalum Band Council	Kitsumkalum requires a full report on all of this, not just a brief summary.					
135	3.1 Issues Scoping and Selection of Valued Components - PRGT004776-TC-EN-IP-0003 Selection of Valued Components	Bruce Rogers	Ministry of Forests Lands and Natural Resource Operations; Omineca/North East	"Under: "1. Issues scoping, which includes: a. Understanding of the existing human and biophysical environment including proximity to" I would add: "i. Any lands with legal land use objectives/orders Note: RE: ii. Parks or other protected areas and v. Agricultural lands and tenured lands—Although the latter two may indirectly address LLUO's, this is something that should clearly be defined up front in the issues scoping stage e.g. OGMA's, WMA's etc..."	Any lands with legal land use objectives/orders were considered during issue scoping and will be considered in the Application.			ok
136.4.7	Don Roberts	Kitsumkalum Band Council	The soil/material on the marine floor needs to be assessed as well	Project interactions with marine sediments will be addressed within the Marine Resources VC. Please see Standard Response 11.				
137	3.1 Issues Scoping and Selection of Valued Components - PRGT004776-TC-EN-IP-0003 Selection of Valued Components	Bruce Rogers	Ministry of Forests Lands and Natural Resource Operations; Omineca/North East	"RE: the statement: "c. Understanding of project-environment interactions based on: i. Identification of legislation that is applicable to the design, construction and operation of a pipeline (as outlined in Section 3.2). Where existing laws and regulations directly prevent the possibility of significant adverse environmental, economic, social, heritage, or health effects, there is no requirement for inclusion as a VC." If selection of proposed routes have already taken into account and avoided impact to the Legal Land Use Objectives as mentioned in comment # 2, then this last sentence stands. However, there are cases where licensing does permit mitigated impacts to LLUO's and if this is occurring then the LLUO's should be included as VCs along with mitigation strategies."	Interactions and conflicts with land use planning objectives will be assessed in the land and resource use VC in the application. See Standard Response 2 and Standard Response 4. PRGT notes that considerable TK information resides within Aboriginal communities beyond the impacts of the Project.			ok
138.4.3.2	Adrienne Fitzpatrick	Nak'adli Band	Suggesting that TK will be used "where relevant and available" is inappropriate. No reference is made to the "relevance" of scientific data above. TK/TLU will not be treated as second class data. This change should be made throughout the entire document.	PRGT believes that TK/TLU information can be incorporated into the project design to help ensure Aboriginal interests are addressed in a meaningful way. No changes to the dAIR are required.	As highlighted in the above comments (all references to Standard Response 2), this is not acceptable. Nak'adli raised the point that TK has not yet been used in the scoping phase. It appears as though PRGT will treat TK as an independent part of the EA. TK must be part of the whole EA, influencing key indicators or thresholds for project effects and cumulative effects. This is a fundamental aspect of the EA for all VCs, including in relation to TK and assessment on the ability to exercise rights and title.	TK information will be used where applicable for each VC and where available. Please refer to Sections 4.3.2, 4.4.2, 4.5.2, 4.6.2, 4.7.2, 4.9.2, 6.4.2, and 7.2.2 of the dAIR for examples of TK incorporation into the Application.		
139	3.1 Issues Scoping and Selection of Valued Components - PRGT004776-TC-EN-IP-0003 Selection of Valued Components	Bruce Rogers	Ministry of Forests Lands and Natural Resource Operations; Omineca/North East	"RE: the statement: "4. For the preliminary VCs, consideration is given to industry standard design, construction, and operational mitigation measures that may prevent project environment interactions. For the PRGT Project, some of these include: a. CSA 2602-11 Oil and Gas Pipeline Systems b. Oil and Gas Commission Information Bulletins and Information Letters c. National Energy Board's Filing Manual (2013) d. Pipeline Associated Watercourse Crossings, 3rd Edition (CAPP 2005) e. Hydrostatic Test Water Management Guidelines (CAPP and CEPA 1996) f. TransCanada's internal construction and environmental protection standards" I don't understand what the consideration entails in relation to the operational mitigation measures listed here. At this preliminary stage at potential impacts should relate somehow to or actually be considered VCs and, as assumptions about the effectiveness of general mitigation measures effectiveness may not yet have been substantiated. To avoid losing any relevant VCs, in the process, broader scope is need up front and then scope can be narrowed via the dAIR stage if warranted."	The feedback received regarding the VC selection document was considered when developing the draft AIR. PRGT believes that the dAIR drafting process has identified a reasonable and comprehensive list of VCs to be evaluated. It is acknowledged that VCs should be broadly considered at first and then focused based on risk and other factors including application of standard mitigation and best practices and industry standards. PRGT looks forward to receiving this information to inform the project as appropriate.		OK. Being as comprehensive as possible with VCs at the beginning will be more efficient for both the proponent and the technical reviewers when making evaluation of the impact assessment.	
140.5.0	Don Roberts	Kitsumkalum Band Council	Kitsumkalum will conduct our own socioeconomic studies and provide the proponent with information regarding our findings.	No changes to the dAIR are required.			Comment acknowledged. Thank you for your feedback.	

141.4.3.3	Adrienne Fitzpatrick	Nak'azdli Band	Observation is the measuring stick for much of TK. It is recommended that the text be revised as follows: "Available TK measurable or observable parameters must be considered in the assessment of potential effects and identification of mitigation measures."	Applying "measurable and observable" unnecessarily constrains the use of TK. It is the intention to incorporate all TK that is relevant and available into the assessment of freshwater fisheries. No changes to the dAIR required.	Within the short timeframe of the EAO process, there will not be enough time and resources to hear all kinds of TK as per a CEAA oral hearing process. How exactly does the EAO and PRGT propose to solicit TK in a way that can be used effectively in the EAO? All evidence must be observable through some sensory perception (even spiritual experiences related to cultural ties to land that are not easily measured, imperfect measures may be adopted).	PRGT believes that the environmental assessment process administered by the Environmental Assessment Process provides multiple and meaningful opportunities for the Nak'azdli Band to share traditional knowledge information. However, PRGT would welcome the opportunity to meet with the Nak'azdli Band to discuss this matter further.	
142	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	"RE: the statement: Estimated number of individual plants from the species of interest destroyed - I don't think this is a realistic statement. Rare plant floristic survey work does not quantify abundance and is only designed for detecting presence of species. Methods for this can be seen at: http://www.gov.bc.ca/biodiversity/letfms/ProtocolsforRarePlantSurveys.html ". It would be more appropriate to say: Estimate the number of ecological communities where individual rare plants species are likely to be found based on rare plant floristic survey data."	Rare plant occurrences will be assessed on a case-by-case basis. In some cases, the occurrences are well-defined, in others, they are not. Where possible, the impact to numbers of individuals will be described, but the potential for other individuals and populations outside of the known occurrence will also be discussed in each case.			Updated response to Round 1 working group comment
143	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Add to Rational: There is a need for an inventory of all ecological communities that will be impacted. The TEM and rare plant surveys will not only focus on species and communities of interest (at risk) but on all ecosystems impacted in the USA and SSA.	Noted. The dAIR will be updated to reflect this change.			What I am saying is that what all your sampling surveys will likely do is give you a relative abundance of occurrence, not an absolute abundance, so their abundance is only as "well defined" as the scale chosen for analysis, so your observation and discussion should accurately reflect sampling scale and methods.
144.4.3.4	Adrienne Fitzpatrick	Nak'azdli Band	It is recommended that the text in the conclusions (in all VC sections, not merely this one) be revised as follows: "This section of the Application must include a brief summary of the predicted project-specific and cumulative residual effects on freshwater aquatic resources and make an assessment of the significance of these effects. Significance estimations must be made for each indicator considered in the assessment."	PRGT is adopting a standard approach approved in recent AIR documents as outlined in Section 3.4.	This does not address our concern.	The proposed wording is not substantially different from that currently in the draft AIR. The language used in the draft AIR is consistent with the environmental assessment practice used in Canada for decades and will provide the EAO and Working Group with the information they need to prepare the Environmental Assessment Report for the Ministers to make a decision on the Project.	
145.4.4.1	Adrienne Fitzpatrick	Nak'azdli Band	Development of the "marine resources" VC is an example of inappropriate "lumping". For example, salmon fish both fresh and salt water so it is being assessed twice? More discussion is required, given the high level of concern identified by the Working Group on October 18 re: inadequate scoping of salmon and salmon habitat at this assessment.	The broad VC of Marine Resources has been disaggregated through the proposed indicators and potential effects. Each indicator will be given full and due attention within the relevant sections of the EA. With respect to the salmon example specifically, salmon and their habitat are addressed independently in the "Freshwater aquatic resources" and "marine resources" sections to ensure that the "land" and "marine-based" project activities that could affect salmon are addressed explicitly. This approach will yield greater transparency and clarity regarding the potential effects of the project.	The development of a VC is based upon the component of the environment that is valued. Project activities, scoped through spatial and temporal boundaries and an interaction matrix, are then used to make the assessment of potential effects transparent.	Agreed.	
146 pp 4-16	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Comment on Indicators: RE: "Ecological communities at-risk (as defined by the BC Conservation Data Centre)" I would be sure to include in the methods not just a search on listed species and ecosystems from BC Species Ecosystem Explorer but also any spatially identified areas which can be accessed at MeC's Sensitive Ecosystems Inventory: http://www.env.gov.bc.ca/en/	Noted. Section 4.6.2 of the dAIR will be changed to reflect the added resource of information provided in the comment.			ok
147.4.4.2	Adrienne Fitzpatrick	Nak'azdli Band	It is suggested that the section name be changed to the following: "Existing Conditions and Change over Time for Marine Resources". This is a generic change required throughout all VC-specific sections.	See Standard Response 33.		This wording comes from the EAO's Application Information Requirements Template. Specifically it states: "Context refers to the current condition of the VC, particularly the current and future sensitivity and resilience of the VC to change caused by the project. Consideration of context draws heavily on the description of existing conditions of the VC, which reflect cumulative effects of other projects and activities that have been carried out, and especially on information about natural and/or human-caused trends in the condition of the VC." As indicated in the AIR Template, PRGT will use its understanding of the current conditions, which reflect past impacts and effects, to establish the context of future sensitivity and resilience of each VC.	
148 pp 4-16	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Comment - RE: Old forests (including old growth management areas) - If this is used as a VC indicator then all management elements associated with old forest should be considered and consultation with Forest Licensees and government agencies should take place around elements that include old growth targets under the PGTA and Provincial non spatial Biodiversity Order. Spatial old growth management areas (under FRPA - legal and guidance), wildlife habitat areas and ungulate winter ranges (under FRPA), Wildlife Tree Retention Areas (under the EPMA and OGAA).	PRGT will consult with Forest Licensees and government agencies regarding management elements associated with old forest. The assessment of the Vegetation and Wetlands VC will consider regional and provincial spatial and non-spatial old growth targets, legal and non-legal Old Growth Management Areas and Wildlife Tree Retention Areas. Wildlife Habitat Areas (WHA) and Ungulate Winter Range (UWR) will be presented and discussed in the assessment of the Wildlife and Wildlife Habitat VC.	Oil and Gas Commission comment on response to Round 1 FLNRD Omineca/North East comment: PRGT must consider WTRAs, WHAs and UWRs under the Environmental Management and Protection Regulation through the Oil and Gas Activities Act for permitting.	Comment acknowledged and requirements will be addressed during permitting.	ok
149.4.4.3	Adrienne Fitzpatrick	Nak'azdli Band	It is suggested that the text be revised as follows: "Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3.0 (Assessment Methods). Mitigation measures will be compiled from available and relevant best management practices, First Nations inputs and traditional knowledge, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers."	See Standard Response 2. Traditional knowledge (TK), if available, will be used to develop mitigation measures - as will direct feedback from Working Group members, including Aboriginal Groups and government agency representatives drawing from their respective expertise and experience. No changes to the dAIR are required.	The AIR should include commitments that PRGT has made in terms of where their evidence base is derived from. How is the Working Group able to provide guidance and direction to PRGT if they are not clear about the methods and approaches they plan to use?	It is PRGT's understanding that responses, including commitments, provided in tracking tables such as these become part of the official record for the EA process and therefore present commitments to be fulfilled, though not explicitly stated in the dAIR.	
150 pp 4-16	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Comment RE: Reference Resources - The list of available resource information used characterize baseline conditions is appropriate. Regarding spatial information on existing rare ecosystems I would also include MeC's Sensitive Ecosystems Inventory: http://www.env.gov.bc.ca/en/	This reference will be included in the assessment.			ok
151	Karen Grainger	Yekoché First Nation	This section should include a statement that the Application will describe the scope of the EA pursuant to the BC Environmental Assessment Act Section 11 Order issued by the BC Environmental Assessment Office, and that the Application will meet the requirements of the Canadian Environmental Assessment Act, 2012.	The Application will abide by the direction provided in the Section 11 Order. No assessment is required under CEAA 2012. No change to the dAIR is required.			
152 pp 4-16	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Comment - RE: Survey Intensity Level (SIL) - Using SIL 5 (1:15,000, 5-10% ground inspection for the ISA is appropriate, however SIL 4 with more polygon ground inspections (15-25%) would be more appropriate for the USA, especially in more complex terrain. The level of localized experience of the mapping personnel with the ground in question can be a factor in determining survey intensity level. If area is encountered that has high likelihood of containing rare plants and/or ecosystems (e.g. wetlands and higher elevation subarctic to alpine sites) then it may be more appropriate to use SIL 1 or 2 in these isolated areas to verify presence or absence of rare ecosystems.	Comment noted. Final survey intensity data and historical data is included. Wetlands and atypical ecosystems were heavily sampled to ensure a higher level of intensity for these types. The TEM Sampling Plan was geared toward ground sampling of all mapped potentially listed ecological communities; when encountered field crews were expected to complete a ground plot at a minimum, and preferably, an Ecosystem Field Form (FS882). Taken together, these efforts resulted in a higher level of sampling intensity for these ecosystem types.		Ok. The TEM standards list for each SIL the ratio of Full-GIF:Visual plots suggested. If the RISC standard is to be sited as the standard used, then any deviations from this needs to be justifiably rationalized.	Final sampling intensity was 11.4%. Actual plot type ratios deviated from the RISC recommendations; this will be justified in the Technical Data Report.
153 pp 4-18	Bruce Rogers	Ministry of Forests and Natural Resource Operations: Omineca/North East	Comments RE: Mitigation - In terms of mitigation measures, avoidance of high value areas is the only real approach in USA. If development occurs it is accepted that the plants and ecosystems in the operational areas will be lost and that the work done to document habitat loss then becomes an impact inventory. If BMP's, recovery plans and other literature is going to be used to developed mitigation strategies, specific details on implementation such as past success/risk of failure of the strategy used and monitoring effort to measure success should be presented in the dAIR.	Noted. This information will be presented in the Application. No changes to the dAIR are required.			ok
154.4.4.3	Adrienne Fitzpatrick	Nak'azdli Band	It is suggested that the text be revised as follows: "Project residual effects, after application of mitigation, must be described in the Application using the measurable parameters in Table 4-8 or other identified measurable parameters."	The measurable parameters presented reflect a reasonable and comprehensive list of applicable parameters for which information exists to support a determination of residual project effects and their significance. PRGT welcomes additional supplemental information from the Working Group in this regard.	The recommendation was not aimed at the list of measurable parameters. The recommendation was focused on ensuring that the direction in the AIR is clear. By focusing the response on revising the measurable parameters list, the response from PRGT neglects the Nak'azdli's concern.	PRGT understands the intent of the comment however does not agree with narrowing the direction of the AIR to this level of specificity. The AIR is clear that the measurable parameters will be used to quantify the effects. However, to use the recommended language would limit the use of parallel qualitative discussions of the residual effects. As currently written, the draft AIR allows for a broader discussion of the potential effects. PRGT believes this will allow for a more robust assessment.	
155.6.3	Don Roberts	Kitsumkalum Band Council	The geographic scope is not acceptable. The whole road, air, train and waterway access corridors need to be assessed. Our members, living in the Kitsumkalum reserve as well as in Prince Rupert, will be impacted by increased transportation and materials. Environmental risks to the Nass and Skeena and other systems in between will be increased due to increased accident and spill risks. Health risks will increase to our members due to potential increase in traffic accidents.	The LAA and RAA will be amended for Transportation and Access. Please see Standard Response 10. See Standard Response 23 regarding GHG emissions. Spills and traffic accidents will be considered in the Accidents and Malfunctions section of the application. In both cases, the interrelations will be referenced within Transportation and Access VC where applicable.			
156.4.5.1	Adrienne Fitzpatrick	Nak'azdli Band	With respect to the Project Footprint, it is suggested that the text be revised to read as follows: "Project Footprint: includes all areas that will be disturbed through construction activities including all physical works and activities associated with the Project (e.g., the ROW, compressor stations, metering facilities, and associated temporary workspaces, laydown areas, and access roads)."	As described in the BC EAO's section 11 order, the scope of the project includes both construction and operational activities, and includes the temporary and permanent on-site and off-site components and activities described in Part B. The project footprint for all VCs will consider these components and activities.			
157.4.5.1	Adrienne Fitzpatrick	Nak'azdli Band	It is important that the wildlife and wildlife habitat description and characterization along the pipeline corridor incorporate an analysis of conditions over time. Consequently, it is suggested that the text be revised as follows: "This section of the Application must describe and characterize the existing wildlife and wildlife habitat conditions and change over time along the pipeline corridor with a focus on the wildlife indicator species identified in Table 4-8."	See Standard Response 29.	Standard response reads, "The assessment for the Wildlife and Wildlife Habitat VC includes consideration of existing conditions (i.e., before the Project) and conditions with the Project. Effects from past, present and reasonably foreseeable future projects and activities, where they overlap with residual effects from the Project, are also considered for an assessment of potential cumulative effects. The focus of the assessment will be on the indicator species identified in Table 4-9". Again, if a VC is not characterized over time, how will conditions with the Project in the future be predicted? How will the quality and quantity of the VC be known in the future? Will 2013 numbers be brought forward? It is unlikely that the future will be the same as the present. How will this be predicted without some knowledge of historical trends?	The assessment of cumulative effects is described in Section 3.10 and 3.11 of the dAIR. The temporal scope of the assessment of cumulative effects, provided there is a predicted residual effect that will act cumulatively with past, present and reasonably foreseeable projects and activities, includes those future projects that: a) have been publicly announced with a defined project execution period and with sufficient project details for assessment, b) are currently undergoing an environmental assessment, or c) are in a permitting process. For the assessment of the wildlife and wildlife habitat VC, the potential for cumulative effects will be assessed for each effect pathway: change in habitat, change in mortality risk, and change in movement.	
158.4.5.3	Adrienne Fitzpatrick	Nak'azdli Band	It is suggested that the text be revised as follows: "Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3.0 (Assessment Methods). Mitigation measures will be compiled from traditional knowledge inputs, available and relevant best management practices, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers."	See Standard Response 2 and Standard Response 5. No changes to the dAIR are required.	If PRGT is relying upon the Working Group to provide evidence, when have we exchanged information and evidence? Has PRGT posed questions to Working Group members to provide this information (e.g. guidelines, peer-reviewed journal articles, etc.)? Or, did PRGT hire experts to gather this information for them? If the latter is true, it is important that the AIR include a commitment describing the sources of information.	PRGT continues to work with the Nak'azdli Band to seek further knowledge and understanding of traditional knowledge that is important to the Nak'azdli Band. Additionally, the EAO has held several meetings and provided multiple opportunities for Working Group members, including the Nak'azdli Band, to provide comments on all aspects of the draft Application Information Requirements (dAIR), including the comments regarding traditional knowledge. PRGT has responded to all comments received, and will continue to do so, until the Environmental Assessment Office is satisfied with the responses and the dAIR is finalized.	
159.1.4	Karen Grainger	Yekoché First Nation	For each criterion listed, the major factors considered in the decision-making process should be described, to ensure that the factors necessary to evaluate alternative means of undertaking the Project will be considered in the EA. For example, when considering alternatives for watercourse crossings, it is important to consider hydrological factors, including the characteristics of watersheds and associated runoff potential, and potential for frequent and/or high-magnitude flash floods. Such factors are important when considering alternatives for crossing structures, crossing location, construction methods and timing, etc.	The major factors considered as part of assessing the alternative means of undertaking the project will be described in sufficient detail in the Application to understand the environmental effects of alternatives, including effects of the environment on the proposed project such as flash floods.			
160 Section 7	Hurrian Peyman	Analyst, Climate Action Secretariat	As stated in earlier feedback on GHGs and Valued Components: Greenhouse Gases (GHGs) should be added to the Valued Components for the Prince Rupert Transmission Project for the following reasons: <ul style="list-style-type: none"> • GHGs correspond to the Environmental pillar of the Valued Components • Including Greenhouse Gases will ensure that the Valued components are comprehensive in listing the potential adverse effects of the project and representative of the important features of the natural environment likely to be affected by the project. • The 900 km, 48-inch natural gas pipeline will likely have emissions that may be comparable to those of TransCanada's current emissions (166,000 tonnes CO2e) or those of Spectra Transmission (739,831 tonnes CO2e). The facility could have emissions between 0.25%-1.1% of the Province's total emissions. At 25,000 CO2e, the emissions are at a material level (covered by the BC GHG reporting regulations and a valued component in the EA) and subject to a third party verification performed by a qualified professional. • Furthermore the deforestation involved in building a 900 km pipeline may have a one-time material effect on the project's emissions • Greenhouse Gas Emissions are regulated under the Greenhouse Gas Reductions Target Act. Reducing emissions has also been a stated priority of Aboriginal groups • Including GHGs will be concise, in that the nature of the project VC interaction and the resulting effect pathway will be clearly articulated and understood. Redundant analysis will be avoided since facilities with emissions over 10,000 tonnes CO2e are already required under the Reporting Regulations of the Greenhouse Gas Reductions Target Act. • A recent similar gas transmission project in the EA process (the Natural Gas Transmission System) included GHGs for all of the reasons described above. We would like to remain consistent in our application information requirements, valued components and assessment. We would propose the following as rationale and indicators: <ul style="list-style-type: none"> § Greenhouse Gas (Proposed VC) Rational for Inclusion: <ul style="list-style-type: none"> § Greenhouse Gas emissions from the Project facility and shipping/rail/road traffic Potential Adverse Project Effects: <ul style="list-style-type: none"> § Unmitigated increase in greenhouse gas emissions may exceed dangerous levels of global escalation and impede achievement of BC's legislated targets § Failure to adequately forecast future greenhouse gas cost may threaten the economic viability of the facility and the future economy of the region 	See Standard Response 23.			

				<p>The indicator species include those species that are part of an Aboriginal fishery, as included in the current Fisheries Act. This also includes fish species that may not be directly part of a fishery, but also those that support fish species that are part of a fishery (e.g., a fish species that is commonly preyed upon by a species that is part of a fishery). While the assessment does not directly refer to fish species outside of this definition, the assessment of potential effects to the indicator species will likely ensure that conditions are maintained which will protect a broad spectrum of freshwater aquatic species.</p> <p>Changes to fish habitat and water quality are the potential effects that are being assessed for the receptors - the indicator species. They are not included as separate VCs, as these are the environmental conditions upon which the indicator species rely on to complete their life cycles.</p> <p>Groundwater quality is not being assessed as construction of the pipeline has no associated releases or discharges to the environment. Surface water quality is being assessed primarily as it relates to potential elevated levels of total suspended solids during watercourse crossing construction. There are no other expected changes in surface water quality.</p>			
163.3.1	Karen Grainger	Yekooche First Nation	<p>The following indicators should be listed for the "Freshwater Aquatic Resources" VC: (1) species of fish that are part of a commercial, recreational or Aboriginal fishery, and species that are important for cultural or traditional use, (2) species of fish that are provincially or federally listed, or are considered of special management interest under a planning initiative (e.g., regional land use plan, BC Conservation Framework), (3) Fish habitat, (4) Surface water quality, (5) Groundwater quality</p>				
162.4.5.4	Adrienne Fitzpatrick	Nak'azli Band	<p>How will conclusions on the significance of impacts be managed across different populations of the same indicator species? What if caribou effects are significant in one place and not on another herd? More detailed guidance required on the spatial scope of cumulative effects assessment over such a long linear disturbance - Nak'azli calls for more clarity on this issue in a revised dAIR.</p> <p>The current "Water Quality" indicator should be divided into "Surface Water Quality" and "Groundwater Quality". YFN understands that in many areas along the pipeline route there is little or no information on groundwater - aquifer mapping has not been undertaken and groundwater quality is unknown. In order to assess potential impacts of the Project on groundwater, e.g., from disposal of hydrostatic test water or spills/leaks of deleterious substances, baseline information on groundwater must be available and obtained through a sampling program, if necessary. YFN notes that for the proposed Spectra natural gas transmission project, water sampling will be conducted prior to construction for all groundwater wells located within 500 metres of the pipeline right-of-way to obtain baseline data. The wells will also be sampled following pipeline construction to determine the extent to which groundwater quality and quantity has been affected by the pipeline.</p>	<p>These variations will be identified within the environmental assessment where data is available; a conservative approach will be taken to identify areas where the most pronounced effects are likely and mitigation is required.</p>	<p>The results of this engagement should inform the assessment boundaries and methods in the AIR. This must be included for Nak'azli's review. How is TK being solicited to inform these boundaries?</p>	<p>PRGT would welcome any specific recommendations related to the draft Application Information Requirements (GAR) put forward by the Nak'azli Band dealing with their views on assessment boundaries or the scope of cumulative effects assessment.</p>	
163.3.1	Karen Grainger	Yekooche First Nation		<p>We note the importance of the change of vegetation cover and wildlife habitat over time; however, the purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>The Project Inclusion List was based on the BC Major Projects Inventory. It will be updated to include activities such as forestry (existing and known future cut blocks); existing roads (resource, forest service and permanent access roads); existing and known future transmission lines; existing and known future well sites and facilities; and existing and known future pipelines.</p>			
164.4.6.2	Adrienne Fitzpatrick	Nak'azli Band	<p>Forests have changed over time in Nak'azli territory. Composition, density, health, and other aspects of forest health have changed over time. Nak'azli is rightfully concerned about landscape degradation and fragmentation, changes to water quality, increased access, and associated effects on population health of key harvested terrestrial and aquatic species, from forestry activities in the past half century in our territory. We note that forestry was exempted from the list of Project and Activities listed in the Project Inclusion List and have already called for forestry activities to be properly integrated. We call for more detailed trend-over-time data, going back until such time as aerial photos are not readily available, of changes in forest cover, linear disturbance and habitat fragmentation in our territory as part of the vegetation baseline. These considerations must also be included in the assessment of effects on wildlife and wildlife habitat, and the Part C assessment of Aboriginal rights.</p>		<p>It is not clear, then, how a project effects assessment or cumulative effects assessment will determine the change in any VC. If historical trends are not considered, it is the responsibility of PRGT to ameliorate this long-term environmental and socio-economic change, but simply raise it to the EAO for their consideration in the EA. In some cases, VCs may be improving in quality and quantity and demonstrate resilience.</p>	<p>The cumulative effects assessment will indirectly consider historical trends. The current status of any VC reflects past effects and population trends. Within the context of an environmental assessment certificate application, PRGT does not believe it is a proponent's responsibility to research historical trends; this is a government responsibility that should be undertaken for land use planning or other similar processes used by the province to establish regional and provincial policy.</p>	
165.3.1	Karen Grainger	Yekooche First Nation	<p>YFN supports the general consensus of the Working Group that Salmon should be a stand-alone VC even though the Proponent views that it is already covered off under the Freshwater Aquatic Resources VC. YFN members rely on both Skeena and Fraser salmon as a large component of their diet. YFN believes that salmon returns have already decreased due to industrial activities in the Skeena and Fraser watersheds. YFN is concerned that watercourse crossings, the compressor station near Middle River and the marine activities associated with this project could negatively impact salmon returns.</p>	<p>See Standard Response 6 and Standard Response 15.</p>			
166.3.1	Karen Grainger	Yekooche First Nation	<p>Wildlife and Wildlife Habitat VC - Beaver, lynx, and wolverine should be added to the list of indicators for the "Wildlife and Wildlife Habitat" VC. All commercially valuable fur-bearing species are important to First Nations and should be included as indicators. Additionally, the PRGT should consider including bat species, especially those identified by the Conservation Data Centre.</p>	<p>Bats are not currently considered as a key indicator. The primary potential effect of the project on bats would be change in habitat, specifically old forest and wetlands. Several key indicators presently chosen are considered appropriate suitable surrogates, namely: fisher, marten, old seral forest song birds, wetland birds, olive-sided flycatcher, Canada warbler, marbled murrelet, western screech-owl and northern goshawk. The old-growth forest indicator would also be considered an appropriate surrogate.</p> <p>Potential effects of the Project on beaver, lynx and wolverine can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, grizzly bear, caribou, moose, fisher and marten are all examples of species indicators that would collectively have similar and overlapping habitat requirements. See Standard Response 16.</p>			
167.3.1	Karen Grainger	Yekooche First Nation	<p>The following indicators should be listed for the "Vegetation and Wetland Resources" VC: (1) Plant species at risk, (2) Ecological communities at risk or of special management interest, (3) Traditionally important species as identified by Aboriginal communities, (4) wetland function (habitat, hydrologic, biogeochemical), (5) old growth forests, including Old Growth Management Areas, (6) invasive plant species</p>	<p>Clarification is required regarding what the commenter means by "Ecological communities of special management interest". Baseline wetland function and wetland classification will be classified using the following characteristics: hydrological function (e.g., hydrogeomorphic setting); habitat function (e.g., vegetation indicator species); and biogeochemical function (e.g., substrate characteristics).</p> <p>The following indicators will be used for the Vegetation and Wetland Resources VC as outlined in the dAIR: (1) Plant species at risk are an existing indicator. (2) The indicator "Ecological communities at risk" will be changed to include 'or of special management interest'. The best available information will be used to incorporate Wildlife Tree Retention in the assessment within this indicator. Clarification is required regarding what the commenter means by "Ecological communities of special management interest". (3) Traditional use species are an existing indicator. The species list has been developed in consultation with the TEK/TLU program, which included substantial Aboriginal input. (4) Wetlands are an existing indicator. Wetland function will be assessed through potential changes to wetland habitat and hydrology. PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen and that biochemistry as a measurable parameter is outside of the scope of this assessment. (5) Old growth forests, including Old Growth Management Areas, are an existing indicator. (6) Invasive plant species are an existing indicator.</p>			
168.3.1	Karen Grainger	Yekooche First Nation	<p>YFN requests the addition of a "Current First Nations Land Use" indicator under the Land and Resource Use VC which could include seasonal camp sites, trails, trapping areas, fishing areas and plant gathering areas that are not "historic".</p>	<p>Cultural features such as camps sites, trails, trapping areas, fishing areas and plant gathering areas that are not historic will be discussed in Section 11 of the Application. This will include background information of past and current practices where such information is available. No changes to the dAIR are required.</p>			
169.3.1	Karen Grainger	Yekooche First Nation			<p>Standard response reads, "Potential chemical exposure scenarios for human health will be evaluated for air emissions, discharges or releases to land, freshwater and marine environments within a screening level risk assessment framework and a focus on potential risk through consumption of country foods. Marine country foods is one of the indicators for Human Health. The potential for the quality of other country foods (terrestrial, aquatic) to be affected by the proposed Project is considered negligible in consideration of the typical best management practices and mitigation measures (spill response, ABD mitigation, hydrostatic test water monitoring, herbicide management plan) involved in controlling potential releases to the environment". Why is the VC being evaluated exclusively using chemical exposure scenarios? What is the significance of chemical pathways over others? As our comment points out, there are several other pathways through which human health are affected that may have a greater biophysical effect than any chemical exposure.</p>	<p>Country foods are directly and indirectly considered in a number of ways in the Application. Indicators selected for the Wildlife VC include species harvested by Aboriginal peoples, the Vegetation VC considers traditional use plants, the Freshwater Aquatics VC considers fish species harvested by Aboriginal peoples, and the Human Health VC considers the safety of country foods for consumption. By including harvested species, the biological assessments will identify where appropriate protection of the harvested resources may be required. Further, all of these effects are carried forward into Part C of the Application for further consideration. While this approach does not look at country foods within a single VC, the fundamentals necessary to ensure Aboriginal peoples are able to continue harvesting country foods is fully addressed through multiple measures.</p>	
169.4.6.2	Adrienne Fitzpatrick	Nak'azli Band	<p>Greater dialogue on how to incorporate country food production and consumption, a critical aspect of First Nations' economies (the term economy actually meaning the wealth and resources of a territory), is required prior to the finalization of the AIR. It is currently unacceptable poorly integrated and is a critical consideration from a social, economic, cultural and rights perspective. Greater discussion at the Working Group level is required on this subject to give the Proponent guidance on how to study and/or facilitate data gathering on this critical issue.</p>	<p>See Standard Response 40.</p>			
170.4.6.3	Adrienne Fitzpatrick	Nak'azli Band	<p>Effect Mechanisms are rarely singular, they are often multiple in nature. In addition, Nak'azli is highly concerned about the Proponent's seemingly unilateral and close-minded (all the effects mechanisms - what we would call effects triggers, and the pathways along which they may progress) appear to have been determined aforesaid and without meaningful input from Nak'azli on any subjects other than traditional land use.</p>	<p>The effects mechanisms were identified based on known pathways. Nak'azli, as well as other Aboriginal groups, were provided with a meaningful opportunity to provide comments on the VC Report, which included VC selection and effect pathway discussions. If there are specific pathways that require amendments, we would be happy to discuss.</p> <p>No changes to the dAIR are required.</p>	<p>There are several pathways that the AIR overlooks that should be included. Nak'azli looks forward to this discussion with PRGT.</p>	<p>PRGT looks forward to this discussion with Nak'azli.</p>	
171.3.1	Karen Grainger	Yekooche First Nation	<p>Human Health VC - The addition of "Drinking Water Quality" as an indicator for human health is appropriate to reflect the potential interactions of the Project with the YFN community.</p>	<p>Water quality will be assessed primarily for the potential increases in total suspended solids (TSS) during construction of watercourse crossings. At the time of construction, a qualified environmental professional will be on site with an approved turbidity meter to measure background TSS and ensure levels remain within approved provincial and federal standards for allowable increases in TSS. We anticipate that by following these guidelines, any fines deposited in downstream pool habitats will be minor and will be removed through flushing flows during the next freshet. See Standard Response 8.</p>			
172.3.1	Karen Grainger	Yekooche First Nation	<p>The existing "Marine Country Foods" indicator should be changed to consider all Country foods, as the availability of traditional foods, which is of paramount importance to YFN, is not adequately considered by the other VCs and indicators. YFN country foods include salmon, char, trout, berries, moose, deer, bear and grouse.</p>	<p>PRGT is interested in Yekooche's comments regarding country foods, and would welcome any relevant traditional land use and/or traditional ecological knowledge information from Yekooche regarding country foods. See Standard Response 2 and Standard Response 40.</p> <p>No changes to the dAIR required.</p>			
173.4.6.3	Adrienne Fitzpatrick	Nak'azli Band	<p>It is suggested that the text be revised as follows: "Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3. Mitigation measures will be compiled from traditional and local knowledge inputs, available and relevant best management practices, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers."</p>	<p>No changes to the dAIR required.</p>	<p>The AIR should clearly provide guidance on what evidence sources are being used for what parts of the EA. At this time, the AIR does not provide assurances to the Working Group members that this knowledge has been acquired.</p>	<p>PRGT will be providing evidence sources and a detailed reference list as part of the Application.</p> <p>PRGT has also directed this comment to the EAO to provide clarity on the purpose and appropriate context of the AIR.</p>	
174.1.2	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	<p>For the bullet describing land uses that overlap or may potentially affect proposed Project components and activities, add the bullet: Provincial Resource Management Objectives set under FRPA and Government Actions Regulation.</p>	<p>Agreed. The dAIR will be updated to reflect the addition of the bullet: Provincial Resource Management Objectives set under FRPA and Government Actions Regulation.</p>	<p>Despite what was agreed upon in this table, the reference to "FRPA and Government Actions Regulation" was left out in the actual draft AIR document (Sect. 1.3), which may lead to confusion</p>	<p>PRGT apologizes for the oversight. The bullet in dAIR Section 1.3 will be updated as follows: Provincial Resource Management Objectives (including those set under FRPA and the Government Actions Regulation).</p> <p>comments adequately addressed</p>	
175.3.2.1	Karen Grainger	Yekooche First Nation	<p>YFN feels that the proposed Local Area Assessment (LAA) boundaries (300 metres upstream and 300 metres downstream of crossing locations) for "Freshwater Aquatic Resources" is inadequate to assess negative impacts to fish and fish habitat should the construction of the pipeline or design or installation of a stream crossing structure result in a blockage to upstream fish movement. For example, undersized culverts can result in velocity barriers within culverts during high flow periods. Additionally, an undersized or improperly installed culvert can result in outlet scouring and the creation of a "perched" culvert, which prevents fish from entering the culvert. Although YFN intends to follow Provincial standards for stream crossing design and construction, unforeseen natural events can result in the failure of a crossing structure to function as designed/intended, resulting in a blockage to fish movement. Certain fish species (e.g., salmon, trout, suckers) migrate large distances during spawning periods and the blockage of migrating fish, even a temporary blockage, could significantly affect fish production for a particular year class. Impacts could be significant if spawning success had been poor in successive previous years, perhaps due to low streamflow, or the fish blocked were part of a rare population. An upstream LAA boundary of 100 metres is clearly inadequate to assess impacts resulting from a blockage to fish movement. YFN requests that, for migratory fish species included as VC indicators, this boundary be changed to the boundary of the watershed. YFN also requests that the downstream LAA boundary be changed from 300 metres to one kilometer. Sediment plumes emanating from pipeline or watercourse construction sites could easily extend greater than 300 metres below such sites.</p>	<p>The LAA is the area for which the standard baseline studies are conducted to facilitate habitat characterization in the zone of influence and also to facilitate minor adjustments in the pipeline alignment due to environmental or engineering concerns. At larger, and more sensitive watercourses, assessment will include areas much further downstream (1 km or more) depending on site specific conditions and the expected zone of influence.</p> <p>The majority of the watercourse crossings associated with the project are pipeline crossings at which the pipe will be buried well below the substrate level of each watercourse. There will be no culverts or potential barriers associated with these crossings. At access road crossings where a culvert or clear-span structure is installed, unobstructed fish passage must be ensured. If a barrier is created, this would be deemed an unauthorized destruction of fish habitat under the Fisheries Act, and the barrier would need to be removed and access to the upstream habitat reinstated.</p>			
176.4.7.2	Adrienne Fitzpatrick	Nak'azli Band	<p>This term "Zones of Influence" were never used previously in the assessment. Differs from LAA or RAA alone - has this zone of influence been mapped by proponent? If the term is not being used in the Application, remove it and replace with appropriate terms. If it is being used, define it earlier in the dAIR.</p>	<p>The dAIR will be revised to remove this term.</p>			
177.1.4	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	<p>Add the bullet: "Very High and High Visual Sensitivity Areas" as a criteria to consider when evaluating possible pipeline routes. Scenic Areas classified as Very High (VSC-1) and High (VSC-2) visual sensitivity to human-made alterations should be avoided if possible, especially those areas with a Preservation or Retention VQO.</p> <p>YFN requests that the LAA around Middle River be increased for all VCs and encompass the proposed compressor station location. According to the draft Section 11 Order, the compressor station could be up to a 30 hectare fenced area. The compressor station is a primary concern for the YFN as it has the potential to negatively impact air quality and could be a source of disturbance to wildlife movements along the Middle River corridor.</p>	<p>Comment noted. The list provided in Section 1.4 is not intended to be exhaustive. Consideration of Scenic Areas VSC-1 and VSC-2 are considered under the "environmental constraints" bullet.</p>	<p>I am glad to read that VSC-1 and VSC-2 visual polygons will be considered but typically, "visual quality" is not a factor included as an "environmental value" but rather as a "social value". A good example is the way the AIR document is structured: Visual Quality is not part of Sect. 4 "Assessment of Potential Environmental Effects". You can find it further down in Sect. 6 under "Social Effects". Consequently, I still find it necessary to add a bullet to Sect. 1.5 (was 1.4 before) similar to what I suggested in October so that people know that both types of effects may influence the pipeline route selection.</p>	<p>VSC-1 and VSC-2 polygons have been treated as environmental constraints on the landscape that have been taken into consideration when identifying potential routes and facility location alternatives. The list in Section 1.5 will be updated to include a "Visual Sensitivity Areas" bullet.</p> <p>Update to the dAIR required</p>	
178.3.2.1	Karen Grainger	Yekooche First Nation	<p>In order for an acceptable EA to be completed for the Project, the temporal boundaries must include decommissioning and abandonment. YFN does not consider a 40-year operational phase to be sufficiently "long-term" to justify the exclusion of an assessment of the potential effects of decommissioning and abandonment within this EA. YFN further notes that the temporal boundaries for the EA of the proposed Coastal GasLink Project include decommissioning and abandonment, and that the Coastal GasLink Project is subject to a federal EA under the direction of the National Energy Board. There is a reasonable likelihood that a federal EA will also be required for the Project, with a requirement that the scope of the EA include decommissioning and abandonment.</p>	<p>Compressor stations are included as part of the Project Footprint, and as such, will be included for assessment by all VCs. No change to the dAIR required.</p>			
179.3.2.2	Karen Grainger	Yekooche First Nation		<p>See Standard Response 34.</p>			
180.4.7.3	Adrienne Fitzpatrick	Nak'azli Band	<p>Deleted "potential contributions from Project-related activities". What matters, as always, is the overall health of the VC first.</p> <p>Add key indicator: "Visual Quality Objectives" - the proposed Project would likely overlap designated Scenic Areas with established VQOs so these overlaps should be reported. I recommend that for the Visual Sensitivity indicator, the #ha be tabulated for each class from 1 to 5 and for the VQO indicator, #ha for each VQO class.</p>	<p>The overall health of the VC prior to potential contributions from Project-related activities is important and will be considered in the application.</p> <p>The "visual sensitivity" bullet will be changed to read "visual sensitivity, including established Visual Quality Objectives". The dAIR will be updated to reflect this change.</p>	<p>OK. Where is this commitment in the revised AIR? See critique above on the purpose of the AIR.</p>	<p>The description of baseline conditions of each VC will be provided in the Application and forms the basis upon which an assessment of the overall health of the VC prior to the consideration of Project-related activities can be carried out.</p> <p>The intent will remain the same. "Visual Quality Objectives" in the dAIR refers to Established Visual Quality Objectives as defined on the British Columbia Geographic Warehouse.</p>	
3.1-Table 3-1-Social-181 Visual Quality	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations			<p>Established Visual Quality Objectives is a technical term found on the BCGW and although the word "established" was dropped in the actual dAIR, the intent should remain the same.</p>	<p>comments adequately addressed</p>	

182.5.1	Adrienne Fitzpatrick	Nak'adii Band	Disaggregation of Aboriginal vs. non-Aboriginal economic baseline and trend over time conditions is essential to the conduct of a proper economic effects assessment.	As part of the assessment, PRGT is compiling socio-economic baseline data specific to Aboriginal groups that will be discussed in Section 11 of the Application. The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend over time analysis of the project area is outside of the scope of this project.	This does not address Nak'adii's concern. It is not possible to predict potential future Project effects when knowledge about always changing quality and quantity of a particular VC is not known. If a VC is stable over time, this is informative.	This comment is acknowledged; however, it is beyond the scope of the environmental assessment process. Collection of this type of information is a government responsibility and should be undertaken for planning purposes necessary for regional, provincial, or federal policy.		
183.3.3	Karen Grainger	Yekooche First Nation	The dAIR should include the provincial and federal standards and guidelines by which baseline information for each VC will be collected, analyzed, and interpreted. For each VC indicator for which baseline information will be collected (e.g., Wildlife and Wildlife Habitat), the type of survey(s) to be conducted and the standard/guideline to be followed, should be listed. Where a particular standard or guideline includes multiple levels of intensity, the intensity level to be followed should be indicated. This information should either be presented in Section 3.3 or Section 4.0 of the dAIR. In EN's view, this information has been correctly provided for the Vegetation and Wetland Resources VC only.	Standards, guidelines and methods pertaining to the assessment of potential effects on each VC, including for each of the indicators, will be provided in the Application and associated Technical Appendices. Although this level of detail is provided in the Vegetation and Wetland Resources VC it is not required in the dAIR.				
184.3.3	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	Add the bullet: "Using relevant data from the BC government corporate geographic data system (DATACBC). For example, for mapped visual polygons, data on Existing Visual Conditions (EVC) may be available from the Visual Landscape Inventory layer under the field "REC_EVC_FINAL_VALUE_CODE", which could then be supplemented with photographic records and field observations. The same layer will also provide data on VSC (REC_VSC_FINAL_VALUE_CODE) and EVGO ratings.	A bullet will be added specifying that available data contained within the BC government corporate geographic data system (DATACBC) will be utilized, where possible and appropriate. The dAIR will be updated to reflect this change.	November dAIR updated accordingly.	No additional response required.	comments adequately addressed	
185.6.4.1-Table 6-5	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	Add key indicator: "Visual Quality Objectives". See comments above for Sect. 3.1	Existing bullet will be modified to include established VQOs. The dAIR will be updated to reflect this change.	Established Visual Quality Objectives is a technical term found on the BCGW and although the word "established" was dropped in the actual dAIR, the intent should remain the same.	The intent will remain the same. "Visual Quality Objectives" in the dAIR refers to "Established Visual Quality Objectives" as defined on the British Columbia Geographic Warehouse.	comments adequately addressed	
186.6.4.1	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	The proposed spatial boundaries are reasonable. The third bullet should be clarified as follows: "Regional Assessment Areas: Includes an area located up to 25 km to either side of the proposed ROW centreline".	Agreed. The third bullet will be changed to include "25 km to either side of the proposed ROW centreline". The dAIR will be updated to reflect the change.	November dAIR updated accordingly.	No additional response required.	comments adequately addressed	
187.3.3	Karen Grainger	Yekooche First Nation	Section 3.3 should indicate that the Application will state that existing data used as baseline information will be rigorously assessed for quality and applicability, and that data gaps, inaccuracies and uncertainties will be identified. Further, this section should state that the Application will include input data quality assessments for all existing data that are utilized in the EA.	Section 3.3 states "Appending and/or reference relevant reports and documents as appropriate". Rigorous review of these data sources for quality and applicability is inherent in preparing a strong, defensible environmental assessment. In addition, quality assurance/quality control on baseline data collected by PRGT is similarly inherent in preparing a defensible EA.				
188.5.1	Adrienne Fitzpatrick	Nak'adii Band	Note that absence of "Aboriginal economic development" would be an adverse effect. Inability to take advantage of economic opportunities creates and reinforces existing impact inequities and that has spin off effects on society and economy of First Nations.	See Standard Response 3.				
189.6.4.3-Table 6-6	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	Re-write first bullet as follows: "Number of recreational, cultural, and publicly accessible viewpoints affected". Second bullet: Replace the word "established" with "selected". There are only a few viewpoints that have been formally established across the province through higher level plans. The majority are inventory viewpoints or design viewpoints used to assess the visual impact of specific proposals. Third bullet: In assessing this "change in visual quality class", the Proponent should use the procedure described in the Visual Impact Assessment Guidebook Second Edition 2001 and using the updated visual quality class definitions found in the Forest Planning and Practices Regulation, Section 1.1.	The dAIR will be updated to reflect these comments.	In the second bullet, the word "established" was not replaced with "selected" in the dAIR.	The dAIR will be updated to reflect this change.	Update to dAIR required.	
190.3.7	Karen Grainger	Yekooche First Nation	Section 3.7 should include criteria to be used to characterize any residual adverse effects, including residual cumulative effects that may result from the Project, e.g., for each residual effect identified, its spatial and temporal boundaries, magnitude, and probability of occurrence should be stated.	The criteria that will be used to characterize residual effects are listed in Section 3.6 and will be defined in the Application. These criteria will be applied when assessing effects on individual VCs and indicators as well as cumulative effects. A discussion surrounding prediction confidence (probability of occurrence) will also be presented (as outlined in Section 3.8 of the dAIR).				
191.5.2.1	Adrienne Fitzpatrick	Nak'adii Band	Given that the Project Footprint is not a useful geographic scope of assessment for economic effects, it is suggested that the text be revised as follows: "The Application must consider the following spatial boundaries for employment (see Figure 5-1 and Appendix A). Note that the Project Footprint is not relevant to the geographic scope of assessment for employment."	The Local Assessment Area (LAA) is inclusive of the Project footprint and extends 100 kilometers in either direction of the pipeline, for the length of the pipeline, thus capturing the communities within proximity of the Project, and those most likely to experience Project-related economic effects. The Regional Assessment Area (RAA) is a sum of the LAA and includes additional communities that may serve as staging communities, or service hubs to the Project. Work occurring within the Project footprint generates economic activity and is appropriate to retain as a relevant scale for this VC.	Why isn't this corrected in the AR? It is clear that the "project footprint" is different than the RAA and the LAA. We seem to agree on this point, but are speaking at cross-purposes in this document. This is why it is important to be clear in the AR.	Reference to the Project Footprint in this section of the dAIR (5.2.1) has been retained to provide context and to be consistent with other VC sections.		
192.5.2.1	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "Measurable parameters used to characterize employment may include but are not limited to: wage levels, employment rate, labour availability by trade or skill level, training programs, and migration rates/labour force stability. Each measurable parameter will be broken down by regional district, community, and Aboriginal vs. non-Aboriginal sub-populations, wherever possible. Where quantitative data is not available, additional qualitative data gathering will be conducted by the Proponent."	PRGT believes that the effects assessment as set out in the dAIR, including the suite of measurable parameters is comprehensive and sufficient to identify any potential adverse effects, as well as identifying measures to avoid such effects.	This is not Nak'adii's opinion. As outlined above, it is important that additional pathways be considered to ensure that the measurable parameters selected will indeed lead to characterization of most potential adverse effects.	PRGT believes that the effects assessment as set out in the dAIR, including the suite of measurable parameters, is comprehensive and sufficient to identify any potential significant adverse effects, as well as identifying measures to avoid such effects. Measurable parameters used to characterize employment include: wage levels, employment rate, labour availability by trade or skill level, training programs, and migration rates/labour force stability.		
193.6.4.3	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	A Best Management Practices document that would be useful for the Proponent in developing mitigation strategies is the "Visual Landscape Design Training Manual - Recreation Branch Publication 1994.2"	This document will be considered and referenced when planning mitigation strategies in the application.	The document should also be added to the References section (17.0) of the dAIR.	Section 17 contains references included in the dAIR document itself.	comments adequately addressed	
194.3.9	Karen Grainger	Yekooche First Nation	YN believes that an assessment of cumulative effects as proposed would be inadequate. Table 3-4 should include the proposed Enbridge Northern Gateway project and the increased logging rates in YN territory over the last 15 years due to the Mountain Pine Beetle epidemic.	The list of proposed projects and activities (Table 3-4) that will be considered in the cumulative effects assessment is based on a major projects inventory available at the time of dAIR development. This list will be refined by PRGT subject to review by the Working Group and confirmation from the EAO. The process and methodology for conducting the cumulative effects assessment is described in Section 3.9.2.				
195.5.2.3	Adrienne Fitzpatrick	Nak'adii Band	The lack of disciplinary specifics in the dAIR (e.g., imposing a template from the biophysical effects assessment onto the very different type of assessment conducted in the human environment) is unacceptable and indicative of what appears to be a lower priority and level of effort for assessment of effects on the human environment. Further Working Group discussion on the proposed effects assessment on the human environment for this Project should be conducted prior to finalizing the AIR.	PRGT welcomes input from the Working Group on the appropriate effects assessment methodology to be considered for the human environment.	As per comment 170, this discussion is an important one that Nak'adii looks forward to contributing to.	PRGT looks forward to the discussion with Nak'adii on the appropriate effects assessment methodology to be considered for the human environment.		
196.6.2.3	Adrienne Fitzpatrick	Nak'adii Band	Using such a metric as "student/teacher ratio" implies that there will be in-migration effects beyond short-term Project workers. Thus, estimation of in-migration levels must be a requirement of the dAIR. Some details required here. Proper description of camp locations, size, management, is also essential.	In-migration resulting from the proposed Project is expected to be minimal and not permanent. Based on professional experience, construction workers typically do not move their families, including children, for temporary work. The operations workforce will be small, consisting of approximately 40 workers who will be responsible for maintenance of the entire pipeline. Workers will largely be hired from within the assessment area, especially if a local hiring policy is instituted as part of the Project mitigation measures. As a result, in-migration to the area and any resulting effects on elementary and secondary education services will likely be low. A change in demand for elementary and secondary education services should therefore not be considered a potential effect of the Project and the student/teacher ratio can be deleted as a measurable parameter. Instead, the potential effect on education services consists of a change in demand for workforce training services provided by training institutions within the assessment area. The measurable parameter for this potential effect would be training institution capacity.	Change to dAIR required.			
197.6.2.3	Adrienne Fitzpatrick	Nak'adii Band	"Mitigation measures will be compiled from available and relevant best management practices, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers." This sentence is generic and inappropriate for SEA and should be revised to meet good practice of impact assessment on the human environment.	PRGT looks forward to engaging the Working Group on the development of appropriate mitigation measures within the human environment.				
198.6.2.4	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "Project Footprint: The physical area that will be directly disturbed by the proposed Project construction activities, including associated activities and physical works such as the ROW, compressor stations, metering facilities and associated temporary workspaces, laydown areas, and all access roads including highways.	As described in the BC EAO's Section 11 Order, the scope of the proposed Project includes both construction and operational activities, and includes the temporary and permanent on-site and off-site components and activities described in Part B.				
199.6.5.2	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "Information on commercial fishing will be collected from DFO databases and staff, commercial fishing operators and organizations, Aboriginal groups and non-governmental organizations."	Where there is a commercial component of Aboriginal fishing, that component will be addressed in 6.5.2. Aboriginal groups will be added to the information sources included in bullet 3 under section 6.5.2. All other elements of Aboriginal Land use will be assessed through Section 11 of the Application as relevant and be used to supplement socio-economic baseline information.	Thank you.	No additional response required.		
200.7.2	Adrienne Fitzpatrick	Nak'adii Band	Nak'adii is fundamentally opposed to the narrow focus of the Proponent's archaeological and heritage resources assessment. Where are Aboriginal tangible and intangible cultural effects considered in the dAIR? Further Working Group discussion on scope of assessment for this topic required.	PRGT welcomes further Working Group discussion on this important issue. See Standard Response 41. No changes to the dAIR required.				
2018.2.1	Adrienne Fitzpatrick	Nak'adii Band	Risk perception and reduction in access to and faith in country foods is an absolutely essential effect pathway that must be considered through this EA. Currently, the dAIR does not recognize or require these lines of inquiry and that needs to change.	Thank you for your comment. PRGT will consider this in Section 11 of the Application. Marine country foods is included as an indicator for human health, and will be evaluated using a screening level risk assessment based on guidance from Health Canada.	OK. Where is this commitment in the revised AR? See critique above on the purpose of the AIR.	The inclusion of marine traditional and country foods as an indicator for human health is provided in Section 8.2.1 of the dAIR. It is PRGT's understanding that responses, including commitments, provided in tracking tables such as these become part of the official record for the EA process and therefore represent commitments to be fulfilled in the EA process, though not explicitly stated in the dAIR.		
2029.0	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the following text be added: "The Proponent must also show all evidence of efforts to engage stakeholders and First Nations in identification, risk characterization, avoidance mechanism development, and other considerations for accidents and malfunctions."	Sections 11, 12, and 13 of the Application will contain the results of the implementation of the Aboriginal Consultation Plan, for each Aboriginal group, and the Public Consultation Plan, including in respect of accidents and malfunctions. Engagement of stakeholders will be discussed in Section 13 of the Application, and engagement with Aboriginal groups will be discussed in Section 12 of the Application and in the Consultation Reports.	This does not address Nak'adii's concern. Exactly how is the Accidents and Malfunctions sections going to consider the information and evidence collected from First Nations and stakeholders?	Below are portions of Sections 11, 12 and 13, which will be incorporated into Section 9 (Accidents and Malfunctions). Section 9 states that the Application must include a "description of the likelihood and circumstances under which the potential accidents, malfunctions, or unplanned events described could occur, based on historic experience/trends". Historic experience/trends are gathered through the consultation process. These chapters are iterative.		
203.10.0	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the following text be added: "The Application will also identify all efforts by the Proponent to engage stakeholders and First Nations in this assessment."	The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Nak'adii.	If there is text to suggest that the Application has been informed by Nak'adii, there must be evidence of this. To date, there is no evidence of this. The most critical concerns raised by Nak'adii have not been addressed. Therefore, PRGT is not able to make the claim that their perspective has indeed been informed by Nak'adii. If PRGT were to begin seriously considering Nak'adii's perspective in the development of the AIR, then this claim might be possible. For now, Nak'adii rejects this claim.	PRGT acknowledges and appreciates current and previous comments from the Nak'adii with respect to the dAIR.		
204.11.0	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "The Application will contain the Proponent's perspective on the results of the implementation of the Aboriginal Consultation Plan for each Aboriginal group."	PRGT will amend the dAIR accordingly.				
205.11.1	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "Maps of the asserted or established traditional territories of each Aboriginal group, (if available publicly), and also showing Indian Reserves and Aboriginal communities."	Changes to the dAIR are required.				
206.11.2.3	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "The Application will characterize, for each Aboriginal group, the Proponent's perspective on the residual effects of the proposed Project after mitigation taking into account an assessment of likelihood and certainty. This section will also include views of Aboriginal groups, as provided through consultation, regarding residual adverse effects."	The characterization of residual effects that will be presented in the Application will be from the Proponent's perspective; however, the characterizations would take into account input from Aboriginal groups. As noted in the comment, the views of Aboriginal groups, as provided through consultation, will also be included. No changes to the dAIR are required.	As per above, this claim is rejected by Nak'adii. There is no evidence to date that Nak'adii's perspective has been taken seriously in the development of the AIR.	PRGT acknowledges and appreciates current and previous comments from the Nak'adii with respect to the dAIR.		
207.11.2.4	Adrienne Fitzpatrick	Nak'adii Band	It is suggested that the text be revised as follows: "A description of mitigation measures committed to by the Proponent to avoid or reduce identified impacts. A characterization from the Proponent's perspective of the residual effects after the application of mitigation measures. Identification of any alternative characterization of likely residual effects and/or alternative mitigation measures identified by Aboriginal groups through consultation, on these other interests."	The characterization in the Application are from the PRGT's perspective; however, it does take into account input from Aboriginal groups. Both Aboriginal and non-Aboriginal participants will have opportunities to provide alternative characterizations of residual effects during the Application Review period.	As per above, this claim is rejected by Nak'adii. There is no evidence to date that Nak'adii's perspective has been taken seriously in the development of the AIR.	Nak'adii will be provided multiple opportunities to comment on proposed mitigation measures (and propose new measures) and the characterization of residual adverse effects during the Application review phase of the environmental assessment. There will also be opportunities for Nak'adii to comment on the characterization of Nak'adii's Aboriginal interests and concerns during Application review.		

208.4.3	Karen Grainger	Yekooche First Nation	The importance of water quality is significantly understated in the dAIR. Water quality is listed as an indicator for the Freshwater Aquatic Resources VC, yet it is not listed as an indicator in Table 4-5. There is no reference to water quality in Section 4.3, other than in Table 4-6. There is no indication in the dAIR as to whether or not the quality of both surface and groundwater will be considered in the EA. Neither sampling methodology nor sampling locations (e.g., watercourse crossings) have been stated. Also, whereas Table 2 of the Inshore Aquatic Resource (Transmission Project) – Selection of Values Components document (Aug. 16, 2013) indicates that sampling for total suspended solids, pH, and metal will be conducted, Table 4-6 of the dAIR indicates that only pH and levels of total suspended solids will be determined. Table 4-6 should indicate that metal levels will be determined as well. YFN is concerned about naturally high levels of mercury and arsenic occurring in the local soils and sediments and that disturbance during construction could negatively impact water quality.	Fish habitat evaluations require the determination of pH and TSS in order to assess water quality. Given that discharges into the aquatic environment are not expected, increases in the level of metals in sediment and surface water due to project activities is unlikely. See Standard Response 8.			
209.11.2.5	Adrienne Fitzpatrick	Nak'azdi Band	It is suggested that the text be revised as follows: "A Summary Table that includes issues raised by Aboriginal groups that might be impacted by the proposed Project, and the Proponent's commitment to measures to avoid, reduce or mitigate those impacts. Where no measures are identified, the Proponent will provide a rationale to support this decision."	Mitigation measures that become commitments attached to the Environmental Assessment Certificate, if one is granted, would be legally enforceable against PRGT. As a result, a statement of commitment in the dAIR is not required. However, PRGT will amend the dAIR to provide a rationale if and why a mitigation measure has not been proposed to avoid or reduce impacts to an Aboriginal interest or other concern. Changes to the dAIR are proposed.	It is not clear why PRGT would not want to clearly commit to any mitigation measures. This simple change will only help make the Application more clear. Nak'azdi acknowledges the other change in the AIR and appreciates this.	Any mitigation measures proposed in the effects assessment are commitments proposed by PRGT, particularly as these mitigation measures, and their success, are inherently linked to the assessment of residual effects. These proposed mitigation measures are available to be incorporated at the discretion of the regulator to the Environmental Assessment Certificate, if one is granted, making them legally enforceable.	EAO response to Round 1 comment: The AIR content related to Niiga'a is a reflection of the unique obligations of the Niiga'a Final Agreement, Chapter 10. It is not a "lower standard", but rather a different set of requirements.
210.12.2	Adrienne Fitzpatrick	Nak'azdi Band	It is TOTALLY UNACCEPTABLE to Nak'azdi that the standards being applied to Niiga'a are not replicated for each First Nation. Why would a lower standard apply? Just because it is not legislated? That is not good EA and requires revision.	This comment has been forwarded to EAO for their consideration.	Nak'azdi will be interested to hear from the EAO on this issue.		
211.14.1.1	Adrienne Fitzpatrick	Nak'azdi Band	It is totally unacceptable to Nak'azdi for the dAIR not to include GHG management as a VC.	See Standard Response 23.			
212.6.4.3	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	Ministry of Forests Lands and Natural Resource Operations	A Best Management Practices document that would be useful for the Proponent in developing mitigation strategies is the "Visual Landscape Design Training Manual - Recreation Branch Publication 1594-2"	This document will be considered and referenced when planning mitigation strategies in the application.	Acknowledged. Thank you for noting this duplication.	comments adequately addressed
213.14.1.2	Adrienne Fitzpatrick	Nak'azdi Band	It is suggested that the text be revised as follows: "The GHG management plan will focus on the Project's GHG emissions from the proposed compressor stations. The plan will estimate the proposed Project's GHG emissions compared to the most recent provincial and national GHG emissions inventories and to provincial legislated reduction targets. It will also identify the measures that will be implemented to mitigate, reduce, or avoid emissions of GHGs (e.g., best management practices (BMPs)). Links to other sections in the Application will be identified."	See Standard Response 23.			
214.4.3.2	Karen Grainger	Yekooche First Nation	Section 4.3.2 should include the standards and guidelines by which baseline information will be collected, analyzed and interpreted, e.g., for the collection of field data, relevant guidebooks and standards, such as the Fish Stream Identification Guidebook, Riparian Management Area Guidebook and Resource Inventory Standards Committee Fish Collection Methods and Standards, should be referenced.	Appropriate BC standards, including ISC standards for fish and habitat sampling, were used in fish and fish habitat surveys. These methods will be provided in the baseline sections of the environmental assessment.			
215.16.3	Adrienne Fitzpatrick	Nak'azdi Band	It is suggested that the text be revised as follows: "The Application will provide a summary, in the form of Table 16-2 below, of all the Proponent's commitments (mitigation measures) to prevent or reduce adverse environmental, economic, social, heritage and health effects."	PRGT will put forward proposed commitments for consideration by regulatory decision makers and to inform future EAC commitments.			
216.References	Luc Roberge	Ministry of Forests Lands and Natural Resource Operations	Since the BC government corporate geographic data system (DataBC) will be used to prepare the Application, it should be added to the listing of references. Add: "Resources Inventory Committee 1997. Visual Landscape Inventory - Procedures & Standards Manual. B.C. Ministry of Forests, Forest Practices Branch, Victoria. BC."	This reference will be added to the reference section of the dAIR.	November dAIR updated accordingly.	No additional response required.	comments adequately addressed
217.4.3.3	Karen Grainger	Yekooche First Nation	Table 4-6 should be changed to better reflect potential negative effects to fish and fish habitat and eliminate the subjectivity associated with the potential effects. "Changes in Habitat" is a subjective evaluation, is open to interpretation, and impossible to quantify. In fact, there would be three significant habitat-related impacts (unrelated to water quality) that could result from the project, each of which may be measured. They are: (1) The amount of habitat formerly abraded (e.g., natural cobble habitat replaced by metal culvert); (2) The amount of habitat destroyed (e.g., habitat abraded at a road crossing); (3) The amount of habitat affected by partial or complete blockages to fish movement. The other 2 Potential Adverse Project Effects are (4) Fish mortality and (5) Changes in Water Quality. The corresponding Measurable Parameters would be: (1) Area (ha) of habitat affected, (2) Area (ha) or habitat affected, (3) Area (ha) completely partially blocked, (4) Number of dead or moribund fish, and (5) pH, metals and TSS. Further, "Change in mortality risk" cannot be measured. However, numbers of dead or moribund fish may be determined.	Measurable parameters for change in fish habitat include the area (m ²) of altered or eliminated habitat (both riparian and instream) by any Project activity. Within the assessment, all potential pathways-of-effects (e.g., vegetation clearing, placement of material, or structures in water) that can lead to alterations or destruction of fish habitat are identified and the potential change in available habitat is assessed for each pathway.			
218.16.4	Adrienne Fitzpatrick	Nak'azdi Band	It is suggested that the text be revised as follows: "Provide a statement on the overall significance of the Project's environmental, economic, social, heritage, and health effects, as well as on Aboriginal groups' rights and interests and the Proponent's ability to mitigate them."	PRGT will consider changing "its" to "the Proponents" to add clarity to Section 36.4			
219.4.3.3	Karen Grainger	Yekooche First Nation	YFN is concerned with the potential for erosion and sedimentation at locations where streams will be crossed by the pipeline or by new access roads. PRGT states that there are over 1800 stream crossings along the proposed route. The dAIR should indicate that the Application will include the criteria by which decisions will be made as to the type of stream crossing undertaken (e.g., open cut, HDD, bridge, culvert), the type of crossing/crossing structure planned for each crossing, and information regarding third party environmental monitoring.	The crossing method selection process will use a combination of stream morphology, fish habitat characteristics, fish habitat sensitivity, fish presence, fish species sensitivity, and engineering concerns to identify the best crossing method. The process relies on aspects of DFO's "Fisheries Protection Program", formerly known as the "Fish Habitat Management Program". Mitigation measures and monitoring requirements will all be included in the assessment.	Oil and Gas Commission comment on response to Round 1 Yekooche First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to crossing the Oil and Gas Activities Act and associated regulations.	Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	
220.4.5.1	Karen Grainger	Yekooche First Nation	Bats are not currently considered as a key indicator. The primary potential effect of the project on bats would be change in habitat, specifically old forest and wetlands. Several key indicators presently chosen are considered appropriate suitable surrogates, namely, fisher, marten, old seral forest song birds, wetland birds, olive-sided flycatcher, Canada warbler, marbled murrelet, western scree-owl and northern goshawk. The old-growth forest indicator would also be considered an appropriate surrogate. Potential effects of the Project on beaver, lynx and wolverine can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, grizzly bear, caribou, moose, fisher and quoniam are all examples of species indicators that would collectively have similar and overlapping habitat requirements.	See Standard Response 16.			
221.4.5.1	Karen Grainger	Yekooche First Nation	YFN is concerned that a LAA of 2 km and a Regional Assessment Area (RAA) of 30 km may be insufficient to adequately assess the potential impacts of the Project on some indicator species such as grizzly bear. YFN requests that PRGT re-assess the appropriateness of LAA and RAA boundaries on a species-by-species basis.	Specific to Grizzly Bear and Caribou, PRGT will consult with regulatory agencies (i.e., BC MOE or BC MFNR) on the use of appropriate assessment boundaries.			
222.18.0	Adrienne Fitzpatrick	Nak'azdi Band	The dAIR should include a blanket requirement to identify all experts and their qualifications in Appendices to the Application.	Information prepared by professionals and provided under their professional seal will be identified in the Application.	There are several types of experts that do not have a "professional seal" associated with them. The AIR must require that a brief description of qualifications of lead authors for each VC (or groups of VCs) be provided at minimum.	The draft AIR follows the EAO's Application Information Requirements Template. Providing the qualifications of lead authors is not a requirement. However, as previously stated, information prepared by professionals and provided under their professional seal (where applicable) will be identified in the Application.	Updated response to Round 2 working group comment ' There is a difference between the EAO Guide and the request from the Nak'azdi. One is asking for justification of the information prepared by qualified professionals and the other is asking for a list of everyone who worked on the project. We believe that the Nak'azdi request infringes on the privacy of the project team members. Stantec and PRGT have agreed to provide information on the professional staff who oversaw preparation of the effects assessments. This is sufficient for every profession that operates under a legislated Code of Conduct and we believe it addresses the requirements of the May 27, 2013 AIR Template and the draft June 2013 template.
223.4.5.2	Karen Grainger	Yekooche First Nation	Standards and guidelines documenting how baseline information for all VC indicators will be collected, analyzed and interpreted need to be included in the dAIR. These would include standards for wildlife inventory, terrestrial ecosystem mapping (TEM), wildlife habitat rating, etc.	See Standard Response 25.			Updated response to Round 1 working group comment ' The Section 3.3 bullet 2 of the dAIR has been updated to include standards and guideline to be used to determine baseline conditions for the VCs.
224.4.5.2	Karen Grainger	Yekooche First Nation	YFN specifically requests baseline information on existing wildlife use patterns for the indicator species in all seasons, which would require winter track counts for ungulates and furbearers.	PRGT is using remote cameras as a method for assessing wildlife use patterns of large mammals (e.g. bears, ungulates, wolves). The cameras are operational 24-hours a day, 7 days a week and will be in use for up to a year since deployment. Subsequently, data from the cameras will represent all seasons for these mammals. In combination with the use of remote cameras, PRGT is also conducting surveys for songbirds and amphibians, and completing habitat assessments for all terrestrial indicators. Winter track surveys are not currently planned.			
225.4.5.2	Karen Grainger	Yekooche First Nation	TEM or LIDAR should be used, where appropriate, to assess habitat availability for indicator species. The currently-proposed level of TEM (SL 5) should be improved to a survey intensity level 4 for this purpose.	See Standard Response 26.			
226.4.5.2	Karen Grainger	Yekooche First Nation	YFN requests that Section 4.5.2 specify that the Application will also indicate that baseline data on species of concern (provincially-listed red and blue species and species listed under the Federal Species at Risk Act) will be used to evaluate the Project's potential effect for species of concern.	As indicated in Section 4.5.2 the Application will consider species of management concern, particularly those selected as indicators, with respect to baseline conditions and any Project related effects on ongoing management efforts for those species.			
227.4.5.3	Karen Grainger	Yekooche First Nation	Section 4.5.2 of the dAIR indicates, correctly, that the Application will describe and characterize wildlife habitat conditions along the pipeline corridor, including important habitat features such as dens. However, while Section 4.5.3 indicates that a qualitative assessment of potential impacts to marine bird habitat will be made, there is no indication that impacts to terrestrial wildlife habitat features will be assessed, either in the text or in Table 4-10.	See Standard Response 28.			
228.4.5.3	Karen Grainger	Yekooche First Nation	YFN feels that there is little value in collecting information on important habitat features such as dens, mineral licks, wildlife trees, etc. if an assessment of likely impacts to such features will not be made. YFN requests that the dAIR indicate that the Application will include an assessment of potential impacts to important wildlife habitat features. Table 4-10 should also include wildlife habitat features as a Measurable Parameter.	See Standard Response 28.			
229.4.5.3	Karen Grainger	Yekooche First Nation	One of YFN's primary concerns with this Project is the increased access through YFN territory that will result from the constructed right-of-way. YFN believes that this will result in decreased numbers of moose, bear and deer due to increased hunting pressure. YFN requests that this issue be addressed through wildlife population monitoring and access management planning.	Change in mortality risk will be assessed for all key indicator species. A specific quantitative assessment of change in mortality risk as it pertains to change in access will be completed for caribou and grizzly bear (i.e., incremental contribution to motorized vehicle access or predator access). Change in access can be inferred from these indicators. Project mitigation measures, as well as an Access Management Plan, will be developed to reduce adverse residual or cumulative effects associated with change in access.			
230.4.6	Karen Grainger	Yekooche First Nation	It appears that information collected on wetlands will be insufficient to determine the potential impacts of the Project on wetlands and the species that depend on them. It is YFN's view that "wetland function" should be included as an indicator for the Vegetation and Wetland Resources VCs, and that function should be characterized by habitat function (e.g., vegetation indicator species), hydrology (e.g., hydrogeomorphic setting), and biogeochemistry. YFN requests that wetlands be mapped and classified as requested and that the classification system(s) used, e.g., Canadian Wetland Classification System, is identified. YFN also requests that the wetland mapping extend beyond the boundaries of the LAA or RAA wherever wetland complexes are encountered.	Comment acknowledged. Wording in the dAIR will be clarified to acknowledge that the terms have specific meaning in legislation. In British Columbia, heritage resources are managed in accordance with the legal requirements and conditions set forth in the Provincial Heritage Conservation Act (HCA). The HCA defines "heritage site" to mean, "whether designated or not, land, including land covered by water, that has heritage value to British Columbia, a community, or an aboriginal people." This broad definition encompasses a variety of resource types including archaeological sites and historic sites as well as other places, such as spiritual sites, which may not contain physical evidence of human activity."			
231.7.21 Heritage and Archaeological Resources - Introduction	E. Forgang	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	There is inconsistent and confusing use of the terms "heritage," "archaeological," and "historic" throughout the dAIR. These terms should be defined clearly and used appropriately. "Heritage resources" include a variety of subtypes, for example "archaeological" resources and other "heritage" resources that are automatically protected under provisions of Sec. 13 of the Heritage Conservation Act, other types of "heritage" resources such as spiritual sites that do not include physical evidence of human activity prior to 1846, as well as "historic" resources that post-date 1846. These other types of heritage resources are not automatically protected under the HCA, but may have value to communities affected by the proposed project.				
232.4.6.2	Karen Grainger	Yekooche First Nation	YFN requests that the best available information to describe and characterize existing vegetation and wetland conditions along the pipeline corridor will include LIDAR information. The dAIR should indicate that forest soils and agricultural soils will be assessed and mapped with the same intensity. Also, the specific approach and methods used to undertake soil survey field work and determine the potential effects of the Projects on soils needs to be stated.	LIDAR data has been used for mapping of existing vegetation and wetland cover.			Updated response to Round 1 working group comment ' Where available, LIDAR contours will be used along with orthophotograph interpretation to define wetland boundaries.
233.4.7.2	Karen Grainger	Yekooche First Nation		Methodologies used will be provided in the application and associated Appendix. These will conform to Schedule A for ALR lands and to TEM standards for non-ALR and forested lands as outlined by the Province.			Updated response to Round 1 working group comment ' Current First Nations Land Use, including seasonal camp sites, trails, trapping areas, fishing areas, gathering areas that are not "historic" are considered in part Part C of the Application where relevant information is available.
234.6.0	Karen Grainger	Yekooche First Nation	YFN requests that an Indicator of "Current First Nations Land Use" be added to this section. While aspects of current First Nations land uses are discussed elsewhere in the dAIR, the topic should be treated on its own and include seasonal camp sites, trails, trapping areas, fishing areas and plant gathering areas that are not "historic."	Change or incompatibility with land use is an effect that will be discussed within the Land and Resource Use VC.			
235.6.2.3	Karen Grainger	Yekooche First Nation	YFN is extremely concerned that construction of the Project will result in a sharp decrease in the availability of rental housing in Fort St James. Due to a lack of on-reserve housing and schooling, many YFN families have to live in Fort St James where it is already very difficult to find suitable rental housing.	No changes to dAIR required.			
236.8.2.3	Karen Grainger	Yekooche First Nation	YFN requests that "Water Quality" and "Country Foods" also be addressed in this Section. The diets of many YFN members still largely consist of subsistence-type foods such as berries, fish and game. Access to an abundance of traditional foods is the highest priority for YFN and although components of this proposed VC indicator are discussed elsewhere in the dAIR, country foods should be addressed as a separate entry.	The potential for changes to the quality of marine traditional and country foods will be assessed for the Human Health VC. Potential changes to water quality will be assessed under the Water Quality VC. Information, if available, about the availability, access and consumption patterns of Traditional foods will be discussed in section 11 of the Application.			

2379		Karen Grainger	Ylekoche First Nation	YFN requests that this section indicate that the Application will indicate how YFN members will be contacted in the event of an accident or issue that could affect their health or well-being.	A list of management plans will be prepared for the PRGT Project, which will include information detailing the reporting requirements and dissemination of information in the event of an accident or malfunction.	Oil and Gas Commission comment on response to Round 1 Ylekoche First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to emergency response under the Oil and Gas Activities Act and associated regulations.	Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.		
2389		Karen Grainger	Ylekoche First Nation	The specific accident/malfunction listed as "Leakage or failure of the pipeline during operation" should be re-worded as: "Leakage or failure of the pipeline to the terrestrial or aquatic environment during operation" so that both scenarios are addressed.	Effects of leakage or failure of the pipeline on terrestrial or aquatic environments will be considered in Section 9.0 of the Application. Updates to the draft AIA are not required.	Oil and Gas Commission comment on response to Round 1 Ylekoche First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to emergency response under the Oil and Gas Activities Act and associated regulations.	Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.		
23915		Karen Grainger	Ylekoche First Nation	Unlike other proposed pipeline projects in BC, the dAAR provides little information on the nature of follow-up programs to be described in the Application - the follow-up strategy is described in one sentence. For example, the dAAR for the proposed Spectra natural gas transmission system describes in some detail the environmental management plans and compliance plans to be developed for each of the project's phases, including post-construction restoration and monitoring plans. YFN request that the dAAR contain a commitment to monitor environmental, social and health indicators during construction, operations, and decommissioning. A commitment to develop an Access Management Plan and Decommissioning Plan is specifically requested.	Section 15 of the dAAR indicates that a description of the monitoring and follow-up programs the Proponent proposes to implement, including their activities, objectives, and reporting will be provided in the Application. Furthermore, the reporting structure as identified within the environmental management plans, monitoring plans, and EA certificate will also be described. Updates to the dAAR are not required.				
7.2.2 Existing Conditions for Heritage and Archaeological Resources		E. Forging	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	The dAAR states that "the application must characterize the existing conditions for heritage and arch. resources identified Table 7-2," however, it is my understanding that the final route for the proposed project has not been identified, and therefore all areas with potential for unrecorded, HCA-protected heritage sites have also not been identified, and only a partial assessment of those areas will have been completed by the proposed date of application. This section references an "Archaeological Impact Assessment (AIA)," and proposes to implement it [and develop a predictive model] during Application Review. The characterization of the existing conditions for heritage and arch resources will therefore not be complete at the time of the application.	Agreed. Existing conditions will be characterized to the extent possible in the Application using existing site information as well as information obtained as a result of ongoing AIA study and archaeological potential model developed for the Project. A commitment will be made for follow up studies and heritage resource protection planning to the satisfaction of the Archaeology Branch.	Oil and Gas Commission comment on response to Round 1 FNRO Archaeology Branch comment: Note: for oil and gas activities the BC Oil and Gas Commission has specified enactments under the Heritage Conservation Act and is the decision maker on these elements during the permitting process.	Comment noted.		
240		E. Forging	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	The dAAR states that "this section of the application must describe the assessment of the potential effects of the proposed project on heritage and arch resources." As with Section 7.2.2, the existing conditions have not been identified, and it will therefore not be possible to consider or quantify any potential adverse effects at the time of Application. It will also not be possible to describe effects mechanisms, mitigation, residual project effects, or cumulative effects in the Application without completing the full Archaeological Impact Assessment. There is a typo in Sentence 3 [page 7-2] which should read "Available traditional land use information will be considered."	The Application will include the required commitment to the development of a Heritage Resources Management Plan as described in this comment. An outline of the Plan will be included in the Application. The Plan will be developed in full and approved prior to construction.				
241	7.2.3 Potential Effects	E. Forging	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	The dAAR states that "this section of the application must describe the assessment of the potential effects of the proposed project on heritage and arch resources." As with Section 7.2.2, the existing conditions have not been identified, and it will therefore not be possible to consider or quantify any potential adverse effects at the time of Application. It will also not be possible to describe effects mechanisms, mitigation, residual project effects, or cumulative effects in the Application without completing the full Archaeological Impact Assessment. There is a typo in Sentence 3 [page 7-2] which should read "Available traditional land use information will be considered."	Existing conditions will be characterized to the extent possible in the Application using existing site information, as well as information obtained as a result of ongoing AIA study and archaeological potential model developed for the Project. A commitment will be made for follow up studies and heritage resource protection planning to the satisfaction of the Archaeology Branch.				
242	7.2.3 Cumulative Effects and their Significance	E. Forging	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	Assessment of cumulative effects for heritage resources will have to take into account both specific site types and regional variation by culture area, within the Regional Assessment Areas (Borden blocks) identified in Section 7.2.1. Some Borden blocks may include multiple culture areas. In other words, cumulative effects will have to be assessed for each site type [shell middens, lithic scatters, CMT, etc] within each culture area (NW Coast, Interior Plateau, Boreal Forest), organized by Borden block.	The spatial units/scope of assessment will be defined by Borden blocks but analysis and assessment in the application will consider site types and culture regions as applicable.				
243	General	E. Forging	Ministry of Forests Lands and Natural Resource Operations: Archaeology Branch	Understanding that the archaeological studies commissioned by the proponent are as yet incomplete, depending on the final project design, the extent and severity of adverse effects on archaeological values could vary greatly. In the event that the current deadline for Application cannot be changed, and the necessary assessments cannot be completed prior to Application, and the Environmental Assessment Office is comfortable in going forward with a post-certification Table of Commitments under these conditions, it may be possible to design a heritage resource management plan whereby all areas with archaeological potential can be identified and assessed, and any heritage resources avoided or mitigated, prior to construction, so that no significant adverse effects eventually result from the proposed project. An explicit condition would have to require that the construction of the project is not to proceed until the Archaeology Branch's impact assessment requirements have been met and the appropriate mitigation measures have been implemented.	The Application will include the required commitment to the development of a Heritage Resources Management Plan as described in this comment. An outline of the Plan will be included in the Application. The Plan will be developed in full and approved prior to construction.				
244	New VC or sec 4 (under soil) or 9 accidents and malfunctions	Marten Geertsema	Ministry of Forests Lands and Natural Resource Operations	Terrain integrity. The main concern with terrain is the influence of terrain on the pipeline. Landslides can rupture a pipeline. Concerns with the pipeline on terrain integrity result from: • initial construction (judgements and landslides) • and from response to ruptures where quick response and remediation construction is required. • Special concerns over the lifetime of the pipeline relate to mountain permafrost, alluvial fans and glaciomarine sediments. • Ensure there is a strong emphasis on terrain stability mapping based on LDA.	Terrain stability is a key technical input to routing and design of pipelines. Terrain and terrain stability mapping will be completed for the corridor and will feed into the routing and engineering design of the Project. Terrain stability considerations and the engineering methods to be used to protect the pipeline from damage will be discussed in the Effects of the Environment section of the Application, as outlined in Section 10.0 of the dAAR. Updates to the dAAR are not required.	Talika Lake First Nation comment on response to Round 1 FNRO comment: Talika would like to request more detail as to why terrain integrity was identified and used as a VC.	Terrain integrity has not been brought forward as a VC because the issue with terrain integrity relates to its influence on the proposed pipeline (e.g., the influence of slope stability on the proposed pipeline, the effects of landslides on the proposed pipeline). It is therefore most appropriately addressed in Section 10 of the Application (Effects of the Environment on the Project) where it will be addressed under "slope stability and mass wasting events".	comments adequately addressed	
245	9.0	Marten Geertsema	Ministry of Forests Lands and Natural Resource Operations	landslides should be mentioned here as a potential cause of malfunction				comments adequately addressed	
246	Table 3-2 - Potential for Substantive/Meaningful Project-VC Interactions	Chelton van Geloven	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	In the Archaeology and Heritage column, please add an X in the row for "Offshore pipe placement...etc." There may be historic features in the water such as docks, wharves, etc. There is also potential for heritage wrecks, which are automatically protected under Heritage Conservation Act.	That interaction is noted on Table 3.2. AIA permit/study explicitly considers such resources and the potential for Project related impacts.				
247	7.1 Heritage and Archaeological Background	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	Add wording to include historical background and historic features of the Project area. Suggested wording: "The potential and any identified historic sites or historic resources in the vicinity of the Project area."	Wording in the dAAR will be updated to reflect the comment. Historical background including discussion of known and potential resources will be provided in Application as described.				
248	7.2.1 Introduction	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	"Under the Heritage Conservation Act, the term heritage site means, "whether designated or not, land, including land covered by water, that has heritage value to British Columbia, a community or an aboriginal people." Therefore the assessment should also examine heritage resources that are valued by the communities and regional districts through which the pipeline route will pass, even if those sites are not protected under the HCA. As part of the research and public input process, it is recommended that the proponent consult with local people to identify and inventory heritage sites and related historic features along the route of the pipeline, whether or not these are formally recognized/protected under HCA. Locations of interest and may reserves established for heritage conservation purposes should also be included in the inventory. Mitigation strategies can then be considered based on the Standards and Guidelines for the Conservation of Historic Places in Canada (see references). Proponent should also note that Local Government Act (Part 27) provides heritage conservation tools to local governments, who may formally recognize and/or designate property, among other actions."	PRGT will include any feedback from the public or Aboriginal groups that identify heritage sites and features. Section 7.2.2 of the dAAR references the input of traditional knowledge in the identification of resources where provided. Heritage sites to be otherwise identified based on inclusion in Provincial and/or local registers. Mitigation/management of potential effects to be developed (in Heritage Resources Management Plan) in consideration of National and local guidelines as referenced.				Updated response to Round 1 comment: Heritage resources considered include those automatically protected by the Act (archaeological sites, burials and wrecks), those protected by specific designation under Section 9 of the Act, as well as other heritage sites (e.g., non-protected historical sites identified through public or aboriginal feedback, inclusion in Provincial and/or local registers, and those identified as a result of ongoing archaeological impact assessment fieldwork for the Project.
249	7.2.1 Introduction	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	Proponent suggests that Local Assessment Area and Project Footprint are the same. However spatial boundaries for historic sites may include more than the footprint of the proposed works. The context of the heritage site is also important, and views to and from the historic features may be character-defining elements of the site. Therefore a LAA should be established for historic sites and this LAA should include a buffer area around the site such that views to and from the site are not impaired.	Given the types of interactions normally associated between pipeline projects and in-situ heritage resources, the localized POA/LAA is considered generally appropriate. Heritage research for the assessment including context will identify any exceptions to this which will be identified in the Application and subsequent heritage protection planning. In general, the setting of the Project largely outside of areas of historical settlement suggests that the likelihood of interactions with historic sites with important view attributes is probably low.				Updated response to Round 1 comment: "The Local Assessment Area defined for heritage and archaeological resources for the Project is appropriate considering that impacts would occur only within the Project Footprint. We will engage in further discussion with the Heritage Branch to clarify and address concerns relating to potential effects of the Project on the context of sites situated outside of the Project Footprint."
250	7.2.2 Existing Conditions for Heritage and Archaeological Resources	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	"First bulleted point should say: "Provincial archaeological and historic site records."" Please add to the bulleted list: "Local and regional government historic place records and inventories accessed by contacting local and regional governments.""	BCNHP will be referenced as information source in the Application in addition to community heritage register(s) where available and as applicable. The dAAR will be updated to reflect this change.				
251	7.2.3 Potential Effects (Table 7-2: Potential Project Effects on Heritage and Archaeological Resources)	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	Proponent should consult relevant heritage management plans produced by the communities and regional districts along the proposed route, as well as the best practices documents "Standards and Guidelines" and "Conservation Planning Methodology" recommended below.	Community/regional management plans will be consulted if available and where applicable.				
252	Resources	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	Context of historic sites should be referenced. Suggested wording: "Disturbance of historic sites and site context" and "Number of disturbed or destroyed sites, including site context."	Context is implied and captured by term "disturbance". It is standard practice to include historical site contexts in assessments, and this will be considered when evaluating possible site disturbance.				
253	17.1 References	S. Green & Richard Linzey	Ministry of Forests Lands and Natural Resource Operations: Heritage Branch	Please add the following documents: 1. Canada's Historic Places (A Federal, Provincial and Territorial Collaboration) 2010. Standards and Guidelines for the Conservation of Historic Places in Canada. 2nd Edition. Available at: http://www.historicplaces.ca/en/pages/standards-normes.aspx . This is the best practices manual on heritage conservation in Canada. 2. Province of British Columbia. 2012. Conservation Planning Methodology: Developing policies for the conservation of historic places. Heritage Branch, Ministry of Forests, Lands and Natural Resource Operations. Available at: http://www.for.gov.bc.ca/7170/heritage/external/public/lands/Conservation_Planning_Methodology.pdf .	The referenced documents will be added to the dAAR, reviewed and applied (where appropriate) in the development of Heritage Resources Management Plan for the project in the application.				
254	Table 3-1 - Proposed List of VCs for PRGT	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Please clarify if wetland function is included within the "Wetlands" Indicator and the Vegetation and Wetlands Resources VC.	Wetland function will be assessed within the "Wetlands" Indicator of the Vegetation and Wetlands Resources VC in the application.			comments adequately addressed	Updated response to Round 1 working group comment ' Wetlands are an existing indicator in the Vegetation and Wetland Resources VC. PRGT believes the assessment of effects to wetlands is sufficient to understand potential effects of a pipeline on wetland function. The assessment will consider potential effects on both wetland communities (habitat) and will include a hydrology assessment (considering changes in flows and drainage patterns). PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen. Based on the environmental assessment of other pipeline projects, there is no rationale for a broader assessment. PRGT confirms that a follow-up and monitoring plan will be in place for wetlands, this commitment will be reflected in the Application as well as the Environmental Management Plan. Post-construction monitoring will be conducted during the first, third and fifth complete growing seasons following construction. The Company will record locations of concerns identified during construction related to weeds, vegetation establishment, general right-of-way conditions, water crossing stability, and reclamation success. This issue list will be used to measure success of mitigation measures used during construction of the Project, and to ensure outstanding issues are investigated, resolved and reported during the PCMP for the Project.
255	3.2.1 - Spatial Boundaries	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	In some cases, it may be appropriate for the size of the LAA and/or RAA to differ among indicators, as well as between VCs. For example, indicators with a very small home range may be differently affected by the Project than indicators with larger home ranges.	Specific to Grizzly Bear and Caribou, PRGT will consult with regulatory agencies (i.e., BC MOE or BC MFNR) on the use of appropriate assessment boundaries.			comments adequately addressed	Updated response to Round 1 working group comment ' Specific to grizzly bear, PRGT consulted with BC MOE (Tony Hamilton, Large Carnivore Specialist, Victoria) on the development of Project-specific Grizzly Bear Assessment Areas (GBAA). Specific to woodland caribou, PRGT consulted with BC MFNR on defining assessment boundaries for woodland caribou herds that are directly intersected by the Project footprint.
256	3.2.2 - Temporal Boundaries	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Surveying has been included as a construction activity. Please clarify if any surveying has been or will be conducted during the route selection phase, prior to construction. If so, how will these activities be assessed?	Surveying and other pre-construction testing activities to gather information in support of the environmental assessment and preliminary project design) are not included in the scope of the environmental assessment and the dAAR will be amended to reflect this. Where required, PRGT obtains necessary permits and authorizations to conduct such activities.			comments adequately addressed	
257	Table 3-2 - Potential for Substantive/Meaningful Project-VC Interactions	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Physical construction and installation of facilities and compressor stations has the potential to have indirect effects through sensory disturbance on wildlife. Please clarify if these effects will be considered within Emissions, Discharges, and Waste effect.	See Standard Response 31.			comments adequately addressed	
258	3.6 - Characterization of Residual Project Effects	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Please clarify if residual adverse effects will be characterized for each indicator as well as by VC. It will be important for wildlife in particular to identify those indicators for which residual adverse effects are predicted.	Residual adverse effects will be characterized for each indicator as well as by VC. Some VCs will use more generalized significance thresholds where they provide adequate coverage for the effects addressed. Others, such as those related to terrestrial and aquatic wildlife will include indicator-specific significance thresholds.			comments adequately addressed	
259	3.9.1 - Project Inclusion List	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Please clarify the spatial extent used to populate the Project Inclusion List.	The spatial extent used to populate the Project Inclusion List was determined for each VC where there is a demonstrable or measurable overlap of effects within the RSAs identified for each VC.			comments adequately addressed	
260	3.9.2 - Cumulative Effects Assessment	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	As suggested in the EAO Guidelines, there is value in determining the significance of cumulative effects even if the Project is anticipated to have little contribution to these effects. This information helps decision-makers weigh the potential adverse effects of the Project and the benefits of the Project, as well as providing context. Please comment on consideration of cumulative effects as well Project contribution to cumulative effects.	PRGT intends to consider cumulative effects, as well as Project contribution to the cumulative effects according to EAO Guidelines and best practices.			comments adequately addressed	
261	4.3.3 - Freshwater Aquatic Resources	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Will changes to water quantity be considered as one of the potential effects on aquatic resources?	Change in water quality is listed as one of the potential adverse project effects in Table 4-6 and will be considered in the assessment of the Freshwater Aquatic Resources VC.	Could the proponent please comment on the assessment of changes to water quantity, such as alteration of ground water flow or blockage of watercourses? The response addressed changes to water quality, rather than quantity. Changes to water quantity could have a number of effects on ecosystem values, such as altering bull trout spawning habitat, reducing yield of mineral licks, and altering vegetation communities.	Yes, changes to water quantity (i.e., alteration of drainage patterns, reduction in flow) will be assessed as outlined in Section 4.10 of the dAAR, within the Hydrology VC assessment. Groundwater that incidentally discharges to surface is recognized as surface water under the Water Act and, therefore, will be considered in the Freshwater Aquatic Resources section of the Application.	comments adequately addressed	
262	4.3.1 (Table 4-9) - Wildlife and Wildlife Habitat	M. Watters	Ministry of Forests Lands and Natural Resource Operations: Fort St John	Please clarify if waterfowl are only being assessed in the marine environment, or they may also be considered throughout the Project area.	An effects assessment on waterfowl (namely dabbling ducks and diving ducks) will be completed for the marine environment only. However, inland waterfowl surveys (breeding and fall staging) have also been completed and results will be provided in a Technical Appendix. Potential effects on waterfowl and their breeding and fall staging habitats can be estimated from monitoring on wetlands (i.e., by region and by wetland size class).	I would appreciate further clarification on the approach used to assess effects on waterfowl outside of the marine environment of the route. The proponent suggests that potential effects on waterfowl can be estimated using information from the wetland assessment. I am looking for clarification on whether these potential effects will be discussed in the Application, and if so, in which section(s) this discussion will occur.	Inland breeding and staging waterfowl are not identified as indicators, and therefore will not be assessed directly in the Application. However, in the Wildlife Technical Data Report, estimates of breeding density and staging abundance will be provided. These results will be summarized by wetland size class by ecoregion (consistent with Canadian Wildlife Service methods). Potential Project effects on wetlands (e.g., hectares affected by site class) used in the Application, could be used to infer potential effects on inland waterfowl.	comments adequately addressed	
263	6.3.3 Potential Effects on Transportation and Access	J. Liddis	Ministry of Forests Lands and Natural Resource Operations	Add Dispersed motorland recreation access as a key indicator. Corridors and increased road access will be utilized by motorized recreationalists affecting noise, damage to road surfaces, drainage, soils as well as impacts to wildlife and fisheries resources. Measurable parameters should include severity of the impacts, whether temporary or permanent change/damage occurs and levels of public complaint. Affects and impacts of the increased and changed recreational use should be identified and addressed with mitigative measures.	The effects of Project-related increase in access for outdoor recreation, including operation of recreational vehicles, will be addressed within the relevant VCs (as receptors) in the application such as Land and Resource Use, Soils, Freshwater Aquatic Resources and Vegetation and Wetland Resources.			no further comments	

264	6.5.1 Land Resource Use Existing Condition	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Consider changing the list of indicators to the list of Valued Components. It seems odd that this vast area of concern could be lumped together and evaluated against each other.	Given the close relationship between the suite of indicators, experience has shown that it is beneficial and practical to discuss these indicators collectively under a VC umbrella. Each indicator will be separately addressed in the application in this context using measurable parameters appropriate to the land use topic being discussed.			no further comments	Updated response to Round 1 working group comment	
265	6.5.2 Land Resource Use Existing Condition	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Identify/list all legally established recreation sites and trails within the "local assessment area". (defined within the document as 2 km). Provincial recreation staff can assist.	Legally established recreation sites and trails will be identified within the LAA in the application and, where possible, presented using spatial data. PRGT will consult with provincial recreation staff particularly where information gaps are identified.			no further comments	Recreation sites and trails are already included as measurable parameters in Table 6-8.	
266	6.5.2 Land Resource Use Existing Condition	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Describe and distinguish current condition use and trends of dispersed (unmanaged) recreation use on crown land from that which occurs within legally established recreation sites and trails, regional parks etc. (see comment regarding dispersed motorized recreation access)	The application will describe unmanaged recreational use to the extent possible. Where information is not publicly available, information from FLNRO staff will be useful.			no further comments	Updated response to Round 1 working group comment	
267	Table 6-8 Potential Project effects on Land and Resource Use	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Potential Adverse Project Effects: Add loss of recreation opportunity (due to unavailability during construction) temporary or permanent to legally established recreation sites and trails as well as dispersed (unmanaged) recreation on crown land.	These effects will be assessed in the application within the Land and Resource Use VC.			no further comments	Change in outdoor recreational use is considered in the Land and Resource Use VC. This will capture the potential for reduced opportunity (use both temporarily (during construction) as well as permanent changes to both managed and unmanaged recreational areas.	
268	Table 6-8 Potential Project effects on Land and Resource Use	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Potential Adverse Project Effects: change measurable parameters from area (ha) to number of sites, kms of trails, # of user days based on traffic counters and historic levels of use. (area based parameter is not meaningful)	The area of disturbance will be considered according to the individual sites, as well as the total area for recreational use. Provincial Recreation officers will be consulted regarding historic levels of use. The total kms of trails will be considered and added to the list of measurable parameters in the dAIR.			no further comments	Updated response to Round 1 working group comment	
269	Table 6-8 Potential Project effects on Land and Resource Use	J. Ladds	Ministry of Forests Lands and Natural Resource Operations	Potential Adverse Project Effects: include economic loss to partner outdoor recreation groups, retailers, suppliers, community events etc. due to temporary or permanent loss of recreation opportunity.	This potential adverse effect will be considered either in LRU and / or through other VCs such as Employment and infrastructure and services (community recreation and leisure facilities indicators) as appropriate.			no further comments	Measurement for trails in meters. User days is not a measurable parameter for this effect, however it will be discussed in the Land and Resource Use TDR in order to provide additional context for the assessment.	
270	4.6.3 & Table 4-12	Robert Hodgkinson	Ministry of Forests Lands and Natural Resource Operations	"Suggested insertion under Vegetation and Wetland Resources under Old Forests. This pipeline will traverse forests susceptible to spruce beetle infestations. Spruce beetle outbreaks originate in windthrown spruce or in spruce logging slash, high stumps, and/or decked logs that become breeding sites. Once beetle populations breed up in such material, they often then seek out and are able to attack adjacent standing timber. Mitigation: All live spruce slash greater than 20 cm dbh and all live forest spruce must either be removed from the right-of-way before spruce beetle infest it, or it must be burnt or milled before new generation beetles emerge from such material."	PRGT appreciates this risk and will address this issue in the application within the appropriate VCs related to forestry. Specific, detailed mitigation will be included in the Summary of Mitigation Measures section of the Application as outlined in section 16.3 of the dAIR. Change to the dAIR not required.			comments adequately addressed		
271	Table 3-2 Environment	Andarge Baye	Ministry of Forests Lands and Natural Resource Operations	"Add VC for Groundwater Quality with the following K's <ul style="list-style-type: none"> Loss of yield to aquifers, wells, springs, or surface water resources during excavation and tunneling such as interruption of groundwater flow, interruption of recharge to well, and dewatering drawdown of water table during pipeline construction. Changes in the local aquifer permeability caused by equipment compaction or use of fill materials of lower permeability than the natural surrounding aquifer. Impact of disposal of groundwater pumped from trenches related to siltation of nearby streams or overland flow towards wells and springs. Possible damage to or loss of wells during blasting operations, if there is any, during construction." 	Oil and Gas Commission comment on response to Round 1 FLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to groundwater in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.		Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.			
272	Table 3-2 Environment	Andarge Baye	Ministry of Forests Lands and Natural Resource Operations	Add VC for Groundwater Quality with the following K's <ul style="list-style-type: none"> Potential effects of accidental spills and acidic drainage to potential aquifers hydraulically down-gradient of the proposed route particularly in areas of highly permeable media (sand, gravel and shallow fractured bed rock) and wetlands which are identified to be transected by the proposed pipeline in all phases of the project (construction, operation and maintenance). Adverse changes in water quality in aquifers, wells, and interrelated surface water resources during construction. 	Accidental spills will be considered in Section 9.0 of the draft AIR (Accidents or Malfunctions). With regards to acid rock drainage (ARD), an ARD analysis will be completed as part of the geohazard assessment. The information gathered will be used to assess the risk of encountering acid rock. As outlined in Section 14.0 of the dAIR (Summary of Proposed Environmental and Operational Management Plans), an ARD management plan may also be developed for the Project depending on the risk of encountering acid rock. The ARD management plan would describe protocols for testing samples of rock encountered during construction, handling, and management of excavated material and material left in pits, and monitoring.					
273	VC Selection Document - General	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	SFC notes that the version of this document received has pages requiring signatures from the report's authors which have not been signed. By logical extension this presumably means that the version of the report is a draft for review and thus should be explicitly identified as such.	The sign off pages are not required for the dAIR and were for internal PRGT purposes only. They will not be included in future drafts or the finalized AIR.	Sufficient response.		No additional response required.		
274	VC Selection Document - Page 4	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	SFC notes that there are five spacing typos on this page; essentially there are five instances where there should be a space between two words where there is not. Relating to the previous comment, given that this version of the VC report appears to be less than polished, one should presume that this draft for review and hence should be identified as such.	Comment noted. PRGT will make every effort to ensure that the final version of the draft AIR does not contain typos.	Sufficient response.		No additional response required.		
275	VC Selection Document - Page 5	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	2nd paragraph: <ul style="list-style-type: none"> "...the EAO asked PRGT to recommend a set of VCs that would be considered in the environmental assessment (EA)." SFC comment: The directive to the proponent from the EAO highlighted in the sentence above points to a disjuncting trend and a potential conflict of interest. As one might naturally expect project proponents will wholeheartedly endorse their given project and ultimately want their project to gain the appropriate approvals, permits, etc. to move forward. By logical extension a project proponent would wish to avoid subjects and issues that could portray their project in an unfavourable way. Thus allowing a project proponent the latitude to choose/recommend the 'valued components' that are to be evaluated in a given project environmental assessment creates quite the ethical quandary. How can a proponent driven EA really be regarded as an objective exercise of scientific inquiry and deliberation? It is the view of SFC and the First Nations it represents that an objective third party without a vested interest in a given project (such as a technical working group) be the one to choose the 'valued components' that are rigorously evaluated in an environmental assessment. 	Comment directed to EAO.		The response does not address the issue raised. Lax Kw'alaams reiterates its concern that the selection of the Valued Components have been put in the sole hands of the proponent. This is not just a matter for the BCEAO. In an effort to make this an objective, fair and transparent process the proponent needs to incorporate the views of others, including First Nations, on the Valued Components affected by the project. The EAO's process for identifying VCs is not sufficient and does not adequately incorporate First Nations' concerns.	EAO response to Round 1 comment (and applicable to Round 2 comment): EAO is responsible for determining which VCs need to be studied on any particular project. Although the proponent does propose an initial set of VCs, subsequent reviews and consultation with the Working Group, Aboriginal Groups, and the Public, help inform EAO's final determination (when the AIR is issued).	So is VC selection a proponent driven part of the EA process or not?	Comment directed to the EAO.
276	VC Selection Document - Page 5	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	3rd paragraph: <ul style="list-style-type: none"> "The expected project effects on the VCs after applying mitigation measures will ultimately be used to determine the significance of residual effects." SFC comment: What does this sentence really mean? Does this mean that no data on project effects will be collected until the mitigation measures are applied? Seems to be a misguided approach especially if one wishes to truly ascertain what the given magnitude of an effect on an environmental variable really is. If the approach advocated for above is employed, how will one truly and empirically determine the exact magnitude of the success or failure of a given mitigation measure? 	Residual effects are those that remain after mitigation has been applied. The significance of environmental effects is determined on a residual basis; that is assuming mitigation will be applied where warranted.	Sufficient response.		No additional response required.		
277	VC Selection Document - Page 6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	"As a result, surface waters and underlying groundwater are protected from contamination and do not need to be assessed." SFC comment: For the whole project? Or only in terms of waste disposal? Need to be explicitly spelled out.	See Standard Response 8 and Standard Response 36.	Sufficient response.		No additional response required.		
278	VC Selection Document - Page 7	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	2nd paragraph: <ul style="list-style-type: none"> "The following list of legislation is applicable to the PRGT Project and will in the legal constraints that need to be considered in the VC selection process..." SFC comment: This sentence appears to be nonsensical. What concept or idea is supposed to be being conveyed in this sentence? 	The VC selection document is superseded by the draft AIR. The sentence referenced above contained a typo and should read as follows: "The following list of legislation is applicable to the PRGT Project and will be part of the legal constraints that need to be considered in the VC selection process."	Sufficient response.		No additional response required.		
279	VC Selection Document - Table 1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Pillar -> Environment (Aquatic) -> Potential Effects: <ul style="list-style-type: none"> (a) Permanent alteration or destruction of direct and indirect fish habitat (i.e. in-water and riparian habitats) (b) Potential fish mortality (c) Reduced water quality (d) Potential injury of fish or marine mammals due to pressure waves or underwater noise SFC comment: Will there be quantification of these factors (a -> d)? 	Expected changes in fish mortality and water quality will be estimated and measures put in place to mitigate these potential effects will be monitored at the time of construction to ensure they are effective.	Inadequate response. Lax Kw'alaams reiterates its request that monitoring occur up until such time as there is no reasonable probability of measurable effects from the Project, not just during construction.	Monitoring will be proposed where there is sufficient uncertainty with an effects prediction or a new application of a mitigation measure is prescribed. In addition, it is anticipated that Fisheries and Oceans will require construction and long-term monitoring for any serious harm to fish that requires authorization and offsetting under section 35(2) of the Fisheries Act. Until the effects assessment is complete and Fisheries and Oceans Canada has completed its review of any requests for authorization, it is premature to stipulate any monitoring requirements.	Regardless however comprehensive baseline data on all VCs needs to be collected well before the project is constructed and begins operations.	PRGT acknowledges the comment from Lax Kw'alaams (Skeena Fisheries Commission) and wishes to reiterate that baseline data on the VCs identified in the dAIR has been collected and will be provided as part of the Application.	
280	VC Selection Document - Table 1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Pillar -> Health -> Potential Effects: <ul style="list-style-type: none"> (a) Potential change in human health (b) Potential change in ecological health SFC comment: Will effects (a) and (b) be measured? 	Potential health risks to humans will be assessed for air and marine contaminant exposures following standard risk assessment guidance from Health Canada. Potential health risks to ecological receptors will be assessed using a risk assessment that will support the effects assessment of the Marine VC.	Inadequate response. Lax Kw'alaams requests that the dAIR be amended to require sufficient detail of how the effects to human and ecological health will be measured.	The Application will include a separate Human Health and Ecological Risk Assessment that will present details as to how potential changes in human health were measured. Ecological health will be addressed through the potential adverse Project effects identified for each VC.	"Ecological health will be addressed through the potential adverse Project effects identified for each VC" - Huh? What does this mean? That ecological health will be addressed but not necessarily quantified? Clarification is needed here. Performance metrics need to be established now before a risk assessment is developed so that said risk assessment will be meaningful and quantifiable.	The statement "Ecological health will be addressed through the potential adverse Project effects identified for each VC" refers to the fact that the effects of the Project, as quantified in the Ecological Risk Assessment, will be included in the individual sections of the ecological VCs. The Ecological Risk Assessment will follow standard procedures for carrying out such an assessment.	
281	VC Selection Document - Page 13	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	3rd paragraph: <ul style="list-style-type: none"> "Hydrology: There is no permanent/long-term withdrawals or discharges of freshwater required for the project." SFC comment: So this project and it's associated 'valued components' pertain only to the pipeline portion of the project? What about the fracking processes required to release the natural gas from the shale bed deposits? 	Only the infrastructure related to conveying natural gas from the source (not included in the scope) to the export facility (also not included in the scope) are included as part of the PRGT Project. As such, the fracking processes to release natural gas are not part of this application.	Inadequate response. Lax Kw'alaams reiterates the need to examine the cumulative effects of projects in the area in this EA. With the rapid pace of development in the general Prince Rupert Harbour area comes a large quantity of effects, including cumulative biophysical, cultural, social and economic effects. To date, no meaningful efforts have been initiated by industry or government to actually start examining cumulative effects of industrial development in Lax Kw'alaams territory. We request that the dAIR be amended to require an Application that considers the cumulative effects of the concomitant development in the area.	Section 3.10 of the PRGT dAIR describes the process that will be adopted in the Application to assess cumulative effects, including those associated with existing and known future pipelines.			
282	VC Selection Document - Section 4	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Section 4 - Proposed Valued Components and Indicators SFC comment: For the freshwater aquatic resources and Marine resources 'Environmental Pillars' SFC advocates that water quality (empirically measured and verified) needs to be captured in the definitions for these two (2) pillars as well. 1st paragraph: <ul style="list-style-type: none"> "PRGT gas recommended broad VCs to allow for a comprehensive, efficient and defensible effects assessment." 	See Standard Response 8 and Standard Response 11.	Sufficient response.		No additional response required.	Again, minor quibble, but given that "standard responses 8 and 11" are two lines each, wouldn't it have been easier to cut and paste these responses directly into this section of the tracking table? Also MS Excel is much better used for "numerical analyses" than "written word analyses".	PRGT acknowledges the comment from Lax Kw'alaams (Skeena Fisheries Commission) and agrees with respect to the treatment of Standard Responses (which will be provided directly as a response going forward instead of referencing a separate document).
283	VC Selection Document - Page 14	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	"PRGT gas recommended broad VCs to allow for a comprehensive, efficient and defensible effects assessment." SFC comment: The logic (or lack thereof) presented in this case is counterintuitive and remarkably vague - defining VCs broadly does not easily allow for finite, comprehensive, efficient and defensible positions/arguments.	VCs are initially identified broadly to promote a comprehensive assessment. They are then focused into more detailed units of discussion for an efficient and effective perspective on those items of greatest importance. For example, the broader "Wildlife and Wildlife Habitat" VC has been broken down into 22 separate indicators which will each be assessed for potential Project effects.	Inadequate response. Lax Kw'alaams reiterates the need to sufficiently define VCs in the dAIR. Particularly, salmon and salmon habitat and Aboriginal rights must be added as specific VCs and Key Indicators.	Specific reference to salmon and their habitat has been clarified in the dAIR in regards to the marine and freshwater resources VCs. Potential effects on the exercise of Aboriginal rights in regards to salmon harvesting is described in Part C/ section 11 of the dAIR.			
284	VC Selection Document - Page 14	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	1st paragraph: <ul style="list-style-type: none"> "This also allows for the assessment rationale, regulatory/policy context, and description of project components/activities to be discussed in a single chapter of the environmental assessment." SFC comment: Is this really a realistic attribute to consider for the development of an effective EA process overall? 	PRGT C. This approach has been used successfully on many other environmental assessments.	Inadequate response. Lax Kw'alaams reiterates its concerns about the proponent-driven selection and consideration of VCs as proposed by the dAIR.			Publications relating to the selection of VCs (whether broad or otherwise) are not often published in conventional scientific journals but instead are issued as various government policy and guidance documents such as those produced by the EAO (EAO 2013 - Guidelines for the Selection of Valued Components and Assessment of Potential Effects), Hegmann et al. (1999 - Cumulative Effects Assessment Practitioners Guide - report prepared for CEAA), and under Section 5 of CEAA 2012. PRGT is not unwilling to close data gaps ahead of receiving an EAC however they do believe the data collected and compiled to date in support of the Application is sufficient to conduct a valid effects assessment. WG members will have an opportunity to evaluate the Application in its entirety during the review period initiated once the Application is submitted to the EAO.	
285	VC Selection Document - Page 14	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Last paragraph - Cumulative effects SFC comment: How exactly are cumulative effects defined for the purposes of this EA? What about cumulative effects that arise from where the LNG pipeline and the LNG shipping and receiving terminal meet?	Please refer to section 3.10 of the dAIR for a description of the cumulative effects assessment. The list of projects considered in the cumulative effects assessment will include other projects and activities that could have potential overlapping residual effects with the PRGT project, this would include projects near it's terminals on Lelu Island.	Inadequate response. Lax Kw'alaams remains critically concerned about the Project-focused CE. Lax Kw'alaams calls on the proponent and the Crown to develop a proper regional CEA scheme.	PRGT feels that the response and assessment method described above is appropriate to address the comment.	So PRGT and BCEAO please spell out how the cumulative impacts of where the pipeline meets Flora Bank and the LNG terminal on Lelu Island will be addressed exactly.	Potential cumulative effects with respect to the cumulative effects assessment for the marine environment in the Application, as described in Section 3.10 of the dAIR. The process will proceed as follows: <ul style="list-style-type: none"> is there a PRGT Project residual environmental effect around Lelu Island? Does the PRGT Project residual environmental effect overlap spatially and temporally with those of past, present, or reasonably foreseeable future Projects in the area (in this case the LNG terminal on Lelu Island)? Where both answers to the above questions are "yes", the potential contribution of these project effects to cumulative effects will be assessed. A final question is then posed: <ul style="list-style-type: none"> is there a reasonable expectation that the contribution (i.e., addition) of the PRGT Project's residual effects would cause a change in cumulative environmental effects that could affect the viability or sustainability of the VC? The cumulative effects assessment is conducted on a VC by VC basis.	
286	VC Selection Document - Section 5	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Section 5 - Aboriginal and Treaty Rights <ul style="list-style-type: none"> "No VCs are recommended related to the direct assessment of potential adverse effects of the PRGT Project on the exercise of Aboriginal and Treaty rights." SFC comment: The logic presented in this sentence is contradictory - First Nations fisheries are inextricably linked to Aboriginal and Treaty rights thus would be considered a 'valued component' to any First Nation. 	While the Application will not include Aboriginal Interest VCs, Section 12 of the Application will include the assessment of potential effects on Aboriginal interests, as well as a description of proposed mitigation measures. Section 12 will identify specific asserted Aboriginal interests identified by Aboriginal groups or through secondary sources. Where there is overlap between an Aboriginal interest and a VC (such as fisheries), the information from other sections of the Application will be cross-referenced and summarized in context of the specific Aboriginal Interest. No changes to the dAIR are required.	Inadequate response. Lax Kw'alaams remains of the view that a specific VC concerning Aboriginal rights must be added to the dAIR. Lax Kw'alaams requests that the Working Group meet to discuss the development of such a VC before the AIRs are finalized.	PRGT feels that the response and assessment method described above is appropriate to address the comment.	Lax Kw'alaams comment on response to Lax Kw'alaams Round 2 comment: Unfortunately SFC has seen a recurring theme in PRGT's responses to many of SFC's comments and criticisms of the PRGT dAIR. PRGT feels that the response and assessment method described above is appropriate to address the comment". An EA is ultimately to be an objective exercise of scientific inquiry with the main purpose being the determination of whether a given proposed project will cause significant irreparable and unmitigable environmental harms. PRGT saying that they "feel" their response is adequate with no actual explanation of the logic they used to justify their "feelings" is an unacceptable approach. Both the BCEAO and PRGT need to fully realize and acknowledge that many VCs are inextricably tied to Aboriginal Rights and Title especially in the case of fisheries resources.	Response to Lax Kw'alaams: PRGT is aware that many VCs are inextricably tied to Aboriginal Rights and Title, particularly in the case of fisheries resources. Where there is overlap between an Aboriginal Interest and a VC (such as fisheries), the information from other sections of the Application will be cross-referenced and summarized in context of the specific Aboriginal Interest. WG members will have the opportunity to comment on PRGT's assessment of Aboriginal Interests during the review period of the Application. Response to Ktsuumakum Band Council: The request for a WG meeting to discuss unresolved issues is being directed to the EAO.	

287	VC Selection Document - Section 6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Section 6 – Closing Based on Stantec's experience conducting environmental assessments across Canada, including involvement in 31 assessments under BCEAA, we believe that broad VCs fully address all potential effects of the Project in an efficient and effective process. SFC Comment: This is not comforting to Skeena and Northcoast BC First Nations given Stantec's recent poor performances and track record with other Prince Rupert area LNG EAs.	Stantec and PRGT stand behind the general approach to VC selection including issues raised by First Nations potentially affected by the project under review.	Lax Kw'alaams reiterates its concern that the selection of the Valued Components have been put in the sole hands of the proponent. In an effort to make this an objective, fair and transparent process the proponent needs to incorporate the views of others, including First Nations, on the Valued Components affected by the project.	The VCs have been selected using the BC EAO, VC Selection Document guidelines. In addition, based on feedback received during working group meetings and comments received on the dAIR, PRGT has added VCs to the assessment.	So what VCs specifically has PRGT added to the assessment?	PRGT has added Greenhouse Gases, Water Quality, and Hydrology as VCs. Further indicators have also been added to the Wildlife and Wildlife Habitat VC (e.g., Great Blue Heron (A.N. fennix) and Canada warbler) and specific fish species (as indicators) in both the freshwater aquatic resources and marine resources VCs, for example.
288	VC Selection Document - Section 6	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Section 6 – Closing SFC Comment: How so specifically? Further, we believe this approach will provide greater legal defensibility for any potential substitution process under CEAA 2012."	On October 24, 2013 the CEAA agency released regulations amending the Regulations Designating Physical Activities. The amendment removed reference to 75 km of new pipeline right-of-way as a trigger for CEAA, 2012 and therefore CEAA, 2012 is no longer applicable to the PRGT project. The dAIR will be amended to reflect this change.	Sufficient response.	No additional response required.		
289	VC Selection Document - Appendix 289 B / Page 1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Section 6 – Closing 1st paragraph: The environmental, economic, social, heritage and health effects of pipelines are well understood. SFC Comment: By whom? According to whom? What is the actual citeable source of this information?	With more than 60 years experience, TransCanada has a good understanding of sustainability issues associated with pipeline construction and operations and is a leader in the responsible development and reliable and safe operation of North American energy infrastructure. Countless environmental assessments have been done and post construction reclamation and monitoring undertaken to confirm effects and effectiveness of mitigation.	Inadequate response. Lax Kw'alaams is of the view that the extent of environmental, economic, social, heritage and health effects of pipelines and the accompanying risks are not well understood. Particularly, Lax Kw'alaams is of the view that the dAIR do not take into account the unique impact the project will have on them and other First Nations. Lax Kw'alaams requests that the dAIR not be finalized until further consultation and accommodation has occurred to allow First Nations' perspectives to be integrated into the dAIR.	Comment regarding timing for the finalization of the AIR directed to the EAO.	Lax Kw'alaams comment on response to Lax Kw'alaams Round 2 response: So when can we expect BCEAO's response? Kikumaluk Band Council comment on response to Lax Kw'alaams (Skeena Fisheries Commission) comments: Kikumaluk supports WG member's comments. We support many of the other WG members' comments and have concerns about some of the PRGT responses but we do not have the resources to respond to all of them. We suggest we have another WG meeting to discuss unresolved issues.	Comment directed to the EAO.
290	VC Selection Document - Appendix 290 B / Table B1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Valued Components SFC Comment: How is fish habitat defined for the purposes of this Environmental Assessment (EA)?	For the purposes of this assessment, fish habitat is defined as it is in the Fisheries Act: "... spawning grounds and nursery, rearing, food supply and migration areas on which fish depend directly or indirectly in order to carry out their life processes."	Sufficient response.	No additional response required.		
291	VC Selection Document - Appendix 291 B / Table B1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Valued Components SFC Comment: How exactly are fisheries water quality and aquatics water quality defined?	See Standard Response 8 and Standard Response 19.	Inadequate response. Lax Kw'alaams requests that the dAIR be amended to require fisheries water quality and aquatics water quality to be sufficiently defined in the Application.	The potential changes in water and sediment quality resulting from pipeline construction and operation relate primarily to changes to fish habitat or the health of fish species (as a result of toxicity). Changes in temperature and total suspended solids (TSS) will be addressed in the Freshwater Aquatic Resources VC, changes in TSS will be addressed in the Marine Resources VC, and pH in freshwater and metals or organic pollutants on the National Action List in marine waters will be addressed in the newly created Water Quality VC. Complete definitions of relevant standards for marine and freshwater quality will be provided in those sections of the Application.		
292	VC Selection Document - Appendix 292 B / Table B1	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Valued Components SFC Comment: What exactly is a viewshed? What exactly is a 'non-pipeline facility' that is connected to a pipeline project?	A viewshed is the part of a landscape visible to the human eye from a specific, fixed location. Wording will be updated in the dAIR to replace non-pipeline facilities to above ground pipeline facilities, including compressor and metering stations. The term viewshed will be added to the Appendix 18 Glossary of Technical Terms of the dAIR.				
293	VC Selection Document - Appendix 293 B / Table B2	Daive Latremouille	Lax Kw'alaams (Skeena Fisheries Commission)	Project Components SFC Comment: How is the facility defined in this case – just the pipeline? Just the LNG Terminal? Both the pipeline and the terminal?	The scope of the Project will be defined by the EAO in the Section 11 order. The Project Component/Activity List presented in Table B2 has been updated and is Table 3-2 of the dAIR. Updates to the draft AIR are not required.	Inadequate response. Lax Kw'alaams repeats its request for a wider focus of the proposed EA and dAIR for the project that takes into account the rapid pace of development in the Prince Rupert Harbour.	Comment directed to the EAO.	So when can we expect BCEAO's response?	Comment directed to the EAO.
294	General Comment	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	There appears to be a significant discrepancy in the level of detail provided in the Draft AIR, and the more recently approved AIR for the very similar West Coast Connector project, by Spectra Energy. Gitanow does not see the PRGT dAIR as close to complete, and is anticipating that there will be numerous revised versions that the EAO will be asking Gitanow to review again. This is not the most effective or efficient approach to meaningful consultation, and places a further burden on Gitanow who are currently engaged in multiple EA processes. Approving the dAIR as proposed would appear to be providing inconsistent application of the EA process requirements to two competing companies.	Comment directed to the EAO.				
295	General Comment	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Gitanow and the EAO (through Chris Hamilton & Cory Waters) are currently drafting a letter of Understanding that will ensure EAO recognition of the Gitanow Land Use Plan and recognition clauses of the Gitanow Housing Recognition & Reconciliation Agreement. This LOU will be very important in improving consultation between the EAO and Gitanow. We strongly urge you to incorporate reference to the LOU in the final dAIR and to consider it in your review of our comments.	This comment has been forwarded to EAO for their consideration.				
296	General Comment	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	The Section 11 Order comments provided by Gitanow have yet to be addressed, as the final Section 11 for this project has not been approved. It is problematic for Gitanow to be reviewing the dAIR without knowledge of the final Section 11, and how our comments were addressed. As you know, the Section 11 is an essential step in the EA process and should be concluded prior to the drafting of the dAIR. It appears that the EAO is fast-tracking this process to meet the economic and commercial needs of the Proponent, at the cost of meaningful consultation with Gitanow and other First Nations.	No changes to the dAIR are required.				
297	Executive Summary	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	A summary of the consultation undertaken with the First Nation potentially impacted by the project should also be included.	The executive summary will include a summary of the consultation undertaken during the environmental assessment, including consultation with Aboriginal groups.				
298	1.2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Project description should include transportation requirements for the project. What highways and secondary roads will be used?	Transportation and access is a component that will be assessed in the Application (see Section 6.3 of the dAIR).				
299	1.2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	NAD 83 is a more common datum to use for mapping in BC. Why use WGS 84?	NAD 83 datum will also be considered to support the effects assessment in the Application.				
300	1.2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Description of land use should include an acknowledgement of the Gitanow Land Use Plan as being a First Nations Land Use Plan. Proponent should include the identification of the Gitanow Traditional Territories separated by Wip. Under the "Identification of the Niga'a Lands, the Nasa Area and the Nasa Wildlife Area" there should also be a reference to Section 33 of the NFA and non-derogation of other Aboriginal rights and title. Project Description should also include a description of a decommissioning and reclamation plan, which should be included in the Application.	Please see Standard Response 20. This would include Gitanow's Land Use Plan. Section 11 of the Application will include background information on Aboriginal groups, including Gitanow. PRGT will acknowledge in this section that Gitanow's traditional territory is comprised of eight Wipis. PRGT does not believe that a specific reference to Section 33 of the Niga'a Final Agreement is required. According to BC's Reviewable Projects Regulation, decommissioning of the proposed Project is not scoped into the environmental assessment. No changes to the dAIR are required.				
301	1.4	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Descriptions of the major alternatives considered must be provided in the Application as well as the methods and criteria used to evaluate each alternative. The preferred alternative and the rationale for its selection will also be described." Will the proponent be seeking an EA certificate for alternate route for the pipeline or will the application specifically identify the route? Gitanow has been engaged extensively in a route selection process based on the Gitanow Land Use Plan and this is a major component of the consultation and accommodation process. The Application should include and confirm the Gitanow Preferred Route.	PRGT is evaluating a number of alternative pipeline routes and facility sites for the proposed Project. However, the Application will include the PRGT and Gitanow agreed upon route alignment, as well as all other routes proposed by PRGT that are viable at the time the Application is filed. The Application will identify the various technically and economically feasible ways to implement and carry out the proposed Project, and identify methods and criteria used to evaluate each route alternative. The preferred alternative and the rationale for its selection will also be described. No changes to the dAIR required.				
302	1.5	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	This section should include a clear description on the proponent's strategy for employment training. What opportunities will be provided by the proponent to get local people trained prior to construction and operation of the pipeline? This section should be detailed and should clearly outline that the proponent has already linked with educational institutions to prepare to provide training in advance of the project. Gitanow has raised this issue as a part of the consultation process, with both the Proponent and the Province.	PRGT recognizes the importance to local Aboriginal groups, communities and stakeholders of employment and training opportunities associated with the proposed Project. PRGT is committed to discussing such opportunities with interested parties, including Gitanow. Potential issues and mitigation related to employment are addressed in the Employment VC (dAIR Section 5.2). This includes barriers that may impede the local workforce, both Aboriginal and non-Aboriginal, from accessing employment and/or contractor opportunities (e.g. education attainment) will be identified along with proposed mitigation measures including aboriginal-specific mitigation measures where appropriate. No changes to the dAIR are required.				
303	2.3	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	An additional sub-section should be added to include the Section 33 of the NFA (non-derogation clause) which ensures the NFA will not affect other First Nations rights and title. Misinterpretation of the NFA rights and consultation duties by Proponents and the Province has in the past, and could potentially impact/infringe Gitanow rights and title. This needs to be addressed early in the EA process by both the Proponent and the EAO.	PRGT does not believe that a specific reference to Section 33 of the Niga'a Final Agreement is required. No changes to the dAIR are required.				
304	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	The application should describe quantitatively how this project will affect British Columbia's ability to achieve the greenhouse gas (GHG) emissions reductions as outlined in the Greenhouse Gas Reduction Targets Act. Gitanow is aware that the proponent is not responsible for other projects or government initiatives that may/may not prevent BC from achieving its GHG reduction targets. However, climate change is a huge overarching environmental issue that is of major concern to Gitanow. It is clear that this project would result in massive GHG emissions. Recent evaluations have shown however that, depending on how this project is designed and executed, there can be a significant variance in the amount of GHG released (Grove and Moothouse, 2013. Report attached for ease of reference). In the context of this EA Application, it is critical that the proponent describes in quantitative terms the amount of GHGs that will be released through all aspects of the project, from wellhead to LNG Terminal. Furthermore, the proponent should describe how this level of GHGs will impact BC's ability to achieve its GHG reduction targets.	See Standard Response 23.				
305	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Assessment of marine vegetation should include any marine vegetation of ecological importance, not just cultural importance.	See Standard Response 14.				
306	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	The proponent should list specific indicators for the valued components under Freshwater Aquatic Resources section (e.g. sockeye salmon, steelhead, bull trout, etc.)	See Standard Response 15.				
307	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Assessment of marine resources should include specific mention of 1) effects on juvenile salmonids, 2) effects on shellfish.	See Standard Response 13. The assessment will consider effects on juvenile salmon and shellfish.				
308	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Assessment of human health should include terrestrial and freshwater traditional foods, not just marine foods. Please avoid use of the term "country" foods.	No changes to the dAIR are required. See Standard Response 41.				
309	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Heritage and Archaeological Resources" should include Cultural Sites, as identified by affected First Nations.	No changes to the dAIR required.				
310	Table 3-1	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Assessment of human health should include effects of increased traffic in the area on human health.	The potential for traffic accidents to result in effects to people will be included within the Accidents and Malfunctions section of the Application.				
311	Table 3-2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Several of the potential project components / VC iterations were omitted (no "X" indicated). These include interactions between Freshwater Aquatic Resources and Physical construction, installation of metering facilities and compressor stations, operations of physical facilities, vegetation management, and the discharges and wastes. There is also for potential interaction between wildlife and operations and maintenance of physical facilities. There is also a potential for interactions between land and resource uses and vegetation management. As stated earlier, the application needs to include a section under the potential effects of the project on BC's GHG reduction targets. This assessment could potentially go under either Environment or Social effects in Table 3-2.	Interactions between the freshwater environment and project are selected only for those project activities that will occur within 30 metres of a watercourse. In is the plan to locate metering facilities and compressor stations a minimum of 30 metres from any watercourses. The primary interactions between the project and the freshwater environment will occur where the pipeline or access roads cross watercourses. All other project activities will occur away from watercourses. An "X" will be added to Table 3-2 to indicate the potential interaction between vegetation management during operations and maintenance and the Land and Resource Use VC. Potential interactions between the Wildlife and Wildlife Habitat VC and project facilities during operations will be included in the effects assessment (see Section 3.2.2) in the application. See Standard Response 23.				
312	Table 3-2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	In Table 2 we will list several Project Components/Activities and the corresponding VC that we believe should be marked with an X in Table 2 (see points below). Terrestrial Pipe Placement: Visual Watercourse Crossing: Soil, Land and Resource Use Fjord Crossings: Freshwater Aquatic Resources, Soil Presence of Physical Facilities: Freshwater Aquatic Resources, Wildlife and Wildlife Habitat, Vegetation and Wetlands, Heritage and Archaeological Resources. Vegetation Management: Soil, Land and Resource Use, Human Health, Heritage and Archaeological Resources.	The intent of Table 3-2 is to present a preliminary indication of "substantive/meaningful" interactions for purposes of VC selection. It is acknowledged that there may be additional, minor interactions. All potential interactions will be reviewed and justified and evaluated in a more detailed manner in the environmental assessment given the benefit of additional context and analysis and Project detail.				
314	Table 3-2	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Reclamation and post-decommissioning should be included in Table 3-2. Also, construction camps should be listed in Table 3-2 as they have the potential to affect fish, wildlife, visual quality, soil, land and resource use, human health, heritage and archaeological resources, etc.	See Standard Response 34.				

315.3.7	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	At a 2013 EAO workshop on Valued Components, the EAO and its consultants admitted that the determination of significance is largely a "subjective" process. The determination of significance of residual effects should be elaborated on in more detail here, including how affected First Nations will be involved. This is needed to ensure that economic interests do not supersede more objective or multi-lateral determination of significance that better protect the identified VCs.	The determination of significance is based on scientific analysis compared against quantitative thresholds for significance wherever possible. The Application will provide a detailed description of analytic methods as well as significance criteria. PRGT welcomes input from the Working Group, including Aboriginal groups, to support the environmental assessment process and rigorous significance determinations. No changes to the dAIR required.				
316 Table 3-4	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Project inclusion list shown in Table 3-4 should also include the Northwest Transmission Line (already built), as well as the proposed KSM mine (EA application submitted), Red Chris Mine (has EA certificate), Kulocho and Schaf Creek mines (both proposed), and the Northern Gateway Pipeline. This proposed pipeline will intersect directly with the NL. Transportation effects assessment for the proposed mines utilizing the Highway 37 corridor is underway and with the cumulative impacts on moose and other key species, these projects need to be included on this list.	PRGT will consider adding the projects outlined by the Gitanayow Hereditary Chiefs within the project inclusion list if there is a reasonable prospect of overlapping environmental effects. PRGT will consult further with the EAO.				Updated response to Round 1 working group comment
317.3.9.2	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Because of the intensity of development in the northwestern part of British Columbia, the issue of cumulative effects has been of great importance to Gitanayow, and to other First Nations groups. This concern regionally has prompted several initiatives to better understand and manage cumulative effects including the creation of the Northwest BC First Nations Cumulative Impacts Roundtable (Headwaters Initiative), the Northwest CE Pilot (FNRO) and now the Highway 37 Advisory Group (MOT). EAO, First Nations groups, industry, etc.). These initiatives started prior to the various natural gas pipeline proposals, indicating there was concern even prior to the additional pressures added by these proposals. This section of the AIR includes a discussion of what conditions must be met for a particular effect to be considered as part of a cumulative effects assessment. It appears by the way this section is written that the proponent is looking more for ways to eliminate having to conduct CE assessments on various VCs, rather than being conservative and proactive in determining if a VC could be impacted by CEs. Furthermore, this section only mentions that other "project"-related effects will be considered. In the Cumulative Effects Assessment Practitioners Guide (Ingrmann et al. and AKYS, 1999), it explains that all human caused impacts must also be considered in an effective CE assessment. The proponent must consider other existing/historical impacts to various VCs in addition to project related effects, and in doing so must also consider the current state of VCs when doing their CEAs. This needs to be reflected in this section of the AIR.	PRGT recognizes and acknowledges the importance of cumulative effects to Gitanayow and other Aboriginal groups, and the efforts undertaken to better understand and manage these effects in northwestern BC. The Application will summarize the process and methodology used to determine the need for a cumulative effects assessment. The cumulative contribution of other existing, approved and reasonably foreseeable projects and activities will be considered in conjunction with the Project's residual adverse effects. Residual effects will also be characterized in terms of their context, including the current condition for the VC. See Standard Response 38.				
318.4.2.1	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	The regional study area should be extended beyond 3km, at a minimum to address the impacts from helicopter traffic and blasting during construction, as well as traffic related impacts during construction.	The text in the dAIR has been updated to reflect an increase in the RAA from 3 km to 5 km. A change to the dAIR is required.				
319.4.4.1	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	As mentioned earlier, the term "habitat-forming marine vegetation of cultural significance or at-risk" is very narrow. By that definition, it seems as though it would be acceptable to negatively impact marine vegetation that is of ecological value (i.e., such as eel grass in how it provides habitat for juvenile salmon) provided that vegetation type is not culturally significant or at-risk. Who decides if a vegetation type is culturally significant? It should state in the AIR what vegetation types and overall marine ecological communities are going to be considered in the EA.	See Standard Response 14.				
320 Table 4-5	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	The proponent should list specific indicators for the valued components under Freshwater Aquatic Resources section (e.g. sockeye salmon, steelhead, bull trout, etc.).	See Standard Response 15.				
321 Table 4-5	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	The present definition of indicators under the assessment of Freshwater Aquatic Resources fails to recognize the value of fish from an ecosystem perspective and for their intrinsic value to some First Nations people. The indicators need to be expanded to capture these values.	The indicator species include those species that are part of an Aboriginal fishery, as included in the current Fisheries Act. This also includes fish species that may not be directly part of a fishery, but also those that support fish species that are part of a fishery (e.g., a fish species that is commonly preyed upon by a species that is part of a fishery). While the assessment does not directly refer to fish species outside of this definition, the assessment of potential effects to the indicator species will likely ensure that conditions are maintained which will protect a broad spectrum of freshwater aquatic species.				
322.4.3.1	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Local Study Area will need to be larger than 300m in many cases. Methodologies for determining zone of impact should be based on site specific criteria and not just set as an arbitrary zone that may be inadequate for some parts of the project (e.g. steep terrain).	The LAA (Local Assessment Area) is the area for which the standard baseline studies are conducted to facilitate habitat characterization in the zone of influence and also to facilitate minor adjustments in the pipeline alignment due to environmental or engineering concerns. At larger, and more sensitive watercourses, assessment will include areas much further downstream (1 km or more) depending on site specific conditions and the expected zone of influence.				Updated response to Round 1 working group comment The following will be added to the LAA definition in section 4.3.1. "At larger, and more sensitive watercourses, assessment will include areas up to 1 km downstream depending on site specific conditions." Edits to the dAIR required.
323.4.3.1	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	"Regional Assessment Area: includes a 1.1 km section of the stream that extends 100 m upstream and 1,000 m downstream from the pipeline ROW or new access road." Should include ALL access roads, not just new. Many old roads in the study area have been de-commissioned or are now over grown and/or abandoned (e.g. old forestry access roads). By re-activating these roads there could potentially be an impact and should be assessed and mitigated during the construction and operation of the project.	See Standard Response 17. The definition will be changed to include all areas where a potential disturbance may occur (e.g., old and new roads). The dAIR will be updated to reflect the change.				Updated response to Round 1 working group comment The following will be added to the LAA definition in section 4.3.1. "At larger, and more sensitive watercourses, assessment will include areas up to 1 km downstream depending on site specific conditions." The revised language in the dAIR allows for a larger area to be considered where relevant in both the LAA and RAA. In addition, the revised definition of the LAA allows for inclusion of a larger area downstream in larger rivers or more sensitive habitats. Edits to the dAIR required.
324.4.3.1	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Regional Assessment Area will need to be much larger than 1.1 km from the pipeline ROW in some cases. This is especially true in steep terrain in the coastal mountains on the westerly side of the project. The Proponent should not arbitrarily cut the RAA short without considering site specific characteristics.	See Standard Response 17.				Updated response to Round 1 working group comment The following will be added to the LAA definition in section 4.3.1. "At larger, and more sensitive watercourses, assessment will include areas up to 1 km downstream depending on site specific conditions." The revised language in the dAIR allows for a larger area to be considered where relevant in both the LAA and RAA. In addition, the revised definition of the LAA allows for inclusion of a larger area downstream in larger rivers or more sensitive habitats. Edits to the dAIR required.
325.4.3.2	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	"Assessment of habitat availability for indicators within the LAA derived from field fish surveys completed in 2013 and known species distributions." There was only one season of field surveys completed in 2013, at least two seasons of sampling should be performed, therefore additional sampling will be required in 2014 (or beyond).	Two seasons of fish sampling are required to confirm fish absence at a watercourse for which no historical fish information is available. For the purposes of this assessment, fish presence is assumed in all watercourses, except in those cases where fish absence is known from historical records, or in those cases where the watercourse does not provide the minimum conditions to support fish.				
326.4.3.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	"Available TK must be considered in the assessment of potential effects and identification of mitigation measures." This statement should further read that the proponent will adequately consult with First Nations along the route to ensure they have an opportunity to share TK and that TK will be adequately used to minimize the potential impacts of the project on Freshwater and Aquatic Resources.	See Standard Response 2 and Standard Response 5. No changes to the dAIR are required.				Updated response to Round 1 working group comment The collection of Traditional Knowledge (TK) for the proposed Project includes, but is not limited to, Traditional Ecological Knowledge (TEK) information shared by community members during biophysical field studies, and Traditional Land Use (TLU) studies from potentially affected Aboriginal communities. TK was also collected from the following secondary sources: • publicly available TEK and TLU reports, • publicly available reports that cite TEK and TLU results, • open houses and community gatherings, • meetings and conversations with Aboriginal community representatives, and • Geographic Information System (GIS) tools to determine spatial relationships of source data to the proposed Project.
327.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	This section provides no detail on what methodology will be used to determine 1) baseline conditions for wildlife populations 2) habitat assessment or 3) actual effects on wildlife. This section has no mention of considering special wildlife/ecosystem related sections in the Gitanayow Land Use Plan.	The Gitanayow Land Use Plan (legislated through the Cranberry, Nass South and Kalam SRMPs) will be referenced in the Application, and wildlife management objectives will be considered. Effects assessment methods will be described in the Application and supporting Technical Appendices. No changes to the dAIR are required.				
328.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Requires specific reference to the wildlife management zones, and wildlife management objectives established through the Gitanayow Land Use Plan (legislated through the Cranberry, Nass South and Kalam SRMPs).	The Gitanayow Land Use Plan (legislated through the Cranberry, Nass South and Kalam SRMPs) will be referenced in the Application, and wildlife management objectives will be considered. No changes to the dAIR are required.				
329.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Regional Study Area needs to be expanded for grizzly bears and moose in some parts of the projects. RSA for moose in the Nass need to be based on population units. 70% of Nass moose (winterer) in the Cranberry floodplains, within the study area. These moose are currently of great concern because their populations have been in steep decline (~65% decrease between 2001 and 2011). Because most of the Nass moose rely on the Cranberry wintering grounds the RSA should be expanded to include the entire range of Nass moose. Grizzly bear RSA should be based on population units.	Specific to Grizzly Bear, PRGT will consult with regulatory agencies (i.e., BC MOE or BC MFLNRD) on the use of appropriate assessment boundaries; results will be summarized at least by each Grizzly Bear Population Unit. A larger RAA is not considered for moose, but any important moose areas occurring in the RAA for the Wildlife and Wildlife Habitat VC will be considered in the assessment. The Gitanayow Land Use Plan (legislated through the Cranberry, Nass South and Kalam SRMPs) will be referenced in the Application, and wildlife management objectives will be considered.				Updated response to Round 1 working group comment PRGT did consult with BC MOE (Tony Hamilton, Large Carnivore Specialist, Victoria) on the development of Project-specific Grizzly Bear Assessment Areas (GBAAs). The GBAAs take into consideration a sub-regional analysis of potential effects and are based on primary driving factors (i.e., height of land and major rivers or lakes) that determine female home range boundaries. The GBAAs include portions of Grizzly Bear Population Units (GBPUs), as it was felt by MOE that the GBPUs were not an appropriate assessment boundary (i.e., too large to be meaningful) for a long linear project. The GBAAs also account for regional differences in home range size (smaller on the coast, larger in the interior). Moose population units have not been defined for the Province. The RAA for moose is as defined in the dAIR - a 30-km wide band centred on the Project centreline. Change in habitat is assessed for the entire Project, but quantitatively broken down in to various administrative boundaries, including Land and Resource Management Plans and Sustainable Resource Management Plans areas, Hogg's Lands, and the Coast Land Use Decision Implementation area. The Application will assess mortality risk for moose using the GBA boundaries as a surrogate. The Project does not interact with any Provincially-defined Ungulate Winter Range or Wildlife Habitat Area for moose. Discussions with Gitanayow First Nation resulted in substantial changes to the original preferred route in the Cranberry SRMP area as to avoid moose winter habitat (among other valued areas).
330.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	The Application should incorporate all of the wildlife and other Gitanayow Land Use Plan zonations for habitat, as well as management objectives, targets, and direction. The GLLUP has been the focus of the majority of consultation with the Proponent and the EAO, to date on this project. This should be reflected in the AIR.	See Standard Response 20.				
331.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	Proponent must clearly state that they will conduct an assessment on the effects on predator-prey interactions in relation to the pipeline corridor, specifically in relation to moose, wolf and bear (black and grizzly).	Change in mortality risk will be assessed for all key indicator species. A specific quantitative assessment of change in mortality risk as it pertains to change in access will be completed for caribou and grizzly bear (i.e., incremental contribution to motorized vehicle access or predator access). Change in access can be inferred from these indicators. Project mitigation measures, as well as an Access Management Plan, will be developed to reduce adverse residual or cumulative effects associated with change in access. No change to the dAIR is required.				Updated response to Round 1 working group comment The Application will include discussion points on predator-prey interactions as it pertains to moose, wolf and bear.
332.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	This project is being proposed in a region which has already experienced significant industrial impact due to forestry and highway development, which has caused negative impacts to wildlife and biodiversity. Furthermore, this region is currently experiencing significant development from electrical infrastructure, mining exploration and construction, hydroelectric development, in addition to other existing industries (forestry, well-siting, commercial sport fishing, guide outfitting, etc.). There will be significant cumulative impacts in relation to the PRGT project. For these reasons the Proponent must participate in any regional cumulative effects processes, and contribute to the currently developing "Trust" fund designed to assess, prevent and mitigate cumulative impacts within this region.	A screening for the need to complete a detailed cumulative effects assessment will be completed for each indicator species in the wildlife and wildlife habitat VC. The screening will include the consideration of the cumulative contribution of past and existing disturbances, as well as reasonably foreseeable projects and activities, in conjunction with residual Project effects. A detailed cumulative effects assessment will be completed as per section 3.9 of the dAIR.				
333.4.5.3	Glen Williams - Chief Mali	Gitanayow Hereditary Chiefs	The AIR and subsequent EA application must include an assessment of traffic related impacts in association with this project. There will be increased traffic throughout the region and this will have an impact on wildlife populations. The AIR should also include a specific assessment on the impacts from helicopter traffic in association with all stages of this project.	Helicopter flyover and flight path will be occasional and transient, and only during the daytime hours. Traffic related impacts will be addressed in section 6.3 Transportation and Access. Helicopter traffic will also be addressed within section 6.3 only if applicable (i.e. if the Project is planning to use helicopters for transporting people or goods). The wildlife and wildlife habitat VC will cross-reference the findings with respect to effects on wildlife. Change in Mortality Risk is identified as a potential adverse effect. Collision potential with motor vehicles is expected to be negligible, particularly in light of mitigation (e.g., Traffic Management Plan, adherence to speed limits) and reporting requirements. Collision risk potential will be discussed in the Application.				In our previous comments (#333 from 2013-11-12) we indicated concern over the impacts from helicopter traffic. Our largest concern is for mountain goats where the literature clearly indicates a low tolerance for helicopter traffic, especially from Nov 1-June 15 each year. Your previous response was that this is not a concern because helicopter traffic would be "occasional and transient". The level of helicopter traffic since the baseline study commenced has been extremely high and from our experience flying as part of this project, helicopter pilots are not flying with an awareness of the potential effects on mountain goats (i.e. flying directly over escape terrain and actual goats). In moving forward, we are going to require that PRGT develop a mountain goat mitigation plan with respect to helicopters. We expect that during future assessments and construction, starting with next season, that there will be continued high levels of helicopter use, and that the level will taper off during operations. However, all industries in this area are using helicopters for transport and the cumulative effects of this on mountain goats is going un-monitored. In the EA application we expect to see PRGT develop a mountain goat helicopter mitigation plan, including prescribed and allowable flight paths. This is not unprecedented in this region or in our experience, as we have just recently done this with other companies. We expect to be fully consulted on this, prior to the onset of fieldwork next season. PRGT recognizes that mountain goat is sensitive to helicopter activity. In consideration of this comment, PRGT will commit to the development of a mountain goat helicopter mitigation plan. Development of the plan will include consultation with the appropriate regulatory agencies and interested Aboriginal groups, including the Gitanayow. Applicable Transport Canada safety guidelines will be included in the plan, as well as existing guidance documents (e.g., Peace Region Guidelines) and available literature for reducing adverse effects.

334	4.5.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	The Proponent must consult Gitanyow technical staff with respect to mitigation of negative effects on wildlife. It is proposed that this becomes a sub-working group at an early stage. Initial key areas with respect to mitigation of wildlife impacts include: <ul style="list-style-type: none"> Retaining significant amounts of coarse woody debris along the ROW instead of burning (benefits to small mammals, weasel, marten). Access management planning: attraction of wildlife to the ROW in conjunction to increased access can have negative results to wildlife populations. In our experience this is a very difficult issue to resolve, therefore requiring consultation at an early stage. Long term monitoring programs for key wildlife populations including grizzly bear, Kermode bear, moose, marten, fisher and wolverine, should form a key component of the Mitigation and Environmental Management strategy. This must include methodologies for before-after-control-impact (BACI) analysis, and adaptive management strategies to deal with any negative impacts that arise. <ul style="list-style-type: none"> Mitigation programs to minimize traffic related mortalities to wildlife. Mitigation programs to minimize stress caused by helicopter traffic. This must include developing accepted helicopter travel routes that reduce/eliminate impacts to mountain goat and other wildlife populations. 	Thank you for your comment. PRGT looks forward to ongoing consultation with the Gitanyow regarding mitigation of potential project effects on wildlife.			In our previous comments (#333 [NOTE: Should read comment #334] from 2013-11-12) we indicated the following: The Proponent must consult Gitanyow technical staff with respect to mitigation of negative effects on wildlife. It is proposed that this becomes a sub-working group at an early stage. Initial key areas with respect to mitigation of wildlife impacts include: <ul style="list-style-type: none"> Retaining significant amounts of coarse woody debris along the ROW instead of burning (benefits to small mammals, weasel, marten). Access management planning: attraction of wildlife to the ROW in conjunction to increased access can have negative results to wildlife populations. In our experience this is a very difficult issue to resolve, therefore requiring consultation at an early stage. Long term monitoring programs for key wildlife populations including grizzly bear, Kermode bear, moose, marten, fisher and wolverine, should form a key component of the Mitigation and Environmental Management strategy. This must include methodologies for before-after-control-impact (BACI) analysis, and adaptive management strategies to deal with any negative impacts that arise. <ul style="list-style-type: none"> Mitigation programs to minimize traffic related mortalities to wildlife. Mitigation programs to minimize stress caused by helicopter traffic. This must include developing accepted helicopter travel routes that reduce/eliminate impacts to mountain goat and other wildlife populations. PRGT will continue to consult with the Gitanyow regarding the mitigation of potential residual effects on wildlife. This includes development of an Access Management Plan, and most recently on the development of a mountain goat helicopter mitigation plan. Regarding initial discussion with Gitanyow on routing and sensitive areas, PRGT is of the opinion that key impacts have been addressed, and are thus out of scope with the dAR. Subsequently, PRGT will continue to consult with Gitanyow during the Application review stage process to address potential residual effects and related mitigation or monitoring requirements.
335	Table 4-9	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	Should include Wolverine, Kermode bears, other watershed such as geese. Add buffer: Socio-Cultural data provided by First Nations. Gitanyow has an agreement with Proponent to submit our own socio-cultural/economic data in the Gitanyow Wip-Based Socio-Cultural Needs Assessment, which the Proponent has committed to including in the Application. This would be similar to census data, but gathered for Wip members, as opposed to Indian Act band members, with more locally and culturally appropriate indicators.	See Standard Response 16			
336	5.2.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	See above comment on 5.2.2 (TT - previous comment reads.) Add buffer: Socio-Cultural data provided by First Nations. Gitanyow has an agreement with Proponent to submit our own socio-cultural/economic data in the Gitanyow Wip-Based Socio-Cultural Needs Assessment, which the Proponent has committed to including in the Application. This would be similar to census data, but gathered for Wip members, as opposed to Indian Act band members, with more locally and culturally appropriate indicators.	The relevant socio-economic data provided by Gitanyow will be included in Section 11 of the Application if submitted in time to facilitate its inclusion. No changes to the dAR required.			
337	6.2.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs		PRGT is confident that the proposed archeological and heritage resources assessment as set out in the dAR will identify any potential significant adverse effects, and identify practical means to avoid or reduce such effects. Additional information on Aboriginal tangible and intangible cultural effects will be further covered in Section 11. See Standard Response 41. No changes to the dAR are required. PRGT is committed to continuing to engage Gitanyow in the identification and assessment of potential adverse effects on their Aboriginal interests.			Updated response to Round 1 working group comment - Cultural Sites, as defined by First Nations will be addressed in Part C of the Application.
338	Table 7-1	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	Add Cultural Sites, as identified by affected First Nations. See Gitanyow Cultural Heritage Management Policy for definition and management direction regarding Cultural Sites and Resources. This Policy is referred to in the Gitanyow Recognition & Reconciliation Agreement, 2012.	No changes to the dAR are required. PRGT does not believe that a specific reference to Section 33 of the Nisa's Final Agreement is required. No changes to the dAR are required.			
339	Table 12-1	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	Add a reference to Section 33 of the NFA (non-derogation clause) which ensures the NFA will not affect any other First Nations rights and title. Misinterpretation of the NFA rights within the Nass Wildlife Area has resulted in impacts/infringements to Gitanyow rights and title, and specific and agreed measures to avoid this need to be undertaken by both the Proponent and the Province. See Comment 10 in this sheet. (TT - Comment 10 reads.)				
340	14.1.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs	The application should describe quantitatively how this project will affect British Columbia's ability to achieve the greenhouse gas (GHG) emissions reductions as outlined in the Greenhouse Gas Reduction Targets Act. Gitanyow is aware that the proponent is not responsible for other projects or government initiatives that may/may not prevent BC from achieving its GHG reduction targets. However, climate change is a high over-arching environmental issue that is of major concern to Gitanyow. It is clear that this project would result in massive GHG emissions. Recent evaluations have shown however that, depending on how this project is designed and executed, there can be a significant variance in the amount of GHGs released (Grove and Moorhouse, 2013. Report attached for ease of reference). In the context of this EA Application, it is critical that the proponent describes in quantitative terms the amount of GHGs that will be released through all aspects of the project, from wellhead to LNG terminal. Furthermore, the proponent should describe how this level of GHGs will impact BC's ability to achieve its GHG reduction targets.	See Standard Response 23.			
341		Dan Bernier	Halfway River First Nation	This section should include a statement that the Application will describe the scope of the EA pursuant to the BC Environmental Assessment Act Section 11 Order issued by the BC Environmental Assessment Office, and that the Application will meet the requirements of the Canadian Environmental Assessment Act, 2012. For each criterion listed, the major factors considered in the decision-making process should be described, to ensure that the factors necessary to evaluate alternative means of undertaking the Project will be considered in the EA. For example, when considering alternatives for watercourse crossings, it is important to consider hydrological factors, including the characteristics of watersheds and associated runoff potential, and potential for frequent and/or high-magnitude flash floods. Such factors are important when considering alternatives for crossing structures, crossing location, construction methods and timing, etc.	On October 24, 2013, the CEA Agency released regulations amending the Designated Physical Activities Regulation. The amendment removed reference to 75 km of new pipeline right-of-way and therefore, CEA is no longer applicable to the PRGT project. The dAR will be amended to reflect this change.			
342	1.4	Dan Bernier	Halfway River First Nation		A more detailed discussion of the factors considered for each criteria listed in Section 1.4 will be included in the Application. The indicator species include those species that are part of an Aboriginal fishery, as included in the current Fisheries Act. This also includes fish species that may not be directly part of a fishery, but also those that support fish species that are part of a fishery (e.g., a fish species that is commonly preyed upon by a species that is part of a fishery). While the assessment does not directly refer to fish species outside of this definition, the assessment of potential effects to the indicator species will likely ensure that conditions are maintained which will protect a broad spectrum of freshwater aquatic species. Changes to fish habitat and water quality are the potential effects that are being assessed for the receptors - the indicator species, as these are the environmental conditions upon which the indicator species rely on to complete their life cycles. See Standard Response 8.			
343	3.1	Dan Bernier	Halfway River First Nation	The following indicators should be listed for the "Freshwater Aquatic Resources" VC: (1) species of fish that are part of a commercial, recreational or Aboriginal fishery, and species that are important for cultural or traditional use, (2) Species of fish that are provincially or federally listed, or are considered of special management interest under a planning initiative (e.g., regional land use plan, BC Conservation Framework), (3) Fish habitat, (4) Surface water quality, (5) Groundwater quality. The current "Water Quality" indicator should be divided into "Surface Water Quality" and "Groundwater Quality". HRFN understands that in many areas along the pipeline route there is little or no information on groundwater - aquifer mapping has not been undertaken and groundwater quality is unknown. In order to assess potential impacts of the Project on groundwater, e.g., from disposal of hydrostatic test water or spills/leaks of deleterious substances, baseline information on groundwater must be available and obtained through a sampling program, if necessary. HRFN notes that for the proposed Spectra natural gas transmission project, water sampling will be conducted prior to construction for all groundwater wells located within 500 metres of the pipeline right-of-way to obtain baseline data. The wells will also be sampled following pipeline construction to determine the extent to which groundwater quality and quantity has been affected by the pipeline.	Oil and Gas Commission comment on response to Round 1 Halfway River First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to groundwater, water quality and water quantity in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act. Thank you for your comment regarding requirements during the permitting stage - we will be sure to address this.			
344	3.1	Dan Bernier	Halfway River First Nation		Interactions with water quality due to spills will be addressed in the context of accidents and malfunctions (see Section 6 of the dAR). See Standard Response 8.			
345	3.1	Dan Bernier	Halfway River First Nation	Bats are not currently considered as a key indicator. The primary potential effect of the project on bats would be change in habitat, specifically old forest and wetlands. Several key indicators presently chosen are considered appropriate suitable surrogates, namely: fisher, marten, old seral forest song birds, wetland birds, olive-sided flycatcher, Canada warbler, marbled murrelet, western screech-owl and northern goshawk. The old-growth forest indicator would also be considered an appropriate surrogate. Potential effects of the Project on beaver, lynx and wolverine can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, grizzly bear, caribou, moose, fisher and marten are all examples of species indicators that would collectively have similar and overlapping habitat requirements. See Standard Response 16.				
346	3.1	Dan Bernier	Halfway River First Nation	Wildlife and Wildlife Habitat VC - Beaver, lynx, and wolverine should be added to the list of indicators for the "Wildlife and Wildlife Habitat" VC. All commercially valuable fur-bearing species are important to First Nations and should be included as indicators. Additionally, the PRGT should consider including bat species, especially those identified by the Conservation Data Centre.	Clarification is required regarding what the commenter means by "Ecological communities of special management interest". Baseline wetland function and wetland classification will be classified using the following characteristics: hydrological function (e.g., hydrogeomorphic setting); habitat function (e.g., vegetation indicator species); and biogeochemical function (e.g., substrate characteristics). The following indicators will be used for the Vegetation and Wetland Resources VC as outlined in the dAR: (1) Plant species at risk are an existing indicator. (2) The indicator "Ecological communities at risk" will be changed to include "or of special management interest. The best available information will be used to incorporate Wildlife Tree Retention in the assessment within this indicator. Clarification is required regarding what the commenter means by "Ecological communities of special management interest". (3) Traditional use species are an existing indicator. The species list has been developed in consultation with the TEK/TLU program, which included substantial Aboriginal input. (4) Wetlands are an existing indicator. Wetland function will be assessed through potential changes to wetland habitat and hydrology. PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen and that biogeochemistry as a measurable parameter is outside of the scope of this assessment. (5) Old growth forests, including Old Growth Management Areas, are an existing indicator. (6) Invasive plant species are an existing indicator. Aboriginal Land Use, including current land use, will be considered in Part C of the Application.			
347	3.1	Dan Bernier	Halfway River First Nation	The following indicators should be listed for the "Vegetation and Wetland Resources" VC: (1) Plant species at risk, (2) Ecological communities at risk or of special management interest, (3) Traditionally important species as identified by Aboriginal communities, (4) wetland function (habitat, hydrologic, biogeochemical), (5) old growth forests, including Old Growth Management Areas, (6) invasive plant species. HRFN requests the addition of a "Current First Nations Land Use" indicator under the Land and Resource Use VC which could include seasonal camp sites, trails, trapping areas, fishing areas and plant gathering areas that are not "historic".	No changes to the dAR required.			
348	3.1	Dan Bernier	Halfway River First Nation	Human Health VC - The following indicators should be listed for the "Human Health" VC: (1) Drinking water quality (2) Air quality (3) Country foods (i.e., berries, moose, elk, rainbow trout, grouse) (4) Sediment quality. The addition of "Drinking Water Quality" as an indicator for human health is appropriate to reflect the potential interactions of the Project with the HRFN community.	The potential for changes to ambient air quality, sediment quality, and the quality of marine traditional and country foods will be assessed for the Human Health VC. PRGT feels that this approach and scope is sufficient to address plausible chemical exposure scenarios. Potential changes to surface water quality will be assessed under the Freshwater Aquatic Resources VC. This is related to potential short-term turbidity effects and is not associated with chemical exposures.			
349	3.1	Dan Bernier	Halfway River First Nation	The existing "Marine Country Foods" indicator should be changed to consider all Country foods, as the availability of traditional foods, which is of paramount importance to HRFN, is not adequately considered by the other VCs and indicators. HRFN country foods include Rainbow Trout, berries, moose, elk and grouse.	The potential for changes to sediment quality and the quality of marine traditional and country foods will be assessed for the Human Health VC. PRGT feels that this approach and scope is sufficient to address plausible chemical exposure scenarios. Unplanned releases or leaks of product will be addressed in the Accidents and Malfunctions section of the Application. See Standard Response 40.			
350	3.2.1	Dan Bernier	Halfway River First Nation	HRFN feels that the proposed Local Area Assessment (LAA) boundaries (100 metres upstream and 300 metres downstream of crossing locations) for "Freshwater Aquatic Resources" is inadequate to assess negative impacts to fish and fish habitat should the construction of the pipeline or design or installation of a stream crossing structure result in a blockage to upstream movement. For example, undersized culverts can result in velocity barriers within culverts during high flow periods. Additionally, an undersized or improperly installed culvert can result in buffer scouring and the creation of a "perched" culvert, which prevents fish from entering the culvert. Although HRFN recognizes that PRGT intends to follow Provincial standards for stream crossing design and construction, unforeseen natural events can result in the failure of a crossing structure to function as designed/installed, resulting in a blockage to fish movement. Certain fish species (e.g., salmon, trout, suckers) migrate large distances during spawning periods and the blockage of migrating fish, even a temporary blockage, could significantly affect fish production for a particular year class. Impacts could be significant if spawning success had been poor in successive previous years, perhaps due to low streamflow, or the fish blocked were part of a rare population. An upstream LAA boundary of 100 metres is clearly inadequate to assess impacts resulting from a blockage to fish movement. HRFN requests that, for migratory fish species included as VC indicators, this boundary be changed to the boundary of the watershed. HRFN also requests that the downstream LAA boundary be changed from 300 metres to one kilometre. Sediment plumes emanating from pipeline or watercourse construction sites could easily extend greater than 300 metres below such sites.	The LSA is the area for which the standard baseline studies are conducted to facilitate habitat characterization in the zone of influence and also to facilitate minor adjustments in the pipeline alignment due to environmental or engineering concerns. At larger, and more sensitive watercourse crossings, assessment will include the areas further downstream (1 km or more) depending on site specific conditions and the expected zone of influence. The majority of the watercourse crossings associated with the project are pipeline crossings at which the pipe will be installed well below the substrate level of each watercourse. There will be no culverts or potential barriers associated with these crossings. At access road crossings where a culvert or clear-span structure is installed, unobstructed fish passage must be ensured. If a barrier is created, this would be deemed an unauthorized destruction of fish habitat under the Fisheries Act, and the barrier would need to be removed and access to the upstream habitat reinstated.			
351	3.2.2	Dan Bernier	Halfway River First Nation	In order for an acceptable EA to be completed for the Project, the temporal boundaries must include decommissioning and abandonment. HRFN does not consider a 40-year operational phase to be sufficiently "long-term" to justify the exclusion of an assessment of the potential effects of decommissioning and abandonment within this EA. HRFN further notes that the temporal boundaries for the EA of the proposed Coastal GasLink Project include decommissioning and abandonment, and that the Coastal GasLink Project is subject to a federal EA under the direction of the National Energy Board. There is a reasonable likelihood that a federal EA will also be required for the Project, with an requirement that the scope of the EA include decommissioning and abandonment.	Through consultation with the EAO, it was determined that the assessment of decommissioning and abandonment phase is not required for this Project. With planned engineering design and maintenance activities, the need for decommissioning is not foreseen. If decommissioning is required in the future, it would be subject to the regulatory requirements current at that time.			
352	3.3	Dan Bernier	Halfway River First Nation	The dAR should include the provincial and federal standards and guidelines by which baseline information for each VC will be collected, analyzed, and interpreted. For each VC indicator for which baseline information will be collected (e.g., Wildlife and Wildlife Habitat), the type of survey(s) to be conducted and the standard/guideline to be followed, should be listed. Where a particular standard or guideline includes multiple levels of intensity, the intensity level to be followed should be indicated. This information should either be presented in Section 3.3 or Section 4.0 of the dAR. In HRFN's view, this information has been correctly provided for the Vegetation and Wetland Resources VC only.	Standards, guidelines and methods pertaining to the assessment of potential effects on each VC, including for each of the indicators, will be provided in the Application and associated Technical Appendices. Although this level of detail is provided in the Vegetation and Wetland Resources VC it is not required in the dAR.			
353	3.3	Dan Bernier	Halfway River First Nation	Section 3.3 should indicate that the Application will state that existing data used as baseline information will be rigorously assessed for quality and applicability, and that data gaps, inaccuracies and uncertainties will be identified. Further, this section should state that the Application will include input data quality assessments for all existing data that are utilized in the EA.	Section 3.3 states "Appending and/or reference relevant reports and documents as appropriate." Your comment regarding rigorous review of these data sources for quality and applicability is inherent in preparing a strong, defensible environmental assessment. In addition, rigorous quality assurance/quality control on baseline data collected by PRGT is similarly inherent in preparing a defensible EA. Any data gaps or deficiencies identified during the EA process will be addressed.			
354	3.7	Dan Bernier	Halfway River First Nation	Section 3.7 should include criteria to be used to characterize any residual adverse effects, including residual cumulative effects that may result from the Project, e.g., for each residual effect identified, its spatial and temporal boundaries, magnitude, and probability of occurrence should be stated.	The criteria that will be used to characterize residual effects are listed in Section 3.6 and will be defined in the Application. These criteria will be applied when assessing effects on individual VCs and indicators as well as cumulative effects. A discussion surrounding prediction confidence (probability of occurrence) will also be presented (as outlined in Section 3.8 of the dAR).			

355.3.9	Dan Bernier	Halfway River First Nation	HRFN believes that an assessment of cumulative effects as proposed would be inadequate due to the exclusion of some projects from the assessment of cumulative effects. Table 3-4 should include proposed natural gas extraction projects, including those that would involve fracking, and the proposed Enbridge Northern Gateway and Aitken-Kahla transmission projects. HRFN notes that the Aitken-Kahla project could extend to within approximately 5 kilometres of the HRFN reserve.	The list of proposed projects and activities (Table 3-4) that will be considered in the cumulative effects assessment is based on a major projects inventory available at the time of dAAR development. This list will be refined by PRGT subject to review by the Working Group and confirmation from the EAO. The process and methodology for conducting the cumulative effects assessment is described in section 3.8.2. See Table 3-4 for edits to the inclusion list. Northern Gateway Pipeline has been included and Aitken, Kahla Transmission Project will be considered in future edits to the dAAR when developing the Project inclusion list.			Updated response to Round 1 working group comment The Aitken-Kahla transmission project is included in the cumulative effects table E3-4 in the December 2013 version of the dAAR under the North Montney Project. Aitken Creek and Kahla are the two sections of the North Montney Project.
356.4.3	Dan Bernier	Halfway River First Nation	The importance of water quality is significantly understated in the dAAR. Water quality is listed as an indicator for the Freshwater Aquatic Resources VC, yet it is not listed as an indicator in Table 4-5. There is no reference to water quality in Section 4.3, other than in Table 4-6. There is no indication in the dAAR as to whether or not the quality of both surface and groundwater will be considered in the EA. Neither sampling methodology nor sampling locations (e.g. watercourse crossings) have been stated. Also, whereas Table 2 of the InPhase Rupert Gas Transmission Project - Selection of Valued Components document (Aug. 16, 2013) indicates that sampling for total suspended solids, pH, and metal will be conducted, Table 4-6 of the dAAR indicates that only pH and levels of total suspended solids will be determined. Table 4-6 should indicate that metal levels will be determined as well.	See Standard Response 8.			
357.4.3.2	Dan Bernier	Halfway River First Nation	Section 4.3.2 should include the standards and guidelines by which baseline information will be collected, analyzed and interpreted, e.g., for the collection of field data, relevant guidebooks and standards, such as the Fish Stream Identification Guidebook, Riparian Management Area Guidebook, and Resource Inventory Standards Committee Fish Collection Methods and Standards should be referenced.	Appropriate BC standards, including RISC standards for fish and habitat sampling, were used in fish and fish habitat surveys. These methods will be provided in the baseline sections of the environmental assessment. No changes to the dAAR required.			
358.4.3.3	Dan Bernier	Halfway River First Nation	Table 4-6 should be changed to better reflect potential negative effects to fish and fish habitat and eliminate the subjectivity associated with the potential effects. "Changes in habitat" is a subjective evaluation, is open to interpretation, and impossible to quantify. In fact, there would be three significant habitat-related impacts (unrelated to water quality) that could result from the project, each of which may be measured. They are: (1) The amount of habitat harmfully altered (e.g., natural cobble habitat replaced by metal culvert); (2) The amount of habitat destroyed (e.g., habitat infilled at a road crossing); (3) The amount of habitat affected by partial or complete blockages to fish movement. The other 2 Potential Adverse Project Effects are (4) Fish mortality and (5) Changes in Water Quality. The corresponding Measurable Parameters would be: (1) Area (ha) of habitat affected; (2) Area (ha) or habitat affected; (3) Area (ha) completely or partially blocked; (4) Number of dead or moribund fish; and (5) pH, metals and TSS. Further, "Change in mortality risk" cannot be measured. However, numbers of dead or moribund fish may be determined.	Measurable parameters for change in fish habitat include the area (m ²) of altered or eliminated habitat (both riparian and instream) by any project activity. Within the assessment, all potential pathways-of-effects (e.g., vegetation clearing, placement of material, or structures in water) that can lead to alterations or destruction of fish habitat are identified and the potential change in available habitat is assessed for each pathway. The crossing method selection process will use a combination of stream morphology, fish habitat characteristics, fish habitat sensitivity, fish presence, fish species sensitivity, and engineering concerns to identify the best crossing method. The process relies on aspects of DFO's "Fisheries Protection Program", formerly known as the "Fish Habitat Management Program". Mitigation measures and monitoring requirements will all be included in the assessment. See Standard Response 35.			
359.4.3.3	Dan Bernier	Halfway River First Nation	HRFN is concerned with the potential for erosion and sedimentation at locations where streams will be crossed by the pipeline or by new access roads. PRGT states that there are over 1800 stream crossings along the proposed route. The dAAR should indicate that the Application will include the criteria by which decisions will be made as to the type of stream crossing undertaken (e.g., open cut, HDD, bridge, culvert), the type of crossing/crossing structure planned for each crossing, and information regarding third party environmental monitoring.	Oil and Gas Commission comment on response to Round 1 Halfway River First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to sedimentation in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.			
360.4.5.1	Dan Bernier	Halfway River First Nation	HRFN requests that Table 4-9 be amended to include all commercially trapped fur-bearing species, which would require the addition of beaver, lynx and wolverine. In addition, PRGT should also consider adding bat species to the Table, particularly those that are listed in the BC Conservation Data Centre.	Bats are not currently considered as a key indicator. The primary potential effect of the project on bats would be change in habitat, specifically old forest and wetlands. Several key indicators presently chosen are considered appropriate suitable surrogates, namely: fisher, martin, old forest song birds, wetland birds, olive-sided flycatcher, Canada warbler, marbled murrelet, western screech-owl and northern goshawk. The old-growth forest indicator would also be considered an appropriate surrogate. Potential effects of the project on beaver, lynx and wolverine can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, gizzly bear, caribou, moose, fisher and marten are all examples of species indicators that would collectively have similar and overlapping habitat requirements. See Standard Response 36.			
361.4.5.1	Dan Bernier	Halfway River First Nation	HRFN is concerned that LAA of 2 km and a Regional Assessment Area (RAA) of 30 km may be insufficient to adequately assess the potential impacts of the Project on some indicator species such as grizzly bear. HRFN requests that PRGT re-assess the appropriateness of LAA and RAA boundaries on a species-by-species basis.	See Standard Response 24.			
362.4.5.2	Dan Bernier	Halfway River First Nation	Standards and guidelines documenting how baseline information for all VC Indicators will be collected, analyzed and interpreted need to be included in the dAAR. These would include standards for wildlife inventory, terrestrial ecosystem mapping (TEM), wildlife habitat rating, etc.	See Standard Response 24.			Updated response to Round 1 working group comment The requirement to include standards and guidelines that document how baseline information will be collected, analyzed and interpreted is already addressed in bullet 2 of Section 3.3 (Description of Existing Conditions): "Collecting, analyzing, and presenting data following appropriate provincial or federal standards and guidelines (e.g., Resource Information Standards Committee)".
363.4.5.2	Dan Bernier	Halfway River First Nation	HRFN specifically requests baseline information on existing wildlife use patterns for the indicator species in all seasons, which would require winter track counts for ungulates and furbeaters.	PRGT is using remote cameras as a method for assessing wildlife use patterns of large mammals (e.g. bears, ungulates, wolves). The cameras are operational 24-hours a day, 7 days a week and will be in use for up to a year since deployment. Subsequently, data from the cameras will represent all seasons for these mammals. In combination with the use of remote, PRGT is also conducting surveys of songbirds and amphibians, and completion habitat assessments for all terrestrial indicators. Winter track surveys are not currently planned. See Standard Response 26.			
364.4.5.2	Dan Bernier	Halfway River First Nation	TEM or LIDAR should be used, where appropriate, to assess habitat availability for indicator species. The currently-proposed level of TEM (SIL 5) should be improved to a survey intensity level 6 for this purpose.	Final survey intensity will be closer to 12% when all field data and historical data are included. Wetlands and atypical ecosystems were heavily sampled to ensure a higher level of intensity for these types. The TEM Sampling Plan was geared toward ground sampling of all mapped potentially listed ecological communities; when encountered field crews were expected to complete a ground plot at a minimum and preferably an Ecosystem Field Form (FSB2). Taken together, these efforts resulted in a higher level of sampling intensity for these ecosystem types. As indicated in Section 4.5.2 the Application will consider species of management concern, particularly those selected as indicators, with respect to baseline conditions and any Project related effects on ongoing management efforts for those species. See Standard Response 27.			
365.4.5.2	Dan Bernier	Halfway River First Nation	HRFN requests that Section 4.5.2 specify that the Application will also indicate that baseline data on species of concern (provincially-listed red and blue species and species listed under the Federal Species at Risk Act) will be used to evaluate the Project's potential effect on current and future recovery effort for species of concern.	See Standard Response 28.			
366.4.5.3	Dan Bernier	Halfway River First Nation	Section 4.5.2 of the dAAR indicates, correctly, that the Application will describe and characterize wildlife habitat conditions along the pipeline corridor, including important habitat features such as dams. However, while Section 4.5.3 indicates that a qualitative assessment of potential impacts to marine bird habitat will be made, there is no indication that impacts to terrestrial wildlife habitat features will be assessed, either in the text or in Table 4-10.	All wetlands will be classified to Class within the RAA and to Association where field data permits; mapping wetland complexes outside of the RAA is outside of the scope of this project. Wetland classification follows Land Management Handbook 52: Wetlands of British Columbia (Mackenzie and Moran 2004). Baseline wetland function and wetland classification will be classified using the following characteristics: hydrological function (e.g., hydrogeomorphic setting); habitat function (e.g., vegetation indicator species); and biogeochemical function (e.g., substrate characteristics). The following indicators will be used for the Vegetation and Wetland Resources VC as outlined in the dAAR: (1) Plant species at risk are an existing indicator. (2) The indicator "Ecological communities at risk" will be changed to include "or of special management interest." The best available information will be used to incorporate Wildlife Tree Retention in the assessment within this indicator. Clarification is required regarding what the commenter means by "Ecological communities of special management interest." (3) Traditional use species are an existing indicator. The species list has been developed in consultation with the TEK/TLI program, which included substantial Aboriginal input. (4) Wetlands are an existing indicator. Wetland function will be assessed through potential changes to wetland habitat and hydrology. PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen and that biochemistry as a measurable parameter is outside of the scope of this assessment. (5) Old growth forests, including Old Growth Management Areas, are an existing indicator. (6) Invasive plant species are an existing indicator.			Updated response to Round 1 working group comment Wetlands are an existing indicator in the Vegetation and Wetland Resources VC. PRGT believes the assessment of effects to wetlands is sufficient to understand potential effects of a pipeline on wetland function. The assessment will consider potential effects on both wetland communities (habitat) and will include a hydrology assessment (considering changes in flows and drainage patterns). PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen. Based on the environmental assessment of other pipeline projects, there is no rationale for a broader assessment. PRGT confirms that a follow-up and monitoring plan will be in place for wetlands; this commitment will be reflected in the Application as well as the Environmental Management Plan. Post-construction monitoring will be conducted during the first, third and fifth complete growing seasons following construction. The Company will record locations of concerns identified during construction related to weeds, vegetation establishment, general right-of-way conditions, water crossing stability, and reclamation success. This issues list will be used to measure success of mitigation measures used during construction of the Project, and to ensure outstanding issues are investigated, resolved and reported during the PCMP for the Project.
367.4.5.3	Dan Bernier	Halfway River First Nation	HRFN feels that there is little value in collecting information on important habitat features such as dams, mineral licks, wildlife trees, etc. if an assessment of likely impacts to such features will not be made. HRFN requests that the dAAR indicate that the Application will include an assessment of potential impacts to important wildlife habitat features. Table 4-10 should also include wildlife habitat features as a Measurable Parameter.	See Standard Response 28.			
368.4.6	Dan Bernier	Halfway River First Nation	It appears that information collected on wetlands will be insufficient to determine the potential impacts of the Project on wetlands and the species that depend on them. It is HRFN's view that "wetland function" should be included as an indicator for the Vegetation and Wetland Resources VC, and that function should be characterized by habitat function (e.g., vegetation indicator species), hydrology (e.g., hydrogeomorphic setting), and biogeochemistry. HRFN requests that wetlands be mapped and classified as requested and that the classification system(s) used, e.g., Canadian Wetland Classification System, is identified. HRFN also requests that wetland mapping extend beyond the boundaries of the LAA or RAA whenever wetland complexes are encountered.	LIDAR data has been used for mapping of existing vegetation and wetland cover. Methodologies used will be provided in the application and associated Appendix. These will conform to Schedule A for A/R lands and to TEM standards for non-A/R and forested lands as outlined by the Province. Aboriginal Land Use, including current land use, will be considered in Section 11 of the Application. No changes to the dAAR are required. PRGT has and will continue to provide opportunities for HRFN members to participate as environmental monitors for all archaeological work that will take place within HRFN territory. PRGT believes that, taken together, Section 11 of the Application, the related assessments conducted in the VC sections, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information (if provided by Halfway River First Nation) will address the interests raised by Halfway River First Nation and other Aboriginal groups regarding traditional/country foods. No changes to the dAAR are required.			Updated response to Round 1 working group comment Where available, LIDAR contours were used along with orthophotograph interpretation to define wetland boundaries. This will be reflected in the TOR methods.
369.4.6.2	Dan Bernier	Halfway River First Nation	HRFN expects that the best available information to describe and characterize existing vegetation and wetland conditions along the pipeline corridor will include LIDAR information.				
370.4.7.2	Dan Bernier	Halfway River First Nation	The dAAR should indicate that forest soils and agricultural soils will be assessed and mapped with the same intensity. Also, the specific approach and methods used to undertake soil survey field work and determine the potential effects of the Project on soils needs to be stated.				
371.6.0	Dan Bernier	Halfway River First Nation	HRFN requests that an indicator of "Current First Nations Land Use" be added to this section. While aspects of current First Nations land uses are discussed elsewhere in the dAAR, the topic should be treated on its own and include seasonal camp sites, trails, trapping areas, fishing areas and plant gathering areas that are not "historic".				Updated response to Round 1 working group comment Current First Nations Land Use, including seasonal camp sites, trails, trapping areas, fishing areas and plant gathering areas that are not "historic" are considered where information is relevant and available in Part C of the Application.
372.7.2.2	Dan Bernier	Halfway River First Nation	HRFN requests that HRFN members be given the opportunity to participate as environmental monitors for all archaeological work that will take place within HRFN territory.				
373.8.2.3	Dan Bernier	Halfway River First Nation	HRFN requests that "Water Quality" and "Country Foods" also be addressed in this Section. The diets of many HRFN members still largely consist of subsistence-type foods such as berries, fish and game. Access to an abundance of traditional foods is the highest priority for HRFN and although components of this proposed VC indicator are discussed elsewhere in the dAAR, country foods should be addressed as a separate entity.				
374.9	Dan Bernier	Halfway River First Nation	HRFN requests that this Section indicate that the Application will indicate how HRFN members will be contacted in the event of an accident or issue that could affect their health or well-being.	A list of management plans will be prepared for the PRGT Project which will include information detailing the reporting requirements and dissemination of information in the event of an accident or malfunction. During the permitting process, PRGT is required to meet the requirements relating to emergency response under the Oil and Gas Activities Act and associated regulations			Thank you for your comment regarding requirements for emergency response under the Gas Activities Act and associated regulations - we'll be sure to address this.
375.9	Dan Bernier	Halfway River First Nation	The specific accident/malfunction listed as "Leakage or failure of the pipeline during operation" should be re-worded as: "Leakage or failure of the pipeline to the terrestrial or aquatic environment during operation" so that both scenarios are addressed.	Effects of leakage or failure of the pipeline on terrestrial or aquatic environments will be considered in Section 9.0 of the Application. Updates to the dAAR not required.			
376.15	Dan Bernier	Halfway River First Nation	Unlike other proposed pipeline projects in BC, the dAAR provides little information on the nature of follow-up programs to be described in the Application - the follow-up strategy is described in one sentence. For example, the dAAR for the proposed Spectra natural gas transmission system describes in some detail the environmental management plans and compliance plans to be developed for each of the project's phases, including post-construction restoration and monitoring plans. HRFN request that the dAAR contain a commitment to monitor environmental, social and health indicators during construction, operations, and decommissioning. A commitment to developing an Access Management Plan and Decommissioning Plan is specifically requested.	Section 15 of the dAAR indicates that a description of the monitoring and follow-up programs that PRGT proposes to implement, including the activities, objectives, and reporting will be provided in the Application. Furthermore, reporting structure as identified within the environmental management plans, monitoring plans, and EA certificate will also be described. Updates to the dAAR not required.			
377	General Comment	Chief Gary Reece Lax Kw'alaams (Skaneateles Fisheries Commission)	1. Serious Deficiencies in Engagement/Consultation of Lax Kw'alaams in Pre-Application Period The dAAR and the presentation by the Proponent at the Working Group meeting of October 31, 2013, jointly are strongly indicative the Proponent is using, and plans to continue to use, an assessment approach that has not engaged or will not engage affected rights holding First Nations meaningfully in: 1. Identification of Valued Components ("VCs"), indicators and measurable parameters 2. Identification of appropriate methods 3. Identification of issues, spatial and temporal scope of assessment 4. Routing of Project and identification of criteria for assessment of alternatives 5. Identification of significance thresholds 6. Identification of potential impact pathways 7. Estimation of data sufficiency in secondary data being relied upon and identification of appropriate fieldwork to fill critical information deficits 8. Cumulative effects assessment ("CEA") across all categories 9. Identification of mitigation and monitoring needs 10. Estimation of significance 11. Development of the dAAR prior to its issuance by the Proponent to the EAO 12. Review of the Application in advance (see discussion point #2 below on the Proponent's unrealistically fast proposed turnaround of the A/R to Application filing) This is not evident of an adequate consultation approach or adequate consultation outcomes to date that will discharge legal obligations to consult with Lax Kw'alaams on the Project.	With respect, PRGT believes that it has used, and plans to continue using, a consultation approach that meaningfully engages First Nations. PRGT believes that between its own consultation efforts, and those led by EAO there have been and will continue to be - multiple opportunities for meaningful engagement of Aboriginal groups. No changes to the dAAR required.	Oil and Gas Commission comment on response to Round 1 Halfway River First Nation comment: During the permitting process, PRGT is required to meet the requirements relating to emergency response under the Oil and Gas Activities Act and associated regulations	Thank you for your comment regarding requirements for emergency response under the Gas Activities Act and associated regulations - we'll be sure to address this.	Comment regarding the adequacy of consultation process with Lax Kw'alaams directed to the EAO. Lax Kw'alaams remains concerned about the proposed level of consultation with First Nations on the issues identified. The proposed consultation process remains seriously deficient and does not provide the opportunity for meaningful consultation with First Nations. We reiterate our request for a higher level of consultation on the identified issues, as well as on the overall impact of the project.
							(Tracking Table comment) In the 243 comments #377 through #620 provided by Lax Kw'alaams, very few issues have been resolved. Lax Kw'alaams remains disappointed that PRGT has rejected the majority of substantive changes offered by Lax Kw'alaams. As a result, a very large number of critical and specific issues remain unresolved. This submission highlights only a selected portion of those particular critical issues raised by Lax Kw'alaams that have not been addressed in any revisions of the dAAR to date and does not reiterate all of the comments previously made, but not yet responded to by either PRGT or the EAO. Many of the comments in this submission refer to one or several specific comments in the tracking table issued in the email dated December 31, 2013. As a result, you will see many of the comments boxes empty. By no means does an absence of ADDITIONAL Lax Kw'alaams comment always indicate that the changes made to date in the dAAR (if any) has been adequate. PRGT will be submitting a letter to Lax Kw'alaams and the CAO addressing the comments provided by Lax Kw'alaams in the dAAR document. PRGT will continue to meet with Lax Kw'alaams in an effort to resolve outstanding issues.

378	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>2. Serious Problems with Proponent's Proposed Timeline for Application Submission At the Working Group meeting of October 17, 2013, BCEAO identified a potential AIR finalization date of January 17, 2014. The Proponent subsequently indicated at the same meeting that it effectively plans to have all of its Application materials drafted by mid-February for a late March, 2014, proposed filing date. Lax Kw'alems joins other attending First Nations who expressed serious concerns about the speed at which the Application is proposed to be submitted by the Proponent. The Proponent seems to have assumed that it will have all the information it needs to respond to the AIR prior to issuance, which seems optimistic given that the Proponent does not know what the final requirements of the AIR will be. This demonstrates the lack of a meaningful approach to the development of the AIR and the Application and significantly compromises consultation.</p> <p>Given the large amount of concern raised at the Working Group meeting about (1) the adequacy of the VCs and indicators proposed by the Proponent, (2) the lack of any real engagement to date on routing alternatives (including the five remaining routing alternatives through Lax Kw'alems territory), (3) inappropriate time pressure on First Nations (including Lax Kw'alems) to produce TLU/TK and socio-economic impact assessment ("SEIA") information and the lack of time to ground truth findings, and (4) the lack of information bases for a variety of VCs, including appropriate backcasting, among many other issues, Lax Kw'alems' strong view is that the Proponent's timelines will lead to the issuance of an inadequate Application that would not pass a meaningful conformity check and will not adequately capture or deal with Lax Kw'alems' interests. Lax Kw'alems is opposed to the schedule as set out by the Proponent, given the risks it represents to any proper assessment of our rights and interests and calls on the EAO and the Proponent to discuss with Lax Kw'alems what a realistic schedule might be. Two key issues, among others, that undermine meaningful consultation at this time are that no capacity funding has been provided by the Proponent, the EAO or the Crown otherwise, to support consultation and no site- and Project-specific assessment has been undertaken by Lax Kw'alems to assess the impacts of what is proposed on our rights and title interests. As a result, at present and in the future, Lax Kw'alems' interest assessment has been in its ability to participate in meaningful consultation because we have not been able to take the steps necessary to support and inform consultation.</p> <p>In addition, issuance of a premature Application by March, 2014 would likely preclude the ability for the EAO to schedule Working Group and sub-Working Group meetings between the AIR being issued and the Application being finalized. EAO expressed a desire, supported by Lax Kw'alems, to have such meetings in the AIR-Application interim in order to guide the Proponent on how to meet the requirements of the AIR. Such important meetings would either be impossible to schedule in such a truncated time period or have little meaning if the Proponent has already effectively completed its data collection and analysis for the Application in advance and with little input from either individual First Nations or the Working Group as a whole.</p>	<p>PRGT recognizes the timing associated with the Application and appreciates the efforts that are being made to address this timing. As PRGT has indicated in various discussions, it is very important from a commercial perspective that the Project continue to move forward through the EAO process or the commercial opportunity associated with the Project may no longer be available. PRGT is prepared to work directly with First Nations, including Lax Kw'alems to address issues that arise from this timing. PRGT and Lax Kw'alems also have been and are actively negotiating capacity funding arrangements.</p> <p>Potential adverse effects to Aboriginal interests will be assessed in Section 11 of the Application. PRGT is confident that a complete Application can be filed with EAO within established timelines and informed by input from Aboriginal groups.</p> <p>PRGT is confident that the Project will be consistent with the EAO's requirements and will be consistent with the EAO's requirements and will be consistent with the EAO's requirements.</p> <p>No changes to the dAIR are required.</p>	<p>PRGT remains confident that a complete Application can be filed with EAO within established timelines and informed by input from Aboriginal groups obtained through PRGT's consultation efforts, including those with Lax Kw'alems. PRGT and Lax Kw'alems continue to actively negotiate funding arrangements to ensure Lax Kw'alems has the capacity to participate in the EA process in a meaningful way. PRGT has, and will continue to, seek opportunities to discuss with Lax Kw'alems its Aboriginal interests and concerns, and any potential adverse effects the Project may have on these interests. PRGT and Lax Kw'alems are also actively discussing the terms of a Lax Kw'alems Aboriginal interest and use study.</p>	<p>[Comment combined from word document and Tracking Table]</p> <p>1. No capacity funding has been provided for Lax Kw'alems to engage with PRGT in the regulatory process to date. Lax Kw'alems is up against significant capacity constraints in relation to this and numerous other LNG-related projects being proposed in our traditional territory at this time. These capacity constraints make it currently impossible to adequately assess each Project.</p> <p>2. No studies have been undertaken by Lax Kw'alems to assess impacts of the proposed project on rights and title. Any such studies should be undertaken prior to the development and submission of the Proponent's Application (given, for example, the critical role such studies would play in Part C "Aboriginal Interests" assessment) not after.</p>	<p>PRGT has been working jointly with the Lax Kw'alems on a capacity/consultation agreement and looks forward to concluding the Agreement shortly.</p>
379	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>3. Engagement of Lax Kw'alems in Consideration of Alternative Routes The Project Description for the Project describes several alternative routes in its western portion. Our understanding from the October 17 Working Group meeting is that five routes are being considered in this area, but that the Proponent would like to present a single option in the Application.</p> <p>The lands and waters along all of the alternative Project routes, stretching northwest to southeast from Nees Bay to Lulu Island, and including Portland Inlet, Khutaymaten Inlet, Work Channel, the Tumbash Peninsula, Chatham Sound, and the Prince Rupert Harbour, are within the traditional territory of the Lax Kw'alems. Our ancestors lived in this area for thousands of years and our members continue to do so. Lax Kw'alems has never ceded or surrendered any of our territory and we retain our aboriginal rights and title interests to the lands and waters of our territory and to the resources therein. Whenever the Crown contemplates any conduct or decision that has the potential to infringe our constitutionally-protected interests, such as is contemplated with respect to the authorization of the proposed Project, the Crown owes Lax Kw'alems a duty of consultative accommodation. Given the strength of our claim in the areas to be affected by this proposed Project, and the extent and magnitude of the potential adverse impacts to our interests from the Project, deep consultation is required. As an example of the need for deep consultation, Lax Kw'alems notes that 18 of the 29 First Nations reserves identified as within 10 km of the PRGT Conceptual Corridor are Lax Kw'alems reserves (PRGT Project Description, May 2013, Table B-5).</p> <p>To date, those aspects of consultation delegated to the Proponent (which are unknown to Lax Kw'alems) at this apparent delegation of the constitutional duties of the Crown to the Proponent occurred unilaterally, without discussions with or engagement of Lax Kw'alems, including apparently the critical examination of the five alternatives (or identification of new alternatives) and the identification of appropriate routing alternatives. Lax Kw'alems is not satisfied with the manner in which the Proponent has approached this process. The Proponent is advised to start this engagement process immediately, and Lax Kw'alems also requests that EAO play a facilitating role in scheduling and conducting of sub-Working Group meetings specifically focused on identification of appropriate routing alternatives.</p>	<p>PRGT recognizes and respects Lax Kw'alems rights and interests in the Project area. PRGT has not been any Crown or any sufficient proponent consultation on these routing issues to date. The different routing options each impact on the environmental and cultural values of Lax Kw'alems territory uniquely. A high level of community engagement will therefore be necessary to determine the potential adverse effects on Aboriginal interests.</p> <p>PRGT will continue to engage with the Lax Kw'alems and other Aboriginal groups on pipeline routing and the location permanent and temporary infrastructure.</p>	<p>Inadequate response. Lax Kw'alems remains critically concerned that the dAIR does not provide adequate direction to the proponent on the expectations and requirements for deep consultation of First Nations, and particularly Lax Kw'alems, on the routing options. There has not been any Crown or any sufficient proponent consultation on these routing issues to date. The different routing options each impact on the environmental and cultural values of Lax Kw'alems territory uniquely. A high level of community engagement will therefore be necessary to determine the potential adverse effects on Aboriginal interests.</p> <p>PRGT is engaged in discussions with Aboriginal groups, including Lax Kw'alems regarding TLU studies. The relevant information that is provided will be used to inform the environmental assessment process.</p>	<p>PRGT has and will continue to share with Aboriginal groups, including Lax Kw'alems, information on route alternatives under consideration and invite input on potential adverse effects on Aboriginal interests.</p> <p>In making routing decisions, PRGT considers a variety of factors including: technical (engineering), environmental, Aboriginal interests, community and stakeholder interests, and cost.</p> <p>3. No substantive engagement with Lax Kw'alems regarding routing alternatives through Lax Kw'alems' territory has been undertaken by PRGT with Lax Kw'alems. It is unclear how Lax Kw'alems' interests ("Aboriginal Interests") will be considered in the routing assessment. As highlighted in Comment #384, clear criteria and weighting should be created. Five factors are listed: "technical (engineering), environmental, Aboriginal Interests, community and stakeholder interests, and cost". How and why were these factors selected? How are they being measured exactly? Lax Kw'alems recommends adopting one or more of the several guidelines on the dAIR. PRGT will provide descriptions of the major alternatives considered in the Application, as well as the methods and criteria used to evaluate each alternative. Providing this information in the dAIR, however, is beyond the scope of the dAIR.</p>	<p>The factors considered by PRGT when making routing decisions are those commonly used by various development projects (e.g., mines, major roads, transmission lines).</p> <p>As per Section 1.5 (Alternative Means of Undertaking the Proposed Project) of the December 2013 of the dAIR, PRGT will provide descriptions of the major alternatives considered in the Application, as well as the methods and criteria used to evaluate each alternative. Providing this information in the dAIR, however, is beyond the scope of the dAIR.</p>
380	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>4. Inadequate Spatial Scope(s) of Assessment Appendices A and B to this letter include a variety of concerns and proposed changes related to the current inadequate spatial scopes of assessment for the EA. We ask that the EAO consider each of them very carefully; proper spatial scope is essential to good EA. For example, currently there has been no information provided to Lax Kw'alems on proposed locations of camps, access roads, new cut or new ROW (including new roads, lay down locations, borrow and other clearing and material removal sites). These locations are part of the physical works and activities for the Project and must be included in detail in the Project Description and the spatial scope of assessment on a VC-by-VC basis. In addition, Lax Kw'alems does not accept an argument that this information be first provided in the Application. The information on these activity and physical work locations must be provided to affected First Nations in advance in order to meet other requirements of the dAIR, including advance sharing of concerns by First Nations about the Project and identification of mitigation measures. Such meaningful engagement and input is impossible without First Nations being provided full scope information about the Project.</p>	<p>PRGT will continue to engage with the Lax Kw'alems and other Aboriginal groups on pipeline routing and the location permanent and temporary infrastructure.</p>	<p>Inadequate response. Lax Kw'alems remains particularly concerned about the lack of information on the scope of the project. Without adequate scoping of the project Lax Kw'alems will not be able to meaningfully assess the impact of the project on their rights and interests. Lax Kw'alems cannot engage in meaningful discussions unless they know how their rights and interests will be affected. Lax Kw'alems repeats its request that the scope of the project be adequately defined before further steps are taken in the EA process.</p>	<p>The scope of the project has been outlined in Part 6 of the Section 1 Order. PRGT has or will be providing Lax Kw'alems and other Aboriginal groups with information on, and inviting input regarding Aboriginal interests in respect of, proposed locations of temporary infrastructure including camps, access roads, borrow sites, stockpile sites, and laydown areas in advance of the Application.</p>	<p>[Comment in both Tracking Table and word document]</p>
381	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>5. Temporal Scope of Assessment There are a couple of key problems with the temporal scope of assessment, and these problems go both back and forward in time.</p> <p>* Baseline and trend-over-time data is critical to good EA. Currently, the Proponent-developed dAIR emphasizes current or existing conditions and makes no or little mention of trend-over-time data. In Lax Kw'alems opinion (and that of EIA practitioners everywhere), it is essential to identify existing cumulative effects loads as part of the context of the receiving environment. This cannot be accomplished without backcasting to establish change over time in the health or status of VCs, indicators and measurable parameters. The revised dAIR must establish appropriate expectations for appropriate backcasting in baseline conditions profiling: the Working Group may be of assistance in establishing appropriate temporal boundaries.</p> <p>* Time scope for effects assessment - forecasting. Lax Kw'alems outright rejects any efforts by the Proponent or EAO to artificially constrain the temporal scope of assessment into the future to the end of operations of the Project. The proper temporal scope of assessment is until such time as there is no reasonable probability of measurable effects from the Project. The Crown's honour requires a proper temporal scope of assessment, rather than leaving adverse legacy effects from Projects on the territories of First Nations. Lax Kw'alems and other First Nations have been asked to bear too many industrial legacy effects already.</p>	<p>PRGT welcomes input from the Working Group in recommending appropriate temporal boundaries to support the effects assessment.</p> <p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from the Project and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>The question related to "time scope" and requirements under the Reviewable Project Regulation are directed to the EAO.</p>	<p>Lax Kw'alems maintains their concern over the use of current conditions as an appropriate baseline for the effects assessment in the dAIR. An adequate assessment requires consideration of existing as well as trend over time data. Since the rights and interests of Lax Kw'alems have already been significantly impacted, appropriate consideration of these existing impacts is necessary to adequately assess the effects of the Project on their rights and interests. We repeat our request that the dAIR be revised to establish appropriate expectations for backcasting in baseline conditions profiling. This information will be presented in the Application.</p>	<p>[Comment in both Tracking Table and word document]</p> <p>4. The method of characterizing baseline conditions in the dAIR should require a longer temporal boundary that extends into the past to establish adequate trend-over-time data for those (most) VCs that are dynamic. This must be presented in Section 3.0 Assessment Methods. At present, the dAIR does not clearly state the "temporal boundaries" for the assessment. The temporal boundaries of the Project (p. 3-5). While PRGT notes that "[h]is concern is understood", they go on to state that the "biological VCs will be established through a combination of literature review" including "information on the natural history of the indicators" (Comment #381). This response ignores the highly dynamic nature of other VCs that make up the other 4 pillars of the EA's 5-pillar approach. This response only exacerbates Lax Kw'alems' concerns that PRGT's approach to this EA is (a) a static and superficial approach to baseline characterization and (b) a narrow focus on biophysical VCs over social, heritage/cultural, economic, and health VCs. Indeed, social, economic, heritage/cultural, health, and "non-biological" environmental VCs are often more dynamic than "biological" VCs and should also require characterization of a trend prior to conducting an effects assessment. While this baseline and trend-over-time data, neither the contextual status (e.g., pristine vs. previously damaged) of the VC and indicators, nor the vulnerability and resilience of the VC and the receiving environment in general can be understood prior to the effects characterization process. As a result, any prediction of expected changes to the VC over time in the project case (and the project cumulative effects case) will not include adequate contextual information and will likely lead to inaccurate and indefensible predictions. This is an area where good practice of EIA requires revisions to the final AIR and likely further study by the Proponent to build an effective backcast and contextual analysis.</p>	<p>Compiling baseline information for both biological and non-biological, cultural, economic, and health VCs, whether through direct field studies and observations or the compilation of information from existing data sources concerns the effects of past events, which have shaped and influenced current conditions. Conducting a specific backcasting and/or trend over time analysis is beyond the scope of the effects assessment and the dAIR.</p>
382	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>6. Presumptive and Limited Effects Mechanisms The Proponent has already pre-supposed all potential "substantive interactions" in the drafting of the dAIR and the provision of an Interaction Matrix. This is unacceptable and represents another example of inadequate consultation in the EA of this proposed Project. This "presumption beforehand" model is not acceptable effects assessment methodology. Baseline and trend over time data must be analyzed before "potential project effects" can be defined. The inclusion of other opinions beyond those of the Proponent is essential to balance perspectives and identify alternative but equally valid effects pathways. In addition, the dAIR focuses in most cases on singular, discrete effects mechanisms on a VC-by-VC basis. In our experience, there are often many effects mechanisms affecting the same VC (land by extension, other linked VCs) at once in complex additive ways. The dAIR does not capture many of the likely effects mechanisms, but leaves little room for identification of new ones or means to do so. This needs to be revisited and revised by the Working Group.</p>	<p>Table 3-2 represents PRGT's preliminary assessment of the "Potential for Substantive/Meaningful Project-VC Interactions" and welcomes input from the Working Group, the public, First Nations, the EAO and other interested parties through the environmental assessment process.</p>	<p>Lax Kw'alems acknowledges that the interactions identified in the dAIR are only a preliminary assessment of the "Potential for Substantive/Meaningful Project-VC Interactions". However, even as a preliminary assessment they should include additional perspectives, as well as incorporate the likely effects mechanisms. The pre-determination of substantive interactions, undermines the potential for effective engagement and consultation on the project with affected groups.</p>	<p>PRGT welcomes additional perspectives from the Working Group, the public, First Nations, the EAO and other interested parties through the environmental assessment process.</p>	<p>[Comment in both Tracking Table and word document]</p>
383	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>7. Inadequate CIA Lax Kw'alems is completely unsatisfied with the CIA undertaken under the BCEAO EIA processes it has been involved in to date; they have been wholly inadequate and the conclusions meaningless. Given the level of development to date in the Prince Rupert Harbour, with the resultant significant adverse impacts on and diminishment of Lax Kw'alems' rights, and the level of development proposed for the area, a robust CIA is required in this instance. With the rapid pace of development in the general Prince Rupert Harbour area comes a large quantity of effects, including cumulative biological, cultural, social and economic effects. To date, no meaningful efforts have been initiated by industry or government to actually start examining cumulative effects of industrial development in Lax Kw'alems territory, including with respect to all the LNG development proposed for our territory.</p> <p>Lax Kw'alems has previously called for the federal and provincial Crowns to work with affected First Nations to develop an action plan for a strategic CIA and monitoring plan for the Prince Rupert Harbour area. As yet, we have seen no evidence of any work planning, let alone work occurring, on a regional CIA across any of the VCs so central to Lax Kw'alems' meaningful practice of aboriginal rights.</p> <p>Composing the existing entry, the PRGT dAIR takes a regional CIA approach. This approach does not correspond with principles of good practice CIA. Lax Kw'alems' opinion, and that of environmental assessment practitioners everywhere*, is that a VC-focused CIA is the only meaningful form of assessment. The lack of meaningful regional and VC-based CIA leads to the slow erosion, over the thousands of years, of Lax Kw'alems' lands and waters, and to substantial species loss marine mammals, many different species of fish, and fish habitat such as reefs, among many others.</p> <p>Lax Kw'alems on the record is rejecting the "project contribution" model of CIA, and calls for proper focus on total effect loading on VCs, not how much the individual project contributes. Nonetheless, the Proponent proposes the latter methodology in the dAIR. Among the many major flaws with this approach are:</p> <ul style="list-style-type: none"> * Establishing the existing cumulative effects context is critical to understanding the baseline and trend-over-time status for a VC. Salmon stocks today, or harvesting levels by aboriginal people today (to cite just two of many examples), are useless for the purposes of proper effects assessment without an understanding of how they have changed over time. The Proponent appears to be rejecting the need for longitudinal depth in baseline characterization and as a result a largely useless CIA. * Lax Kw'alems does not accept the Proponent's (and by current extension, the EAO's) argument that what is important is not the total health of a VC but rather how much this one Project is likely to change that health. It is our strong view that no experienced or practitioner would support this approach. This methodology equally allows for "death by 1000 cuts" of Lax Kw'alems' interests. The Proponent ignores these concerns and instead of focusing its CIA on the health of the VC - the only useful measuring stick - focuses on opportunities of blame for change to the Project, effectively ignoring the actual status of the VC. This is unacceptable. * In summary, the proposed CIA approach is totally inappropriate and reflects a total flaw in the proposed dAIR and the EA of this Project. The focus of good CIA should be on identifying significant impacts on VCs that already exist or would become significant should the Project proceed. Project-focused CIA is effectively useless. Lax Kw'alems call again for the Crown to consider its constitutional obligations and develop a proper regional CIA scheme. A regional cumulative effects modeling exercise needs to begin immediately, while there is still a chance for meaningful protection of Lax Kw'alems' aboriginal rights and title and the attributes of the land and marine base those interests are premised on. <p>(T, footnote included)</p>	<p>Comment directed to EAO</p>	<p>These changes, as described in the EAO's response, have been incorporated into the dAIR.</p>	<p>[Comment in both Tracking Table and word document]</p> <p>5.a. In Comment #383, PRGT indicates that the EAO offered a response regarding cumulative effects assessment. What changes were made to the dAIR in response to Comment #383? Section 3.10 does not address Lax Kw'alems concerns. Lax Kw'alems requests EAO respond in writing to this clarification request.</p> <p>[Comment in both Tracking Table and word document]</p> <p>5.b. In Comment #384, PRGT defects to the EAO Lax Kw'alems' request that a Working Group meeting be established to approach SEIA in a more meaningful way. This is appropriate, and now it is time for EAO to respond to this and other Lax Kw'alems requests, BEFORE finalizing the AIR. Lax Kw'alems, back at the only full Working Group meeting, explicitly called for additional full Working Group meetings on VCs and a variety of other issues, and made it clear this full Working Group meeting or meetings MUST occur prior to the finalization of the AIR. We ask the EAO to identify when this meeting will take place. To date, the EAO has done little to accommodate our process requests, revise the information requirements for the EA, or even respond in writing to Lax Kw'alems' and other First Nations' requests for further information.</p>	<p>In reference to 5.a., the dAIR was updated to reflect a VC-based cumulative effects assessment approach, which is consistent with the EAO's approach to cumulative effects assessments. Comment 5.b. is referred to EAO.</p>
384	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>8. Lack of Disaggregation in Human Environmental Impact Assessment Lax Kw'alems has raised this concern previously and provided further detail in the appendices. The crux of the issue is that aggregation of aboriginal and non-aboriginal sub-populations in a single SEA is simply not good practice because the socio-economic context of aboriginal and non-aboriginal people differs in a multitude of ways. Using an aggregated approach invariably leads to masking of the likely heightened effects on those most vulnerable to change and least likely to be able to take advantage - aboriginal people living on- and off-reserve. Lax Kw'alems requests the currently proposed SEA on this basis and calls for the Working Group to meet to identify a more meaningful approach to SEA with appropriate VCs, indicators and measurable parameters for aboriginal people. We are happy to contribute to this effort for a more meaningful SEA.</p>	<p>Community-specific socio-economic baseline data is being collected, and will inform the assessment. This data and any data received through community-based data collection will be included, where available, in Section 11 of the application.</p> <p>No changes to the dAIR are required.</p>	<p>Lax Kw'alems remains critically concerned that the dAIR does not distinguish the critical differences between Aboriginal and non-Aboriginal social, economic and cultural conditions and likely impacts. Impact equity considerations are centrally important to characterizing project impacts. The proposed approach will not adequately address the impacts of the Project on Aboriginal people. Lax Kw'alems repeats its call for the Working Group to meet to identify a more meaningful approach to SEA with appropriate VCs, indicators and measurable parameters for aboriginal people.</p>	<p>Request for a Working Group meeting to identify a more meaningful approach to SEA directed to the EAO.</p>	<p>[Comment in both Tracking Table and word document]</p>
385	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>9. Inadequate Cultural Impact Assessment Lax Kw'alems' culture is tied beyond measure to the lands and waters (and the resources therein) through which the proposed Project would travel. Impacts on our culture are not limited to impacts on physical heritage resources, though these are of strong importance. To reduce cultural impact assessment down to heritage resources is comparable to reducing a biophysical environmental impact assessment down to the study of soils or trees. Given the importance placed on culture by EAO, the lack of any meaningful VCs related to less tangible cultural attributes in the dAIR is unacceptable. Lax Kw'alems is happy to contribute to specific revisions to the assessment of cultural impacts by identifying meaningful VCs, indicators and measurable parameters.</p>	<p>PRGT acknowledges that Heritage and Archaeology are only a portion of the assessment for the proposed Project. The Traditional Knowledge and Traditional Land Use Information, if provided, will enable PRGT to consider other non-tangible cultural resources and effects.</p> <p>The Application will not include a culture VC, however culture will be addressed in Section 11 of the Application if it pertains to Aboriginal Interests or other concerns raised by Lax Kw'alems during Pre-Application. Please see Standard Response 41.</p> <p>PRGT has provided for opportunities for Lax Kw'alems to conduct Traditional Land Use studies that would inform the EA Process.</p> <p>No changes to the dAIR are required.</p>	<p>Lax Kw'alems repeats its request for a proper assessment of the cultural impacts of the Project. The assessment of the impacts on culture in section 11 is insufficient. A culture VC is necessary to give these impacts meaningful consideration.</p>	<p>The comment from Lax Kw'alems is acknowledged. PRGT believes that our response to the original comment is appropriate.</p> <p>PRGT is engaged in discussions with Aboriginal groups, including Lax Kw'alems regarding TLU studies. The relevant information that is provided will be used to inform the environmental assessment process.</p>	<p>The collection of Traditional Knowledge (TK) for the proposed Project includes, but is not limited to, Traditional Ecological Knowledge (TEK) information shared by community members during biophysical field studies for the Project, and Traditional Land Use (TLU) studies from potentially affected Aboriginal communities.</p> <p>TK was also collected from the following secondary sources: publicly available TEK and TLU reports, publicly available reports that cite TEK and TLU results, open houses and community gatherings, meetings and conversations with Aboriginal community representatives, and Geographic Information System (GIS) tools to determine spatial relationships of source data to the proposed Project.</p> <p>The following potential adverse effects were identified through a review of the Traditional Knowledge collected to date: disruption of hunting, disruption of trapping, disruption of fishing, an alteration of plant harvesting, disruption of use of trails and travelways, disruption of habitation areas or reduced use of habitation areas, disturbance of gathering areas or reduced use of gathering areas, disturbance of sacred areas or reduced use of sacred areas, disruption of cultural transmission. A characterization of residual effects will be undertaken, which will include the views of Aboriginal groups if provided.</p> <p>A determination of significance will not be provided, and as such significance thresholds have not been established. The identification of potential adverse cumulative effects in Part C will rely on the methods used to assess cumulative effects in Part B, outlined in section 3.10.2.</p>
386	General Comment	Chief Gary Reece Lax Kw'alems (Skeena Fisheries Commission)	<p>10. Inadequate VCs, Including Inappropriate Lumping of VCs and Lack of First Nations Engagement At the Working Group meeting, it emerged clearly from a variety of First Nations that the currently proposed VCs are inadequate. Lax Kw'alems raised these concerns in a previous letter to the EAO in September 2013. Salmon and salmon habitat, in particular, could be added as a specific VC. In addition, and as noted in Appendices A and B to this letter, specific VCs for GNG Management and Sufficiency of Resources for Meaningful Practice of Aboriginal Rights need to be added to the dAIR.</p>	<p>PRGT believes that, taken together, Section 11 of the Application, the related fisheries assessments conducted in the EA, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information (if provided by Lax Kw'alems) will address the interests raised by Lax Kw'alems regarding salmon and salmon habitat.</p> <p>See Standard Response 23.</p> <p>No changes are required to the dAIR.</p>	<p>Inadequate response. Lax Kw'alems maintains its position that salmon and salmon habitat and sufficiency of resources for meaningful practice of aboriginal rights must be added as specific VCs to the dAIR. This is a critical issue to address project impacts to Lax Kw'alems' interests. We do not agree that taken together, Section 11 of the Application, the related fisheries assessments conducted in the VC section, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information will address the interests raised by Lax Kw'alems.</p>	<p>PRGT is confident that taken together, Section 11 of the Application, the related fisheries assessments conducted in the VC section, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information will address the interests raised by Lax Kw'alems.</p>	<p>[Comment combined from Word document and Tracking Table]</p> <p>6. There is no clear EIA methodology outlined in the dAIR for cultural effects, traditional land use (TLU)/Aboriginal interests, traditional knowledge (TK), or rights assessment. The dAIR must include VCs and other components of an EA methodology (key indicators, boundaries, cumulative effects, significance thresholds) to guide the effects assessment for TLU/Aboriginal interests, TK, rights, and cultural effects.</p> <p>While PRGT refers to ongoing negotiations, an important step in the process to accommodate for specific community needs, the dAIR should also have several VC and related methods selected that can be applied across the entire assessment and be included in the dAIR. This step is vital for a good EA. Comment #385 and the others on this topic are not adequate."</p>
387	Email	Ann Godon Ministry of Environment FP LNG Team	<p>It was identified within the dAIR that water quality could be affected by the project. Because water is a critical resource that fits a number of the attributes (relevant, comprehensive, representative, responsive, concise) of a VC and water quality can be affected by the project, it should be identified as a VC. When water quality is not considered a VC on its own, it makes it very difficult to find the information to determine the project effect on water quality and critical water quality parameters may not be determined.</p>	<p>See Standard Response 8.</p>	<p>Accept.</p>	<p>No additional response required.</p>	<p>[Comment in both Tracking Table and word document]</p>

388	Preface - Page 1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Where reference is made to "For some sections, such as marine alternatives and aerial crossings, multiple lines may be required..." and the remainder of that paragraph, which lists a variety of physical works required in support of the Project, the dAIR needs to require greater detail on the location, nature, extent of works and activities (including workforce and material requirements), in the dAIR. As currently structured, the dAIR requires a great deal of detail primarily on the physical ROW and construction process for the pipeline, and little detail on ancillary activities and works, which can be equally harmful to the environment and Aboriginal rights. Greater discussion is required at the Working Group level, with the Proponent contributing to identify full information requirements for these ancillary development components.	Information on ancillary sites development and plans will be provided in the Proposed Project Overview, including location, extent and nature of works, access and logistics maps. Details on any upgrading of existing access to meet the safety needs of the project will be included. Workforce and material requirements will be described as part of Economic Effects. Multiple lines are only contemplated in the offshore portion of the project.	Inadequate response. Lax Kw'alaams repeats its request that the dAIR is amended to require greater detail on the location, nature, and extent of ancillary works and activities (including workforce and material requirements).	Lax Kw'alaams' comment is recognized. As stated in the response to the original comment, the requested information will be provided in the Application. More specifically, the section 11 Order encompasses the ancillary infrastructure in the Project. Therefore the "Proposed Project Overview" section of the Application will include details on ancillary sites, including location, extent and nature of works, access and logistics maps. Further details on any requirements to upgrade existing access roads to meet the safety needs of the project will be included.		
389	Executive Summary	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Here and at many places in the dAIR, a far too deterministic language was used. Given that environmental assessment is about parties making estimations of what may happen in the future, the dAIR needs to remove deterministic language and make it clear the document provides only the Proponent's estimations and conclusions. Specific wording changes are included in track changes in the body text. The Proponent should be given blanket direction to revise the dAIR appropriately wherever such language is included.	Comment directed to the EAO. It should be noted that the last bullet in the executive summary clearly states that the Application will require "PRGT's conclusions resulting from the environmental assessment". Both Aboriginal and non-Aboriginal participants will have opportunities to provide their perspectives throughout the course of the environmental assessment process including during the Application Review period.	Inadequate response. Lax Kw'alaams has again included a track changes document with specific wording changes to clarify that the document only provides the proponent's estimations and conclusions.	EAO response to Round 1 comment: The dAIR is directing what the proponent must include in their Application for an Environmental Assessment Certificate. No change required. PRGT Response: In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
390	1.2	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	The dAIR, here and elsewhere, requires clear direction that the Application will include all physical works and activities required for the full build out at maximum capacity for the Project, rather than the likely build out and associated changes such as increased compressor stations, line implications for the physical land disturbance, impact footprint, economics (benefits and risks), and cumulative effects associated with the Project. Specific proposed wording changes are included in the body text.	The assessment will include all physical works and activities required at full build out and maximum capacity of the Project (3.6 BCF). The scope of the project to be assessed is defined by the BC EAO and PRGT anticipates that the Section 11 Order will include temporary and permanent infrastructure and activities, including access roads, bridges, stockpile sites, borrow sites, laydown yards, and construction camps. As stated in section 1.2 of the dAIR, the Project description in the Application will include a description of the onsite and offsite components of the Project and associated supporting infrastructure.	Lax Kw'alaams repeats its request that there is a clear direction in the dAIR that the Application will include all physical works and activities required for the full build out at maximum capacity for the Project, rather than the likely build out. Specific wording changes have been repeated in the track changes document.	The environmental assessment will include all physical works and activities required at full build out and maximum capacity of the Project (3.6 BCF). Please see the EAO's Section 11 order for additional information.		
391	1.2	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams notes that certain aspects of the proposed Project are not included in the list of items that will be considered in the Project Description, including any new road building, enhancement of current roads, borrow sites, laydown areas, among many other activities required for this +/- 500 km pipeline to be developed. This is unacceptable. Recommended revised text: A description of all physical works and activities required to undertake the Project at maximum build out, including all direct and ancillary works and activities. This will include description of the onsite and offsite components of the Project and associated supporting infrastructure.	See Standard Response 23.	Lax Kw'alaams repeats its request that the Project Description specifically include all direct and ancillary works. The request for inclusion of the proposed revised text is included in the tracked changes version of the document. Lax Kw'alaams is satisfied that the GHG will be assessed as a VC in the Application and that the dAIR has been amended accordingly. Lax Kw'alaams requests to participate in any working group discussion planned with the BCEAO to discuss the specifics of the GHG VC assessment methodology. Lax Kw'alaams expects to be fully consulted with respect to the GHG VC assessment methodology.	The Application will include all physical works and activities required at full build out and maximum capacity of the Project (3.6 BCF). Please see the EAO's Section 11 order for additional information.		
392	1.2	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	When considering "the relationship between the Project objectives to any broader private or public sector policies, plans or programs", this must explicitly include BC's legislated GHG reduction targets and should be assessed at an LNG production system level - i.e., the implications of all the physical works and activities required to flow of as much as over 3 billion cubic feet per day of gas through this pipe, from upstream shale and hydraulic fracturing operations, liquefying it and transporting it overseas, in terms of provincial GHG emissions.	See Standard Response 23.		Comment directed to EAO regarding participation in WG meeting to discuss GHG VC assessment methodology.		
393	1.4	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	"Technically and economically feasible": the dAIR must be revised to provide more instruction on the level of detail required to support assertions of what constitutes feasible vs. infeasible. Technical and economic feasibility rationales must be convincingly shown.	Technical and economic feasibility will be addressed in the context of specific project alternatives. The criteria for feasibility will vary depending on the alternatives discussed and will be defined in the Application. The criteria for ground alternatives in the Application may be qualitative or quantitative, based on industry standards and proven technologies used on similar scale of projects. A full discussion of the route and facility selection process will be included in the Application. PRGT will continue to share with Aboriginal groups, including Lax Kw'alaams, information on route alternatives under consideration and invite input on potential adverse effects on Aboriginal interests. No changes to the dAIR required.	Inadequate response. It is not sufficient that technical and economic feasibility are to be addressed in a context specific manner. The dAIR needs to set out specific criteria in relation to the information to be provided when assessing economic feasibility/feasibility.	Until the specific mitigation measures have been identified, it is not possible to determine the context of technical and economic feasibility. As a result, PRGT cannot respond to this request. PRGT has and will continue to share with Aboriginal groups, including Lax Kw'alaams, information on route alternatives under consideration and invite input on potential adverse effects on Aboriginal interests. In making routing decisions, PRGT considers a variety of factors including: technical (engineering), environmental, Aboriginal interests, community and stakeholder interests, and cost.		
394	1.4	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams requests that not only the criteria considered in the selection of routes and facility locations be listed (and identified in more detail where necessary), but that the weighting given to different criteria in making decisions be a requirement of the Application as well. Lax Kw'alaams has not been meaningfully consulted on the comprehensiveness, appropriateness, or weighting of criteria for any aspect of the consideration of alternative means or routing locations through its territory to date, and meaningful consultation must occur before the finalization of routing options. See proposed revisions in body text.		Inadequate response. Lax Kw'alaams remains critically concerned that the current version of the dAIR does not provide adequate direction to the proponent on expectations for engagement and consultation of First Nations in pipeline routing, including in the identification of appropriate criteria and weighting for routing alternatives. We reiterate our request both for more detailed information on the proposed criteria on which the Proponent proposes to make its final routing determination and for consultation at a higher level on the routing options.		Updated response to Round 2 working group comment - Section 1.5 of the January 2014 version of the dAIR indicates that alternative means to implement and carry out the Project will be described, which will include a description of technical and economic feasibility. The dAIR also states that the methods and criteria taken into consideration for major alternatives (which include cost and constructability, surrogates for economic and technical feasibility) will be identified and defined. The requests to include a requirement to specify the rationale for any feasibility determinations are adequately covered in the dAIR.	
395	1.5	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	As noted in our proposed changes to the body text, the employment estimates sub-section has to be substantially revised to contribute to a proper assessment of: 1) ability of local, regional and (within them) Aboriginal workforces to take advantage of the employment on offer from the proposed Project; 2) actual likely portion of the Project workforce that will be local and regional Aboriginal people; 3) the adequacy of the Proponent's plans, policies and programs to maximize Aboriginal employment; and by extension of all of the above: 4) impact equity and inequity, most often seen in the past where Aboriginal sub-populations are forced to bear the majority of negative effects on the environment, culture, society, economy, and rights and title, while receiving a disproportionately small amount of benefits from the Project. If an estimate can be made of the proportion to come from the other four labour markets, the Aboriginal proportion will be a better estimate. More information on the proportion of the workforce to be identified and mitigated. More detailed requirements are necessary. A proper workforce evaluation of affected First Nations population is the only way to tap into "potential for meeting staffing requirements".	See Standard Response 3.	Lax Kw'alaams maintains their concern that the employment estimates need to be calculated with respect to the proportion of employees to be represented from Aboriginal groups. The ability of the Aboriginal workforce to take advantage of the employment on offer from the proposed Project, determines whether they will see any benefit from the Project. The barriers specific to Aboriginal groups need to be identified and mitigated. The collection of community specific socio-economic baseline data must include a proper workforce evaluation of affected First Nations populations.	Workforce data available from Statistics Canada, BC Stats and from information provided via key informants and community-specific socio-cultural evaluations will be included in the Application, where available. Issues pertaining specifically to Aboriginal groups will be included and addressed in section 11 of the Application. PRGT will continue to meet with Aboriginal groups identified in Schedule B of the Section 11 Order with respect to the collection of socio-economic data. PRGT is committed to working with Aboriginal groups to maximize employment opportunities.	[Comment in both Tracking Table and word document] 7. Gathering primary socio-economic information will be necessary to develop a good socio-economic impact assessment that considers issues that are of particular concern to Aboriginal groups, including Lax Kw'alaams. If the EAO is really committed to a "five pillar" approach to EA, how is it that the four pillars linked to human environmental impact assessment (health, "heritage", social and economic) have little in the way of detailed requirements for primary data collection? How will Aboriginal workforce numbers be calculated? If it is unknown what the trends and barriers are for employment, how will an Aboriginal workforce strategy be developed? How will success of any strategy be measured? Workforce data available from secondary sources is limited and will not disaggregate Aboriginal and non-Aboriginal populations. In response to Comment #395, #40, #45, #64, #67, #68, #70, and others on this topic, this remains a critical and outstanding gap in the dAIR from Lax Kw'alaams' perspective.	PRGT incorporated secondary source information on labour force from First Nations and non-First Nations communities within the LAA, as well as available primary source information obtained through information interviews, and applicable information from traditional use studies. PRGT requested information related to employment and labour force of each First Nation community within the LAA, and incorporated provided information as applicable within the Application.
396	3.0	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	There are no clear expectations in the dAIR to guide the Proponent re: the importance of TLU/TK data collection and integration of same into the Application. In Lax Kw'alaams opinion, the section on Assessment Methods should identify that: "Traditional knowledge and western scientific knowledge are both essential parts of the BC environmental assessment process and will be considered of equal importance. The Proponent will identify in a summary table in the Application all instances where traditional knowledge inputs contributed to the identification of effects, mitigation and monitoring programs."	See Standard Response 2.	Inadequate response. It is not sufficient for the proponent to generally state that "[i]f available, relevant Traditional Knowledge and Traditional Land Use information will be incorporated into the Application." There needs to be a clear expectation in the dAIR in relation to the incorporation of TLU/TK data collection into the Application. Lax Kw'alaams repeats its request that "Traditional knowledge and western scientific knowledge are both essential parts of the BC environmental assessment process and will be considered of equal importance. The Proponent will identify in a summary table in the Application all instances where traditional knowledge inputs contributed to the identification of effects, mitigation and monitoring programs."	Update to the dAIR required		
397	Figure 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams requests the Figure be revised to integrate the collection and analysis of baseline and trend over time data for each VC, a critical requirement prior to the estimation of project effects.	The collection and analysis of baseline information is inherent within the "Project Effects for VC" box in Figure 3-1. The potential effects of the project on a VC cannot be assessed without first understanding the existing baseline conditions. See Standard Response 33.	Lax Kw'alaams repeats its concern with accepting current conditions as a baseline without adequate longitudinal data to establish trend over time and existing impact loading on the receiving environment. This is not reflective of good EA practice or conducive to effective environmental protection and management. Lax Kw'alaams requests that trend over time data for each VC and additional guidance on this subject be included in the final AIR.	PRGT acknowledges Lax Kw'alaams comment and is confident that the methodology proposed in the dAIR will adequately assess the potential effects that may result from the proposed Project, including the cumulative effects of other projects that may overlap in space and time.		
398	3.1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	"The VCs and indicators considered in the Application are listed in Table 3-1. These were identified through consultation with Aboriginal groups, the Working Group, and various interested parties between August 2013 and January 2014." This statement indicates that the identification of Valued Components only began in August 2013. Lax Kw'alaams finds this hard to believe. Easier to believe is that those Valued Components and indicators listed in the October 2013 dAIR were developed internally by the company and its consultant and without inputs from First Nations prior to the issuance of the dAIR. This was certainly the case with Lax Kw'alaams. In the absence of advance consultation, the Nation recommends the EAO overcome this lack of engagement through conducting additional Working Group meeting or meetings where First Nations and other members of the Working Group can review the proposed Valued Components list to one appropriate to the receiving environment and what matters most to affected First Nations.	PRGT believes that there was meaningful opportunity for Aboriginal Groups to comment on the draft VC report, and the related provisions set out in the dAIR. While PRGT is forwarding your request for additional Working Group meeting(s) to discuss the proposed VCs to the EAO for their consideration, PRGT believes that such meetings are not required.	Lax Kw'alaams repeats its request to be consulted on the proposed VCs. To date Lax Kw'alaams has not been adequately consulted in relation to the identification of VCs. Proceeding to finalize the AIR without the input of Aboriginal groups on VCs is not good EA practice.	EAO response to Round 1 comment: Opportunities to discuss additional VCs are provided through the review and comment on several versions of the dAIR, as well as at the one working group meeting and three technical working group meetings held during the dAIR review period. PRGT Response to Round 1 comment: As noted by EAO, the Working Group including Lax Kw'alaams is provided multiple opportunities to provide input through review and discussion of the VC document and dAIR.	[Comment in both Tracking Table and word document] 8. The EAO states that there were "opportunities to discuss additional VCs are provided through the review and comment on several versions of the dAIR, as well as at the one working group meeting and three technical working group meetings held during the dAIR review period". Lax Kw'alaams' records indicate otherwise. Lax Kw'alaams has provided comment on several versions of the dAIR and did provide a large number of comments on several VCs. This commentary and several concrete recommendations, however, did not result in changes in the dAIR. Indeed, a large number of outstanding concerns remain that highlight the inadequacy of several VCs. See Comments #403, #405, #406, #407, #468 to name a few. None of these comments has resulted in changes to the VCs selected in the dAIR. (For an exception, see response to Comment #402.)	PRGT has reviewed and considered all comments submitted by Lax Kw'alaams in regards to suggested changes to the dAIR, and believes that the issues that have been brought forward will be adequately addressed in the Application.
399	Email	Ann Godon	Ministry of Environment EP LNG Team	The marine construction and maintenance activities as presented in the PRGT project description and dAIR are NOT described in sufficient detail to evaluate if the VC selection is appropriate. One paragraph is provided in the project description and a single bullet in the dAIR. A similar lack of description also affects evaluation of the VC selection as they pertain to ford crossings.	The dAIR (which builds upon the project description) identifies the information requirements for the Application. More detail on project construction and operations will be provided in the Application.	Accept.	No additional response required.		
400	Email	Ann Godon	Ministry of Environment EP LNG Team	More detail (similar to that provided for terrestrial activities) needs to be provided in the project description and/or the dAIR before one can begin to review and comment on the marine VC selection.	The dAIR (which builds upon the project description) identifies the information requirements for the Application. More detail on project construction and operations will be provided in the Application.	Accept.	No additional response required.		
401	Email	Ann Godon	Ministry of Environment EP LNG Team	SEE ATTACHMENTS IN FOLDER \\V1231\active\EM\123110555\report(dAIR)\dAIR working group comments\Attachments_MDE EP LNG Team	PRGT thanks the commenter for this LNG facility assessment information. The Application will describe the SO2 and NOx emissions from the proposed compressor stations and a significant determination will be made by comparing results from the air dispersion modeling to provincial and national ambient air quality objectives (and standards).	Accept.	No additional response required.		
402	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	See proposed new Salmon and Salmon Habitat VC and associated indicators in our comments on the body text of the dAIR. GHG/GW/SLP is included as a valued component, as they are among the most likely impacts to already be significant, and where Project-specific and cumulative effects are likely to create real and negative lasting changes. In addition, given the importance placed under law by the Provincial Crown on reduction in provincial GHG emissions, this is a critical Valued Component. The Proponent has provided no compelling argument for exemption of GHG Management as a Valued Component, further, there is no compelling argument.	See Standard Response 23.	Sufficient response.	No additional response required.		
403	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	see also Table 4-5 and 4-7 and those sections of the dAIR See proposed new Salmon and Salmon Habitat VC and associated indicators in our comments on the body text of the dAIR. As was evident at the Working Group meeting of October 17, the lumping of salmon into two separate lumped VCs is inappropriate. Salmon and salmon habitat, in both the marine and freshwater aquatic ecosystems, must be a stand alone VC. Lax Kw'alaams has relied upon this food source since time immemorial. Recent declines have seen increasing pressures on this vital social, economic, cultural and ecological resource. Lax Kw'alaams highly recommends the dAIR also be revised to recognize Salmon and Salmon Habitat as a Key Line of Inquiry VC, meriting an increased level of effort in its assessment.	Section 11 of the Application will focus on the proposed Project's impacts on Aboriginal interests and other concerns raised by Lax Kw'alaams, drawing upon the relevant environmental, economic, social, heritage and health analysis that will take place in Part B of the Application. PRGT would welcome any information (including TK or TLU) or views that Lax Kw'alaams may have regarding potential adverse effects that may be caused by the proposed Project. This comment has also been forwarded to EAO to consider your request regarding the Working Meeting.	Lax Kw'alaams remains critically concerned that the dAIR does not distinguish the critical differences between Aboriginal and non-Aboriginal social, economic and cultural conditions and likely impacts. This unwillingness to require disaggregated socio-economic impact assessment for Aboriginal vs. non-Aboriginal sub-populations in the four pillars ignores the many differences that make the cumulative impacts and ability to take advantage of new projects fundamentally different between Aboriginal and non-Aboriginal sub-populations. Lax Kw'alaams repeats its call for the BCEAO to facilitate the Working Group's reconsideration of the scope of the VCs, indicators and assessment parameters for each of these four pillars. Lax Kw'alaams further requests consultation on what a proper economic, social, heritage and health impact assessment would look like.	Based on comments received from the PRGT Technical Working Group, the dAIR has been updated to clarify the inclusion of salmon both within the freshwater aquatic resources and marine resources VCs. It is appropriate to assess potential effects on salmon in the marine and freshwater environments separately due to the different types of effects and the different sensitivities of their natural histories in these two environments.	EAO response to Round 1 comment: Opportunities to discuss additional VCs are provided through the review and comment on several versions of the dAIR, as well as at the one working group meeting and three technical working group meetings held during the dAIR review period.	
404	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Each of the four pillars of economic, social, heritage and health must be disaggregated appropriately between Aboriginal and non-Aboriginal sub-populations in indicator-specific assessments, quantitatively and qualitatively where possible. Otherwise the lumping of data at the population level will make the assessment broader and artificially dampen down the likely adverse effects felt by the most often marginalized sub-population. Aboriginal people. Lax Kw'alaams calls for the EAO to facilitate the Working Group's reconsideration of the scope of the VCs, indicators and assessment parameters for each of these four pillars, prior to the finalization of the AIR, including in its consideration, but not limited to, the additional VCs and indicators identified in Lax Kw'alaams proposed revisions to the body text of the dAIR in Table 3-1.	No changes to the dAIR are required.				
405	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Specific economic issues raised by Aboriginal groups will be discussed in section 11 of the Application. In addition, socio-economic baseline studies are planned for all Aboriginal groups listed in Schedule B of the section 11 Order. If available, this information, including education, employment and socio-economic community data, will inform the Application. PRGT will also discuss with Aboriginal groups project contracting and employment opportunities.	No changes to the dAIR are required.	Lax Kw'alaams maintains its position that the requirement for information on the impact inequality of the project between Aboriginal and non-Aboriginal groups needs to be explicitly addressed in the dAIR.	As part of the Project benefits analysis, PRGT will engage with First Nations to identify interests and the potential for employment requirements. Aboriginal concerns with respect to accessing economic opportunities associated with the Project will be addressed in Section 11.2.4 (Concerns of Aboriginal Groups and Mitigation Measures).		
406	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams does not accept the limited focus of the Proponent's health and social pillar VCs and indicators. Missing entirely from either is consideration of non-contaminant driven community health and well-being considerations. A Project of this size will draw substantial numbers of workers (and other potential non-migrants) into and around Aboriginal communities, and be a draw of Aboriginal labour away from communities. History indicates that these sorts of projects, especially in combination with other mega projects (and this pipeline will only proceed if the PNW LNG Project is proceeding, meaning that both will likely have substantially overlapping construction stages and associated effects), bring with them not only economic benefits, but adverse effects on the society, economy and culture of Aboriginal peoples. The Proponent has not listed any non-biophysical aspects of Aboriginal community health and well-being in its dAIR. This is unrealistic and unacceptable.	See Standard Response 1.	Inadequate response. The effects on Aboriginal community health and well-being still remain unaddressed in the dAIR. Just generally identifying the effects from Project employment in the infrastructure and services VC, does not account for the unique impacts on Aboriginal communities.	Beyond identifying the effects from Project employment in the infrastructure and services VC, the dAIR also describes PRGT's requirement to assess potential effects related to air quality, acoustics, sediment quality, marine county foods, water quality, visual quality, and other socio-economic issues that are relevant to the health and well-being of Aboriginal and other communities. Part C of the Application will specifically consider these effects on Aboriginal rights and interests.		
407	Table 3-1	Chief Gary Reece	Lax Kw'alaams (Skeena Fisheries Commission)	The absence in the dAIR of any Valued Components related to the assessment of Aboriginal rights is inappropriate. We have provided a proposed VC of "Sufficiency of Resources for Meaningful Practice of Aboriginal Rights", and a partial list of related sufficiency indicators, in our comments on the dAIR body text. The full practice of Aboriginal rights reasonably includes, and is not limited to, access to sufficient lands, waters and resources in which the rights are predated and where they can be exercised. "Sufficiency" refers not only to quantity but quality, and is evaluated from the perspective of what is required to fulfill not only subsistence requirements, but also cultural (food, social, ceremonial, economic) needs, of the First Nation now and into the future. Determining what is "sufficient" encompasses a suite of interconnected tangible and intangible resources that underlie the meaningful practice of rights. The Proponent's suggestion that the temporal boundaries will be after construction and operation is not acceptable to good practice of EA. Good EA demands the following definition of the forward looking temporal scope of assessment, as proposed by Lax Kw'alaams (revisions underlined): "The temporal boundaries will encompass the construction, operation and decommissioning phases of the Project, but for greater clarity the temporal scope of assessment for each VC will be up until such time as it is estimated there will be no measurable residual effects from the Project on that VC."	See Standard Response 24.	Inadequate response. Lax Kw'alaams maintains that the current and future sensitivity and resilience of the VCs to change caused by the Project need to be assessed over the construction, operation and decommissioning phases of the Project.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013. PRGT has updated the dAIR to include a commitment to assess the operation and decommissioning phases of the proposed Project. This change was made based on feedback received from the PRGT Technical Working Group.		

				<p>baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project). Relevant factors to be considered in baseline conditions include current condition of the VC, and the current and future sensitivity and resilience of the VC to change caused by the Project. Some datasets used to determine baseline conditions (e.g., air quality monitoring data, fishing catch) provide useful historical information from which trends may be inferred.</p> <p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>"Trend over time" comment also directed to the EAO.</p>	<p>adequate response. The acceptance of current conditions as baseline conditions is not reflective of good EA practice or conductive to effective environmental protection and management. Full recognition of appropriate backcasting on a VC-by-VC basis is required and additional guidance should be included in the final EA on this subject. The assertion that "some datasets used to determine baseline conditions (e.g., air quality monitoring data, fishing catch) provide useful historical information from which trends may be inferred" does not adequately address Lax Kw'alems' concern.</p>	<p>EAO response to Round 1 comment (and applicable to Round 2 comment):</p> <p>In most cases, relevant trends to a VC would be discussed in the presentation of baseline conditions. Where the project is found to have a residual effect, the context (i.e. sensitivity and resiliency) of the valued component would also consider the factors noted in the comment. This methodology is outlined in the project's AIR, as well as in EAO's VC Guideline.</p> <p>PRGT response to Round 2 (additional to EAO response):</p> <p>Historical information and trends will be considered as part of the cumulative effects assessment (see DAIR section 3.1.2)</p>	
409.3.3	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>Throughout this section and throughout the DAIR, references to existing conditions and in some cases baseline conditions are made. In all such instances (including section headings - e.g., 4.4.2), reference must also be made to trends over time or change over time from an appropriately backcasted starting point for the VC in question. It is totally inappropriate to consider current conditions as reflective of what matters most, changes over time in the health, vitality, abundance, or other aspects of the vulnerability and resilience of the receiving environment. To accept an improperly backcasted baseline conditions assessment is to conduct an inaccurate effects assessment. Lax Kw'alems calls on the EAO to work with the Working Group and the Proponent to identify appropriate minimum backcasting requirements for each VC so that the change over time in VCs to date can be identified and integrated into the assessment. From this proper understanding of the cumulative effects context can emerge.</p>	<p>Reference to "relevant reports and documents" in bullet #1 implies the use of case studies and acknowledges that they will be an important tool to support the EA.</p>		<p>[Comment in both Tracking Table and word document]</p> <p>9. PRGT notes that it "is not aware of any relevant case studies from this part of BC". This response is indicative that the Proponent and its consultants have adopted an extremely narrow concept of what would constitute appropriate case studies to inform this EA. In reality, the case study method is useful for EA not only for drawing upon information from the same place as the proposed Project, but also for drawing upon information on similar kinds of processes and projects occurring in other places around the world where a similar VC is being affected and/or similar or identify Project components have been put in place. For example, a case study of another linear development that included construction of a pipeline on the sea floor in a similar kind of marine-terrestrial interface would be useful. Or several case studies that offer specific information on certain VCs that have been monitored during construction and operations phases of a project. Case studies offer real data that can more reliably inform the effects assessment than predictions. So again, Lax Kw'alems must request the EAO include specific requirements related to canvassing all available literature and other information sources for similar types of projects to identify and include appropriate case study material in the development of the Application."</p>	
410.3.3	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>Lax Kw'alems notes that the DAIR makes no reference to incorporation of material from case studies, one of the most powerful predictive tools available in EIA. We have recommended the additional bullet in section 3.3: "Collecting, analyzing and presenting data from relevant case studies of similar projects, clearly identifying any factors limiting the applicability of the case studies in this instance"</p>				
411.3.4	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>3.4 Potential Effects, pg. 3-4; all VC-specific sub-sections in Section 4 under "Effects Mechanisms"</p> <p>The Proponent has provided a draft Interaction Matrix for the Project, but has not provided any information, or drafted any information requirements, related to how the Interaction Matrix (and more appropriately, will be) populated. To date, and prematurely, the Matrix seems to have been populated solely by the Proponent and its consultants using unknown methods. Lax Kw'alems has recommended filling this gap with the following information requirement both in the general methodology in section 3, and in each of the "Effects Mechanisms" sections for specific VCs in Section 4: "The Application will detail what methods were used by the Proponent to populate this interaction matrix and establish potential effects, with special emphasis on identifying all inputs from stakeholders and First Nations that contributed to the identification of these likely and potential interactions." In addition, Lax Kw'alems strongly recommends the Proponent put more time and effort into engaging First Nations in identification of potential effects pathways linking the Project to adverse effects on Valued Components of high priority to individual Nations. The Nation has not weighed in on the accuracy of the current matrix because it is premature to do so, but is willing to engage in further discussion at the Working Group level on this topic.</p>	<p>Table 3-2 represents PRGT's preliminary assessment of the "Potential for Substantive/Meaningful Project-VC Interactions," with the intent to identify where interactions may result in an adverse effect due to a specific Project activity. PRGT welcomes input on potential Project interactions from the Working Group, the public, First Nations, including Lax Kw'alems, the EAO and other interested parties through the environmental assessment process.</p>	<p>Lax Kw'alems repeats its request for the inclusion of information on how the Interaction Matrix will be populated. Lax Kw'alems has recommended filling this gap with the following information requirement both in the general methodology in section 3, and in each of the "Effects Mechanisms" sections for specific VCs in Section 4: "The Application will detail what methods were used by the Proponent to populate this interaction matrix and establish potential effects, with special emphasis on identifying all inputs from stakeholders and First Nations that contributed to the identification of these likely and potential interactions." In addition, Lax Kw'alems repeats its recommendation for stronger engagement with First Nations in identification of potential effects pathways linking the Project to adverse effects on Valued Components of high priority to the individual Nations.</p>		
412.3.5	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>3.5 Mitigation Measures, pg. 3-11; also relevant to 3.7 Determination of Significance of Residual Effects, 3-12</p> <p>The Proponent states that "Mitigation is defined as actions to prevent or reduce to an acceptable level potential adverse Project effects". Lax Kw'alems is concerned that to date, other than specified government regulations, no thresholds of acceptable or manageable change have been identified by the Proponent and shared with Lax Kw'alems or the Working Group for this proposed Project. Identification and agreement on these thresholds, where possible, is critical prior to the Proponent conducting its effects assessment. Lax Kw'alems calls for the Proponent to identify for the Working Group all proposed thresholds of acceptable change, for each VC, that it plans to use in the environmental assessment, for Working Group review and comment.</p>	<p>Various thresholds and criteria related to manageable environmental change (i.e., level of significance) will be presented in detail in the Application with respect to each VC. In the first case, these will be based on established guidelines and criteria. This extends to monitoring programs that may be proposed to measure Project-related environmental change where substantial uncertainty exists. The PRGT welcomes input from the Working Group to provide thresholds for manageable change, especially where threshold criteria does not exist based on legislative, regulatory or management standards.</p>	<p>Lax Kw'alems repeats its request that, where possible, thresholds of acceptable change for each VC be determined, and provided to the Working Group for review and comment, prior to the Proponent conducting its effects assessment.</p>	<p>Various thresholds and criteria related to manageable environmental change (i.e., level of significance) will be presented in detail in the Application with respect to each VC. The PRGT Working Group, First Nations, the public and EAO will have the opportunity to review and comment on this information during Application review.</p>	
413.3.6	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>3.6 Characterization of Residual Project Effects, pg. 3-11; also 3.2 Cumulative Effects Assessment, pg. 3-17</p> <p>Lax Kw'alems requests that the DAIR include the following requirement in relation to "context" characterization: "The context characterization metric will also be used to identify any instances where there is evidence there is already pre-existing significant adverse effect on a VC." This will be critical contextual information and requires appropriate backcasting and use of thresholds of acceptable and manageable change in making this estimation. In addition, Lax Kw'alems recommends the specific inclusion of a requirement in section 3.9.2, pg. 3-17 that a cumulative effects assessment be conducted "when contextual analysis of baseline-and-trend over time conditions indicates a high likelihood that existing cumulative effects loading has created an already significant pre-existing effects load on the VC," in order to better assess the merit of proceeding with any additional development that may affect the VC in question in the proposed location. See proposed revisions in body text.</p>	<p>The Application will consider available historical information, in baseline conditions (e.g., regional air quality databases, demographic information, fish catch) where it may be possible to infer certain trends. The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p>	<p>Lax Kw'alems repeats its suggested track changes in the document in relation to context characterization and cumulative assessment.</p>	<p>In regards to suggested edits to the DAIR submitted via letter and edits directly in the DAIR document, please see PRGT's letter to Lax Kw'alems dated December 11, 2013.</p>	
414.3.7	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>3.7 Determination of Significance of Residual Effects, pg. 3-12, and throughout the document</p> <p>This section includes one of the first of many references to the Proponent making significance determinations in the DAIR. The meaning of determination implies the Proponent is making a decision, when in fact the Proponent is merely making an "estimation", providing its "conclusions", or conducting an "assessment" of significance. The decision on significance is not the Proponent's to make. Lax Kw'alems has suggested track changes in many places in the document to reflect the need for this revision, and ask that the DAIR be revised to remove all references to Proponent significance determinations.</p>	<p>Significance determination is a term used in environmental assessment. PRGT's application is, in essence, a proposed EA including conclusions. It is up to EAO to make conclusion on significance ultimately.</p>	<p>Lax Kw'alems repeats its suggested track changes in the document to reflect the fact that the Proponent is not making determinations. We again ask that the DAIR be revised to remove all references to Proponent significance determinations.</p>	<p>In regards to suggested edits to the DAIR submitted via letter and edits directly in the DAIR document, please see PRGT's letter to Lax Kw'alems dated December 11, 2013.</p>	
415.3.8	Chief Gary Reece	Lax Kw'alems (Skene Fisheries Commission)	<p>There are substantial problems with this sub-section on confidence and risk. In it, the Proponent is espousing a "go it alone" effects characterization model that is typical of the entire DAIR. No mention is made of any inputs from parties other than the Proponent and its experts' judgment in the estimation of confidence and risk, or of methods other than scientific certainty and professional judgment. No mention is made of Aboriginal traditional knowledge, inputs from affected First Nations, multi-party consideration of risks and acceptable tradeoffs. No mention is made of the precautionary principle, here or anywhere in the DAIR. No mention is made of whether in the face of uncertainty there would be a heightened requirement for proactive mitigation and monitoring systems, including the identification of adaptive management mechanisms at set thresholds of acceptable change. Above all, the assessment of risk is a social process, one filled with uncertainty, perception, and stigma. It cannot be reduced down to the simple unilateral methods proposed by the Proponent in the DAIR. Lax Kw'alems strongly recommends further discussion and revisions to requirements for this section of the DAIR before it is finalized.</p>	<p>PRGT welcomes input from Aboriginal on all topics associated with the environmental assessment, including the determinations of confidence and risk. If an Aboriginal group provides their perception of confidence and risk, it will be considered as part of the EA process.</p> <p>No changes to the DAIR required.</p>	<p>Inadequate response. The unwillingness to revise the DAIR to include the input of parties other than the Proponent and its experts' judgment, on confidence and risk is not reflective of good EA practice. Lax Kw'alems remains unsatisfied with the current wording in the DAIR, and recommends further discussion and revisions to the requirements for this section of the DAIR before it is finalized.</p>	<p>PRGT recognizes that consultation is a key component of environmental assessment, including engaging various groups to obtain information on potential project-related issues that may result in potential adverse effects (see sections 11, 12 and 13 of the DAIR).</p> <p>PRGT welcomes input from Aboriginal groups on all topics associated with the environmental assessment, including the determinations of confidence and risk. If an Aboriginal group provides their perception of confidence and risk, it will be considered as part of the EA process.</p>	
416.1.2	IF	Ministry of Environment EP LNG Team	<p>The list of items that will be contained in the application needs to include a description of all wastes (air contaminants, effluents, solid wastes or hazardous wastes) that will be generated at various stages of the projects and the environmental effects of those waste discharges.</p>	<p>PRGT will address air emissions in both the AQ section and the new GHG section (based on working Group feedback). Change in demand on solid and liquid waste management will be assessed under Infrastructure and Services. Hazardous material spills will be considered in the Accidents and Malfunctions section.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
417.1.2	AMG	Ministry of Environment EP LNG Team	<p>Only a single bullet is provided to describe the marine component of the pipeline construction activities. Similarly the project description provides a very short and extremely simplified description of construction activities for the marine portion. More detail (equivalent to the terrestrial descriptions) needs to be provided in the project description and/or the DAIR in order to evaluate the marine VC selection.</p>	<p>The DAIR (which builds upon the project description) identifies the information requirements for the Application. More detail on project construction and operations will be provided in the Application.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
418.1.2	AMG	Ministry of Environment EP LNG Team	<p>Based on other marine pipeline projects, the marine construction has phases of pre-laying, laying, and post-laying, and can include activities such as blasting, rock breaking, dredging, open trenching (for shore crossings), pipeline burial, rock placement and seabed cut and fill. Presently the marine construction activities are not described in sufficient detail to evaluate if the VC selection is appropriate.</p>	<p>The DAIR (which builds upon the project description) identifies the information requirements for the Application. More detail on project construction and operations will be provided in the Application.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
419.1.2	AG	Ministry of Environment EP LNG Team	<p>Similarly (to comments above on marine construction), the ford crossing activities are not described adequately in either the project description or the DAIR to evaluate if the VC selection is appropriate.</p>	<p>The DAIR (which builds upon the project description) identifies the information requirements for the Application. More detail on project construction and operations will be provided in the Application.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
420.1.2	IF	Ministry of Environment EP LNG Team	<p>Compressor station description only states construction and does not include operation. A description of operations is important to evaluate the potential effects from operating a compressor station.</p>	<p>A description of compressor station operation will be provided in the Application.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
421.3.1	IF	Ministry of Environment EP LNG Team	<p>Table 3-1 Proposed list of VCs does not include an indicator for evaluating metal leaching/acid rock drainage (ML/ARD). Assessing water quality alone will not provide the information necessary to determine if ARD would be an issue.</p>	<p>Section 14 of the DAIR indicates that a metal leaching and acid rock management plan will be completed for the Project.</p> <p>See Standard Response 36.</p>			
422.3.1	IF	Ministry of Environment EP LNG Team	<p>Parent material and/or bedrock type would be better indicators, particularly gossanous rock near sensitive areas and/or large stockpiles of rock. These areas may need more assessment.</p>	<p>Comment acknowledged and will be considered in the application.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
423.3.1	IF	Ministry of Environment EP LNG Team	<p>Table 3-1 An indicator for evaluating the risk of dredging is not included. Soil quality and benthic invertebrate tissue should be added to evaluate this risk. Water quality alone will not sufficiently characterize this risk.</p>	<p>See Standard Response 11.</p> <p>The potential for changes to sediment quality will be estimated using a sediment plume model and baseline sediment chemistry data. Baseline tissue chemistry data in marine invertebrates were obtained for the human health and ecological risk assessment which will support the Human Health and Marine VCs.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
424.3.1	IF	Ministry of Environment EP LNG Team	<p>Table 3-1 Freshwater aquatic and marine resources should include "species at risk" in general, not solely "fish species at risk".</p>	<p>See Standard Response 13</p>		<p>Indicator species selected to focus the assessment of freshwater aquatic resources included fish species at risk as well as fish species that are associated with commercial, recreational, or Aboriginal fisheries. Other species at risk with the potential to occur within the aquatic environment (e.g., vegetation, mammal, bird, or invertebrate species at risk) are addressed in other sections of the Environmental Assessment Application. More so, by identifying important fish species at risk and their habitats that may be potentially affected by the Project, and developing avoidance and environmental protection measures to eliminate or reduce effects on the freshwater aquatic environment, the overall integrity and ecological function of the affected aquatic ecosystem (including other species at risk) can be assessed.</p>	
425.3.1	IF	Ministry of Environment EP LNG Team	<p>Ecosystem health from a freshwater aquatic perspective is not included in the AIR. It is unclear how the construction of multiple pipelines on aquatic resources will be assessed.</p>	<p>See Standard Response 19</p>			
426.3.1	IF	Ministry of Environment EP LNG Team	<p>Unless it is identified as a VC, it may not be carried forward to a cumulative effects assessment. Therefore, collecting benthic invertebrates, as an indicator for ecosystem health, should be included in the AIR.</p>	<p>See Standard Response 19.</p>	<p>Takla Lake First Nation comment on response to Round 1 Ministry of Environment EP LNG Team comment:</p> <p>Takla strongly agrees with WG member statement and we have made similar statements. Takla identifies that standard response 19 does not address this recommendation and requests that the ICEAO include Benthic Invertebrates as an indicator of ecosystem health.</p>	<p>Use of benthic invertebrates as an indicator of aquatic ecosystem health is appropriate where there are chronic point source or non point source emissions (e.g., discharges from mines, municipal sewage treatment plants, pulp mills etc.). Natural gas pipelines do not have any wastewater emissions and there would be no effect on benthic invertebrate communities. As a result they have not been included as an indicator for the Freshwater Aquatic Resources or Marine Resources VCs.</p>	
427.3.1	IF	Ministry of Environment EP LNG Team	<p>Water quality has been excluded as a VC and appears to be captured within other VCs. However, water quality is an important resource that should be a VC to ensure that potential effects are fully characterized.</p>	<p>See Standard Response 8 and Standard Response 36.</p>			
428.3.1	IF	Ministry of Environment EP LNG Team	<p>It appears that the LNG pipelines can directly affect freshwater, ground water and marine water resources.</p>	<p>See Standard Response 8 and Standard Response 42.</p>	<p>Accept.</p>	<p>No additional response required.</p>	
429.3.1	IF	Ministry of Environment EP LNG Team	<p>The project may result in water quality changes with the proposed compressor station construction/operation and the potential on-site spills. Stormwater runoff can affect ground water or nearby surface waters.</p>	<p>See Standard Response 8. Compressor site locations were selected to reduce potential impacts to surface waters. Standard mitigations and erosion and sediment erosion control measures to be implemented at the time of construction will be described in the assessment.</p> <p>Contingency and Management Plans to reduce the potential for impacts to nearby surface water and groundwater due to potential on-site spills and stormwater runoff during the operations and maintenance phase will be described in the assessment.</p>	<p>Ministry of Environment EP LNG Team comment on response to Round 1 Ministry of Environment EP LNG Team comment:</p> <p>Accept.</p> <p>Oil and Gas Commission comment on response to Round 1 Ministry of Environment EP LNG Team comment:</p> <p>During the permitting process, PRGT is required to meet the requirements relating to water quality in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.</p>	<p>In response to OGC: Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.</p>	
430.3.1	IF	Ministry of Environment EP LNG Team	<p>Water quality section should also include a discussion of other water users & effects on these users in the project area (i) drinking water users (wells) & (ii) community watersheds.</p>	<p>See Standard Response 8.</p> <p>The list of proposed projects and activities (Table 3-4) that will be considered in the cumulative effects assessment is based on the major projects inventory available at the time of DAIR development. This list will be refined by PRGT subject to review by the Working Group and confirmation from the EAO.</p>	<p>Ministry of Environment EP LNG Team comment on response to Round 1 Ministry of Environment EP LNG Team comment:</p> <p>Accept.</p> <p>Oil and Gas Commission comment on response to Round 1 Ministry of Environment EP LNG Team comment:</p> <p>During the permitting process, PRGT is required to meet the requirements relating to water quality in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.</p>	<p>In response to OGC: Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.</p>	
431.3.9.1	IF	Ministry of Environment EP LNG Team	<p>The project inclusion list is missing a number of other pipelines: Coastal Gaslink project, Pacific Northern Gas Looping, Enbridge Northern Gateway, etc.</p>	<p>See Standard Response 8.</p> <p>The list of proposed projects and activities (Table 3-4) that will be considered in the cumulative effects assessment is based on the major projects inventory available at the time of DAIR development. This list will be refined by PRGT subject to review by the Working Group and confirmation from the EAO.</p>	<p>Accept.</p>	<p>No additional response required.</p>	

464.4.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	4.4.2 Existing Conditions and Change over Time for Marine Resources In the section on existing conditions, specific reference needs to be made to identification of any contaminated sediment, its distribution, existing effects (if any) and physical characteristics. Likewise, in Section 4.4.3 on Potential Effects, a specific requirement is required to identify potential effects of this contaminated sediment if disturbed.	This is captured within the third bullet under "Field surveys include" on dAIR page 4-10. See Standard Response 11.	Sufficient response.	No additional response required.		
463.4.4.3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	4.4.3 Potential Effects: Mitigation and Monitoring, pg. 4-11 and throughout VC-specific sections Lax Kw'alaams asks that each of the VC-specific sections be revised in relation to Mitigation and Monitoring to include reference (as noted in our track changes) to "First Nations inputs and traditional knowledge" alongside existing industry, government and scientific tools and guidance already listed.	See Standard Response 2. No changes to the dAIR required.	Inadequate response. Lax Kw'alaams remains unsatisfied that an explicit reference to the inclusion of "First Nations inputs and traditional knowledge" has not been added to the dAIR. It is evidence of the BCEAO and the proponent not following Aboriginal groups to fully participate and have their interests inform the assessment.	The Standard Response 2 has been included below to add clarity. The requirement is located throughout the dAIR. "If available, relevant Traditional Knowledge and Traditional Land Use information will be incorporated into the Application. TK and TLU will be used by PRGT throughout the environmental assessment process as well as subsequent regulatory approval processes. If an environmental assessment certificate is granted this information will be used to help ensure that the proposed Project identifies and addresses issues of concern to Aboriginal groups." PRGT believes that this information will also help enhance the ability of Aboriginal communities to identify, record and retain important traditional information that can be used for purposes other than the environmental assessment of the proposed Project. PRGT believes this issue has been adequately addressed in the dAIR.		
462.10	Don Roberts	Kitsumkalum Band Council	Earthquakes have increased in the area where the natural gas might be coming from for the project. Some research shows that fracking might be the cause for this. It should be assessed that effects the shutting down of supply will mean to the project. Kitsumkalum requests that the proponent clarify exactly where the gas to be transported comes from. We also expect to see the proponent address the other possible gas deposits/areas that they might be tapping into along the way once the pipeline is built.	The PRGT pipeline will be connected to an extension of the NGTL System. It is proposed that most of the gas that will flow on PRGT will come from the North Montney gas development area in north-eastern BC. Gas may also come from other areas of North America through the NGTL System. The NGTL System and North Montney gas development are not related to the scope of the EAD review for PRGT's proposed Project. The PRGT Project does not connect directly to any sources of gas along its proposed route.				
463.4.5.4	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	The dAIR needs to identify how estimations of significance will be conducted in key indicator species across different landscape units and herd ranges. For example, what if caribou effects are significant in one place and not on another herd? Given the long linear disturbance and the large number of different populations of animals involved, clarity is required on this issue.	Specifically for Grizzly Bear and Caribou, the effects assessment will be completed for each Caribou Herd or Grizzly Bear Population Unit. Results will be presented, and residual effects criteria and significance determined, for each of these herds or units.	Lax Kw'alaams repeats its concern that the dAIR needs to clearly identify the criteria for how estimations of significance will be conducted in key indicator species across different landscape units and herd ranges.	As outlined in Sections 3.8 and 4.5.3 of the dAIR, significance determinations will be made for each wildlife key indicator species. The spatial boundaries for assessing significance for wildlife are described in Section 4.5.1 of the dAIR. As indicated in the Round 1 response, the effects assessment will be completed for each Caribou Herd and Grizzly Bear Population Unit.		
464.5.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams has wide ranging concerns about the inappropriate scope, focus and methods proposed for estimation of potential economic effects that merit further consultation with the Crown prior to finalization of the AIR. Chief among these concerns is the Proponent's assessment method (confirmed verbally at the October 17 Working Group meeting) not to disaggregate between the socio-economic baseline conditions and trends or between the likely economic effects of the Project, between Aboriginal and non-Aboriginal people. Time and again it has been shown through academic study and proper environmental assessment that megaprojects have fundamentally different beneficial and adverse economic effects on Aboriginal vs. non-Aboriginal sub-populations. That reality will be masked if the currently proposed Economic Effects Assessment is accepted by the Crown, and this masking is prejudicial to the protection of the rights and interests of Lax Kw'alaams and its members. Nowhere are the multiple systemic barriers to the ability for First Nations to take advantage of economic development opportunities identified in the dAIR. In addition, the single indicator chosen (labour force capacity) is inadequate to capture all of the potential adverse economic effects of the Project on Aboriginal people, and the absence of consideration of impact equity and requires is unacceptable. Further discussion at the Working Group level is required prior to finalization of this section of the dAIR, it is fundamentally inadequate as currently written.	As per BCEAO requirements, Aboriginal communities will be presented alongside non-Aboriginal communities that fall with the LAA and RAA. Key indicators will be presented and evaluated. See Standard Response 3.	Inadequate response. The specific barriers to Aboriginal populations accessing the benefits of the Project need to be addressed and mitigated. Simply looking at the general barriers that may impede the local workforce, both Aboriginal and non-Aboriginal, from accessing employment and / or contractor opportunities is not sufficient. Lax Kw'alaams again calls for further discussion at the Working Group level prior to finalization of the dAIR, so that the proponent can better understand the unique barriers faced by Aboriginal populations. This section of the dAIR as it stands remains fundamentally inadequate.	As part of the Project benefits analysis, PRGT will engage with First Nations to identify interests and the potential for meeting employment requirements. Aboriginal concerns with respect to accessing economic opportunities associated with the Project will be addressed in Section 11.2.4 (Concerns of Aboriginal Groups and Mitigation Measures).		
465.2.1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	5.2.1 Employment - Introduction, pg. 5-1 and 5-2, see also section 6.2.1, pg. 6-1 Specific required wording changes to the spatial scope of assessment are identified in Lax Kw'alaams' track changes in the body text. The Project Footprint, in particular, is of little value to this assessment. The same is true in Section 6.2.1 on social impact assessment; please revise as per Lax Kw'alaams' track changes.	No changes to the dAIR required.	Lax Kw'alaams repeats its requested changes in the tracked changes version of the document. Lax Kw'alaams requests that the revisions are incorporated into the final AIR.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 10, 2013.		
466.5.2.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	The level of effort described for the economic effects assessment is inadequate. A proper workforce evaluation on a community-by-community basis and First Nation by First Nation basis is required for a Project of this scope. We know that the cost of conducting an appropriate disaggregated SEA would not even constitute a rounding error in the capital costs for this Project, so this inadequate level of effort must be improved. Please revise text as noted: "Measurable parameters used to characterize employment may include but are not limited to: wage levels, employment rate, labour availability by trade or skill level, training programs, and migration rates/labour force stability. Each measurable parameter will be broken down by regional district, community, and Aboriginal vs. non-Aboriginal sub-populations, wherever possible, where quantitative data is not available, more extensive qualitative inputs will be conducted by the Proponent"	See Standard Response 3.	Response does not address the request. We repeat the request for a proper workforce evaluation on a community-by-community basis and First Nation by First Nation basis.	Workforce data available from Statistics Canada, BC Stats and from information provided via key informants and community-specific socio-cultural evaluations will be included in this report. Issues pertaining specifically to Aboriginal communities will be included and addressed in section 11 of this report.		
467.5.2.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	"Measurable parameters used to characterize employment may include but are not limited to: wage levels, employment rate, labour availability by trade or skill level, training programs, and migration rates/labour force stability. Each measurable parameter will be broken down by regional district, community, and Aboriginal vs. non-Aboriginal sub-populations, wherever possible, where quantitative data is not available, more extensive qualitative inputs will be conducted by the Proponent"	See Standard Response 3.	Inadequate response. Lax Kw'alaams repeats the request for changes to the text in the tracked changes version of the document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
468.5.2.3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	5.2.3 Mitigation [for employment], pg. 5-3, also 6.2.3 Mitigation [for social effects], pg. 6-3 This sub-section uses generic cut and paste materials from biophysical effects assessment portions of the dAIR and has nothing to do with development of economic mitigation and monitoring. Please revise accordingly to reflect good practice of full scope economic effects assessment. The same applies for section 6.2.3 on social effects mitigation and monitoring.	As presented in the dAIR, the Application will identify potential effects and mitigation measures. No changes to the dAIR are required.	Inadequate response. Lax Kw'alaams maintains the request to revise both the mitigation for employment and social effects sections.	The dAIR indicates that mitigation measures must be developed. Monitoring will be proposed where there is sufficient uncertainty with an effects prediction or a new application of a mitigation measure is prescribed. Details on any proposed mitigation measures and monitoring programs will be included in the Application and open to review and comment by the EAD, the Working Group, First Nations, and the public.		
470.6.1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Like the economic effects assessment, the current social effects assessment as proposed in the dAIR is fundamentally flawed and requires major revisions; incremental improvements will be inadequate to address the extent of revisions required to address these flaws. The social background of Aboriginal and non-Aboriginal people are likely to be fundamentally different. There is nothing in the dAIR that reflects recognition of that fundamental precept of effective social impact assessment. In addition, the scope of indicators is inadequate to cover all of the social impacts of the Project on Aboriginal people. Lax Kw'alaams requests further refinement at the Working Group level of appropriate social VCs and indicators to overcome these substantial deficits in the scope of the currently planned social impact assessment.	PRGT welcomes information from Lax Kw'alaams on its traditional and current use of the marine environment, and looks forward to a discussion on the best means to obtain this information. Any information provided will be considered in Section 11 of the Application. No changes to the dAIR required.	Lax Kw'alaams remains critically concerned that there are serious deficiencies in the social VCs and indicators in that they do not address the fundamental difference in the social background between Aboriginal and non-Aboriginal people. Lax Kw'alaams requests that the Working Group is convened to discuss appropriate social VCs and indicators.	The request for an additional Working Group meeting to discuss these social VCs and indicators is directed to the EAD.		
471.6.3.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Proponent committed in the working group meeting of October 17 to engaging in direct discussions with small craft users in the area. This is not clearly reflected in the dAIR, and is an important element of the assessment of transportation and access risks, including risk perception and alienation of Aboriginal marine users. Greater clarity is required in the dAIR on the type of data being collected from First Nations marine users, and Lax Kw'alaams seeks more clarity on timelines and nature of the proposed interviews with its marine users (the latter can be discussed outside of the dAIR).	No changes to the dAIR required.	Inadequate response. Lax Kw'alaams again requests that the commitment to engaging with small craft users in the area, and particularly with First Nations marine users, be specifically set out in the dAIR. The dAIR should not be finalized until this information requirement is reflected in the AIR.	As described in section 6.3.2 of the dAIR, PRGT has committed to acquiring information to describe new and existing transportation and access options that have the potential to be affected by proposed Project activities. PRGT welcomes any information that Lax Kw'alaams is willing to provide on its traditional and current use of the marine environment.		
472.6.3.3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	An adverse Project effect not identified by the Proponent, but of high likelihood to occur, is increased alienation/avoidance of certain marine areas and reduced sense of safety for Lax Kw'alaams' marine users. These risk perception and stigma considerations have real outcomes in terms of areas our First Nation members are willing to travel to and in, and may well lead to substantial adverse effects on mobility, traditional use activities, and country food harvesting (with all the benefits those activities entail). These areas need to be added to this list of potential Project effects and fully considered in the EA.	Potential adverse effects on mobility for all marine users, including traditional users, will be assessed under the marine navigability effect within Section 6.3 Transportation and Access. Potential adverse effects on increased alienation/avoidance of certain marine areas and reduced sense of safety for Lax Kw'alaams' marine users will be addressed in Section 11.2.2 Potential Effects and Mitigation Measures.	Sufficient response.	No additional response required.		
473.7.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Lax Kw'alaams is fundamentally opposed to the acultural nature of the Proponent's proposed archaeological and heritage resources assessment. Where are cultural effects – a key consideration in BCEAO process – considered, if not here? Lax Kw'alaams calls for requirements for a fulsome consideration of Lax Kw'alaams cultural landscape and intangible cultural resources. Intangible elements of culture are entirely relevant to Aboriginal well-being, quality of life, and rights and should be integrated into the assessment of this or the social and health VCs. Lax Kw'alaams again requests that this topic be subject to further Working Group discussions prior to the finalization of the AIR.	It is understood that Heritage and Archaeology are only a portion of cultural assessment for the Project. TN/TLU programs, including information provided by First Nations, will consider other non-tangible cultural resources and effects in other sections of the Application. See Standard Response 41.	Inadequate response. If not included in the consideration of archaeological and heritage resources, Lax Kw'alaams requests that there is a specific VC regarding culture and sacred places. How this information is to be considered and how it will be used to inform the environmental assessment and construction processes needs to be specifically set out in the dAIR. Lax Kw'alaams again requests that this topic be subject to further Working Group discussions prior to the finalization of the AIR.	The discussion of Aboriginal interests and concerns including the intangible elements of culture, Aboriginal well-being, quality of life, and rights will be included in Section 11 of the Application (specifically Sections 11.2.2, 11.2.3, and 11.2.4). The VC assessments including social, health and archaeological and heritage resources will consider relevant information from Section 11.		
474.8.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	The lack of community health considerations in the scope of this assessment is very troubling. Further Working Group discussion with the BCEAO to define community health assessment expectations is critical. Health implications of a Project include cumulative effects context of an increasingly industrially damaged territory for Lax Kw'alaams, the heart of which will be bisected by the proposed Project, may be substantial or significant. Specific comments on this flawed scope of assessment are not provided and will not be provided until a community health and well-being component is integrated into the dAIR.	Components of community health, including economy, services and infrastructure, and human health risk are explicitly included in terms of VC assessments.	Response does not address the request. We repeat the request for an adequate community health and well-being component to be integrated into the dAIR, one that addresses the unique impacts the Project will have on Lax Kw'alaams, and other First Nation, community health.	Components of community health, including economy, services and infrastructure, and human health risk are explicitly included in terms of VC assessments. Please see sections 4, 5, 6, 7, and 8 for additional clarity.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application.	
475. General Comments	Don Roberts	Kitsumkalum Band Council	The short timelines are of great concern to us. We have been requesting information that we are told is not available yet, but the proponent plans to submit their application in the next few months. We will need enough time to do our review of the proponent's work and to move towards remediation of any study shortfalls or knowledge gaps. We request that a tracking table by dAIR section will be provided to us. We want to see all comments submitted and the proponent's comments. This will be easier for us to understand than going through everyone's individual tracking table. On several occasions, Kitsumkalum has requested to be provided with a list of information used for various baseline studies. We have not received any of this so far. We will not be able to assess any of the baseline studies, reports or predictions without this information and we will require sufficient time to review this once the information is provided to us. It is represented in the information feeding into the baseline assessments. We have informed the proponent that we will be conducting a knowledge gap analysis on the is once we have been provided with their information. We will be insisting on adequate time to review the information and to conduct the gap analysis. We have not reiterated this under the individual VC sections as this pertains to all VCs. Our review is of a general nature only and restricted to the allotted timeframe and our limited resources. We will comment more as we are provided with more details and resources.	During pre-Application, PRGT presented details of the baseline studies that were planned to Kitsumkalum. The Application will contain the results from the baseline studies. During Application review, Kitsumkalum will have multiple and meaningful opportunities to review and provide comments on the Application. PRGT understands that EAD will provide Kitsumkalum with a dAIR tracking document. PRGT welcomes any relevant information that Kitsumkalum may provide during Application review arising from the proposed GAP analysis, or any other information sources. PRGT understands that EAD will follow-up with Kitsumkalum directly regarding the invitation to EAD for a meeting. Kitsumkalum's comment will be forwarded to EAD for their consideration. No changes to the dAIR are required.	EAD response to Round 1 comment: EAD believes that the information requested has been provided.			
476.8.2.1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	In addition to the identified "quantitative modeling of potential health risks", Aboriginal risk perception and reduction in access to and faith in country foods is an absolutely essential effect pathway and assessment topic that must be considered through this EA. These topics are currently not included in the dAIR.	PRGT believes that the social VCs are sufficient to identify and address any potential significant adverse social effect from the proposed Project. PRGT is also conducting a socio-economic baseline data collection for each Aboriginal group in Schedule B. Relevant issues and information from these studies will be discussed in sections 5, 6 and 11 of the Application. No changes to the dAIR required.	Inadequate response. Lax Kw'alaams repeats the request that the topics of Aboriginal risk perception and reduction in access to and faith in country foods be considered through this EA as assessment topics.	Traditional Knowledge and Traditional Land Use information, where available, will also be used to inform the social and health assessment.		

				9.0 Accidents or Malfunctions, pp. 9-1 and 9-2, also 10.0 Effects of the Environment on the Project, pg. 10-1 The lack of any requirement for the Proponent to show engagement with affected parties here is troubling. Lax Kw'alaams recommends the following additional bullet: "The Proponent must also show all evidence of efforts to engage stakeholders and First Nations in identification, risk characterization, avoidance mechanism development, and other considerations for accidents and malfunctions."	PRGT would welcome the opportunity to engage with Lax Kw'alaams on the Accidents or Malfunctions and the Effects of the Environment on the Project assessments.	Lax Kw'alaams (Skeena Fisheries Commission) comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: Response does not address the request. If the proponent would welcome the opportunity to engage with Lax Kw'alaams on the Accidents or Malfunctions and the Effects of the Environment on the Project assessments, then this sentiment should be reflected in a requirement to provide information on such engagement in the dAAR. Lax Kw'alaams repeats the request for the proposed text changes in the tracked changes version of the document.	Response to Lax Kw'alaams: As per the Round 1 Response provided, PRGT welcomes the opportunity to engage with Lax Kw'alaams on the Accidents or Malfunctions and the Effects of the Environment on the Project assessments. Regarding the request to adjust the dAAR according to the tracked changes version of the document, following direction from the EAO, responses to the tracked changes submitted by the Lax Kw'alaams are not being responded to.		
477	9.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	A similar requirement for evidence of efforts to engage on this topic with First Nations is recommended in Lax Kw'alaams' body text proposed changes to the dAAR for section 10.0, pg. 10-1. Lax Kw'alaams is particularly concerned about the following additional potential events related to environmental change in relation to the Project and calls for their consideration to be required in the AAR: 1) tsunami events; and 2) sea level changes.	PRGT would welcome the opportunity to engage with Lax Kw'alaams on the Accidents or Malfunctions and the Effects of the Environment on the Project assessments. Tsunami events will be captured under "2,475 year seismic events" and sea level change will be discussed within "future climate scenarios". The dAAR will be updated to provide clarity.	Oil and Gas Commission comment on response to Round 1 Lax Kw'alaams (Skeena Fisheries Commission) comment: During the permitting process, PRGT is required to meet the requirements relating to emergency response under the Oil and Gas Activities Act and associated regulations.	Response to Oil and Gas Commission: Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this. The Lax Kw'alaams will have an opportunity to provide specific comments in the tracking sheet during the next round of dAAR review.		
478	10.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)		PRGT believes that the dAAR provides sufficient information to undertake an assessment (in Section 11 of the Application) of how the proposed Project may impact Aboriginal Interests, as well as other concerns identified by Aboriginal Groups. The comment related to government-to-government consultation has been forwarded to EAO for their consideration.	Inadequate response. Lax Kw'alaams again requests the amendment of Section 11 to take into account the Aboriginal perspective. Lax Kw'alaams remains critically concerned that the current approach will not assess the impacts throughout Lax Kw'alaams' territory to rights and title interests.	Section 11 of the Application provides an assessment of potential project effects on Aboriginal interests and concerns. Aboriginal interests means asserted Aboriginal rights, including title or such determined Aboriginal or treaty rights. This assessment will consider information provided by Lax Kw'alaams regarding potential effects to their Aboriginal interests and concerns.		
479	11.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	As noted in Lax Kw'alaams earlier comment regarding the need for a proper VC related to Aboriginal rights-based assessment, we find that the current structure of this Section 11 is inadequate for meaningful assessment of Aboriginal rights and title interests of Lax Kw'alaams. Consultation at a government-to-government level is required to develop a proper Aboriginal rights-based assessment framework for this EA, to be inserted into the final AAR.	No changes to the dAAR are required.				
480	11.0	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	There are two sides to every dialogue/story and in Lax Kw'alaams' experience, environmental assessment processes are typically geared only to the presentation of the Proponent's perspective. Lax Kw'alaams recommends the following wording changes to Application requirements: "The Application will contain the Proponent's perspective on the results of the implementation of the Aboriginal Consultation Plan for each Aboriginal group."	The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Lax Kw'alaams. dAAR to be changed to add wording "the implementation of".	Inadequate response. Lax Kw'alaams again requests the addition of "the Proponent's perspective" to the wording in the dAAR.	As previously indicated, the entire Application will be drafted by PRGT and will inevitably include PRGT's perspective on all issues, including the results of consultation and effects assessments. Adding "the Proponent's perspective" to all sections would add redundancy and unnecessary repetition.		
481	11.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Bullet #2 indicates that the Application will provide "identification of specific asserted Aboriginal Interests", whether these are provided by the First Nation or from secondary sources. The Proponent's interpretation on this topic MUST be provided to each Aboriginal Group in advance for comment, prior to the effects characterization process. This is a major gap right now; these interests need to be properly characterized with Aboriginal input before any sort of impact assessment can take place.	PRGT's understanding of an Aboriginal groups' "Aboriginal Interests" will be the subject of ongoing engagement by PRGT, and also be informed by undertaking secondary research. No changes to the dAAR required.	Sufficient response. However, Lax Kw'alaams requests a specific commitment from the proponent that the proponent's interpretation on this topic will be provided to each Aboriginal Group in advance for comment, prior to the effects characterization process.	Prior to the Application being completed and filed with EAO, Lax Kw'alaams will be given the opportunity to review a draft of the second Consultation Report which will include a summary of potential adverse effects of the proposed Project on Lax Kw'alaams' Aboriginal interests and concerns as well as potential mitigation measures.	[Comment in both Tracking Table and word document] 10. Lax Kw'alaams looks forward to reviewing a draft of the second Consultation Report as committed to in response to Comments #481, 483, and 485."	Comment acknowledged.
482	11.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Currently, the dAAR requires the Application to include "Views of Aboriginal groups, if provided, regarding proposed mitigation measures". Lax Kw'alaams agrees that the Application would be incomplete without this information, but the proper method would be for the Proponent to involve the First Nations in the DEVELOPMENT of mitigation, not merely review of same. And Lax Kw'alaams asks the Proponent to provide clarity on WHEN draft mitigation would be provided in advance for Aboriginal group consideration and WHEN this input would be sought. Please respond in writing and know that Lax Kw'alaams will require sufficient lead time to respond meaningfully to any draft mitigation measures presented to it and to work with the Proponent on same.	Identification and discussion of possible measures to mitigate potential adverse effects on Aboriginal Interests will be the subject of ongoing engagement by PRGT. PRGT welcomes input on proposed mitigation measures from Aboriginal groups including Lax Kw'alaams at anytime. No changes to dAAR required.	Inadequate response. Lax Kw'alaams again asks the Proponent to provide clarity on when draft mitigation measures would be provided in advance for Aboriginal group consideration and when this input would be sought. Lax Kw'alaams emphasizes the need to provide First Nations with sufficient time to review and respond to any draft mitigation measures provided.	Mitigation measures will be drafted as part of the effects assessment for each VC and will be described in the Application. The first formal opportunity for Lax Kw'alaams to comment on proposed mitigation measures (via the Technical Working Group) will be during Application review. However, PRGT welcomes input on mitigation measures from Aboriginal groups including Lax Kw'alaams at anytime.		
483	11.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	Quite rightly, this section calls for inclusion of views of Aboriginal groups on residual adverse effects. The Proponent and EAO are reminded that such views cannot be shared unless First Nations are privy to draft materials identifying, from the Proponent's perspective, likely residual effects. The "pre-assessment" effects mechanisms identified in the dAAR DO NOT constitute proper assessment of residual effects and the results of the effects assessment process proper must be placed before the Aboriginal groups for consideration prior to the filing of the Application. In addition to proposed wording changes in this sub-section (see body text), Lax Kw'alaams recommends adding the following bullet: "Identification of any alternative characterization of likely residual effects and/or alternative mitigation measures identified by Aboriginal groups through consultation, on these other interests."	PRGT believes that, through continued consultation during the Application review phase of the environmental assessment, Aboriginal Groups will be provided multiple and meaningful opportunities to comment on how the proposed Project may adversely impact Aboriginal Interests, including sharing their views on proposed mitigation measures and residual impacts. No changes to the dAAR are required.	Inadequate response. Lax Kw'alaams again requests that the proponent commit to the results of the effects assessment process being placed before the Aboriginal groups for consideration prior to the filing of the Application. It is only with these results will First Nations be able to effectively share their views on residual adverse effects.	Prior to the Application being completed and filed with EAO, Lax Kw'alaams will be given the opportunity to review a draft of the second Consultation Report which will include a summary of potential adverse effects of the proposed Project on Lax Kw'alaams' Aboriginal interests and concerns as well as potential mitigation measures.		
484	11.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)		PRGT welcomes comments from Aboriginal groups, including Lax Kw'alaams, on the characterization of likely residual effects and/or alternative mitigation measures. No changes to the dAAR required.	Inadequate response. Lax Kw'alaams repeats the recommendation for inclusion of the bullet point in the tracked changes version of the document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
485	11.2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	It is noted that the Application will include "An Appendix that contains comments received from Aboriginal groups on the Aboriginal Consultation report". Lax Kw'alaams requests the Proponent identify when that report will likely be forthcoming in advance of the Application, and the Proponent's perspective on an adequate review period for same. Please provide this response in writing to Lax Kw'alaams.	PRGT will provide Aboriginal groups, including Lax Kw'alaams, with a reasonable period of time to review the draft Aboriginal Consultation Report. No changes to the dAAR required.	Lax Kw'alaams again requests the proponent's estimation of what a "reasonable period" is and that the proponent identify when the Aboriginal Consultation report will likely be forthcoming in advance of the Application.	PRGT provided a draft of the first Aboriginal Consultation Plan to Aboriginal Groups in November 2013, and appreciates comments received including those of Lax Kw'alaams. PRGT plans to share a draft of the second Aboriginal Consultation Plan with Aboriginal Groups in January 2014, in advance of the Application, and will provide 21 days for review and comment.		
486	Preface - Page iii	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the following text: Lax Kw'alaams Nation (be changed to) Lax Kw'alaams Band	This change will be incorporated into the dAAR.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
487	Executive Summary - Page six	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	A summary discussion of Valued Components, including the Proponent's conclusions on key potential effects, mitigation measures, residual effects, residual cumulative effects, and the significance of residual effects	PRGT will be providing its conclusions on the environmental assessment, as shown in the last bullet in the Executive Summary.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
488	1.2 - Page 1-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: The Application must provide an overview of the Project with a focus on the main features of the pipeline, compressor stations, metering stations, total labour force required during construction and operation, worker accommodations and other requirements, and estimated capital and operating costs. The Project Description will be for the total maximum build out requirements rather than the initial proposed operating requirements (e.g., with additional compressor stations to increase gas throughput capacity).	The PRGT Project Description will cover the total maximum build out case of 3.6 BCFD. Operating costs will be made public as part of the company's normal annual reporting when the project is operational. PRGT does not plan to share projected operating costs.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
489	1.2 - Page 1-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: "The purpose of the Project and its financial, ownership and any other linkages to any other Projects and Proponents"	Adding "financial, ownership and any other linkages to any other Projects and Proponents" would not be appropriate or relevant to the Environmental Assessment. PRGT has indicated that it is wholly owned by TransCanada Pipelines Limited.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
490	1.2 - Page 1-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: "The location of the Project within a provincial, regional, and local context, including the Project's proximity to nearby communities and First Nations reserves. This information will be presented on maps, and coordinates of the pipeline, compressor stations, and meter stations will be provided in WGS-84 and Universal Transverse Mercator (UTM) coordinate systems"	Wording of dAAR will be changed to "nearby Aboriginal and non-Aboriginal communities".	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
491	1.2 - Page 1-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	A description of all physical works and activities required to undertake the Project at maximum build out, including all direct and ancillary works and activities. This will include a description of the onsite and offsite components of the Project and associated supporting infrastructure	The proposed Project Description will include all works and activities as required under the EAO's Section 11 Order. The full build out of Project components and activities will be addressed in the Application.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
492	1.2 - Page 1-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: "Identification of nearby communities and First Nations reserves, including their distance away from the Project"	Wording of dAAR will be changed to "nearby Aboriginal and non-Aboriginal communities".	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
493	1.2 - Page 1-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: Land ownership Local government zoning plans Tenure, licenses, or other authorizations Provincial land use plans and land use designations First Nations land use plans and land use designations Traditional land use data provided by First Nations Past submissions to provincial and federal agencies	The following text will be added to section 1.2, page 1-2: Land use plans and land use designations provided by Aboriginal groups, if available Traditional land use data provided by Aboriginal groups, if available and relevant	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
494	1.2 - Page 1-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: "The relationship between the Project objectives to any broader private or public sector policies, plans or programs, including both potential beneficial and adverse impacts of the Project."	Potential Project benefits will be described in Section 1.5 and potential adverse impacts will be described in Sections 4-9	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
495	1.4 - Page 1-3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: Routes or facility sites Construction methods, including water crossing technologies Mitigation	Construction methods, including the alternate means of "crossings" is described within the second bulleted list in section 1.4	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
496	1.4 - Page 1-4	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added: Aboriginal input, including information on important locations for cultural and aboriginal rights practices and traditional knowledge of the receiving environment	In section 1.2.3 Please see Standard Response 2. In addition, Section 11 provides additional clarity on the "Aboriginal input" that PRGT will seek to acquire in evaluating alternative means of undertaking the Project.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
497	1.4 - Page 1-4	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the text in bold be added and the underlined text be removed: Descriptions of the major alternatives considered must be provided in the Application as well as the methods and criteria used to evaluate each alternative. The preferred alternative and the rationale for its selection will also be described, as well as suitable information considered but not chosen alternatives, to allow for informed comparison of alternatives.	The description of major alternatives will be sufficiently comprehensive to allow for an informed understanding of why the preferred alternative was selected and why other alternatives were not.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		
498	1.5 - Page 1-5	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	TT - It has been requested that the bold text be added: Direct employment, stated in number of person years, to be created by major job category (e.g., labour, management, business services) during construction and operation, distinguishing among full-time, part-time, and seasonal jobs, and providing a breakdown of skill level requirements for all required positions, in order to facilitate comparison of the employment on offer to local and regional labour capacity Average wage levels, by major job category, for the construction and operation phases Number of jobs that will likely be filled from local, provincial, national, or international labour markets, including a defensible estimate of the proportion of the project workforce likely to be Aboriginal Indirect employment for the construction and operation phases of the Project Information about PRGT's employment strategy, including specific focus on Aboriginal employment issues (recruitment, retention and advancement)	Labour availability by trade/skill will be a measurable parameter under the labour force capacity indicator, as described in section 1.2.3. PRGT is committed to continuing to work with First Nations to provide employment opportunities, and information related to this commitment will be discussed in the employment strategy within the Application. PRGT will discuss direct employment opportunities by major job category, but will not provide an estimate as to what socio-economic groups will fill those positions.	See revisions in attached dAAR document.	In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.		

510	Table 3-1 (Page 3-3)	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>BCCAA Pillar)</p> <p>Environment</p> <p>(Valued Component)</p> <p>Air Quality</p> <p>(Indicator)</p> <p>Criteria Air Contaminants</p> <p>Change in sensory aspects of air quality</p> <p>(Valued Component)</p> <p>Greenhouse gas management</p> <p>(Indicator)</p> <p>Contribution to provincial GHG emissions levels</p> <p>Ability for BC to meet its legislated reduction targets</p> <p>(Valued Component)</p> <p>Acoustic Environment</p> <p>(Indicator)</p> <p>Sound levels</p> <p>(Valued Component)</p> <p>Salmon and Salmon Habitat</p> <p>(Indicator)</p> <p>Population health and abundance of all five salmonid species</p> <p>Abundance and health of natural salmon marine habitat (including especially eelgrass)</p> <p>Abundance and health of salmon freshwater habitat (To be completed after Lax Kw'alaams VCs development process finished)</p> <p>(Valued Component)</p>	<p>Regarding Air Quality: The change in the sensory aspects of air quality are highly subjective because each person has their own thresholds for odours. The federal and provincial ambient air quality objectives (and standards) are conservative and are designed to provide protection for human health.</p> <p>Regarding GHG comment see Standard Response 23.</p> <p>Regarding Salmon and Salmon Habitat: The broad VC of Marine Resources has been disaggregated through the proposed indicators and potential effects. Each indicator will be given full and due attention within the relevant sections of the EA. With respect to the salmon example specifically, salmon and their habitat are addressed independently in the Freshwater aquatic resources' and 'marine resources' sections to ensure that the 'land' and 'marine-based' project activities that could affect salmon are addressed explicitly. This approach will yield greater transparency and clarity regarding the potential effects of the project.</p> <p>Regarding Fresh Water Aquatics: see Standard Response 6, Standard Response, 13 and 15.</p> <p>Regarding Marine: See Standard Response 13 and 14.</p> <p>Regarding Wildlife: See Standard Response 16.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
511	3.4	Robert James	Gixsaala Nation	<p>The Application will present an assessment of potential adverse effects of the Project on Gixsaala governance that may occur during construction, operation and decommissioning phases. Table 3.1 provides a summary of the potential effects of the Project on governance that will be included in the assessment, and the measurable parameters that will be used to quantify these effects.</p> <p>Table 3.1 Potential Project Effects on Governance</p> <p>Potential Adverse Project Effects Measurable Parameters</p> <p>Reduction in transfer of hereditary names Estimated number of hereditary names vacant</p> <p>Status and Position of Hereditary Leaders; Production of traditional foods from particular house territories Access to and use of house territories Potential changes in level of Feasting Estimate of change in food type at cultural gatherings Ability to feast Number of people holding names Reduction in rank of a house due to disruption of territory Reduction in traditional food tributes to hereditary leaders The measurable parameters used to assess potential effects are based on internal Gixsaala workshops as well as potential areas where credible data can be collected.</p> <p>Mitigation measures will be developed collaboratively between Gixsaala and the Proponent.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			
512	3.6	Robert James	Gixsaala Nation	<p>Project residual effects will be characterized by their magnitude, geographic extent, duration, reversibility and frequency and the context of the potential effect.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			
513	11.1	Robert James	Gixsaala Nation	<p>The Application will introduce Gixsaala Cultural Identity and describe, in detail, the rationale for selecting this as a VC, including identification of the linkages to the Project and other aspects of the application. Gixsaala Cultural Identity broadly refers to the key cultural features that make Gixsaala a distinct nation. Interactions are expected between the Project and Gixsaala Cultural Identity because of the construction and operation of marine or terrestrial pipelines and associated compressor stations that will disrupt key conditions required for these cultural features to exist and/or be practiced.</p>	<p>See Standard Response 37.</p> <p>Changes to the dAIR are not required.</p>			<p>Updated response to Round 1 working group comment *</p> <p>PRGT met with Gixsaala representatives on Friday January 24, 2014 to discuss their proposed VCs. Gixsaala representatives provided context regarding how they developed the VCs and how they would like PRGT to address them. PRGT informed them that we will be including their proposed VCs in the 'Gixsaala Aboriginal Interests' table as part of the Aboriginal Consultation section of the application and we will continue to discuss mitigation measures.</p> <p>*Updated response to Round 1 working group comment *</p>
514	Table 3-2	Robert James	Gixsaala Nation	<p>The Application will identify the foreseeable future projects that may also affect Gixsaala Governance.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			<p>PRGT met with Gixsaala representatives on Friday January 24, 2014 to discuss their proposed VCs. Gixsaala representatives provided context regarding how they developed the VCs and how they would like PRGT to address them. PRGT informed them that we will be including their proposed VCs in the 'Gixsaala Aboriginal Interests' table as part of the Aboriginal Consultation section of the application and we will continue to discuss mitigation measures.</p>
515	11.2.5	Robert James	Gixsaala Nation	<p>The Cultural Identity assessment will focus on quantitative and qualitative features of Gixsaala Identity that are associated with the marine or terrestrial pipeline options and associated compressor stations.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			
516	Table 3-1 (Pages 3-4 to 3-5)	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>BCCAA Pillar)</p> <p>Economic</p> <p>(Valued Component)</p> <p>Employment</p> <p>(Indicator)</p> <p>Labour force capacity</p> <p>Impact equity</p> <p>BCCAA Pillar)</p> <p>Social</p> <p>(Valued Component)</p> <p>Infrastructure and Services</p> <p>(Indicator)</p> <p>Accommodations</p> <p>Emergency services</p> <p>Health care services</p> <p>Community recreation and leisure facilities</p> <p>Solid and liquid waste management</p> <p>Access to social services</p> <p>BCCAA Pillar)</p> <p>Health</p> <p>(Valued Component)</p> <p>Human Health</p> <p>(Indicator)</p> <p>Air quality</p>	<p>PRGT appreciates Lax Kw'alaams input on this topic.</p> <p>PRGT has reviewed Lax Kw'alaams's proposals and is interested in following-up with Lax Kw'alaams on them. However, PRGT believes that, taken together, Section 11 of the Application, the related assessments conducted in the VC section, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information (if provided by Lax Kw'alaams) will address the interests raised by Lax Kw'alaams and other Aboriginal groups regarding the assessment of the proposed Project. As a result, the additional VC and changes to indicators, as proposed by Lax Kw'alaams, are not required.</p> <p>No changes to the dAIR are required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
517	11.2.1	Robert James	Gixsaala Nation	<p>The Application will include the following information to characterize current conditions: Description of Sense of Place or Attachment to Place related to the traditional territory, clan territories and house territories. Survey results of the current level of cultural practice including: Traditional Funerals/Feasts/Community Events; Community Resource Sharing; Harvesting Trips; In Traditional Territory In House Territory Teaching Trips; Passing of Knowledge at home; and Passing of Knowledge on the water/land. Description of related Cultural Considerations such as Spananox/Tribal Identity Cross ties/teaching Community Status Description of Supporting Components, including: spirituality, language, economy, and teaching/transmission.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			<p>Updated response to Round 1 working group comment *</p> <p>PRGT appreciates - and has considered - the information that has been provided by Gixsaala during the pre-application phase of the environmental assessment to date. This information has helped us gain a more meaningful understanding of Gixsaala Aboriginal interests, potential adverse effects on those interests, and what measures could be used to avoid or reduce such Project effects. Besides the information and analysis that will take place in Part C of the Application related to Gixsaala's Aboriginal interests and concerns, PRGT looks forward to on-going consultation with Gixsaala during the Application review phase of the environmental assessment to discuss these matters further, and to answer any remaining questions regarding the Project.</p>
518	3.2.1 - Page 3-6	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added and the <u>underlined</u> text be removed.)</p> <ul style="list-style-type: none"> The Project Footprint (Project Footprint). This is the area that will be directly disturbed by construction and operation level activities, including associated physical works and activities (i.e., construction right of way, compressor stations, block valve sites, temporary workspaces, stockpile and storage sites, temporary work camps, and new access roads). A Local Assessment Area (LAA). This is the area within which adverse effects from construction or operation of the Project are reasonably expected to occur and can be described. Rationale for selection of the LAA for each VC must be provided in the Application. A Regional Assessment Area (RAA). This is the area within which adverse cumulative effects from construction or operation of the Project in conjunction with past, present, and likely future projects are reasonably expected to occur and can be described. The RAA is also used by some VCs to assess adverse Project effects within a broader context. A rationale for selection of the RAA for each VC must be provided in the Application. <p>The LAA and RAA will be specific to each VC and therefore may differ between VCs.</p> <p>The spatial boundaries to be used in the assessment for each VC are provided in sections 4 to 8 and in Appendix A. If the spatial boundary for any VC in the Application differs from what is included in the AIR, the rationale for changing the boundary must be clearly outlined in the Application and is subject to review and as necessary additional information requirements issued by the EAO.</p>	<p>Spatial boundaries will be defined and discussed in more detail in each VC section of the Application (as outlined by the individual VC sections in the dAIR).</p> <p>No changes to the dAIR are required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
519	11.2.2	Robert James	Gixsaala Nation	<p>The effects assessment will address effects from the Project pipeline using the following approach.</p> <p>The Application will describe the specific approach and methods used to determine any Project effects on Cultural Identity.</p> <p>TT - It has been requested that the bold text be added.)</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			
520	3.2.2 - Page 3-6	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>This section of the Application will present the temporal boundaries to be used for the assessment of potential adverse effects. The temporal boundaries will encompass the construction and operation phases of the Project, but for greater clarity the temporal scope of assessment for each VC will be up until such time as it is estimated there will be no measurable residual effects from the Project on that VC.</p> <p>The Application will present an assessment of potential adverse effects of the Project on Gixsaala Cultural Identity that may occur during construction, operation and decommissioning phases. Table 3.2 provides a summary of the potential effects of the Project on Cultural Identity that will be included in the assessment, and the measurable parameters that will be used to quantify these effects.</p> <p>Table 3.2 Potential Project Effects on Cultural Identity</p> <p>Potential Adverse Project Effects Measurable Parameters Disruption to Sense of Place Necessary conditions for Gixsaala connection to territory</p> <p>Reduction of Cultural Practices tied to Identity Change to cultural practices such as traditional funerals, feasts, resource sharing, harvesting, teaching</p> <p>Reduction of Community Status in affected House Territories Estimated change to status building activities such as in-community and external trade, provision of food to Elders and hereditary leaders, feasting The measurable parameters used to assess potential effects are based on internal Gixsaala workshops as well as potential areas where credible data can be collected.</p> <p>Mitigation measures will be developed collaboratively between Gixsaala and the Proponent.</p>	<p>It is acknowledged that some effects can last beyond the cessation of project construction and operation. Enduring effects are identified using the "duration" criterion during the residual effects characterization phase.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
521	11.2.2	Robert James	Gixsaala Nation	<p>The Application will present an assessment of potential adverse effects of the Project on Gixsaala Cultural Identity that may occur during construction, operation and decommissioning phases. Table 3.2 provides a summary of the potential effects of the Project on Cultural Identity that will be included in the assessment, and the measurable parameters that will be used to quantify these effects.</p> <p>Table 3.2 Potential Project Effects on Cultural Identity</p> <p>Potential Adverse Project Effects Measurable Parameters Disruption to Sense of Place Necessary conditions for Gixsaala connection to territory</p> <p>Reduction of Cultural Practices tied to Identity Change to cultural practices such as traditional funerals, feasts, resource sharing, harvesting, teaching</p> <p>Reduction of Community Status in affected House Territories Estimated change to status building activities such as in-community and external trade, provision of food to Elders and hereditary leaders, feasting The measurable parameters used to assess potential effects are based on internal Gixsaala workshops as well as potential areas where credible data can be collected.</p> <p>Mitigation measures will be developed collaboratively between Gixsaala and the Proponent.</p>	<p>See Standard Response 37.</p> <p>No changes to the dAIR are required.</p>			

				<p>TT - It has been requested that the bold text be added.)</p> <p>The Application will describe the existing conditions and trends-over-time for each VC, including a description of the VC characteristics and other environmental components upon which the integrity of the VC relies.</p> <p>The Application will summarize the overall process and methods used to identify and study the existing (baseline and trend-over-time) conditions of each VC. Key elements of the approach used to describe existing conditions include:</p> <ul style="list-style-type: none"> • Appending and/or referencing relevant reports and documents as appropriate • Collecting, analyzing, and presenting data following appropriate provincial or federal standards (e.g., Resource Information Standards Committee) • Providing a rationale for the selection of sampling sites and analytical parameters as appropriate • Discussing the quality and reliability of these data sources and how they are used to support the assessment • Incorporating available traditional ecological knowledge (TEK) into the application, in addition to information collected through field studies, surveys, and other research methods • Describing field and laboratory methods, along with any quality assurance and quality control measures applied • Collecting, analyzing and presenting data from relevant case studies of similar projects, clearly identifying any factors limiting the applicability of the case studies in this instance • Describing any modeling and/or scenario exercises and limitations of modeling/scenarios. <p>A summary of the information to be provided and baseline and trend-over-time studies to be used in the assessment for each VC is provided in sections 4 to 8.</p>	<p>Baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project). Relevant factors to be considered in baseline conditions include current condition of the VC, and the current and future sensitivity and resilience of the VC to change caused by the Project. Reference to "relevant reports and documents" in bullet #1 of Section 3.3 implies the use of case studies and acknowledges that they will be an important tool to support the EA.</p> <p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>See Standard Response 37. No changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
522	3.3 - Page 3-7 to 3-8	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)				
523	11.2.3	Robert James	Gitsaala Nation	<p>Project residual effects will be characterized by their magnitude, geographic extent, duration, reversibility and frequency and the context of the potential effect.</p> <p>TT - It has been requested that the bold text be added and the <u>underlined</u> text be removed.)</p> <p>For each VC, the Application will identify, describe and present an analysis of the potential adverse effects resulting from the proposed Project. <u>Where identified indicators have been identified, these</u> will be used to assess the effects on the VC.</p> <p>Meaningful likely and potential interactions between Project physical works and activities and each VC are to be identified using an interaction matrix as shown in Table 3-2. The intent of this Project-environment interaction analysis is to identify where interactions that may result in an adverse environmental, economic, social, heritage, and health effect may result due to a specific Project activity.</p> <p>The Application will detail what methods were used by the Proponent to populate this interaction matrix and establish potential effects, with special emphasis on identifying all inputs from stakeholders and First Nations that contributed to the identification of these likely and potential interactions.</p> <p>For each VC, the Application will describe the mechanisms whereby environmental, economic, social, heritage, or health effects are expected to occur. Where possible, the spatial and temporal extent of these anticipated effects (i.e., where and when an effect might occur) will also be described.</p>	<p>The intent of Table 3-2 is to present a preliminary indication of "substantive/meaningful" interactions for purposes of VC selection. It is acknowledged that there may be additional, minor interactions. All potential interactions will be reviewed and justified and evaluated in a more detailed manner in the environmental assessment, given the benefit of additional context and analysis and Project detail.</p> <p>See Standard Response 37. No changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
524	3.4 - Page 3-8	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)				
525	11.2.4	Robert James	Gitsaala Nation	<p>The Application will identify the foreseeable future projects that may also affect Gitsaala Cultural Identity.</p> <p>The Application will introduce Gitsaala Harvesting Rights and describe, in detail, the rationale for selecting this as a VC, including identification of the linkages to the Project and other aspects of the application. Harvesting Rights refer to Gitsaala's un-extinguished Aboriginal right to harvest resources throughout their traditional territory for subsistence, economic or cultural purposes. Interactions are expected between the Project and Gitsaala Harvesting Rights because of the construction and operation of marine or terrestrial pipelines and associated compressor stations that will occur throughout Gitsaala traditional territory and house territories.</p>	<p>See Standard Response 37. No changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
526	6.5	Robert James	Gitsaala Nation				
527	3.5 - Page 3-11	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added and the <u>underlined</u> text be removed.)</p> <p>Mitigation measures that will reduce or eliminate an adverse environmental, economic, social, heritage, or health effect will be described in each assessment chapter in the Application, with an emphasis on how these measures will avoid, minimize, or reduce the effect. The expected effectiveness of the proposed mitigation measure(s) will be described, and where possible, expressed in terms of the expected change in the measurable parameter(s) for the effect, including the time required for the mitigation to be effective. the confidence held in the prediction, and all mitigation considered and rejected, with reasons. In some cases, mitigation measures may incorporate monitoring to verify results and adaptive management. A description of the mitigation measures that have been incorporated into the site selection and design of the Project will be provided in the Project Description and Alternative Means sections of the Application; these measures will not be reiterated in the VC assessments.</p>	<p>PRGT will consider the proposed revisions to the text, however the suggest word choices related to "expected" and "prediction" may cause confusion with EA terms related to "confidence" and "risk". PRGT would also welcome further explanation as to the benefits and rationale for describing "all mitigation considered and rejected". It is usually sufficient and consistent with best practice to describe the most appropriate mitigation given specific requirements and not alternatives discarded.</p> <p>See Standard Response 37. No changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
528	6.5.1	Robert James	Gitsaala Nation	<p>The Harvesting Rights assessment will focus on key location-based harvesting activities that are associated with the construction and operation of pipelines and associated infrastructure.</p>			
529	3.6 - Page 3-11	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added.)</p> <p>The Application must identify the potential residual Project-specific adverse effects for each VC. For each residual effect, the likelihood of its occurrence must be discussed based on the causal activity and effectiveness of mitigation. Where practical, the residual effects will be quantified and the implications for the indicators must be discussed. The following criteria will be used to characterize (describe) the residual environmental, economic, social, heritage, and health effects. Where possible and appropriate, these criteria will be described both quantitatively and qualitatively for each VC. When residual effects cannot be characterized quantitatively, characterization will be completed using qualitative terms (such as the examples below). Definitions will be provided when qualitative terms are used.</p> <ul style="list-style-type: none"> • Context—the current condition and trends over time in the status of the VC, particularly the current and likely future sensitivity and resilience of the VC to change caused by the Project, described as low, medium, or high sensitivity or resilience. The Context characterization metric will also be used to identify any instances where there is evidence there is already a pre-existing significant adverse effect on VC. 	<p>All requested edits have been made, except sentence 4 where the following text has been inserted: Where possible and appropriate, these criteria will be described both quantitatively and qualitatively for each VC. Changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
530	6.5.2	Robert James	Gitsaala Nation	<p>The Application will include the following information to characterize current conditions: Description of biophysical components represented by key indicators for harvested species on the beach, on the rocks and on the bottom as well as terrestrially harvested species. This will include baseline data on species sensitivity. Description of cultural components such as: Learning/Teaching/Skills/Values (resource respect and stewardship [jaysaw]) Preferred Locations Description of economic components including: Harvest efficiency Catch success Current fuel costs versus cost of potential detour Current time required and subsequent change in time/distance/Frequency/Trade and Trade Network Food preparation method Reputation and Pride Harvest based wealth Description of Supporting Components, including: teaching/transmission, spirituality, and language.</p>	<p>See Standard Response 37. No changes to the dAAR are required.</p>		
531	3.7 - Page 3-12	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added and the <u>underlined</u> text be removed.)</p> <p>For each VC, the Application will provide significance thresholds for residual Project effects. Where possible, threshold criteria should be based on legislative, regulatory or management standards. Standards are recognized government or industry regulations or objectives for physical aspects, such as air quality, water quality, or effluent release. Where standards or thresholds do not exist, significance criteria will be defined, the methods by which they were determined and by whom described, and justifications for the criteria will be provided.</p> <p>The Application must provide a summary of the potential residual effects and discuss their significance for each VC. The Proponent's significance determination conclusions must include consideration of each indicator.</p>	<p>The determination of significance is based on scientific analysis compared against quantitative thresholds for significance wherever possible. The Application will provide a detailed description of analytic methods as well as significance criteria.</p> <p>PRGT welcomes input from the Working Group, including Aboriginal groups, to support the environmental assessment process and rigorous significance determinations.</p> <p>No changes to the dAAR required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
532	3.8 - Page 3-12	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>The Application must state its confidence in the effects predictions and any risks associated with the assessment. Prediction confidence is typically based on expert judgment and characterizes the level of uncertainty associated with significance estimates determinations. The level of confidence is based on scientific information, statistical analysis, professional judgment, effectiveness of mitigation, and assumptions made. This will be provided by describing the "prediction confidence" based on:</p>	<p>Edits were considered, however PRGT feels that "determination" is a more appropriate EA term.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
533	3.9.1 - Page 3-15	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added.)</p> <p>3.9.1 Project and Activities Inclusion List</p> <p>If the Project is expected to result in any residual adverse environmental, economic, social, heritage or health effects, the Application must assess potential cumulative effects of the Project. Projects considered in the cumulative effects assessment include:</p> <ul style="list-style-type: none"> • Projects or activities that have already been built or conducted in the vicinity of the Project (i.e., certain). • Projects that are either proposed or have been approved to be built, but are not yet built, in the vicinity of the Project, or likely to occur as a result of the Project (i.e., reasonably foreseeable). 	<p>The wording "and Activities" will added to the title of the Project Inclusion List as it will be updated to include forestry activities based on Working Group comments.</p> <p>As required by the EAO, only projects that are either proposed or have been approved to be built, but are not yet built (in the vicinity of the Project) will be considered in the cumulative effects assessment.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
534	3.9.2 - Page 3-18	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added and the <u>underlined</u> text be removed.)</p> <ul style="list-style-type: none"> • There a reasonable expectation that the contribution (i.e., addition) of the Project's residual effects to the residual effects from past, present and likely future projects would cause a change in cumulative effects in a manner that could adversely affect the quality or sustainability of the VC's; contextual analysis of baseline and trend over time conditions indicates a high likelihood that existing cumulative effects loading has created an already significant pre-existing effects load on the VC. In the latter case, a cumulative effects assessment must be undertaken to better assess the merit of proceeding with any additional development that may affect the VC in question in the proposed location. <p>The Application will summarize the process and methods used to conduct the cumulative effects assessment, including the identification of potential cumulative effects, identification of additional mitigation measures (if needed), and evaluation of any likely residual cumulative effects.</p> <p>The Application will provide an assessment of the adequacy of existing data in conducting the cumulative effects assessment. It will also include a rationale for not conducting a cumulative effects assessment, for any VC where \geq one is not performed.</p>	<p>The Application will consider available historical information, in baseline conditions (e.g., regional air quality databases, demographic information, fish catch) where it may be possible to infer certain trends. The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>The last sentence in the 4th paragraph of Section 3.9.2 of the dAAR will be updated as follows: "It will also include a rationale for not conducting a cumulative effects assessment, for any VC where one is not performed." Section 3.9.2 has been updated.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
535	3.9.2 - Page 3-19	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the <u>underlined</u> text be removed.)</p> <p>Characterization of Residual Cumulative Effects</p> <p>The Application must describe residual cumulative effects, after application of the additional mitigation measures. The residual cumulative effects will be characterized by direction, magnitude, geographic extent, frequency, duration, reversibility and context to the extent possible. The focus will be on the incremental effect directly attributable to the Project.</p>	<p>PRGT does not agree with the proposed edit. The characterization of residual cumulative effects will focus on the incremental effect directly attributable to the Project.</p> <p>Update to the dAAR is not required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
536	Table 4-1 (Page 4-1)	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added.)</p> <p>Indicator</p> <p>Criteria Air Contaminants (CACs) (i.e., SO₂, NO_x, PM₁₀, PM_{2.5}, CO)</p> <p>Observed change based on sesnate characteristics</p>	<p>Sensory responses are highly subjective for each individual and are therefore not measurable parameters. The air quality measurable parameters are the Criteria Air Contaminants that can be measured and each have provincial and federal ambient air quality objectives (or standards) for protection of human health and the environment.</p> <p>See Standard Response 37. No changes to the dAAR are required.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>
537	6.5.3	Robert James	Gitsaala Nation	<p>The effects assessment will address effects from the Project using the following approach. The Application will describe the specific approach and methods used to determine any Project effects on Harvesting Rights.</p>			
538	4.1.1 - Page 4-5	Chief Garry Reece	Laa Kw'Alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that the bold text be added.)</p> <p>The Application must consider the following spatial boundaries for air quality (see Figure 4-1 and Appendix A).</p> <ul style="list-style-type: none"> • Project Footprint: Includes all areas that will be disturbed through construction activities including the ROW, marine work areas, compressor stations, metering facilities, and associated temporary workspaces, work camps, laydown areas, and access roads. 	<p>The marine work areas and work camps can be classified as "temporary workspaces" for construction. Hence, these items have already been captured in the current version of the dAAR for the air quality spatial boundaries.</p>	<p>See revisions in attached dAAR document.</p>	<p>In regards to suggested edits to the dAAR submitted via letter and edits directly in the dAAR document, please see PRGT's letter to Laa Kw'Alaams dated December 11, 2013.</p>

4.4.3 - Page 4-11 to 4-559.12	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added)</p> <p>Mitigation and Monitoring</p> <p>Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3.0 (Assessment Methods). Mitigation measures will be compiled from available and relevant best management practices, First Nations inputs and traditional knowledge, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers.</p> <p>Residual Project Effects and their Significance</p> <p>Project residual effects, after application of mitigation, must be described in the Application using the measurable parameters in Table 4-4b other identified measurable parameters. The residual effects will be characterized based on the magnitude, geographic extent, duration and frequency, reversibility, context, and likelihood of the potential effect occurring, as outlined in Section 3.0 (Assessment Methods). A summary of residual effects and an assessment of their significance must be provided. Significance decisions will be made for each indicator species considered in the marine assessment. Each significance decision will be accompanied by a confidence statement, reflecting the quality and extent of information available upon which the statement was based.</p> <p>Cumulative Effects and their Significance</p> <p>Where residual effects occur, an assessment of the potential contributions from Project-related activities to cumulative environmental effects on marine resources using habitats within the RAA, as part of an overall VC-specific cumulative effects loading assessment, must follow the procedures described in Section 3.0 (Assessment Methods).</p>	<p>Monitoring plans will be developed separately from the environmental assessment but will be outlined in Section 15 of the application. The following bolded text will be added:</p> <p>Mitigation Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3.0 (Assessment Methods). Mitigation measures will be compiled from available and relevant best management practices, Aboriginal groups input and traditional knowledge, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers.</p> <p>The effects assessment will be carried out as described in Section 3.0 of the dAIR.</p> <p>The updated dAIR will reflect these changes.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
560.1.2	Robert Jones	Gitsaala Nation	<p>The application should also discuss the location of the Project within Aboriginal Nation identified territories and proximity to any reserves. If the reference to "nearby communities" is meant to reference this, please amend to use correct terminology of Aboriginal Nation rather than community which is arbitrary and not defined. Please also include the following in the description of construction activities to ensure all effects are considered:</p> <p>a) road access, traffic type and expected frequency (daily/weekly)</p> <p>b) marine access, construction vessel type (e.g. barges, etc), and expected vehicle numbers/transits</p> <p>c) aerial transportation, aircraft type (including float planes and helicopters), and trip frequency</p>	<p>Section 11.1 will include maps of traditional territories and Indian Reserves of each Aboriginal group.</p> <p>Referenced wording will be changed to "nearby Aboriginal and non-aboriginal communities".</p> <p>Potential effects related to transportation and access will be addressed in the VC of the same name.</p>		
561.4.4.4 - Page 4-12	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application must include a brief summary of the predicted Project-specific and cumulative residual effects and cumulative effects of the Project on marine resources and make an estimation/assessment of the significance of these effects. Significance estimation decisions will be made for each indicator considered in the marine assessment.</p>	<p>The draft AIR follows the direction for determination of significance as outlined within the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects". The text within Section 4.4.4 of the draft AIR will be updated as follows: "This section of the Application must include a brief summary of the predicted Project-specific residual effects and cumulative effects on marine resources and make an determination of the significance of these effects. Significance estimation decisions will be made for each indicator considered in the marine assessment."</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
562.4.5.1 - Page 4-12	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added)</p> <p>This section of the Application must provide an assessment of potential effects on wildlife and wildlife habitat. The focus of the assessment will be on the indicator species identified in Table 4-5. The Application must provide a description of the rationale for VC and indicator selection, including a rationale for why a "key indicator" approach is being utilized. Linkages to other VCs must also be presented in the Application (e.g., vegetation and wetlands).</p>	<p>The rationale for why an indicator approach is being utilized is provided in Section 3.1 of the dAIR.</p> <p>Please see Standard Response 20.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
563.1.2	Robert Jones	Gitsaala Nation	<p>The Description of land use in the areas that are overlapping or may be potentially affected by the proposed Project must include any publicly available marine and land use planning documents prepared by Aboriginal Nations as well.</p>	<p>No changes to the dAIR are required.</p> <p>Aboriginal Groups is a defined term in the section 11 Order. PRGT will seek to clarify the use of "Community" in the dAIR. Aboriginal title is included in the definition of Aboriginal interests.</p>		
564.General Comments	Robert Jones	Gitsaala Nation	<p>Please amend the terminology throughout from "Aboriginal group" or "Community" to state Aboriginal Nation. Also, the dAIR should mention Aboriginal title as well to ensure the focus is not solely on the geographic location of the reserves.</p>			
565.4.5.1 - Page 4-14	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added)</p> <p>Project Footprint: Includes all areas that will be disturbed through construction activities including physical works and activities associated with the Project (e.g., the ROW, compressor stations, metering facilities, and associated temporary workspaces, laydown areas, and access road).</p>	<p>The dAIR has been updated to more closely reflect the physical works and activities associated with the project.</p> <p>The Application will not include a determination of significance of residual effects related to Aboriginal interests. However, the Application will characterize the residual effects of the proposed Project on Aboriginal interests after mitigation according to the process set out in section 3.6.</p> <p>The Application will also include views of Aboriginal groups, if provided, regarding residual adverse effects on Aboriginal interests.</p> <p>No changes to the dAIR are required.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
566.3.0	Robert Jones	Gitsaala Nation	<p>Please confirm that the assessment methods outlined in Figure 3.1 will be applied to the assessment of effects on Aboriginal rights, title and other interests that will be in Part 'C'. If these steps will not be applied, please provide details on the process that will, in fact, be applied to Part 'C'</p>			
4.5.2 - Page 4-14 to 4-567.15	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>4.5.2 Existing and Trend-over-Time Conditions for Wildlife and Wildlife Habitat</p> <p>This section of the Application must describe and characterize the existing wildlife and wildlife habitat condition and change over time along the pipeline corridor with a focus on the wildlife indicator species identified in Table 4-5. The following information will be used to characterize these baseline conditions:</p> <p>• Any TK, where relevant and available.</p>	<p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p> <p>See Standard Response 29.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
568.4.5.3 - Page 4-15	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application must describe the specific approach and methods used to determine potential Project-related effects on wildlife and wildlife habitat, including criteria used for characterizing effects and estimating determining significance. Potential Project effects listed in Table 4-5b will be considered for each terrestrial indicator and quantified using the identified measurable parameters. A qualitative description of potential effects will be provided for marine bird indicators, and will include direct and indirect effects on habitat, and change in movement and mortality risk. Available TK will be considered in the assessment of potential effects and identification of mitigation measures.</p>	<p>Significance determinations will be made for each indicator considered in the wildlife and wildlife habitat assessment.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
569.4.5.3 - Page 4-16	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>Mitigation</p> <p>Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3.0 (Assessment Methods). Mitigation measures will be compiled from traditional knowledge inputs, available and relevant best management practices, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers.</p> <p>Residual Project Effects and their Significance</p> <p>Project residual effects, after application of mitigation, must be described in the Application using the measurable parameters in Table 4-10. The residual effects will be characterized based on the magnitude, geographic extent, duration and frequency, reversibility, context, and likelihood of the potential effect occurring, as outlined in Section 3.0 (Assessment Methods). A summary of residual effects and an assessment of their significance must be provided. Significance estimations decisions will be made for each indicator considered in the wildlife and wildlife habitat assessment.</p>	<p>Referenced wording will be changed to clarify that the VCs and indicators considered in the Application were identified through consultation with Aboriginal groups "where input was provided".</p> <p>The Application will include a reference to study of marine processes such as long-shore transport an indicator for the Marine Resources, or provide a rationale for the exclusion.</p> <p>This revision will not result in any change to the original meaning, so no change will be made.</p> <p>Historical conditions are generally not applicable to the evaluation of vegetation. If research identifies relevant historical information, it will be referenced in the VC assessment for vegetation.</p> <p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p>	See Standard Response 2 and 5. <p>Significance determinations will be made for each indicator considered in the wildlife and wildlife habitat assessment.</p> <p>See revisions in attached dAIR document.</p>	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
570.3.1	Robert Jones	Gitsaala Nation	<p>This section notes that the VCs and indicators considered in the application were identified through consultation with Aboriginal groups. Gitsaala is currently engaged in preliminary discussions related to provision of capacity by the proponent to allow Gitsaala involvement. Prior to the provisions of this capacity, it is a mischaracterization to indicate that Gitsaala may have had meaningful input into VCs and indicators. This section must be specific as to the actual input received by the proponent. As written, this section contains gaps that will result in an incomplete assessment. Please include a reference to study of marine processes such as long-shore transport as an indicator for the Marine Resources or provide a rationale for the exclusion.</p>			
571.4.5.4 - Page 4-16	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application must include a brief summary of predicted residual Project-specific and cumulative effects of the Project on wildlife and wildlife habitat and make a determination of the significance of these effects. Significance decisions will be made for each indicator considered in the wildlife and wildlife habitat assessment. Where available, significance of potential Project and cumulative effects on indicators will be evaluated against established thresholds.</p>	<p>This difference in wording would have no substantial change on the intent of the dAIR or the process of the EA. PRGT believes the current content in the draft AIR for this issue is preferred.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
572.4.6.2 - Page 4-17	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added)</p> <p>4.6.2 Existing and Trend-over-Time Conditions for Vegetation and Wetland Resources</p> <p>TT - It has been requested that bold text be added and underlined text removed)</p>	<p>The purpose of the current Environmental Assessment is to compare current conditions against future conditions that may result from this and other projects. Where appropriate, historic changes to environmental conditions will be discussed when describing current conditions but conducting a detailed trend-over-time analysis of the project area is outside of the scope of this project.</p>	See Standard Response 2 and Standard Response 5. <p>No changes to the dAIR required.</p> <p>See revisions in attached dAIR document.</p>	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
573.4.6.2 - Page 4-18	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>The Application will provide the following information for characterizing the baseline conditions for vegetation resources:</p> <p>• Any available TK, where relevant and available</p>	<p>See Standard Response 2 and Standard Response 5.</p> <p>No changes to the dAIR required.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
574.4.6.3 - Page 4-18	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application must describe the specific approach and methods used to determine potential Project-related effects on vegetation and wetland resources, including criteria used for characterizing effects and determining estimating significance. Potential Project effects listed in Table 4-12 will be considered for each indicator and quantified using the identified measurable parameters. Available TK will be considered in the assessment of potential effects and identification of mitigation measures.</p>	<p>This difference in wording would have no substantial change on the intent or meaning of the dAIR, or the process of the EA. PRGT believes the current content in the draft AIR for this issue is preferred.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
575.4.6.3 - Page 4-19	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added)</p> <p>Effects Mechanisms</p> <p>For each potential effect, the Project activities and effects mechanisms that could induce the effect must be described, as outlined in Section 3.0 (Assessment Methods).</p> <p>Mitigation</p> <p>Mitigation measures designed to avoid or reduce predicted effects must be proposed, as outlined in Section 3. Mitigation measures will be compiled from traditional and local knowledge inputs, available and relevant best management practices, management guidelines, management plans, recovery plans, develop with care guidelines, and peer-reviewed or technical papers.</p>	<p>As noted in section 4.6.3, "Available TK will be considered in the assessment of potential effects and identification of mitigation measures." PRGT believes the current content in the draft AIR for this issue is sufficient.</p> <p>No change to the dAIR required.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
576.4.6.4 - Page 4-20	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application must include a brief summary of predicted residual Project-specific, and cumulative effects of the Project on vegetation and wetland resources and estimate [assess] make a determination of the significance of these effects. Where available, significance of potential Project and cumulative effects will be evaluated against established thresholds.</p>	<p>This difference in wording would have no substantial change on the intent or meaning of the dAIR, or the process of the EA. PRGT believes the current content in the draft AIR for this issue is preferred.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
577.4.7.2 - Page 4-21	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>This section of the Application will provide the following information that will be used to characterize baseline conditions for the soil VC:</p> <p>• Any available TK, where relevant and available</p>	<p>See Standard Response 2 and Standard Response 5.</p> <p>No changes to the dAIR required.</p> <p>See Standard Response 37.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.
578.Table 3-1	Robert Jones	Gitsaala Nation	<p>There is no inclusion of VCs related to Aboriginal rights, title or interests listed in this table. Please describe these VCs. VCs related to Aboriginal rights, title or interests must be included in order for Section 11 to contain the specific information necessary for a fulsome assessment.</p>	<p>No changes to the dAIR are required.</p>		
579.4.7.3 Page 4-21	Chief Garry Reece	Lax Kw'alaams (Skene Fisheries Commission)	<p>TT - It has been requested that bold text be added and underlined text removed)</p> <p>The Application must describe the specific approach and methods used to determine the potential Project-related effects on soil, including criteria used for characterizing effects and assessing determining significance. Project effects listed in Table 4-14 as being of concern will be carried forward into this analysis.</p>	<p>The updated dAIR will reflect this change.</p>	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.

580.3.2.2	Robert James	Gixaala Nation	Please ensure that temporal boundaries indicate time (both in days/months/years) and in relation to ecosystem function (a percentage of species life cycle/life expectancy) or that a rationale for exclusion is provided. Provision of this information is relevant to Gixaala harvesting and governance practices.	This query will be addressed through both the temporal boundaries and limitations provided in the environmental assessment. Temporal boundaries for the proposed Project will be clearly defined. Where there are important interactions between species' lifecycles and the proposed Project's temporal boundaries, they will be described. For the assessment of indicators, important seasons and life requisites will be identified and assessed as appropriate.	No changes to the dAIR required.			
581.4.7.3 - Page 4-22	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. Residual Effects and their Significance Project residual effects must be characterized in the Application using the measurable parameters in Table 4-14. Residual effects will be characterized based on the magnitude, geographic extent, duration and frequency, reversibility, context, and likelihood of the potential effects, as outlined in Section 3.0 (Assessment Methods). A summary of residual effects and an assessment of their significance will be provided. Significance estimation decisions will be made for each indicator considered in the soils assessment. Cumulative Effects and their Significance Where residual effects occur, an assessment of potential contributions from Project-related activities to cumulative environmental effects on soil within the RAA must follow the procedures described in Section 3.0 (Assessment Methods).	The effects assessment will be completed as described in Section 3.0 of the dAIR.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
582.4.7.4 - Page 4-22	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application must include a brief summary of predicted Project-specific residual and cumulative effects of the Project on soil resources and make a conclusion on the significance of these effects.	The effects assessment will be completed as described in Section 3.0 of the dAIR.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
583.4.8 - Page 4-22	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added. The Application must provide a summary table of predicted residual Project-specific and cumulative environmental effects of the Project and their significance. There is no inclusion of potential substantive or meaningful interactions with Aboriginal VCs. Please describe the potential interactions. We also note that additional potential for substantive interactions exist between: a) Watercourse crossings and Heritage/Archaeological Resources; b) Presence of physical facilities and Marine Resource Use; and c) Vessel maintenance programs and Marine Resource Use.	A summary of cumulative environmental effects and their significance will be provided in the Cumulative Effects section of the Application. No change to the dAIR is required.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
584 Table 3-2	Robert James	Gixaala Nation	Please add these or provide a rationale for their exclusion.	PRGT believes that change is not required as current conditions as well as potential future effects are considered in the application. Baseline environmental and socio-economic conditions will be assessed in the PRGT environmental assessment as the basis for estimating Project-related effects (i.e., changes in the existing environmental conditions due to the Project). Relevant factors to be considered in baseline conditions include the current condition of the VC, and the current and future sensitivity and resilience of the VC to change caused by the Project.	No changes to the dAIR are required.			
585.5.1 - Page 5-1	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added. The Application will include a description of the existing economic conditions and trends over time. More details will be provided in the baseline section of the VC chapter. The assessment of Project effects on the economic environment focuses on potential adverse effects. The Project would also result in beneficial effect resulting from expenditures on capital, services, and labour. Beneficial effects of the Project will be described in Section 1.5 of the Application, and will include but not be limited to:	No change in dAIR required.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
586.5.2.1 - Page 5.1 to 5.2	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. The Application must consider the following spatial boundaries for employment (see Figure 5-1 and Appendix A) Note that the Project Footprint is not relevant to the geographic scope of assessment for employment. • Project Footprint: Includes all areas that will be disturbed through construction activities including the ROW, compressor stations, metering facilities and associated temporary workspaces, laydown areas, and access roads. • Local Assessment Area: The LAA will include communities, including Aboriginal communities, within approximately 100 km of the proposed pipeline right-of-way, as these communities are most likely to experience Project effects to labour availability. The precise LAA will be influenced by the geographical organization of census districts. • Regional Assessment Area: Consists of all communities within the five regional districts that the Project would cross.	The Local Assessment Area (LAA) extends 100 kilometers in either direction of the pipeline, for the length of the pipeline, thus capturing the communities within proximity of the Project, and those most likely to experience Project-related economic effects, which include providing goods, services and/or labour. The LAA will include all census subdivision populated communities within 100 kilometers of either side of the pipeline, for the length of the pipeline. This includes Indian Reserves, Villages, Towns, District Municipalities and Cities. The Regional Assessment Area (RAA) is a sum of the LAA and includes additional communities that may serve as staging communities, or service hubs to the Project. The Project Footprint (or Project Development Area) is part of the LAA and also hosts economic activities, and therefore should be retained.	No changes to the dAIR are required.	See revisions in attached dAIR document.	In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
587 Table 3-4	Robert James	Gixaala Nation	Please include a map of these projects.	Maps of the other projects and activities to be included in the cumulative effects assessment will be included in the Application.				
588.5.2.2 - Page 5-2	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added. Measurable parameters used to characterize employment may include but are not limited to: wage levels, employment rate, labour availability by trade or skill level, training programs, and migration rates/labour force stability. Each measurable parameter will be broken down by regional district, community, and Aboriginal vs. non-Aboriginal sub-populations, wherever possible. Where quantitative data is not available, more extensive qualitative inputs will be conducted by the Proponent.	As per BCEAO requirements, Aboriginal communities will be presented alongside non-Aboriginal communities that fall with the LAA and RAA. Key indicators will be presented and evaluated. See Standard Response 3.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
589.5.2.4 - Page 5-3	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application must include a brief summary of the predicted residual effects and cumulative effects of the Project on employment and make an estimation determination of the significance of these effects.	Determination of significance is a standard term in EA practice and should be retained.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
590.3.5	Robert James	Gixaala Nation	It must be clarified that mitigation measures related to Aboriginal rights, title and interests will be developed collaboratively. Additionally, it must be specified where the application will contain a description of these measures.	Section 11 of the Application will include the assessment of potential effects on Aboriginal interests, and a description of mitigation measures to avoid or reduce potential adverse effects on these interests. References will be made to other sections of the Application as appropriate. During on-going consultation activities, PRGT will encourage Aboriginal groups to propose mitigation measures to avoid or reduce potential adverse effects on Aboriginal interests. Views of Gixaala Nation, if provided, regarding proposed mitigation measures will also be included in the Application.	No changes to the dAIR are required.			
591.6.2.1 - Page 6-1	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that underlined text be removed. • Project Footprint: Includes all areas that will be disturbed through construction activities including the ROW, compressor stations, metering facilities, and associated temporary workspaces, laydown areas, and access roads. • Local Assessment Area: Includes a 2 km wide band centered on the proposed Project Footprint (1 km to either side of the proposed ROW centerline). The LAA will include Aboriginal communities where it can reasonably be expected that direct effects from the proposed Project will occur. The LAA will also include land in communities used as staging areas during the construction phase of the proposed Project.	See Standard Response 9.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
592.3.6	Robert James	Gixaala Nation	Please specify whether the criteria that will be used to characterize the residual effects of the environmental, economic, social, heritage and health effects will also be applied to Aboriginal rights, title and interests.	The Application will characterize the residual effects of the proposed Project on Aboriginal interests after mitigation according to the process set out in section 3.6. The Application will also include views of Aboriginal groups, if provided, regarding residual adverse effects on Aboriginal interests. A determination of the significance of residual adverse effects on Aboriginal interests will not be provided. The sections related to relevant VCs included elsewhere in the Application will, where appropriate, be cross-referenced in this section.	No changes to the dAIR are required.			
593.6.2.3 - Page 6-2	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application must describe the specific approach and methods used to determine potential Project-related effects on infrastructure and services, including criteria used for characterizing effects and estimating determining significance. Potential Project effects listed in Table 6-2 will be considered for each indicator and quantified using the identified measurable parameters.	Significance determination is a term used in environmental assessment. No change to the dAIR is required.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
594.6.2.4 - Page 6-4	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application must include a brief summary of the predicted residual effects and cumulative effects of the Project on infrastructure and services and make an estimation determination/estimation/assessment of the significance of these effects. Significance decisions will be made for each indicator considered in the infrastructure and services assessment.	Significance determination is a term used in environmental assessment. No change to the dAIR is required. The Application will not include a determination of significance of residual effects related to Aboriginal interests. However, the Application will characterize the residual effects of the proposed Project on Aboriginal interests after mitigation according to the process set out in section 3.6. The Application will also include views of Aboriginal groups, if provided, regarding residual adverse effects on Aboriginal interests.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
595.3.7	Robert James	Gixaala Nation	Please specify whether a determination of significance of residual effects to Aboriginal rights, title and interests will be completed and who will conduct this determination.	No changes to the dAIR are required.				
596.6.3.1 - Page 6-4	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added. Project Footprint: The physical area that will be directly disturbed by the proposed Project construction activities, including associated activities and physical works such as the ROW, compressor stations, metering facilities and associated temporary workspaces, laydown areas, and all access roads including highways.	As the highways used to access the Project are not physically part of the Project Footprint, highways will instead be addressed within the Local Assessment Area (LAA). Please also refer to Standard Response 10.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
597.3.9	Robert James	Gixaala Nation	Please specify whether an assessment of cumulative effects is contemplated for effects to Aboriginal rights, title and interests.	Cumulative effects assessment on VCs that are relevant to Aboriginal interests will be carried forward in Section 11 of the Application.	No changes to the dAIR are required.			
598.6.4.2 - Page 6-8	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application will describe the approach and methods used to collect baseline information required to support the assessment, and will identify the sources of this information. Baseline information used to characterize visual quality will be obtained from the following sources: • Any available TV, where relevant and available	See Standard Response 2 and Standard Response 5. No changes to the dAIR required.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
599.4.2	Robert James	Gixaala Nation	It is unclear how the noise from the marine portion of the pipeline will be assessed based on the dAIR language. Will the marine components be assessed for sound levels both above and below the water?	Known, typical noise levels produced by the proposed marine activities will be referenced from existing information and compared to published injury and behavioural thresholds for marine mammals and fish. Further, please see Standard Response 12.				
600.6.4.4 - Page 6-9	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. This section of the Application must include a brief summary of the predicted residual effects and cumulative effects of the Project on visual quality and make an estimation determination of the significance of these effects.	Determination of significance is a standard term used in environmental assessment and should be retained.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
601.6.5.2 - Page 6-10	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added. Information on commercial fishing will be collected from DFO databases and staff, commercial fishing operators and organizations, Aboriginal groups and non-governmental organizations.	See Standard Response 4. See Standard Response 13.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
602.4.3	Robert James	Gixaala Nation	Aboriginal fishery should be further specified to include cultural, subsistence and commercial fisheries.	No changes to the dAIR are required.				
603.7.2.2 - Page 7-2	Chief Garry Reece	Lax Kw'Alaams (Skeena Fisheries Commission)	TT - It has been requested that bold text be added and underlined text removed. The information sources will include: • Any available TV, where relevant and available	See Standard Response 2 and Standard Response 5. See Standard Response 13.	See revisions in attached dAIR document.		In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'Alaams dated December 11, 2013.	
604.4.4	Robert James	Gixaala Nation	Intertidal species of cultural, commercial or subsistence importance should also be included as an indicator for assessment of Marine Resources.	A change to the dAIR is not required.				

605	9.0 - Page 9-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <ul style="list-style-type: none"> The conclusions on the potential risk (likelihood multiplied by consequence) of the accident or malfunction. The Proponent must also show all evidence of efforts to engage stakeholders and First Nations in identification, risk characterization, avoidance mechanism development, and other considerations for accidents and malfunctions. 	<p>PRGT is committed to continuing to engage with Lax Kw'alaams with respect to Section 9.0 Accidents and Malfunctions. Please see Standard Response 13.</p> <p>No changes to dAIR required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
606	4.4	Robert James	Gitxaala Nation	<p>Aboriginal fishery should be further specified to include cultural, subsistence and commercial fisheries.</p> <p>TT - It has been requested that bold text be added:</p> <ul style="list-style-type: none"> A one in 2,475 year seismic event, including potential tsunami effects Slope stability and mass wasting events Forest fire Sediment transport and scour Marine current Corrosion Sea level changes 	<p>Tsunami events will be captured under "2,475 year seismic events" and sea level change will be discussed within "future climate scenarios". The dAIR will be amended to provide clarity.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
607	10.0 - Page 10-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <p>The objective of the LAA is to assess the potential effects of the project. Since we do not expect any interaction between the project and marine resources beyond 500 m, this distance is adequate for assessing potential effects of the project.</p>	<p>No change to the dAIR is required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	<p>Updated response to Round 1 working group comment</p> <p>The marine study team is of the opinion that a 500 m buffer is amply sufficient to accommodate consideration of all reasonable and measurable effects from the marine pipeline on marine ecosystems and this will be demonstrated in the EA.</p>
608	4.4	Robert James	Gitxaala Nation	<p>LAA for Marine Resources should be extended to a 1km buffer on the marine portions of the pipeline centerline.</p> <p>TT - It has been requested that bold text be added:</p> <p>For each of these environmental factors, the Application will identify:</p> <ul style="list-style-type: none"> The conclusions on the potential risk (likelihood multiplied by consequence) of the effects of the environment on the Project. The Application will also identify all efforts by the Proponent to engage stakeholders and First Nations in this assessment. 	<p>Details of stakeholder and Aboriginal engagement will be included in Section 11 of the Application.</p> <p>No change to the dAIR is required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
609	10.0 - Page 10-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <p>The Application will contain the Proponent's perspective on the results of the implementation of the Aboriginal Consultation Plan for each Aboriginal group.</p>	<p>The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Lax Kw'alaams.</p> <p>dAIR to be changed to add wording "the implementation of".</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
610	11.0 - Page 11-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <p>The Application will contain the Proponent's perspective on the results of the implementation of the Aboriginal Consultation Plan for each Aboriginal group.</p>	<p>These species were captured within our existing field surveys and reviews of existing information.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
611	4.4	Robert James	Gitxaala Nation	<p>No field surveys are proposed to assess the Aboriginal specific indicators identified. Please amend section to include appropriate field assessment of Aboriginal indicators.</p> <p>TT - It has been requested that bold text be added:</p> <p>The Application will characterize, for each Aboriginal group, the Proponent's perspective on the residual effects of the proposed Project after mitigation taking into account an assessment of likelihood and certainty. This section will also include views of Aboriginal groups, as provided through consultation, regarding residual adverse effects</p>	<p>The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Lax Kw'alaams.</p> <p>No changes to the dAIR required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
612	11.2.3 - Page 11-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <p>The expected mechanisms contributing to underwater noise are construction-related vessel traffic, and other marine-based construction activities, such as trenching. These activities will be short-lived and restricted to specific locations. For these types of mechanisms, which produce relatively low-magnitude and short-lived noise, 500 m ensures that the LAA is focused on the zone in which potential effects of underwater noise are most likely to occur on marine species. Should any construction activities become necessary that produce greater noise levels, a broader LAA will be considered. However, any impacts beyond the LAA could theoretically combine with those of other Projects within the RAA to have a cumulative effect on marine species; consequently, a broader RAA-wide perspective will be taken during the cumulative effects assessment.</p>	<p>The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Lax Kw'alaams.</p> <p>The mitigation measures that would be attached to the environmental assessment Certificate, if granted, would become legally binding commitments made by PRGT.</p> <p>No changes to the dAIR required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	<p>Updated response to Round 1 working group comment</p> <p>We are confident that a 500 m buffer is appropriate, and the current LAA and RAA definitions are appropriate.</p>
613	4.4	Robert James	Gitxaala Nation	<p>Submarine noise from construction is known to travel significant distances. Please provide a rationale for limiting the LSA to 500m from the pipeline centerline during construction.</p> <p>TT - It has been requested that bold text be added:</p> <ul style="list-style-type: none"> A description of mitigation measures committed to by the Proponent to avoid or reduce identified impacts. A characterization from the Proponent's perspective of the residual effects after the application of mitigation measures. Identification of any alternative characterization of their residual effects and/or alternative mitigation measures identified by Aboriginal groups through consultation, on these other interests. 	<p>The Application will reflect PRGT's perspective. However, PRGT's perspective will be informed by engagement with Aboriginal groups including Lax Kw'alaams.</p> <p>The mitigation measures that would be attached to the environmental assessment Certificate, if granted, would become legally binding commitments made by PRGT.</p> <p>No changes to the dAIR required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
614	11.2.4 - Page 11-3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added:</p> <p>A Summary Table that includes issues raised by Aboriginal groups that might be impacted by the proposed Project, and the Proponent's committed to measures to avoid, reduce or mitigate those impacts. Where no measures are identified, the Proponent will provide a rationale to support this decision.</p>	<p>Thank you. The dAIR will be amended accordingly.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
615	11.2.5 - Page 11-3	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>The GHG management plan will focus on the Project's GHG emissions from the proposed compressor stations. The plan will estimate the proposed Project's GHG emissions compared to the most recent provincial and national GHG emissions inventories and to provincial legislated reduction targets. It will also identify the measures that will be implemented to mitigate, reduce, or avoid emissions of GHGs (e.g., best management practices (BMPs)). Links to other sections in the Application will be identified.</p> <p>Effects of climate change will be assessed in the Environmental Assessment Certificate (EAC) Application in the section relating to "Effects of the Environment on the Project." This will include a brief description of the projected changes in climate expected over the lifecycle of the proposed Project.</p>	<p>See Standard Response 23.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
616	14.1.2 - Page 14-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that <u>underlined</u> text be removed:</p> <p>The Application will summarize the Project design elements that the Proponent requests approval to develop and operate if an Environmental Assessment Certificate is issued as necessary. Figures will be provided to identify the location of the Project components.</p>	<p>The dAIR will be updated to incorporate the requested change.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
617	16.1 - Page 16-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>The Application will provide a summary, in the form of Table 16-2 below, of all the Proponent's proposed commitments (mitigation measures) to prevent or reduce adverse environmental, economic, social, heritage and health effects. Commitments will not be proposed where there is a legal requirement to undertake an activity (i.e., commitments to obey the law will not be made).</p> <p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>Provide a statement on the overall significance of the Project's environmental, economic, social, heritage, and health effects, as well as on Aboriginal groups' rights and interests and on the Proponent's ability to mitigate them.</p>	<p>PRGT will consider these species and associated industries. These species will be duly and fully considered within the scope of existing indicators, measurable parameters within the marine resources, and land and resource use VCs. See Standard Response 13 and Standard Response 14.</p> <p>Commitments provided in the Application will only be from the Proponent and are proposed as part of the Environmental Assessment Application process. No change to the dAIR is required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	<p>Updated response to Round 1 working group comment</p> <p>Part C of our Application will summarize PRGT's understanding of Gitxaala Aboriginal Interests, identify potential adverse effects on those interests, and suggest proposed mitigation to avoid or reduce such effects. Gitxaala will have multiple and meaningful opportunities to review this part of the Application. Given the related VC analysis that will take place in Part B of the Application, and the overall structure of Part C of the dAIR, PRGT believes that it is not practical nor necessary to include specific indicators as defined by each Aboriginal Group in the dAIR, in part because these indicators may vary widely between Aboriginal Groups. However, PRGT would welcome the opportunity to continue discussions with Gitxaala during the Application review phase of the environmental assessment to respond to any questions or concerns Gitxaala may have regarding the Application, including our understanding of how the Project may impact Gitxaala's Aboriginal Interests.</p>
618	4.4.3	Robert James	Gitxaala Nation	<p>No potential adverse project effects are listed in relation to previously noted Aboriginal indicators, please update listing to include this level of detail (e.g. Change in exercise of Aboriginal right to harvest marine resources, measurable parameter: Area of use permanently altered or destroyed, access altered or restricted). Gitxaala looks forward to contact from the proponent to assist in structuring a more inclusive assessment.</p> <p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>The Application will provide a summary, in the form of Table 16-2 below, of all the Proponent's proposed commitments (mitigation measures) to prevent or reduce adverse environmental, economic, social, heritage and health effects. Commitments will not be proposed where there is a legal requirement to undertake an activity (i.e., commitments to obey the law will not be made).</p>	<p>See Standard Response 14.</p> <p>Selected traditional use plants, including those harvested for food, will be included as focal species within the Vegetation and Wetlands assessment if relevant TK information is available.</p> <p>No changes to the dAIR are required.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	<p>Updated response to Round 1 working group comment</p> <p>"Traditional use plants" has been added as an indicator within the Vegetation and Wetland Resources VC.</p>
619	16.3 - Page 16-1	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>Provide a statement on the overall significance of the Project's environmental, economic, social, heritage, and health effects, as well as on Aboriginal groups' rights and interests and on the Proponent's ability to mitigate them.</p>	<p>The dAIR will be updated to incorporate the requested change.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	
620	16.4 - Page 16-2	Chief Garry Reece	Lax Kw'alaams (Skeena Fisheries Commission)	<p>TT - It has been requested that bold text be added and <u>underlined</u> text removed:</p> <p>Provide a statement on the overall significance of the Project's environmental, economic, social, heritage, and health effects, as well as on Aboriginal groups' rights and interests and on the Proponent's ability to mitigate them.</p>	<p>The dAIR will be updated to incorporate the requested change.</p>	<p>See revisions in attached dAIR document.</p>	<p>In regards to suggested edits to the dAIR submitted via letter and edits directly in the dAIR document, please see PRGT's letter to Lax Kw'alaams dated December 11, 2013.</p>	<p>Updated response to Round 1 working group comment</p> <p>To clarify our response in the Round 1 comment, while aboriginal harvest of wildlife is considered as part of the wildlife assessment if information is available, it will also be carried forward to Part C of the Application.</p>
621	4.5	Robert James	Gitxaala Nation	<p>There is no connection in this section with Aboriginal harvest of wildlife resources. Please update to include this as a potential effect.</p>	<p>Aboriginal harvest data, if available, will be included in the assessment of wildlife.</p>			
622	4.6	Robert James	Gitxaala Nation	<p>If intertidal plant species are not included as indicators in the Marine Resources section, it must be included in the vegetation section to ensure critical harvested species are properly assessed.</p>	<p>See Standard Response 14.</p>			
623	4.6	Robert James	Gitxaala Nation	<p>By separating the plants harvested by Aboriginal people from the vegetation assessment, the assessment becomes largely secondary. Instead of quantifiable information related to the plant species, the plants will be instead assessed based on the potential effects from other VCs such as air. This is unacceptable. Please update the dAIR to include assessment of Aboriginal harvested plants within the vegetation and wetland assessment.</p>	<p>Selected traditional use plants, including those harvested for food, will be included as focal species within the Vegetation and Wetlands assessment if relevant TK information is available.</p> <p>No changes to the dAIR are required.</p>			<p>Updated response to Round 1 working group comment</p> <p>The Application will provide geographical context for measured parameters for each VC. Geographical context will be provided either as text, or a combination of text and figures. Total area potentially affected will be reported wherever it is defined as a measurable parameter.</p>
624	Table 4-6	Robert James	Gitxaala Nation	<p>Please include both the total area affected and the geographic location or provide a rationale for exclusion.</p>	<p>The total area affected and the geographic location or rationale for exclusion will be provided in the application.</p>			<p>Updated response to Round 1 working group comment</p> <p>It is PRGT's understanding that responses provided in tracking tables, including commitments, become part of the official record for the EA process. Therefore, PRGT considers the above commitment a requirement of the Application.</p>
625	Table 4-10	Robert James	Gitxaala Nation	<p>Please include both the total area affected and the geographic location or provide a rationale for exclusion.</p>	<p>The total area of habitat affected by the Project will be provided for each indicator species within the Wildlife and Wildlife Habitat VC. Area summaries will be provided for each Land and Resource Management Plan (LRMP) area, and for caribou and grizzly bear, by herd range or population unit respectively.</p>			<p>Updated response to Round 1 working group comment</p> <p>It is PRGT's understanding that responses provided in tracking tables, including commitments, become part of the official record for the EA process. Therefore, PRGT considers the above commitment a requirement of the Application.</p>

				<p>As noted at the Working Group meeting, the scientific rationale to identify an impact to the environment is lacking. The use of "Wildlife and Wildlife Habitat" as a valued component is questionable - as we are not aware of any peer reviewed material in international scientific literature that uses such an approach to measure an environmental impact. Can the proponent and/or the BCEAO provide us with scientific literature for the use of such a valued component?</p> <p>Secondly, if species are to be used as "indicator" measurements, it becomes difficult to understand how measurements that exclude any rigor of measurement to health or vitality of the population can identify any "impact" to the environment. Can the proponent and/or the BCEAO provide us with scientific literature for the use of such a valued component?</p> <p>We understand that through this process, the BCEAO and the proponent will rely heavily upon what is called "habitat modeling". Essentially, if there is habitat available, then there should be a relative "low" impact to the wildlife in question. Here we emphasize that if this method of habitat modeling is to be applied, then it is critical that the impacts of forestry in the region are fully considered and recognized in the cumulative impacts assessment both for impacts to wildlife habitat and freshwater aquatic resources on an appropriate temporal scale for the project (approx. 50 year estimation). This certainly should consider the current predictions of the Annual Allowable Cut for the forest regions in question. We recommend that if habitat (or the "home" of the species in question) is going to be used as a measure for "impact" to the environment, then prediction of how the "home" will be impacted needs to be fully considered in both the cumulative effects assessment and as a Valued Component (VC) in and of itself. This VC could be titled "Ecosystem Health" and/or "Biodiversity", in which measurements/indicators such as "rates of Natural Disturbance" and "Forest Representation" can be used and considered when determining an effect. As a final point to this topic, many of us are aware of the effects of the Mountain Pine Beetle (MPB) on the forests and watersheds in the very areas this proposed project intends to intersect. A great deal of these forests and watersheds in these regions are being identified by both government and industry as being close to "thresholds" of harvesting at this point in time - and in particular at the watershed level. This threshold is primarily based on erosion. In addition to erosion due to recognized high harvesting level activities in these areas due to the MPB, the concern of climate change in combination with the number of clear-cuts in these regions (that can contribute to water temperature increase), combined with this project can potentially have a significant effect on the fisheries populations in the Stuart River watershed (and more specifically to the Middle River and Tremblour Lake sub-basins). Therefore, for this environmental assessment to consider impacts to the TLN rights, title and interest, the above points cannot be ignored, as there is a high degree of concern for both wildlife and fisheries population viability into the future in this newly selected "south-central" route by TransCanada. We summarize the following points and request a rationale to each as follows:</p> <ol style="list-style-type: none"> 1. Is climate change and erosion, in combination with current and forecasted forest practices being measured and/or considered in this Environmental Assessment in the context of potential effects and thresholds to salmon populations in the Middle River and Tremblour Lakes sub-basins? 2. Please provide clear rationale as to how and why forestry is being excluded from the cumulative effects assessment? 3. Please provide clear rationale as to how future forestry activity is being excluded from habitat modeling to indicate impacts from the project on wildlife. <p>The effects described in the section should include the Aboriginal trade economy and other VCs of importance to Aboriginal Nations.</p>	<p>PRGT recognizes that forestry can change the availability of suitable habitat on the landscape for some species, as well as change species movement patterns and affect mortality risk. However, assessing potential cumulative effects resulting from an interaction with forestry is only possible if future harvest locations are spatially and temporally defined. Where available, PRGT will use available future harvesting data in its cumulative effects assessment, but generally this data is limited. Annual allowable cuts, although they provide a rough estimate of harvest activity, are subject to large variance depending on market conditions, insect outbreaks, existing road networks, location of delivery points, and location of merchantable timber to name but a few variables. Forest activities in BC are regulated under the Forest Act and the Forest and Range Practices Act. In addition, many Tree Farm License and Timber Supply permit/lease holders operate under a sustainable forest management practices framework.</p> <p>The potential impacts of climate change on the Project will include discussion about erosion, sea level rise and potential changes to the frequency and severity of extreme weather events.</p> <p>To reduce potential effects of the Project, the pipeline will be routed, where possible, to parallel existing linear features such as existing forestry roads and to utilize existing disturbances such as recent cut blocks.</p> <p>As this question relates to Freshwater Aquatic Resources, no modeling of watershed level effects is taking place. Riparian clearing will be reduced as part of mitigation planning, and in those areas where habitat losses will occur (both riparian or instream), habitat compensation will be implemented as required under DFO's "no net loss of fish habitat" policy. Details of fish habitat compensation planning will occur during the permitting stage, at which time the proponent must apply to DFO for an authorization to alter or destroy fish habitat. Generally, the creation of compensation habitat must occur at ratios greater than 1:1.</p> <p>See Standard Response 3</p>	<p>As discussed at the WG meeting on Nov 27, 2013 - Dave Radley did bring this item forward again on behalf of Takla. There has been discussion on changing how this assessment is done, and Nathan Braun did say to the proponent during the meeting to see what could be done to address some of the items brought forward by Takla. This is promising. In short, there are ways in which to predict where "merchantable" timber exists on the landscape. Coupled with the AAC, and the TRUB, it is very realistic to create models that include probability of harvesting in the next: 0-5 years, 5-20 years, and 20 to 50 years (as an example). This may be a solution, in the "variance" concerns the proponent has brought forward. To limit predictions to use "available future harvesting data" can be extremely limiting - and ultimately ignores a known future activity that will occur during the life span of the project. The statement: "To reduce potential effects of the Project, the pipeline was routed, where possible, to parallel existing linear features such as existing forestry roads and to utilize existing disturbances such as recent cut blocks", highlights exactly why forestry is one of the largest cumulative impacts to not be ignored - particularly given where the pipeline is proposing to route - that is, primarily in valley bottom locations. On aquatics and cumulative impacts: Valley bottom locations are generally where rivers exist. Recognition of erosion impacts due to forestry is well understood and documented. Modeling of watersheds has been done by the provincial government where areas of "high erosion" concerns have been identified. Furthermore, water temperature has been shown to increase due to presence of clearcuts. Since the project goes through areas of high levels of forest harvesting due to the MPB and is in areas of high fisheries value to Takla, the proponent and the EAO can not ignore this very real and critical issue related to the potential cumulative effects forestry, in combination with what this pipeline project may have on the impacts to both freshwater aquatics and wildlife habitats.</p> <p>Thank you for your comment. PRGT appreciates these concerns and will be including forestry activities in the assessment of cumulative effects. With respect to soil erosion in particular, soil erosion risk has been identified as a measurable parameter that will be assessed as part of the Soil VCs as well as a cumulative effects context which includes forestry activities.</p>			
627	5.1	Robert James	Gitksana Nation						Updated response to Round 1 working group comment
628	5.2	Robert James	Gitksana Nation	The LAA must include Lach Klan, at minimum.					The Lach Klan does not fall within the LAA boundaries and is not within the Project study area.
629	6.0	Robert James	Gitksana Nation	The LAA for infrastructure and services, transportation and access, land and resource use must be expanded to include Lach Klan, at minimum.	See Standard Response 9, Standard Response 10 and Standard Response 21.				
630	6.2	Robert James	Gitksana Nation	As noted by Transport Canada during the working group meeting on October 17, 2013, this section does not adequately address marine infrastructure and services. Gaps include: a) Increased demand for marina space and services; b) Increased demand for marine safety; and c) Increased demand for marine emergency response services. Please identify how these subjects will be addressed and assessed.	Adverse effects on marinas are not expected as a result of the Project and therefore have not been included as a measurable parameter. Increased demand for marine emergency response services, will be added to Table 2 of the dAR. Change to dAR required.				
631	6.5	Robert James	Gitksana Nation	This section needs to address: a) Changes in access to marine protected areas b) Changes in recreational and subsistence fishing activity for both marine and intertidal species	Changes in access will be assessed in the Transportation and Access VC while recreational fishing will be assessed in the Land and Resource Use VC. See Standard Response 11.				
632	6.5.2	Robert James	Gitksana Nation	Information on commercial fishing must also be collected from Gitksana.	Where there is a commercial component of Aboriginal fishing, that component will be addressed in 6.5.2. Aboriginal groups will be added to the information sources included in bullet 3 under section 6.5.2. All other elements of Aboriginal Land Use will be assessed through Section 11 of the Application as relevant and be used to supplement socio-economic baseline information.				
633	11.0	Robert James	Gitksana Nation	Please see the attached suggestions for 4 VCs specific to Gitksana.	See Standard Response 21 and Standard Response 37.				Updated response to Round 1 working group comment
634	11.2.2	Robert James	Gitksana Nation	This section implies that the consultation will result in the identification of potential adverse effects to Aboriginal interests. This is an incorrect characterization and more specific methodology detail is required in relation to the identification of these effects. Please confirm that standard environmental assessment methodology will be used to identify adverse effects to valued components of interest to Aboriginal peoples.	Section 11 of the Application will include the assessment of potential effects on Aboriginal Interests. This section of the Application will include: • Identification of specific Aboriginal Interests provided by Aboriginal groups or identified through secondary sources. Where there is overlap between an Aboriginal Interest and a VC, the information from other sections of the Application will be cross-referenced and summarized in context of the specific Aboriginal Interest. • Identification of potential adverse effects of the proposed Project on Aboriginal Interests. • A description of mitigation measures to avoid or reduce potential adverse effects on Aboriginal Interests. References will be made to other sections of the Application as appropriate. • Views of Aboriginal groups, if provided, regarding proposed mitigation measures. No changes to the dAR are required.				
635	11.2.2	Robert James	Gitksana Nation	This section contains permissive language that allows the proponent to avoid provision of specific information necessary for the assessment of effects to Aboriginal rights. As it is the proponent's responsibility to engage Gitksana in the process and provide reasonable capacity to do so, the permissive language is unacceptable. Please remove.	PRGT believes that the information requirements set out in Section 11.2.2 of the dAR will ensure that sufficient information is included in the Application so that a meaningful assessment of potential effects on Aboriginal Interests can take place. PRGT will continue to consult with Gitksana Nation during the environmental assessment in a respectful manner to identify and respond to Gitksana's Interests. No changes to the dAR are required.				
636	General Comments	Robert James	Gitksana Nation	The beginning sections of the dAR reference Part C, however this is not outlined in the dAR. Does Section 11 represent Part C? If so, there is no mention of Aboriginal specific VCs to allow for assessment of Aboriginal rights, including title.	Sections 11 and 12 of the dAR outline the requirements for Part C of the Application (see page headers). The dAR will be updated so that this is clear within the table of contents and within the body of the dAR. Change to dAR required. See Standard Response 4				
637	General Comments	Robert James	Gitksana Nation	Gitksana has identified four valued components (Governance, Sacred Places, Harvesting Rights and Cultural Identity). Please see attached document for information related to these valued components.	See Standard Response 37. No changes to the dAR are required.				Updated response to Round 1 working group comment
638	VC Selection Document - Level of meaningful engagement	Anna Urborne	Metlakatla EA Coordinator	Metlakatla is of the opinion that it is premature for TransCanada (the "Proponent") to be submitting a Valued Component (VC) rationale document for the Prince Rupert Gas Transmission Project (the "Project"). We have not been meaningfully engaged by the Proponent regarding the selection of VCs, and we do not feel that it accurately captures Metlakatla's interests. However, in the interest of cooperation, we have reviewed the VC Selection rationale document. Please consider the below points as preliminary comments on the document that can be further addressed in the VC list is more thoroughly populated.	The VC document was provided to the Working Group, including Metlakatla, to obtain input on the VCs prior to their inclusion in the Application. Metlakatla's comments on the VC document have been considered and the VCs revised as required.	Metlakatla recognizes the sharing of the VC document, however, sharing of a VC list and collecting baseline data on those VCs before input from Metlakatla is gathered does not comprise adequate consultation on VCs. No further response is required on this comment.			No additional response required.
639	VC Selection Document - Section 3.1 - Valued Components and Indicators	Anna Urborne	Metlakatla EA Coordinator	This section references the attributes of appropriate VCs. Of concern is the fact that the selection process, despite being admirably iterative, may nevertheless not lead to a suite of indicators that is either comprehensive or representative.	PRGT has selected VCs based on the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects document. PRGT is of the view that the VCs outlined in the dAR is sufficient.				
640	VC Selection Document - Section 3.2 - Applicable Laws and Regulations	Anna Urborne	Metlakatla EA Coordinator	Guidance on selection of VCs is premised on the exclusion of VCs that are otherwise protected by stand-alone legislation, the worker health and safety regime is provided as an example. Recent cutbacks and restructuring among a number of the regulatory agencies, however, raise the possibility that implementation and enforcement of these complementary tools will be insufficient. Of particular concern to the Metlakatla is the availability of parks and protected areas staff to provide field monitoring of works in designated areas. The VC document should be revised to include indicators that speak specifically to enforcement of existing statutes and regulations. Examples include number of Conservation Officers & Fisheries Officers available in regional offices and time allocated to review of this project.	PRGT will implement monitoring and follow-up programs to ensure the accuracy of predictions made during the EA and to determine the effectiveness of mitigation measures. Should the proposed mitigation prove to be insufficient or not meet legislative requirements, corrective measures will be taken.	Metlakatla would like to know the details PRGT's proposed programs. Monitoring and enforcement practices are an important component of assessing uncertainty and potential negative impacts to VCs. Waiting to ascertain whether the proposed mitigation is successful or not before taking corrective monitoring and enforcement measures is reactive and insufficient. Including indicators that speak specifically to enforcement and monitoring of the VC is more appropriately proactive.			A description of the monitoring and management plans PRGT proposes to implement specific to each VC will be described in the Application. PRGT will also hire environmental monitors for the duration of the construction phase whose responsibility will be to enforce the activities covered under the Environmental Protection Plan for Construction (listed in Section 14 of the dAR).
641	VC Selection Document - Section 3.3 - Selection of Valued Components and Indicators	Anna Urborne	Metlakatla EA Coordinator	This section notes that determination of the relationship between project activities and potential effects is "completed by environmental professionals with experience in the pipeline industry," and Section 6 suggests that this experience is derived through the construction and operation of more than 14000 km of pipeline in past two decades. While this may be true, most of these pipelines have been installed on or over land. The Project alternative proposes installation of 100+ km of submerg pipeline through the migratory channels used by the Nass River salmon an important to the Metlakatla as a food fishery. A number of important indicators have been omitted in the list of recommended indicators, suggesting that practitioners are less familiar with the interactions among submarine project components and marine species and processes.	Specialists in fisheries and marine ecology have also been involved in the selection of VCs, indicators, and measurable parameters used by the Nass River salmon an important to the Metlakatla as a food fishery. A number of important indicators have been omitted in the list of recommended indicators, suggesting that practitioners are less familiar with the interactions among submarine project components and marine species and processes.				PRGT did not omit important indicators, and it is not clear to what the commenter is referring. The indicators were selected to be intentionally broad and inclusive, which is appropriate given the wide range of marine habitats and species with which the Project could potentially interact.
642	Transmission Project	Anna Urborne	Metlakatla EA Coordinator	As noted above, a number of gaps are apparent. Those related to the marine environment are particularly concerning to the Metlakatla First Nation given its strong ties to, and dependence on, the marine environment. Without being comprehensive, the following effects and indicators should be added to the proponent's VC Selection document: (see comments 226 to 235 for all comments raised regarding table 2)	See Standard Response 4.				
643	VC Selection Document - Section 5 - Aboriginal and Treaty Rights	Anna Urborne	Metlakatla EA Coordinator	This section states that [t]he findings of the environmental, economic, social, heritage, and health effects assessments that are relevant to the exercise of Aboriginal and Treaty rights will be brought forward into the Aboriginal consultation section of the Application. This is a risky approach for the proponent and the EAO: if the process to select final VCs outlined in Figure 1, Section 3.3 does not result in a suite of VCs and indicators that has been informed by Traditional Use, the findings "brought forward" may be insufficient to inform the discussion regarding effects on rights and title. Specifically, gaps in VC selection resulting in data gaps regarding potential effects to aboriginal and treaty rights may require a return to the data collection phase of the assessment process. The EAO should be aware of this and encourage the proponent to identify VCs related specifically to Aboriginal and Treaty rights.	PRGT appreciates Metlakatla's input on this topic. The discussion of Aboriginal Interests (including rights) and other concerns raised by Aboriginal groups will be included in Section 11 of the Application, drawing on the analysis of relevant VCs in Part 8. As a result, PRGT does not propose to identify separate VCs with respect to Aboriginal interests or concerns. Notwithstanding this, PRGT would like to assure Metlakatla that it treats Metlakatla interests and concerns seriously. PRGT would welcome further input from Metlakatla, including relevant traditional land use and traditional ecological knowledge information, so we can understand these issues fully. PRGT will follow-up separately with Metlakatla on this.				
644	VC Selection Document - Section 6 - Closing	Anna Urborne	Metlakatla EA Coordinator	As noted repeatedly above, there are significant concerns regarding the EAO-guided approach to VC selection. In essence, it assumes that those VCs chosen for the environmental assessment are necessarily those that are of value to Metlakatla and that adverse effects carried forward are the only ones that will affect the exercise of Aboriginal Rights and Title. This is an incorrect assumption. Metlakatla has a unique relationship with the land and waters of its territory that informs the Nation's social and cultural cohesion. Failure to select VCs that representative of this unique relationship will ultimately lead to a flawed and incomplete EA that cannot adequately address effects on Aboriginal Rights and Title.	PRGT believes that, taken together, Section 11 of the Application, the related assessments conducted in the VC section, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information (if provided by Metlakatla) will address the interests, including Aboriginal Interests, raised by Metlakatla and other Aboriginal groups regarding the assessment of the proposed Project. No changes to the dAR are required.				
645	VC Selection Document - VC Selection	Anna Urborne	Metlakatla EA Coordinator	The EAO should encourage the proponent to select VCs and indicators that speak directly to potential effects on Aboriginal Rights and Title.	The Application will not include any VCs directly related to Aboriginal Interests (Rights and Title). However, section 11 will include the assessment of potential effects on Aboriginal Groups' Aboriginal Interests. This section of the Application will include: • Identification of Aboriginal Interests provided by Aboriginal Groups, or identified through secondary sources. • Where there is overlap between Aboriginal Interests and a VC, the relevant information from other sections of the Application will be cross-referenced and summarized in context of the Aboriginal Interests. • Identification of potential adverse effects, including cumulative effects, of the proposed Project on Aboriginal Interests. • A description of mitigation measures to avoid or reduce potential adverse effects on Aboriginal Interests. • Views of Aboriginal groups, if provided, regarding proposed mitigation measures. No changes to the dAR are required.				

646	VC Selection Document - Cumulative Effects Approach	Anna Urborne	Metlakarla EA Coordinator	EAD should also confirm that cumulative effects on the exercise of Rights and Title will be assessed.	See Standard Response 4. Comment also directed to the EAD.				
647	VC Selection Document - 1.2 Project Overview	AG	Ministry of Environment EP LNG Team	The Project Description now has up to ten route alternatives, including two marine route alternatives, and a 384 km long southern route. If all of these alternatives are put forward in the AIR and the application, review of these documents will be very cumbersome. Additionally, as portions of the route alternatives lie very close to or align with other proposed pipeline projects (which also have alternative routes), the possible combinations for a cumulative effects assessment could be substantial.	As the route selection process continues, PRGT will balance numerous factors to determine the route for the proposed project, and the Application for an Environmental Assessment Certificate will outline information on this route selection and siting process. The alternatives considered, and subsequently rejected, will also be summarized (including a rationale for initial consideration and final rejection) in the Application.				
648	VC Selection Document - 3.2 Applicable Laws and Regulations, Pg. 6	AG	Ministry of Environment EP LNG Team	In the dAIR, the proponent needs to put forward their best information regarding the construction camps. The VC selection document and the project description imply that camps will be under 100 persons, when information from other sources have placed them in the range of 500 to 1200 persons. Note that the Municipal Wastewater Regulation (not the Sewerage System Regulation) will apply for camps of 100 persons or more. Also for camps of 100 persons or more, a permit (under Environmental Management Act) will be required to authorize emissions from garbage incinerators.	The dAIR is not intended to provide project specific descriptive details but rather identifies what information is required in the Application. Information regarding the estimated number of people in construction camps will be provided in the Project Overview section of the Application.				
649	VC Selection Document - 3.2 Applicable Laws and Regulations, Pg. 7	JF	Ministry of Environment EP LNG Team	Other relevant legislation under Environmental Management Act (EMA) that needs to be considered in VC selection: Open Burning Smoke Control Regulation Contaminated Sites Regulation Waste Discharge Regulation Municipal Wastewater Regulation Hazardous Waste Regulation	These Acts and Regulations have been considered in the selection of VCs.				
650	VC Selection Document - 3.2 Applicable Laws and Regulations, Pg. 7	JF	Ministry of Environment EP LNG Team	Other relevant provincial regulations that need to be considered in VC selection: Fish Protection Act Riparian Areas Regulation	These Acts and Regulations have been considered in the selection of VCs.				
651	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 13	JF	Ministry of Environment EP LNG Team	Freshwater aquatic resources VC is too broad of a category to capture important information on water quality changes due to the project. Water Quality needs to be an independent VC as it has been in previous applications as indicated in Table 6L.	See Standard Response 8.				
652	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	WIM	Ministry of Environment EP LNG Team	Column 2 (Rationale): third item should be changed to "Operation and maintenance of the facilities..." and add fourth item "Construction and testing of the pipeline and facilities will result in air emissions". Column 3 (Recommended indicators) change item to "Predicted concentrations of Criteria Air Contaminants (CACs) (defined as SO2, NO, NO2, PM (Total), and size ranges 10 and 2.5), CO, H2S and other Hazardous Air Pollutants (HAPs) will be included if they are identified in the emissions profile.	Although Hazardous Air Pollutants are not expected to be an issue on this project, the latest version of the dAIR has been updated to address this comment. In addition, a Detailed Model Plan will be prepared (as per the 2008 Guidelines on Air Dispersion Modeling in BC) and submitted to BC MOE for review.				
653	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	WIM/AG	Ministry of Environment EP LNG Team	Standards and Guidance: Air Quality The proponent should be aware that ambient criteria and guidelines are in a state of review and updating. While the BC AAQs for O3 and PM2.5 are still current, the CWS and NAAQs have been replaced by the Canadian Ambient Air Quality Standards (CAAQS) for O3 and PM2.5. Note that it is recommended to use CAAQs over the AAQs as the provincial objectives are slightly more stringent. The Federal government is also developing CAAQS for SO2 and NO2, but these are not expected until 2014 or 2015. BC MoE is developing SO2 and NO2 interim objectives for use until the CAAQS are promulgated. The proponent should note that the MoE reviewer of the Air Quality assessment will be looking at standards and objectives from other jurisdictions for guidance in the mean time. For SO2 the US National Ambient Air Quality Standards (NAAQS) 1 hour average can be used as guidance (200 ug/m3) and for NO2 the WHO Guidelines 1 hour and annual averages can be used as guidance (200 ug/m3 and 40 ug/m3 respectively). Note that Metro Vancouver has adopted the WHO guidelines for NO2 in their air quality objectives.	PRGT will use the ambient criteria and guidelines in place at the time of the application submission.			The proponent should be aware that if the new CAAQS are in place at the time of permitting then the new CAAQS will be used to assess the emissions at that time.	The PRGT Application will use the AAQs that are in effect at the time of submission. For consistency, the PRGT permitting should include the AAQs that were used for the Application.
654	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	Freshwater Aquatic Resources rationale can include provincial legislation, Fish Protection Act. Important measurable parameters would be i) identification of critical stream habitat, ii) species inventory and use of the proposed project area	See Standard Response 19. Measurable parameters for change in fish habitat include the area (m2) of altered or eliminated habitat (both riparian and instream) by any project activity. Within the assessment, all potential pathways-of-effects (e.g., vegetation clearing, placement of material or structures in water) that can lead to alterations or destruction of fish habitat are identified and the potential change in available habitat is assessed for each pathway.				
655	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	Freshwater Aquatic Resources can include benthic invertebrate community structure as an indicator, as this measurable can be linked to water quality and stream ecosystem health. The proponent should consider following Environment Canada's Canadian Aquatic Biomonitoring Network (CABIN) program in this regard. Field manuals are available on this site for benthic invertebrate monitoring - http://ec.gc.ca/rbw-cabin/default.asp?lang=En&n=72AD806E-1	See Standard Response 19 and Standard Response 8.				
656	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	Water quality needs to be a VC, including surface freshwater and marine water quality and groundwater quality as indicators. What impact will pipeline development have on water quality?	See Standard Response 8				
657	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	Because soil/terrain has not been identified as a VC, metal leaching/acid rock drainage (ML/ARD) can be included as an indicator in the water quality section. Identifying ML/ARD potential be an important component for pipeline crossings.	As indicated on page 13 of the VC Selection Document, an ARD analysis will be completed based on bedrock type identified on geological mapping and field studies conducted as part of the geohazard assessment. This information will be used to inform the effects assessment for change in water quality within the Freshwater Aquatic Resources VC. Depending on risk of encountering acid rock, an ARD management plan may also be developed for the Project. The ARD management plan would describe protocols for testing samples of rock encountered during construction, handling and management of excavated material and material left in-situ, and monitoring.				
658	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	Marine resources VC needs to include water quality as an indicator.	See Standard Response 11				
659	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 15	JF	Ministry of Environment EP LNG Team	there is potential for marine contaminated sediments to be encountered during construction (Alice Arm, Porpoise Channel), marine sediment quality and benthic invertebrates should be included as indicators as well.	Data regarding marine sediment quality and benthic invertebrates are being collected and will be presented in the effects assessment on marine resources.				
660	VC Selection Document - Section 4 Proposed Valued Components and Indicators, Table 1, Pg. 18	WIM/AG	Ministry of Environment EP LNG Team	Column 2 (Rationale): second item should be changed to "Operation and maintenance of the facilities..." and add third item "Construction and testing of the pipeline and facilities will result in air emissions". Column 3 (Recommended indicators) change to "CACs and HAPs found to have impacts of significance" Column 4 (Potential Effects) change to "Change to human health endpoints in relation to the Recommended Indicators"	The Air Quality VC has been updated in the latest version of the dAIR to include CACs and consideration of HAPs.				
661	VC Selection Document - Section 4 Proposed Valued Components and Indicators, Table 1, Pg. 18	JF	Ministry of Environment EP LNG Team	Recommended indicators for human health from other similar projects: soil & sediment quality, country foods, noise, drinking & recreational water quality	Indicators have been updated to include air quality, sediment quality, and marine country foods quality. Water quality will also be assessed in the freshwater aquatics resources and marine resources VCs. Change in soil quality due to admixing will also be considered in the soils VC. The dAIR will be updated to include this change.				
662	VC Selection Document - 4 Proposed Valued Components and Indicators, Table 1, Pg. 18	JF	Ministry of Environment EP LNG Team	Recommended indicator for stream ecosystem health - benthic invertebrate community structure	See Standard Response 19.				
663	VC Selection Document - General	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	Overall, I find it appropriate to have chosen "Visual Quality" as one of the 13 VCs for the project.	PRGT acknowledges the comment from MFLRNO. No changes to the dAIR required.			comments adequately addressed	
664	VC Selection Document - Section 3.3, Table 1, Social Pillar, Second Row, Pg. 664	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	The terminology and listing of Project Activities dealing with Visual Quality is incomplete and not consistent with Table B2. The two tables should be consistent with each other. See comment on Table B2 below.	PRGT acknowledges the comment from MFLRNO. Visual quality has been included in the dAIR.			comments adequately addressed	
665	VC Selection Document - Section 3.3, Table 1, Social Pillar, Second Row, Pg. 665	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	The "ROW establishment" activity would create a permanent linear feature on the landscape and this should be added as a bullet under "Induced or Resultant Change". Linear features on the landscape are not considered good design practices when opening up the forest canopy so in terms of "Potential Effects", another bullet should be added to acknowledge this potential impact e.g. "Potential negative impact on visual quality". It should be noted that this is an impact that would apply mostly to the scenic areas the pipeline would cross and should be a factor to consider in the final route selection. If highly sensitive scenic areas are impacted and cannot be avoided, then these impacts would need to be addressed in the development of the mitigation strategies.	The linear nature of the pipeline and its potential visibility from scenic areas will be considered in the assessment of visual quality. Agreed that appropriate mitigation strategies will be developed in the event that the pipeline will affect highly sensitive scenic areas that cannot be avoided. An assessment of visual quality has been added to the dAIR.			comments adequately addressed	
666	VC Selection Document - Section 4, Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Visual Quality row, Pg. 17	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	The "NA" under "Recommended indicators" is not satisfactory. It is recognized in Table 1 and 2 that a potential effect of the pipeline would be a "change in visual quality" so the extent of this change has to be assessed and a good indicator would be to measure the forecasted visual condition of the landscape of the project against the established Visual Quality Objectives (VQOs) in the scenic areas affected.	The potential change in visual quality and the anticipated visibility of Project features from established viewpoints are being considered in the assessment and have been added to the dAIR. The results of the visual quality analysis will be compared to established VQO's to determine whether VQO's are still able to be achieved.			comments adequately addressed	
667	VC Selection Document - Section 4, Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Visual Quality row, Pg. 17	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	Under "Potential Effects", it should be clarified that the "change in visual quality" may be positive or negative and that the visual impact assessment would determine the extent of this change and whether the established VQOs would be achieved.	The potential change in visual quality (either positive or negative) will be included as part of the assessment as well a determination as to whether established VQO's would be achieved. Visual quality assessment has been included in the dAIR.			comments adequately addressed	
668	VC Selection Document - Section 4, Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Visual Quality row, Pg. 17	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	The following bullets should be added under to the existing ones under "Measurable Parameter(s)": • Area of scenic areas affected (in hectares) broken down by VQO classes. • VQO achieved by the proposed activities in terms of the legal definitions and percent alteration of the affected landscapes. The proponent is encouraged to use the same evaluation methodology used when we assess forest harvesting and road activities in scenic areas (i.e. FREP protocol).	These measurable parameters will be included as part of the assessment of visual quality. PRGT will consider the FREP protocol when conducting the visual quality assessment. Visual assessment has been added to the dAIR.			comments adequately addressed	
669	VC Selection Document - Appendix B, Table B2, Pg. IV	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	Facility Site Preparation Facility Construction Brush and Vegetation Management	The dAIR supersedes the VC Selection Document. Table 3-2 of the dAIR addresses this concern. Change to the dAIR not required.			comments adequately addressed	
670	VC Selection Document - Appendix B, Table B2, Pg. IV	Luz Roberge	Ministry of Forests Lands and Natural Resource Operations	The listing and terminology used in Table B2 should also be used in Table 1 or vice versa.	The project interaction table has been updated in the dAIR.			comments adequately addressed	

673	VC Selection Document - Table 1 Relationship between Project Activities and Potential Effects, Pg 10	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Potential effects on aquatic and terrestrial environment are discussed in terms of changes in hunting, use of land and resources for traditional purposes and economic benefits. While these aspects are very important to consider, indirect changes in species not traditionally harvested are also possible. These include species of conservation concern; for example, loss of habitat suitable for Rusty Blackbird could result in a reduction of the number of individual of this species. It is recommended that PRGT not limit the assessment of indirect effects to harvestable species, and clarify Table 1 to reflect this.	Agreed. All wildlife indicator species within the Wildlife and Wildlife Habitat VC will be assessed for both direct and indirect effects. Support for assessment of indirect effects will be based on relevant and available literature and expert opinion.				comments adequately addressed	
674	VC Selection Document - Section 4 proposed valued Components and Indicators, Pg 14	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Please clarify if significance will be assessed at the scale of the VC or the Indicator. Assessment at the scale of the VC (i.e., Wildlife resources) has the potential to result in loss of detail; for example if effects are significant on only one indicator. Please provide detail on how PRGT plans to provide sufficient detail on the significance of Project effects on individual indicators.	Residual effects and significance will be evaluated for each key indicator within the Wildlife and Wildlife Habitat VC.				comments adequately addressed	
675	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Will the Indicator "Caribou" be assessed by type of caribou (e.g., northern vs central mountain) or by herd?	Effects of the Project on caribou will be assessed by herd. However, PRGT recognizes that herds intersected by the Project are representative of "types" belonging to Northern and Central Designatable Units and that these herds have different management and/or recovery plans associated with them. PRGT will consider caribou herds fully with respect to applicable provincial and federal management designations.				comments adequately addressed	
676	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Measurable parameters for wildlife and wildlife habitat are "areas of high, moderate and low habitat for species-of-interest". Are species-of-interest the same as indicators? If not, please clarify the species for which habitat mapping will be conducted.	"Species of Interest" has been replaced by "indicator". Habitat mapping will not be completed for caribou herds or mountain goat. For these species, important areas, if applicable, will be assessed (e.g., designated or proposed Wildlife Habitat Areas, designated or proposed Ungulate Winter Range, core areas, high elevation winter range (HEWR), low elevation winter range (LEWR)).				comments adequately addressed	
677	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Does the pipeline route overlap with habitat for listed warblers and sparrows (e.g., Connecticut Warbler, Black-throated Green Warbler, Nelson's Sparrow), and if so, will these species be considered for assessment?	The Project has the potential to overlap with listed warblers (Black-throated Green Warbler, Connecticut Warbler, Canada Warbler, Cape May Warbler and Bay-breasted Warbler) and listed Sparrows (Le Conte's Sparrow and Nelson's Sparrow). Canada Warbler will be assessed as its own indicator. Other species will be represented in the Songbird Community Indicator groups. Any observations of these species, either from historical sources or Project-specific field programs, will be provided in a Technical Appendix; mitigation will be described where appropriate.				comments adequately addressed	
678	VC Selection Document - Table B2, Appendix B, Pg IV	Megan Watters	Ministry of Forests Lands and Natural Resource Operations	Please clarify why facility construction is not predicted to have meaningful and measurable project interactions with wildlife resources. Although short-term, construction activities tend to generate sensory disturbance, potentially resulting in alteration of wildlife use of habitat and wildlife movement patterns.	Change to dAIR required. Add Canada Warbler to Table 3-1 and Table 4-9 Table 3-2 of the dAIR will be updated to include Physical Construction and installation of Metering Facilities and Compressor Stations for the Wildlife and Wildlife Habitat VC.				comments adequately addressed	
679	VC Selection Document	Land Tenures Branch	Ministry of Forests Lands and Natural Resource Operations: Paleontological Resources	The project has a very high likelihood of encountering paleontological sites that cover a wide range of geological time and represent a wide range of geological terrains.	See Standard Response 39.					
680	VC Selection Document	Land Tenures Branch	Ministry of Forests Lands and Natural Resource Operations: Paleontological Resources	The proponent needs to expand the scope of work done to identify and specifically locate paleontological resources and to properly rank them with respect to a range of attributes.	See Standard Response 39.				Updated response to Round 1 working group comment	
681	VC Selection Document	Land Tenures Branch	Ministry of Forests Lands and Natural Resource Operations: Paleontological Resources	The proponent needs to use a geological map and identify and locate the geological formations that are known to bear fossils and accordingly develop a fossil sensitivity map for the area under application.	See Standard Response 39.				A high level screening has been completed and determined the project will not disturb any protected paleontological sites (e.g., Makalee fossil beds, Wapiti Lake fossil fish site) or any fossil sites in parks (e.g., Driftwood Canyon fossil beds, Burgess Shale). A fossil sensitivity area map will be developed in advance of construction in order to identify those areas with highest potential to contain paleontological sites. If high heritage value fossils are discovered during construction the proponent will voluntarily report discoveries according to the Heritage Resources Management Plan described in the Application.	
682	VC Selection Document	Land Tenures Branch	Ministry of Forests Lands and Natural Resource Operations: Paleontological Resources	A recommended process would be as follows: 1. Locate the fossil-bearing geological formations on maps, and known fossil exposures and fossil sites: • On paper: identify where the units are using the literature • Include Quaternary deposits in the assessment (soil material, gravel, pit gravel from quarrying) • On the ground: identify and describe where they are on the ground (exposed rocks and where fossils have been found in the past and have been reported). For known sites rank their fossil content with respect to their significance, quantity, quality, types of fossils found, and ease of access for study and sampling. 2. Identify and locate where activity will create new exposures as part of the project, and go on the ground to verify what is there and compare with what is in the literature. 3. Compare the potential new sites with what we already know and rank the new sites with respect to their significance, quantity, quality, types of fossils found. 4. Evaluate whether there are equivalent or better sites elsewhere and whether or not they have been sampled sufficiently and where the collections are. 5. Based on the information found, develop a recovery plan that either avoids impacts or mitigates them. It should contain strategies to obtain representative samples of what will be destroyed or rendered unavailable as result of the project. The sampling/recovery methods will depend on the nature of the exposure, the density and types of fossils found in the beds. The plan must also contain strategies for the description of the geological setting and context of the fossil sites. 6. Develop monitoring protocols for checking when blasting and disturbing sites in high sensitivity areas and have in place sampling/recovery strategies. 7. Arrange in advance for the receipt and care of collections resulting from the project.	See Standard Response 39.					Updated response to Round 1 working group comment
683	VC Selection Document	Andarge Baye	Ministry of Forests Lands and Natural Resource Operations	Potential impacts during the construction, operation and maintenance of natural gas pipelines in relation to local and regional groundwater resources is not only limited to groundwater quality. It includes both physical (i.e. quantity) and chemical (i.e. quality) issues.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to water quality in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.				In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	
684	VC Selection Document	Andarge Baye	Ministry of Forests Lands and Natural Resource Operations	Groundwater Quantity o Loss of yield to aquifers, wells, springs, or surface water resources during excavation and tunneling such as interruption of groundwater flow, interruption of recharge to well, and dewatering drawdown of water table during pipeline construction. o Changes in the local aquifer permeability caused by equipment compaction or use of fill materials of lower permeability than the natural surrounding aquifer. o Impact of disposal of groundwater pumped from trenches related to saturation of nearby stream or overland flow towards wells and springs. o Possible damage to or loss of wells during blasting operations, if there is any, during construction.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to water quantity in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.				In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	
685	VC Selection Document	Andarge Baye	Ministry of Forests Lands and Natural Resource Operations	Groundwater Quality o Potential effects of accidental spills and acidic drainage to potential aquifers hydraulically down-gradient of the proposed route particularly in areas of highly permeable media (sand, gravel and shallow fractured bed rock) and wetlands which are identified to be transected by the proposed pipeline in all phases of the project (construction, operation and maintenance). o Adverse changes in water quality in aquifers, wells, and interrelated surface water resources during construction.	See Standard Response 8.				Updated response to Round 1 working group comment	
686	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	For old growth I see that it is somewhat covered under the Proposed Value Component on page 16 under the Vegetation and Wetland Resources. It states that the EPM Regulation under the OGA establishes objectives for the protection of old growth management areas ... I understand that this is not true at this time but that a pilot is underway or about to get underway for the Old Growth Management Areas (OGMAs) in the Dawson Creek Land and Resource Management Plan area. The proponent should ensure that all OGMAs that are legally established, draft or guidance are included in the assessment. Note that draft OGMAs are often "Section 8 Draft OGMAs" according to the Provincial Old Growth Order and are mapped and available in the Government Data Warehouse. From the submitted document, I believe that this means that the proponent is committing to report out on the area of OGA affected by the pipeline development.	Comment acknowledged. PRGT to discuss with MFLNRO. Both legally established and draft or guidance OGMAs will be included within the assessment.				comments adequately addressed	
687	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	In addition to spatial OGMAs, there are non-spatial Orders for the management of old growth through-out Northern BC.	The orders will be reviewed and may be used for old growth retention targets if applicable.				Updated response to Round 1 working group comment	
688	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	There are likely at least 3 that three non-spatial orders are within the proposed route. o Prince George Timber Supply Area Order http://archive.lmb.gov.bc.ca/srp/srmp/north/prince_george_tsa/tsa_biodiversity_order.pdf o Mackenzie Timber Supply Area Order http://www.lmb.gov.bc.ca/srp/srmp/north/mackenzie/index.html and o Provincial Non-Spatial Old Growth Order http://archive.lmb.gov.bc.ca/srp/srmp/policies/guidelinesandassessments/oldgrowth/index.html	The orders will be reviewed and may be used for old growth retention targets if applicable.				Updated response to Round 1 working group comment	
689	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	These Orders are in geographic units where Old Growth Management Areas have not been spatially identified and mapped, as the method to manage old growth attributes at the landscape or coarse filter level.	The orders will be reviewed and may be used for old growth retention targets if applicable.				Updated response to Round 1 working group comment	
690	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	Due to the nature of cumulative effects of forest disturbance by different resource developers, it is requested that the proponent of the pipeline provide data on the amount of old forest impacted by the pipeline. This impact would be most useful if reported by geographic units, as identified in the Land Use Objectives. Note that the definition of old forest varies depending on the Order and geographical unit in each Order.	Old forest is included as an indicator within the Vegetation and Wetland Resources VC section of the assessment. Old forest will be reported by geographic units, as identified in the Land Use Objectives, to the greatest degree practicable.				comments adequately addressed	
691	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations		Comment acknowledged.					
692	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	Managing for ecosystems and habitat at coarse filter is a method which is commonly supported so that we will not have to manage species by species when they become at-risk. By managing ecosystems and habitats with lens on "natural range of variability" we are more likely to address a variety of species needs and ecosystem processes.	Identifying a number of indicators, including species - such as species at risk and traditional use species - and ecological communities to describe potential effects of the project is effectively a coarse-filter approach. PRGT feels the use of several key species and community indicators will allow an effective assessment of the project on the environment in general.				comments adequately addressed	
693	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	I am requesting in the areas covered by non-spatial old growth orders I am requesting that the proponent also add "old growth" as a Recommended Indicator and report out on the area of old growth impacted by the pipeline development.	Old forest has been included as an indicator within the Vegetation and Wetland Resources VC section. The area of old growth impacted will be reported.				comments adequately addressed	
694	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 17	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	Land use planning objectives mean the objectives and zones presented in approved Land and Resource Management Plans as well as other land use objectives established under the Land Use Objectives Regulation (e.g., objectives established under the Forest and Range Practices Act).	The VC will assess Change or incompatibility with land use plans including (where relevant): • Regional Scale Strategic Land Use Plans; • District land use context; • Land and Resource Management Plans (LRMP); • Resource Management Zones (RMZs); • Official Community Plans (OCPs); • Regional growth strategy; and • Regional land use context.				comments adequately addressed	
695	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	For land use values as per approved Land Use Plans, I note that on page 17 the proponent states that a Potential Effects is "conflicts with land use planning objectives". The Measurable Parameter is "land use planning objectives (criteria and zoning)". The reviewers would like to know what is meant by "land use planning objectives"? Are these the objectives and zones in the approved Land and Resource Management Plans? Do they include other land use objectives that have been established under the Land Use Objectives Regulation?					comments adequately addressed	
696	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	Carbon: A large topic that I think is missing is the discussion / analysis / data on the impact to carbon through the removal of forests on the pipeline corridors. It is my understanding that the current vegetation cover, largely mature forest, will be replaced by different types of vegetation.	See Standard Response 23.				comments adequately addressed	
697	VC Selection Document	Shannon Carson	Ministry of Forests Lands and Natural Resource Operations	It is requested that the proponent provide data on the impact to carbon stores, sinks or sources. I have cc'ed the North Area Climatologist and she is willing to engage in this topic of conversation regarding future pipeline documents, with the assistance of the Provincial Forest Carbon specialist.	See Standard Response 23.				comments adequately addressed	
698	VC Selection Document	Stephane Duhe	Ministry of Forests Lands and Natural Resource Operations	like how they manage each value component and related indicators; they provide "measurables"	Comment acknowledged.				comments adequately addressed	

694	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 16	Stephane Dube	Ministry of Forests Lands and Natural Resource Operations	Under Soil as PVC, though it's missing an important indicator which is "natural surface drainage patterns". There is an obligation to minimize any alteration to natural surface waters e.g., seeps and other non classified drainages under the Environmental Protection And Management Regulation sec. 17 (tie-in to BC Oil and Gas Activities Act).	Natural drainage patterns will be addressed under agricultural land capability assessment. See Standard Response 22.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to drainage in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	In response to OGC: Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	Updated response to Round 2 working group comment The dAIR has been revised to include an assessment on hydrology that will specifically include consideration of alteration of drainage patterns. Between the soils assessment and the hydrology assessment, PRGT believes this matter will be fully considered.
695	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 16	Stephane Dube	Ministry of Forests Lands and Natural Resource Operations	The potential effect is change in natural drainages and it can be measured as "area of diverted waters" and "areas of saturated soils - flooded or wetter ground". These areas that were traditionally drier or not receiving that much water etc.	Natural drainage patterns will be covered under agricultural land capability assessment. See Standard Response 22.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to drainage in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	In response to OGC: Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	
696	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 17	Erk Fergeng	Ministry of Forests Lands and Natural Resource Operations	In addition to sites containing evidence of human activity prior to 1846 (including CMTs), burial places and rock art of any age are protected under the HCA and may not be altered without HCA permit.	Comment acknowledged. PRGT will abide by the HCA.			
697	VC Selection Document	Marten Geertsma	Ministry of Forests Lands and Natural Resource Operations	Consider implications of mountain permafrost on long runoff landslides (see new provincial map)	The presence of mountain permafrost as well as the influence of glacier is being assessed as part of the geohazards baseline studies. PRGT will review the latest site specific data gathered during the baseline studies, as well as the provincial map and will consider mountain permafrost zones as described as part of ongoing engineering design and field studies.			comments adequately addressed
698	VC Selection Document	Marten Geertsma	Ministry of Forests Lands and Natural Resource Operations	From a terrain perspective the marine option via Kitsault is preferred. The lower Nass Valley and land route beyond is very precipitous, has unstable slopes and fans and occasionally tricky sloping (and creeping) fans.	Route selection studies are underway and terrain stability is one of the key elements taken in account for taking decision on the final route option. PRGT has conducted a preliminary engineering analysis of the proposed pipeline route, including all alternative routes and is working on an optimal route option.			comments adequately addressed
699	VC Selection Document	Marten Geertsma	Ministry of Forests Lands and Natural Resource Operations	LIDAR in ASCII format is needed for review purposes of the route.	LIDAR has been acquired and is being used in route refinement. PRGT will consult with MFLNRO regarding the LIDAR data.			comments adequately addressed
700	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	Heritage Branch works with other provincial government branches, ministries and agencies, to incorporate best practices in heritage stewardship into resource management, and to integrate the use of BC Register of Historic Place (BC Register) data into crown resource management.	Comment acknowledged. PRGT to work with MFLNRO and Heritage Branch.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
701	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	Heritage Branch can provide the following: • Advice on the legislative and policy tools (e.g. Local Government Act and Heritage Conservation Act) that exist to help conserve and protect heritage resources. • Advice on the national standards and guidelines for heritage conservation and how those can be applied to specific historic places. • Input to project working groups from a policy perspective. • Comments on terms of reference and proposed mitigation strategies for historic resources affected by a project.	Comment acknowledged. PRGT to contact Heritage Branch.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
702	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	The BC Register is the portion of the provincial heritage register (established under Heritage Conservation Act) that lists formally recognized historic places. (Note that archaeological sites are recorded separately by the provincial Archaeology Branch.) Historic places are buildings, structures, groups of buildings, districts, landscapes, etc. that have aesthetic, historic, scientific, cultural, social or spiritual importance. The BC Register of Historic Places lists post-1846 provincial heritage sites and objects protected under the Heritage Conservation Act, as well as historic places that have been formally recognized by local governments under the heritage conservation provisions of the Local Government Act or Vancouver Charter.	Comment acknowledged.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
703	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	The proponent should note that this is a starting point only; there may be historic places on the ground that local residents value but that have not yet been formally recognized or communicated to Heritage Branch.	Comment acknowledged. Thank you.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
704	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	The proponent should contact local/regional governments and First Nations for additional information about valued historic places in the area of interest. Proponents should also be aware that there are national standards for the conservation of historic places (www.historicplaces.ca).	No changes to the dAIR required.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
704	VC Selection Document	Susan Green	Ministry of Forests Lands and Natural Resource Operations	In general, the following best practices are recommended for identifying and mitigating impacts on valued components: • Actively seek out local interest in historic places within the area of interest by consulting local and regional governments and First Nations • In the absence of detailed information about the significance of any affected historic resources, proponents should presume in favour of high regional significance. Any mitigation measures should reflect that presumed significance. The Regional District and municipalities should be asked for input and their recommendations should be taken into consideration and, where possible, accommodated by the proponent. • Build understanding of heritage values • Conserve heritage values (not necessarily by conserving physical things) • Practice "avoidance" where possible or feasible (i.e. change the route, siting, etc. of proposed development) • Record the site (e.g. photography, site mapping and documentation) • Interpret the site (i.e. provide signage about site history and significance) • Make information publicly accessible (see examples on Canadian Register of Historic Places at www.historicplaces.ca – Heritage Branch can assist with writing Statements of Significance) • Be open to "rescue" ideas • Discuss options with interest groups (e.g. regional district, municipalities, First Nations, heritage organizations, etc.)	Comment acknowledged and will be taken into consideration during the environmental assessment of the proposed project. Thank you. No changes to the dAIR are required.	Please adjust Submitter name to "Susan Green".	Apologies. The name has been adjusted.	
705	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 16	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations	Under the Wildlife and Wildlife Habitat VC, I recommend including tree roosting bats as a recommended indicator. There may also be opportunity to include a broader category of Furbearen as a indicator, which would include marten, fisher and possibly wolverine.	Bats are not currently considered as a key indicator. The primary potential effect of the project on bats would be change in habitat, specifically old forest and wetlands. Several key indicators presently chosen are considered appropriate suitable surrogates, namely: fisher, marten, old seral forest song birds, wetland birds, olive-sided flycatcher, Canada warbler, marbled murrelet, western screech-owl and northern goshawk. The old-growth forest indicator should also be considered an appropriate surrogate. Potential effects of the Project on wolverine can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, grizzly bear, caribou, moose, fisher and marten are all examples of species indicators that would collectively have similar and overlapping habitat requirements. See Standard Response 16.	response is satisfactory.	No additional response required.	
706	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 16	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations	Under the Vegetation and Wetland Resources, I recommend that wetlands be its own VC. Recommend indicators could possibly be hydrology and habitat. Construction has the potential of altering hydrological function and/or wildlife habitat available within a wetland. Under the Vegetation Resource VC, blue and red-listed plant species, native grasslands and invasive plants should be added to the recommended indicators.	Wetlands will be the focus of assessment under the Vegetation and Wetlands Resources VC. The "wetland" indicator will be further clarified in terms of wetland functions (i.e. habitat function, hydrological function and biogeochemical function). The updated dAIR will reflect these changes. Wildlife discipline will contribute to the assessment of potential effects on wetlands (notably wetland function), through four indicators (wetlands songbird community, pond-dwelling amphibians, western toad, rusty blackbird) and six field programs (breeding waterfowl, fall staging waterfowl, American bittern and yellow rail marsh surveys, pond-dwelling amphibian surveys, breeding bird surveys at wetlands, and remote cameras at wetlands). Red and blue-listed plant species as well as invasive plant species have been included as indicators of the Vegetation and Wetland Resources VC.	After reviewing the revised dAIR I am not confident that this concern is appropriately addressed. The methodology does not refer to the Environmental Canada guidebook for Wetland Ecological Functions Assessment which uses the function terms in the proponent's response. When I look at the potential effects, the effect noted is change in abundance or condition; however, the measurable parameter is merely changes in area. How or where are effects of changes to the hydrology of the wetland, which may lead to a change in the habitat function or condition. This type of effect may not result in a measurable change of area	We appreciate the clarification on the earlier comment. The Environment Canada technical report for Wetland Ecological Functions Assessment (Hanson et al. 2008) specifically addresses projects that fall under the Canadian Environmental Assessment Act and is therefore not strictly applicable here. However, the principles and methodologies contained therein will be applied where necessary, particularly if further wetland monitoring is proposed as mitigation to offset potential effects resulting from the Project. Wetland function (as it relates to the provision of habitat for example) will be discussed qualitatively in the Application.	comments adequately addressed
707	VC Selection Document	Joseph Kenny	Ministry of Forests Lands and Natural Resource Operations	The upgrade of existing FSR and Road permit roads to facilitate the construction. Our concern here would that our current Engineering standards be implemented particularly with respect to bridges – design, fabrication, construction, documentation etc.	MFLNRO design standards will be followed for upgrading existing FSR and permit roads. Other bridge upgrades or new bridges (e.g. aerial and highways) will follow applicable federal and provincial bridge design codes. "			
708	VC Selection Document	Joseph Kenny	Ministry of Forests Lands and Natural Resource Operations	The second concern would be the use of existing aggregate sources along corridor and on the access roads. The concern here would be that in using the known sources of aggregate will potentially cause costs to increase in the future and may limit our ability in the future to repair / construct road.	The PRGT project team is currently evaluating various possibilities for aggregate sourcing including a search for new aggregate source sites, the potential to use existing sources based on agreements, as well as the ability of using excavated rock from the ROW.			
709	VC Selection Document	Joseph Kenny	Ministry of Forests Lands and Natural Resource Operations	Roads and bridges are upgraded and maintained as needed. We would not like to see that after the project is completed we are left with roads that need substantial repairs due heavy use. Repairs may include subgrade repairs, bridge deck repairs, surfacing etc. we don't want to be left with back log of maintain issues.	PRGT will leave the roads and bridges directly affected by the Project in the same or better condition. This will be covered in road use agreements.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements of the Oil and Gas Road Regulation for roads authorized under the Oil and Gas Activities Act	Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	
710	VC Selection Document	Joseph Kenny	Ministry of Forests Lands and Natural Resource Operations	Limiting the amount of extreme overloads that are brought through. The road infrastructure (roads and bridges) are only capable of handling a limited amount of heavy loads. Efforts should be made to limit the amount overloads that need to come through and ensure that the MFLRO are informed and consulted when these loads are brought through.	PRGT will leave the roads and bridges directly affected by the Project in the same or better condition. This will be covered in road use agreements.			
711	VC Selection Document	Jim Ladds	Ministry of Forests Lands and Natural Resource Operations	Our staff have conducted a Google Earth review with regards to potential impacts to recreation. We have found that the proposal as shown has very little direct impacts to current established recreation sites. There are a few trail crossings that are predominantly used for nonmobile trails so the impacts will likely be negligible. However, compressor stations, chain linked fencing or other barriers may be of a safety concern to snowmobilers, but once a final location is determined/authorized we could look at the appropriate safeguards and where that might be best suited.	Safety is of paramount importance for PRGT. PRGT will consult with MFLNRO regarding compressor station locations or barriers and appropriate safeguards related to recreational land users. This information will be considered in the Land and Resource Use section of the Application. PRGT is committed to ongoing consultation with various stakeholders to identify issues and concerns in order to implement appropriate mitigation.			no further comments
712	VC Selection Document	Jim Ladds	Ministry of Forests Lands and Natural Resource Operations	From review of other pipeline proposals there has been concern expressed by First Nations, guide outfitters, trappers and private land owners where gas pipelines may provide undesirable access by ATVs and impacts that are not present currently. This will require and we would recommend engagement where these interests/concerns may be an issue. However, they may also provide new recreation opportunities for ATV use, if a proper trail tread is established and the engaged public is supportive. This would require additional funding and community support, and may also serve to mitigate concerns in some areas.	The effects of ATV use and access on a variety of activities including trapping and fishing will be assessed and will include references to the transportation and access VC. No changes to the dAIR are required.			no further comments
713	VC Selection Document	Jim Ladds	Ministry of Forests Lands and Natural Resource Operations	Should TransCanada be interested in developing recreation sites trails or working with community groups, we would be interested to support and engage new recreation enhancement opportunities.	PRGT is supporting community partnerships and initiatives in areas of safety, environment and community wellness PRGT would be pleased to explore any such opportunities which may align with PRGT's community investment priorities and the priorities of communities. PRGT's online application system can be found at http://www.transcanada.com/665.html			no further comments
714	VC Selection Document	Jim Ladds	Ministry of Forests Lands and Natural Resource Operations	wish to mention however, not of a recreation concern, but as a general concern, the proposed location, in a number of areas, cross some very challenging terrain. We are not pipeline layout experts, however wanted to point out a few examples of where this may have been overlooked or perhaps ground truthing may provide better locations or warrant further review	PRGT has conducted ground truthing of many sections of the proposed route. All information collected during field observations will be considered to select the best pipeline route. Local information that can affect siting of the proposed pipeline route, including weather patterns and historical observations are welcomed and will be considered.			no further comments
715	VC Selection Document - 3.3 Selection of Valued Components and Indicators	Troy Larden	Ministry of Forests Lands and Natural Resource Operations	Although the proponent has indicated that the use of Hydrostatic Test Water Management Guidelines is sufficient to mitigate risk to water quantity, it is requested that the proponent include water quantity as a VC to be assessed. The project will be crossing several water courses with undetermined crossing types that have the potential to have effects on water quantity. The project will also be crossing wetlands and other aquatic features that may have an effect on both ground and surface water movement. An assessment must be completed to address this.	Please see Standard Response 8.	Proponent response satisfactory. Issue resolved	No additional response required.	comments adequately addressed
716	VC Selection Document - Table 2: Proposed Valued Components, Indicators, Effects and Measurable Parameters	Troy Larden	Ministry of Forests Lands and Natural Resource Operations	Within the proposed VC of Wildlife and Wildlife Habitat, please include Great Blue Heron as a species for recommended indicator. This is a listed species with a high probability of occurrence over the project footprint and potential negative effects given their susceptibility to disturbance.	PRGT will include great blue heron (<i>Ardea herodias fonnini</i>) as an indicator based on its status, distribution, timing of occurrence and potential to be adversely affected by the Project. The focus of the assessment will be on year-round living habitat.	Proponent response satisfactory. Issue resolved	No additional response required.	comments adequately addressed
717	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	VC for fresh water aquatic resources should include "water" on its own rather than simply in context of supporting fish species. Other water resource users such as potable supply, livestock, recreation, and industrial uses have been ignored. This may be a significant oversight given there are 1300 mapped watercourses to be crossed.	See Standard Response 8.			no further comments

718	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	Water monitoring can include temperature and pesticide/herbicides as well as streambed surface sediment condition.	Water quality data, collected at each watercourse crossing within the Project assessment area in 2013, included pH, electrical conductivity, temperature, and turbidity. Physical characteristics of fish habitat within the Project assessment area included composition of channel bed material (i.e., percent of silt, sand, gravel, cobble, boulder). Findings will be presented in the Application. Testing for pesticides/herbicides were not completed for the Project as the proposed Project is unlikely to contribute additional pesticide/herbicide concentrations within the aquatic environment.				no further comments
719	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	With respect to fisheries, no mention of fisheries sensitive watersheds. These area watersheds identified under GAR that have high- very high fish values and are sensitive to development.	The pipeline route does not cross any identified Fisheries Sensitive Watersheds. Watercourse crossing method/location selection has identified and accounted for high-value, sensitive fish habitats.				no further comments
720	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	Riparian openings should be minimized to reduce temperature increase downstream of crossing, particularly in watersheds supporting temperature sensitive fish species such as bull trout.	Riparian clearing is limited to what is required for safety and construction. Where practicable, riparian areas will be allowed to revegetate. DFO operational statements will be used for crossing design where applicable, to minimize clearing. Where the pipeline corridor is not directly crossing a watercourse, riparian buffers, as outlined in the Environmental Protection and Management Guide, under the Oil and Gas Activities Act, will be maintained. Standard mitigations and sediment control management plans will be described in the Application. A qualified environmental professional will be on site during construction to monitor background and downstream TSS levels, to ensure that mitigation measures are implemented and effective, and to ensure water quality parameters remain within provincial and federal standards.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to riparian clearing in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.	The planned route crosses streams that stem from FSW eg Middle River. Fish that use the designated FSW pass through these streams, consequently the pipeline route and its crossing do have the potential to influence sensitive fish habitat/FWW. Operations must consider habitat needs as well as timing and migration of identified sensitive fish species.	PRGT acknowledges that the proposed pipeline route crosses numerous watercourses with sensitive fisheries values including watercourses identified as fisheries sensitive watersheds (FSW). As well, it is recognized that the Project has the potential to impact sensitive fish habitat at these and other watercourse crossings locations. Impacts of pipeline routing on changes to sensitive fish habitat (including timing and migration) is identified as one of the three project-specific effects within the Freshwater Aquatic Resources Section of the Environmental Assessment Application. A watercourse sensitivity analysis was completed for all proposed watercourse crossings. The sensitivity analysis considered species presence, rarity, species sensitivity to changes in environmental conditions, species dependence on habitat, and habitat resiliency. The sensitivity analysis included all provincially listed species at risk, the free Pacific salmon, and species of commercial, recreational, or Aboriginal importance. The watercourse crossing sensitivity analysis was used to assess the potential risk to fish and fish habitat at each proposed watercourse crossing.
721	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	Fine sediment will be a prominent Water quality issue during road and crossing construction, pipeline installation, and maintenance. Erosion and sediment control plans should be developed for each crossing. Effectiveness of the plan can be assessed using turbidity and streambed Fine sediment measurements.	PRGT's Environmental Protection Plans are based on regulations and best management practices that identify conditions under which machines will not be permitted to operate near streams and/or watercourses. Herbicide application will be prohibited within 30 m of an open body of water, unless the herbicide application methodology is approved by the relevant regulatory agency. An environmental management plan for herbicide use around water will be in the Application and will be based on BC regulations.	Oil and Gas Commission comment on response to Round 1 MFLNRO comment: During the permitting process, PRGT is required to meet the requirements relating to sedimentation in the Environmental Protection and Management Regulation under the Oil and Gas Activities Act.	In response to OGC. Thank you for your comment regarding requirements during the permitting stage - we'll be sure to address this.		no further comments
722	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	Machine free zones near the stream to prevent root damage and maintain bank stability.				Practices/conditions should be provided for comment	WG members will have an opportunity to comment on practices and conditions presented in part as mitigation strategies and management plan overviews in the Application. The inclusion of practices and conditions in the AIR is beyond the AIR's scope.
723	VC Selection Document	John Rex	Ministry of Forests Lands and Natural Resource Operations	no mention of crossing maintenance, which may involve use of pesticides/herbicides.				Where broadcast occurs will monitoring be completed to ensure drift does not contaminate waterways?	Broadcast herbicide and pesticide use will not occur during construction and will be limited during operations. Use of these substances will be minimal and the removal of pest vegetation will be primarily mechanical, following the PRGT Invasive Plant Species Management Plan.
724	VC Selection Document	Chelton van Geloven	Ministry of Forests Lands and Natural Resource Operations	Following John Rex's comments: Water should be a VC unto itself. Pipelines are often used as pasture for cattle and if riparian zones are removed during construction, they are further degraded by animal use. Again, degrading water quality with sediment and feces.	See Standard Response 8.				PRGT acknowledges that watercourse crossing construction may temporarily provide improved access for both livestock and wildlife. PRGT will implement access controls to manage the potential effects from livestock and wildlife on fisheries and water quality. Watercourse and vehicle crossings will be re-contoured and re-seeded/planted in a way that stabilizes the site and facilitates its return to a vegetated state. Reclaimed sites will be monitored and fenced if necessary to confirm successful plant cover re-establishment and long-term site stability. The water quality effects are mitigated through management of the riparian areas, as discussed for the freshwater aquatic resources VC (replacing riparian vegetation, fencing of unvegetated riparian areas at watercourse crossings). Fecal coliforms are not included as an effect indicator. Herbicide use will not occur during construction and will be limited during operations. Use of these substances will be minimal and the removal of pest vegetation will be primarily mechanical, following the PRGT Invasive Plant Species Management Plan.
725	VC Selection Document - Table 2 Proposed Valued Components and Indicators, Table, Pg 15	Steve Roberts	Kitsumkalum Band Council	Marine Resources, Recommended Indicators: you list fish at risk and marine vegetation at risk. The classification "at risk" needs to be deleted. The marine flora and fauna that is used by Kitsumkalum for sustenance, cultural and commercial purposes need to be captured here. Also, the marine environment is a holistic system and affecting one component will affect all components.	Indicator wording has been adjusted to the following: 1) Fish species that are linked to commercial, recreational, or Aboriginal fisheries, including species considered to be at risk, and 2) Marine vegetation of cultural significance or considered to be at risk. Further, please see Standard Responses 13 and 14.				
726	VC Selection Document - Table 2 Proposed Valued Components and Indicators, Table, Pg 15	Steve Roberts	Kitsumkalum Band Council	Marine Resources, Potential Effects: a fifth point needs to be added here: changes in marine species behaviour and migration patterns.	Changes to migration will be fully addressed within the scope of the current potential effects. The potential effect of the project on migration as a consequence of underwater noise will be considered within 'change in behaviour of fish and marine mammals as a consequence of underwater noise'. The potential for the pipe itself to pose as a barrier to migration to benthic species, such as crawling crustaceans, is deemed to be a change in fish habitat and, hence, will be fully addressed within that potential effect. No other project related effects on migration are expected.				
727	VC Selection Document - Table 2 Proposed Valued Components and Indicators, Table, Pg 16	Steve Roberts	Kitsumkalum Band Council	Economic Conditions: socioeconomic studies need to include Kitsumkalum members from Prince Rupert area and Kitsumkalum	Kitsumkalum has indicated that they would like to conduct additional community-led socio-economic data collection which will inform the project and the baseline socio-economic data where appropriate. If such information is included in scope and delivered to PRGT, that information will be utilized in the assessment. Aboriginal issues will also be included in Section 11 of this assessment.				
728	VC Selection Document - Table 2 Proposed Valued Components and Indicators, Table, Pg 15	Steve Roberts	Kitsumkalum Band Council	The timing of pipeline construction in the marine environment will have to be guided by marine species life cycles and migration patterns as well as Kitsumkalum commercial fishing operation windows. Pipeline construction with the increase in marine traffic, the underwater effects like sound and sediment disturbance, for example, will have to be assessed under socioeconomic, marine resources, heritage and health VCs.	Change in behaviour of fish or marine mammals due to pressure waves or underwater noise will be assessed in the Application. The chemical composition of sediment and water will also be considered in the marine and human health VCs sections. TCPL will consider and incorporate a number of factors when planning marine construction, including regulated timing windows, and fishing seasons. Please see Standard Responses 11 and 12. Effects on marine life via impacts such as underwater noise and sediment will be fully considered within the existing potential effects in the marine resources VC. Scheduling of Project activities will be coordinated through consultation with local fish harvesters and other interest groups and best-efforts will be made to schedule activities to minimize interference with fisheries, other activities and known biological events (e.g. salmon runs, Pacific herring spawning).				
729	VC Selection Document - Table 2 Proposed Valued Components and Indicators, Table, Pg 18	Steve Roberts	Kitsumkalum Band Council	Human and Ecological Health: pipeline construction, operation and potential accidents and malfunctions will affect the ecological health of the marine ecosystem. Increase in traffic to transport workers and materials will increase traffic hazards and air emissions.	These items will be addressed as part of the air quality assessment, wildlife assessment, and accidents and malfunctions section.				
730	VC Selection Document	Steve Roberts	Kitsumkalum Band Council	We anticipate that we will have opportunity to comment on the geographic and temporal scope of studies and assessments and monitoring programs before they are finalized. Is that correct?	Statement and question directed to the EAO.				
731	VC Selection Document	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Overall, the indicators listed are quite vague and do not appear to be specific to the Gitanow Lax'ip (and most likely other regions affected by the proposed Project). At this point, it is difficult for Gitanow to adequately assess the accuracy and completeness of the indicators because this is only a preliminary document.	The BC EAO directed PRGT to identify valued components for the Project in accordance with the Guideline for the Selection of Valued Components and Assessment of Potential Effect. PRGT believes that the current content in the draft AIR meets this requirement and is sufficient.				
732	VC Selection Document - Table 1 Relationship between Project Activities and Potential Effects, Pg 10	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	It is unclear if this table is meant to be exhaustive of all of the proposed VCL indicators, and Potential Effects. If this table is only an example of the types of effects, this should be more clearly stated. If it is intended to be exhaustive, then this appears to be a very cursory and preliminary assessment. This type of prediction of effects is part of the Application review period, and asking Gitanow to comment within less than a month, and with so little information is problematic.	Although the VC Selection Document will not be revised, the draft AIR has been updated in response comments received from the working group.				
733	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Air Quality" should include some reference to climate stability, or in the effects should reference climate change. Specifically, the rationale should include reference to BC's climate change targets and relevant legislation. If this does not fit within the scope of the "Air Quality" VC, then a separate VC should be added. The Proponent and the EAO are well aware of the potential contributions to climate change the Project poses, and Gitanow has concerns over the slash burning of operation of the gas-fired compressor stations, and the operation of the LNG terminal.	See Standard Response 23. GHG will be added to the revised dAIR as a distinct VC, not as part of the Air quality VC. The effects of climate change on the Project will be dealt with in the Application section relating to "Effects of the Environment on the Project."				
734	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Freshwater Aquatic Resources" should include Fisheries Habitat as an Indicator. Identifying habitat as an indicator will broaden the scope of the baseline fisheries studies and place a more appropriate emphasis on critical and sensitive habitat needed to support various species. This would be in accordance with the Gitanow Lax'ip Land Use Plan which identifies the Plant Goal for Fisheries Resources as "Protect Fish Populations by Preserving, Maintaining, and Restoring Fish Habitat." (pg 58).	Changes in (fish) habitat is being included as a potential Project effect. The amount (in hectares) of habitat potentially affected by Project activities will be calculated as part of the assessment and will include a discussion of what fish species the affected habitat likely supports.				
735	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 15	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	Transmission Project: "Freshwater Aquatic Resources", the Recommended Indicator of "fish species that are linked to commercial, recreational, or Aboriginal fisheries" is an ecologically flawed indicator. While this may reflect the current Fisheries Act requirements, Gitanow was not consulted on the Fisheries Act changes, nor do we support them. There are numerous species of fish which serve valuable roles in ecosystem functioning, which are not subject to a "commercial, recreational or Aboriginal fishery." Their importance to Wip Sustainability (a cornerstone of the Gitanow RRA), is not undermined by the fact they are not sought after as a part of a designated fishery. Moreover, the document does not define what constitutes an "Aboriginal fishery."	The following Project-specific environmental effects or "indicators" are proposed to assess overall environmental effects on fish and fish habitat within the Environmental Assessment Application: • Changes in fish habitat availability • Changes in fish mortality risk • Changes in water quality Fish habitat attributes such as water quality, habitat availability, spawning substrates, cover and complexity are required to support fish populations. These attributes also provide the conditions necessary to support a healthy and functioning aquatic ecosystem. As such, establishing environmental protection measures to prevent or eliminate environmental effects on fish mortality and fish habitat are also likely to mitigate potential environmental effects on other aspects of the aquatic ecosystem, including fish species which are not subject to a "commercial, recreational or Aboriginal fishery." That said, the PRGT Project is subject to the regulatory authority of the Department of Fisheries and Oceans pursuant to the Fisheries Act and will address amendments not yet in force during the pre-construction and construction phases of the Project. PRGT will continue to consult with the Gitanow Hereditary Chiefs regarding their Aboriginal interests in respect of fisheries in their territory.				
736	VC Selection Document - Table 2 Proposed Valued Components, Indicators, Effects and Measurable Parameters, Pg 16	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Vegetation and Wetland Resources" should be more specific to include those land use values/zones included in the Gitanow Lax'ip Land Use Plan, including: Ecosystem Networks and Buffers, Water Management Units, Pine Mushrooms, Cedar Reserves.	See Standard Response 20. PRGT has met with Gitanow Hereditary Chiefs to review routes and discuss potential realignments of the route and will continue to consult with the Gitanow. Pine mushrooms will be incorporated as a focal species for the Vegetation and Wetlands VC.				Updated response to Round 1 working group comment Pine mushrooms are included under the "Traditional Use Plants" indicator and will be specifically addressed in the Application.
737	VC Selection Document - Section 5 Aboriginal and Treaty Rights, Pg 15	Glen Williams - Chief Mali	Gitanow Hereditary Chiefs	"Aboriginal and Treaty Rights" this paragraph is unclear as to the intent of the Proponent and the EAO in assessing potential impacts and infringements on Gitanow rights and title. The statement "No VCs are recommended related to the direct assessment of potential adverse effects of the PRGT Project on the exercise of Aboriginal and Treaty rights," indicates that there will be no thorough or transparent assessment within the EAO process. Each of the VCs and indicators identified have a direct Aboriginal right associated with them, and this is reflected in the Gitanow right to governance and Wip Sustainability outlined in the RRA. If this is not intended to be a component of the EA process, this should be clearly stated and the EAO should support a custom Level 4 Engagement Process under the Gitanow-BC Engagement Framework to assess impacts to Gitanow rights and title.	Section 11 of the Application will include an assessment of potential adverse effects on Aboriginal interests. Information on VCs from other sections of the Application will be cross-referenced as they relate to Aboriginal interests. No changes to the dAIR are required.				

757	VC Selection Document	Adrienne Fitzpatrick	Nak'adzi Band	Does a legally binding government requirement (such as a regulation or management framework) already exist to protect the component? In many cases in the biophysical environmental realm, the Proponent's VCs are related in some fashion to existing government protection requirements. The same can be said for some elements of physical heritage resources. Even so, thresholds of acceptable or manageable change are not always readily available. At the other end of the spectrum, there are virtually no government protections in place for intangible or tangible elements of culture that go beyond physical heritage resources, traditional use of land and resources by Aboriginal people, population health of Aboriginal peoples, including key well-being and quality of life considerations, and social and economic impact realities. Nonetheless, the EAO's environmental assessment process, instead of prioritizing consideration of effects on elements of the level experience that are not readily protected by existing regulatory means and are therefore most vulnerable to change, treats them largely as an afterthought. As a result of this bitter irony, Nak'adzi is very concerned about the lack of resources, effort, expertise, scoping and issues focus for no less than four of the "five pillars" of the EAO process – health, society, economy and heritage resources (which in itself should be revisited as "culture" and expanded accordingly.	Statement directed to the EAO. Potential adverse effects of the proposed Project on Aboriginal interests, including those of Nak'adzi, will be assessed in Section 11 of the Application. PRGT welcomes any additional information from Nak'adzi that will help inform the assessment.	It is not clear why PRGT would not need to gather this information from government regulators to inform the development of significance thresholds for the AIR.	EAO response to Round 1 comment: VCs and indicators have been identified under all five pillars. If Nak'adzi believes that additional VCs or indicators are required, EAO would be interested in specific suggestions and accompanying explanation.
758	VC Selection Document	Angie Ransom	Nak'adzi Band	The proposed TransCanada Prince Rupert Gas Pipeline Project (the "Project") passes directly through Nak'adzi Territory and, if approved, would have a significant and lasting impact on the Nak'adzi and their people, rights and territory.	No changes to the dAIR are required.		
759	VC Selection Document - Authorization page, Pg 2	AI	Nak'adzi Band	do hope they mean "selection of draft valued components by Proponent".	While not specifically identified as draft, the VC Selection Document was prepared, in part, to elicit feedback from Working Group members. PRGT considered comments received on the VC selection Document in the preparation of the dAIR. PRGT continues to consider working group comments regarding contents of the dAIR. Suggested edits to final response are in red above.	Where exactly have these edits taken place? No red appears in this file.	PRGT apologizes for the confusion; the final sentence in the Round 1 Response ("Suggested edits to final response are in red above") should not have been included in the response.
760	VC Selection Document - Authorization page, Pg 2	AI	Nak'adzi Band	What is the purpose of this document? Did we see Revision A?	The purpose of the VC selection document is to provide EAO with a list of recommended valued components and indicators that would be used in the environmental assessment of the Project. The VCs and indicators would be incorporated into the Application Information Requirements document used to guide what information is to be provided in the Application. The first draft of the document that was shared with the PRGT Working Group for review and feedback was dated August 16, 2013. Revision A was not publicly circulated and was an internal draft.	From this perspective, it appears as though PRGT has spent a long time working towards finalizing the VCs without engaging the Working Group. To encourage early engagement and trust building, the initial draft should have been shared.	Comment acknowledged.
761	VC Selection Document - Authorization page, Pg 2	AI	Nak'adzi Band	looks like an "outside looking in" approach.	Comment acknowledged.		
762	VC Selection Document - Introduction, Pg 1	AI	Nak'adzi Band	CSTC may need to more formally review this guideline document.	No response required.		
763	VC Selection Document - Introduction, Pg 1	AI	Nak'adzi Band	Bit early for that is it not? (referring to effects pathways, potential effects)	The identification of VCs and potential effects early in the assessment process is a fundamental step in scoping what will be included in the Application. VCs for the Project were selected according to the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects document.	This EAO guideline did not gather any demonstrable input from First Nations. Draft pathways, VCs, and indicators, should be calculated first so that Working Group members can have significant input on the methodology of the EA.	This comment will be referred to EAO.
764	VC Selection Document - Section 2 Valued Components and Indicators, start of 2nd paragraph	AI	Nak'adzi Band	why not start with the value holders themselves?	PRGT welcomes clarity on the term "value holders" to help inform the VC selection process.	Those individuals and groups that value something in the biophysical or human environment that has the potential to be negatively affected by the proposed Project. This is usually the population of people who live in the vicinity of the proposed Project but can include others (e.g. a group in Vancouver might care a lot about caribou populations in the Peace region). While Nak'adzi disagrees with the EAO Guide, even it identifies "issues scoping" as the first step in the VC selection process where, "These project-specific issues are generally indicative of the local and regional values held by the public, Aboriginal groups, and other stakeholders in the area within which the project is proposed" (p.7). They suggest that these issues may be collected through engaging First Nations and local communities.	PRGT appreciates the clarification. The Working Group, which includes Aboriginal Groups and local communities, is provided multiple opportunities to provide input on the scope of the environmental assessment through review and discussion of the VC document and dAIR.
765	VC Selection Document - Section 2 Valued Components and Indicators, middle of 2nd paragraph	AI	Nak'adzi Band	where does culture fit in, EAO? I see it listed above but not here?	Please see Standard Response 41.		
766	VC Selection Document - Section 2 Valued Components and Indicators, 3rd paragraph	AI	Nak'adzi Band	Describe FN involvement in that scoping phase please?	Aboriginal groups within the Working Group were given the opportunity to comment on the VC selection document. These comments were considered during the development of the dAIR. The working group is also reviewing the dAIR and comments will be considered prior to release to the public.	To clarify, PRGT's only engagement with First Nations in the scoping phase is through circulating an already written VC selection document and an already written dAIR document? This is not adequate.	Through the Working Group, Aboriginal Groups including Nak'adzi are provided multiple opportunities to provide input on the scope of the environmental assessment through review and discussion of the VC document and dAIR.
767	VC Selection Document - Section 3.1 Valued Components and Indicators, 2nd bullet	AI	Nak'adzi Band	this is a problem area. Individual VCs should not be comprehensive; this leads to inappropriate grouping (e.g., mammals is NOT a VC)	Statement directed to the EAO.		EAO response to Round 1 comment: The AIR specifies additional indicators (e.g. species) under each VC, and lays out the methodology accordingly.
768	VC Selection Document - Section 3.1 Valued Components and Indicators	AI	Nak'adzi Band	EAO: any consultation with First Nations on my understanding is "no, just a rollout workshop"	This comment has been forwarded to EAO for their consideration. No changes to the dAIR required.		EAO response to Round 1 comment: EAO has held several working group and technical working group meetings on the AIR, and VCs. EAO has also met with various Aboriginal Groups during this time.
769	VC Selection Document - Section 3.1 Valued Components and Indicators	AI	Nak'adzi Band	These are not reasonable criteria for choosing indicators. Indicators need to come from multiple sources and triangulate around best guesses of estimated change; in other words there is no magic bullet and perfect indicator. Uncertainty needs to be embraced; it is a fact of life. There are no indicators that meet all of these "must" have.	Comment acknowledged. Indicators were chosen based on the guidance provided in the EAO's document "Guidelines for the Selection of Valued Components and Assessment of Potential Effects."		
770	VC Selection Document - Section 3.1 Valued Components and Indicators, last list of bullets	AI	Nak'adzi Band	Not a single mention of a) are demonstrably important to area peoples b) are culturally relevant and respectful c) embrace a mixture of scientific and traditional knowledge bases d) include qualitative and quantitative elements e) were developed with meaningful inputs from people who know the places being affected f) are derived directly from values	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects. Comments received regarding the VC selection document have been considered in the development of the dAIR. Working group members will also have multiple opportunities to comment on the dAIR before it is finalized. This comment has been forwarded to EAO for their further consideration of your proposed VC selection criteria. No changes are required to the dAIR.		EAO response to Round 1 comment: Many of these are factors identified in the VC Guideline.
771	VC Selection Document - Section 3.2 Applicable Laws and Regulations	AI	Nak'adzi Band	Oh really? Prove it. Where is the cumulative effects data? (referring to sentence "Together, these laws and regulations often prevent the possibility of most significant adverse environmental, economic, social, heritage, or health effects")	PRGT believes that, taken together, Section 11 of the Application, the related assessments conducted in the VC section and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information (if provided) will address well-being and quality of life concerns.	Pushing these concerns to the Application Review phase of the EA, rather than addressing them adequately in the AIR, is a recipe for generating mistand. It is not clear how the statement highlighted in section 3.2 can be true. It would be a very expensive and long research process to generate sufficient evidence to demonstrate this. Suggest deletion from AIR.	The statement in question was included in the draft Selection of Valued Components document, which was drafted to inform the dAIR. The statement has not been carried forward into the dAIR.
772	VC Selection Document - Section 3.2 Applicable Laws and Regulations, 2nd paragraph	AI	Nak'adzi Band	Fair enough; well-being and quality of life for Aboriginal workers should be fair game though. Depends if Nak'adzi expects to involve large numbers of workers, or even desires this.	No changes to the dAIR are required.		
773	VC Selection Document - Section 3.2 Applicable Laws and Regulations, 4th paragraph	AI	Nak'adzi Band	This document kind of thrown together; lots of errors.	Comment noted.		
774	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	How has this been generated? Again, a scoping and consultation/engagement issue.	The identification and selection of VCs follows the EAO (2013) Guideline for the Selection of Valued Components and Assessment of Potential Effects document.	As outlined in Nak'adzi's comments on PRGT's responses, Comments 764 and 747 specifically, it is not clear that PRGT read or followed the guideline. The AIR should be transparent and offer the Working Group a clear idea on what they plan to do in the EA. At this point, it is not clear.	The original comment referred to the VC document and this comment refers to the dAIR. For VCs, the PRGT team followed the EAO (2013) Guideline for the Selection of Valued Components and Assessment of Potential Effects document. With respect to the dAIR, the PRGT is following EAO's template on Application Information Requirements (May 27, 2013) and is still open to review and comment by the EAO, the Technical Working Group, First Nations and the public.
775	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	Usually, we think in terms of triggers, effects pathways and effect outcomes. those terms are not used here and the document is confusing in what it means. Does not reflect deep knowledge of EA, frankly.	Triggers, effects pathways, and effect outcomes are alternate terms used in EA practice. The terminology used in the VC selection document (and the dAIR) is consistent with the EAO (2013) Guideline for the Selection of Valued Components and Assessment of Potential Effects document.	As outlined in Nak'adzi's comments on PRGT's responses, Comments 764 and 747 specifically, it is not clear that PRGT read or followed the guideline.	Comment noted.
776	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	Do they mean impact pathways? (referring to "How the project will interact with the environment and the potential impacts that could occur during construction and operation of the project")	Essentially yes; the identification of impact pathways is similar to the identification of Project-VC interactions.		
777	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	"we were just following orders" argument is not going to fly. When it comes to issues of pipe itself and construction techniques, maybe, but not in relation to routing, environmental monitoring and management, etc.	Comment noted.		
778	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	Industry standards and BMPs are NOT synonymous. Look at GHG emissions practice. (referring to "industry standard design")	Agreed. No change to the dAIR is required.		
779	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	this "cart before the horse" approach is not good practice and is illogical. define VCs based on what project-specific residual effects are likely to occur? impossible to know in advance and guess at it beforehand leads to VCs and impact pathways being too narrowly defined!	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects.	Again, it is not clearly demonstrated in the AIR that this was read, understood, or followed.	Assessment methods were developed following EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects (September 2013). Section 3.1 of the dAIR describes Issue Scoping and Selection of Valued Components VCs were identified through consultation with Aboriginal groups, the Working Group, and various interested parties.
780	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators, flow chart	AI	Nak'adzi Band	I have never seen this approach before. wonder where it comes from, again, need to review BCEAO guidance doc't	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects.	Again, it is not clearly demonstrated in the AIR that this was read, understood, or followed.	Figure 3-1 and Figure 3-2 in the dAIR follow the process laid out in Section 2.0 of the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects (September 2013). This approach has been validated with the EAO.
781	VC Selection Document - Section 3.3 Selection of Valued Components and Indicators	AI	Nak'adzi Band	Again nowhere is mentioned "talking to people". (re: issues scoping)	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects. Comments received regarding the VC selection document have been considered in the development of the dAIR. Working group members will also have multiple opportunities to comment on the dAIR before it is finalized. No changes are required to the dAIR.	While Nak'adzi disagrees with the EAO Guide, even it identifies "issues scoping" as the first step in the VC selection process where, "These project-specific issues are generally indicative of the local and regional values held by the public, Aboriginal groups, and other stakeholders in the area within which the project is proposed" (p.7). They suggest that these issues may be collected through engaging First Nations and local communities.	The Working Group, which includes Aboriginal Groups and local communities, is provided multiple opportunities to provide input on the scope of the environmental assessment through review and discussion of the VC document and dAIR.

782	VC Selection Document - Section 3.3 - Selection of Valued Components and Indicators, bullet 5	AI	Nak'azdli Band	meaning of term lands?	A description of terms will be provided in the Application.	Again, pushing these concerns to the Application Review phase of the EA, rather than addressing them adequately in the AIR, is a recipe for generating mistrust. How is the Working Group able to understand the AIR if there are no definitions provided?	In this instance, the draft Selection of Valued Components document is referring to Reserves and treaty lands. It does not reflect on the use of traditional territories for the exercise of Aboriginal or treaty rights. At this stage of the BECAA process, it was the responsibility of the EAO to conduct a strength of claim analysis and advise PRGT on which Aboriginal communities and groups it needed to consult. For the draft Selection of Valued Components document, this information provided an understanding of which legislation would be applicable (which influences the scope of the assessment).	
783	VC Selection Document - Section 3.3 - Selection of Valued Components and Indicators, bullet 6	AI	Nak'azdli Band	what about past experience of affected parties with pipelines?	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects. Comments received regarding the VC selection document have been considered in the development of the dAIR. Working group members also have the opportunity to comment on the dAIR. Working group members with past pipeline experience are strongly encouraged to share their views. A revised dAIR will be prepared following the receipt of input and comments.			
784	VC Selection Document - Section 3.3 - Selection of Valued Components and Indicators, point 2	AI	Nak'azdli Band	This is garbage, silo scoping.	Suggested edits to final response are provided above.			
785	VC Selection Document - Section 3.3 - Selection of Valued Components and Indicators, point 5	AI	Nak'azdli Band	again, call for proper scoping sessions. total failure in the system to have 20 odd First Nations on the outside looking in. Nations may want to consider some sort of joint response to CEAA and EAO at the October 8, 9-10 FN LNG strategy meeting in Prince George.	VC selection has been completed following the EAO's Guideline for the Selection of Valued Components and Assessment of Potential Effects. Comments received regarding the VC selection document have been considered in the development of the dAIR. Working group members will also have multiple opportunities to comment on subsequent versions of the dAIR before it is finalized.			
786	VC Selection Document - Section 3.3, Table 1, Aquatic Environment, Pg 10	AI	Nak'azdli Band	where are spills?	This comment has been forwarded to EAO for their consideration.			
787	VC Selection Document - Section 3.3, Table 1, Aquatic Environment, Pg 10	AI	Nak'azdli Band	where are induced effects?	However, PRGT notes that the VC document was provided to the Working Group, including Aboriginal groups, to obtain input on the VCs. Comments on the VC document have been considered, and the VCs revised as required.			
788	VC Selection Document - Section 3.3, Table 1, Aquatic Environment, Pg 10	AI	Nak'azdli Band	Where is "reduced use of land for traditional purposes"?	Accidental spills will be discussed in the Accidents and Malfunctions section of the Application, as described in Section 9.0 of the dAIR. Updates to the dAIR are not required.			
789	VC Selection Document - Section 3.3, Table 1, Terrestrial Environment, Pg 11	AI	Nak'azdli Band	where are new roads, lay down areas, borrow sites, temporary etc? work camp locations? not enough info here.	No changes to the dAIR are required.			
790	VC Selection Document - Section 3.3, Table 1, Terrestrial Environment, Pg 11	AI	Nak'azdli Band	there is little point in critiquing the comprehensiveness of this list in advance of baseline data provision and review, and assessment of the PD in detail, including environmental alignment sheets. It is neither provable nor disprovable (if that is a worry until the process is filled with DATA)	The VC Selection document is superseded by the dAIR, which is more recent. Additional information on these project elements will be provided in the project overview section of the Application. Potential project interactions with these elements will be considered through the assessment of various VCs.			
791	VC Selection Document - Section 3.3, Table 1, Economic, Pg 11	AI	Nak'azdli Band	completely different effects on Aboriginal vs. non-Aboriginal. not disaggregating it nullifies its utility right from the outset. for most First Nations, impact equity is a VC, where is that?	The VC Selection document is superseded by the dAIR, which is more recent. Additional information is included on this matter in the dAIR.			
792	VC Selection Document - Section 3.3, Table 1, Economic, Pg 11	AI	Nak'azdli Band	Sustainability is a VC with a seven generations (give or take) temporal scope. where is that?	Impacts on Aboriginal interests and other concerns brought up by Aboriginal groups will be discussed separately in Section 11 of the Application.			
793	VC Selection Document - Section 3.3, Table 1, Social, Pg 12	AI	Nak'azdli Band	development and use of work camps not even mentioned?	No changes to the dAIR are required.			
794	VC Selection Document - Section 3.3, Pg 12	AI	Nak'azdli Band	This confusing and atypical language will require full parsing.	Sustainability is an outcome of a number of often complex factors interacting between a specific valued component and the environment that determine if the component will thrive or diminish. The question of sustainability is intrinsic to the assessment of project related and cumulative effects on all VCs and in the EA generally. The investigation into sustainability begins with research into the baseline conditions of the VC including historical trends, where available. Factors of sustainability explicitly guide the assessment through consideration of context, duration, magnitude and reversibility of project related effects. Residual effects significance thresholds are selected explicitly to guide consideration of environmental and social effects (Project and cumulative) beyond which sustainability becomes an issue for environmental planners and managers. In short, the question of sustainability is implicit throughout the entire assessment process for all VCs, but is not appropriate or necessary as a standalone VC. The conclusions of the EA (including beneficial effects) are a statement on sustainability of the project and its effects.	Where is this definition of sustainability and methodology proposed for the EA outlined in the AIR? This must be demonstrated. Ensuring that the temporal scope of the AIR includes historic trends and not simply current conditions is necessary.	The objective of the AIR is to establish the information that proponents must provide to the EAO in the Application for an Environmental Assessment Certificate. The definition of sustainability will be different for every VC, and may even differ between indicators used for a single VC. Further it is an aspect of the significance threshold but may not be the primary determinant of significance. As a result, it cannot be defined at this stage of the Application process.	The methods that PRGT will use for the assessment are presented in Section 3 of the draft AIR and the temporal boundaries are defined in Section 3.2.2 of the draft AIR.
795	VC Selection Document - Section 3.3, Pg 13, 2nd bullet	AI	Nak'azdli Band	interesting: what VC will this be considered under? Accidents and Malfunctions is not typically a VC.	The VC Selection document is now superseded by the dAIR, which is more recent. The development and use of work camps will be described in the project overview chapter of the application, and will be part of the assessment for a number of VCs including infrastructure and services, economy, and land and resource use.			
796	VC Selection Document - Section 4, Pg 13, Air Quality bullet	AI	Nak'azdli Band	specifically including GHGs	Comment noted.			
797	VC Selection Document - Section 4, Pg 13, Air Quality bullet	AI	Nak'azdli Band	Has this lot been developed in concert with affected first nations?	The VC Selection Document is now superseded by the dAIR, which is more current. In the dAIR, section 9 describes the requirements to assess Accidents and Malfunctions. As noted by the reviewer this is not considered a valued component, but is considered in relationship to potential consequences to VCs.			
798	VC Selection Document - Section 4, Pg 13, Air Quality bullet	AI	Nak'azdli Band	good practice of VCs is to identify a desired end state, not a static, value-LESS component. e.g., maintenance of high local and regional air quality and contribution to BC's legislated requirements to reduce GHG emissions	Please see Standard Response 23.			
799	VC Selection Document - Section 4, Pg 13	AI	Nak'azdli Band	a critic would identify that these are really environmental realms, with VCs such as moose, aquatic forbearers, etc. built in as VCs. how do you measure moose? It is not an indicator, but a VC.	The VC Selection is superseded by the dAIR, which is more recent. Indicator species are included in order to provide a context for the characterization of the measurable parameter (e.g., area of habitat affected). In this way, the indicators are assessed as sub-components of the valued component, and as described in the dAIR, significance will be determined at the indicator level.			
800	VC Selection Document - Section 4, Pg 13, Economic pillar	AI	Nak'azdli Band	again, separation of Aboriginal and non-Aboriginal essential. so fundamentally different.	Please see Standard Response 3.			
801	VC Selection Document - Section 4, Pg 14	AI	Nak'azdli Band	don't even see traditional use of land and resources as a VC. maybe below?	No changes to the dAIR required.			
802	VC Selection Document - Section 4, Table 2, Pg 15, Fish species	AI	Nak'azdli Band	must be on a by species and total basis.	Please see Standard Response 2 and 4.			
803	VC Selection Document - Section 5, Aboriginal and Treaty Rights	AI	Nak'azdli Band	flawed approach and NO detail. this is not acceptable.	Fish presence was determined through qualitative backpack electrofishing or 24-hour minnow trapping, as described in Fish Collection Methods and Standards Version 4 (RC 2001). All fish captures were enumerated by species, measured (fork length to the nearest mm) and released unharmed at point of capture. Totals of both sport and non-sport fish species potentially inhabiting watercourses crossed by the PRGT Project will be based on the 2013 fish sampling program and the documented distribution of fish species in potentially affected watersheds along the proposed route.	How was TK or local knowledge used to inform fish presence? How about seasonal fluctuations? Any primary data collection for this?	Where TK and local knowledge exists regarding fish species assemblages and fish presence, this knowledge has been added to the database of known fish information along with the results of the 2013 freshwater fishery studies. Where seasonal use of habitats has been documented, this information will be included in the environmental assessment and Technical Data Report. Where seasonal use is unknown, fish species are assumed to be present at all times of the year. Fish sampling for this project occurred during summer and fall of 2013 which provides a snapshot of fish presence during those seasons. Some watercourses, in which Project activities have the potential to affect overwintering habitat or are likely to affect fish during the winter, will be sampled in January 2014.	
804	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"ROW maintenance" should be added to the Project Activity Column	PRGT believes that, taken together, Section 11 of the Application, the related assessments conducted in the VC section, and relevant Traditional Land Use/Traditional Knowledge (TLU/TK) information will address this concern.			
805	VC Selection Document - Section 2, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Potential in changes in fish health and populations" should be added to the Potential Effects Column	The Application will not include any VCs directly related to Aboriginal Interests (Rights and Title). However, section 11 will include the assessment of potential effects on Aboriginal Groups' Aboriginal Interests. This section of the Application will include: • Identification of Aboriginal Interests provided by Aboriginal Groups, or identified through secondary sources. • Where there is overlap between Aboriginal Interests and a VC, the relevant information from other sections of the Application will be cross-referenced and summarized in context of the Aboriginal Interests. • Identification of potential adverse effects, including cumulative effects, of the proposed Project on Aboriginal Interests. • A description of mitigation measures to avoid or reduce potential adverse effects on Aboriginal Interests. • Views of Aboriginal groups, if provided, regarding proposed mitigation measures.			
806	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Reduced use of water ways for traditional purposes" should be added to the Potential indirect Effects Column	Operation activities including right-of-way maintenance activities will be included as a potential environmental effect to fish and fish habitat within the Environmental Assessment.			

807	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Road Improvements" should be added to the Project Activity Column	Additional temporary infrastructure, including camps, road improvements, access and pipe laydown locations, will be required for the Project. Project engineering and construction planning is working to determine the number and location of these additional Project facilities. The locations of these facilities will be based on engineering, construction, environmental and stakeholder considerations and will be added to the Project Activities within the Environmental Assessment.					
808	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Environmental Assessment Field Work" should be added to the Project Activity Column	Project activities including field surveys for fish habitat reconnaissance and fisheries inventory will be addressed briefly within the Environmental Assessment Chapter for fish and fish habitat and extensively within the Technical Appendix for the PRGT Project.					
809	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Increase distribution of Invasive Aquatic Species" should be added to the Induced or Resultant Change Column	The VC selection document has been superseded by the dAIR. Mitigation measures to prevent the spread of aquatic invasive species will be addressed within the Environmental Assessment chapter on fish and fish habitat.	If there is no baseline data collected to determine presence/absence of invasive aquatic species before construction (and ideally this should have been done BEFORE people started walking through remote streams) then there is no way to link invasive aquatic species to this project. Takla would like to use the "Kemenis" fish compensation program at Thudate and the spread of Didymo to illustrate the problem of the proponent not taking adequate baseline measures prior to the compensation and then not taking responsibility of this spread due to the very lack of this baseline information. We are highlighting here that we would like to avoid this in this application - particularly given the number of stream crossings related to this project.	While there was no specific field program targeting collection of invasive aquatic species data, the biologists conducting the freshwater fish and fish habitat assessments documented information on existing conditions at all stream crossings (including photographs) and all fish species captured. This information does provide a pre-construction record. Additional field work is expected to address information requirements for section 35(2) Fisheries Act authorizations and section 9 Water Act approvals. If required by approval conditions, additional information on invasive aquatic species can be collected during this field program.	The transfer of Didymo (Didymosphenia) as a result of activities associated with the construction, operation, and decommissioning of the proposed pipeline is unlikely. The most probable, agreed explanation for introduction of Didymo to river systems is transfer via felt-soled waders, as the Didymo cells can survive for up to 30 days in wet felt soles. The other highest risk mechanisms for the transfer of Didymo are motor boats, kayaks, canoes, fishing equipment, and pets. No activities involving these mechanisms will be permitted during the construction, operation, or decommissioning of the Project. As stated previously, mitigation measures using established and tested methods which have proven effective in controlling the spread of Didymo and other invasive species will be implemented during all phases of the Project. Further, these mitigation measures were applied during implementation of the baseline fisheries program.	If all First Nation WG members went and asked all their field workers that participated in this EA project if "mitigation measures" were followed, would this statement be true? Furthermore, if any streams downstream of the project are found with invasive plant species, will the proponent take responsibility for the potential damage? Although it is great that helicopters are used in this project, it also highlights, in part, the remoteness of some of these streams - which are seldom accessed by the general public.	Without direct response to the 3rd round of questions, we would like to reiterate that mitigation measures using established and tested methods which have proven effective in controlling the spread of Didymo and other invasive species will be implemented during all phases of the Project. Further, these mitigation measures were applied during implementation of the baseline fisheries program.
810	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"It has been brought to previous pipeline proponents and the BCEAO that the TLN is concerned for the spread of invasive aquatic species by those working in assessing and/or working in stream. Example invasive species that is detrimental to spawning habitat is the algae known as "didymo".	The human transfer of didymo algae from river to river due to Project activities (i.e., construction, operations, and decommissioning) is unlikely. However, mitigation measures to prevent the spread of invasive species including didymo algae will be addressed within the Environmental Assessment Chapter. These mitigation measures include developed and tested methods which have proven effective in controlling the spread of didymo and other invasive species. Further, these mitigation measures were applied during implementation of the baseline fisheries program.	See above comment.	While there was no specific field program targeting collection of invasive aquatic species data, the biologists conducting the freshwater fish and fish habitat assessments documented information on existing conditions at all stream crossings (including photographs) and all fish species captured. This information does provide a pre-construction record. Additional field work is expected to address information requirements for section 35(2) Fisheries Act authorizations and section 9 Water Act approvals. If required by approval conditions, additional information on invasive aquatic species can be collected during this field program.	The transfer of Didymo (Didymosphenia) as a result of activities associated with the construction, operation, and decommissioning of the proposed pipeline is unlikely. The most probable, agreed explanation for introduction of Didymo to river systems is transfer via felt-soled waders, as the Didymo cells can survive for up to 30 days in wet felt soles. The other highest risk mechanisms for the transfer of Didymo are motor boats, kayaks, canoes, fishing equipment, and pets. No activities involving these mechanisms will be permitted during the construction, operation, or decommissioning of the Project. As stated previously, mitigation measures using established and tested methods which have proven effective in controlling the spread of Didymo and other invasive species will be implemented during all phases of the Project. Further, these mitigation measures were applied during implementation of the baseline fisheries program.		
811	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Potential Loss of Biodiversity" should be added to the Induced Resultant Change Column	The VC selection document has been superseded by the dAIR. Fish habitat attributes such as water quality, habitat availability, spawning substrates, cover and complexity are required to support fish biodiversity. These attributes also provide the conditions necessary to support a healthy and functioning aquatic ecosystem. As such, establishing environmental protection measures to prevent or eliminate environmental effects on fish mortality and fish habitat is also likely to mitigate potential environmental effects on other aspects of the aquatic ecosystem (i.e., potential loss of biodiversity).	This does not address the question. "Biodiversity" is not limited to fish. Please provide peer reviewed literature that verify the following statements: "As such, establishing environmental protection measures to prevent or eliminate environmental effects on fish mortality and fish habitat is also likely to mitigate potential environmental effects on other aspects of the aquatic ecosystem". Please clearly and transparently outline what are the "environmental protection measures" and how these measures have been proven scientifically to protect the potential loss of biodiversity in aquatic habitats - including benthic species.	Biodiversity will be addressed in the Application by focusing the biological assessments on indicator species of concern to First Nations and stakeholders, and on species at risk. This approach ensures that a wide variety of species, habitats and ecological pressures are considered in the assessment. By mitigating potential adverse effects on both secure species and species of management concern, overall biodiversity will be protected.			
812	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Reduction in Biodiversity" should be added to the Potential Effects Column	The VC selection document has been superseded by the dAIR. Fish habitat attributes such as water quality, habitat availability, spawning substrates, cover and complexity are required to support fish populations. These attributes also provide the conditions necessary to support a healthy and functioning aquatic ecosystem. As such, establishing environmental protection measures to prevent or eliminate environmental effects on fish mortality and fish habitat is also likely to mitigate potential environmental effects on other aspects of the aquatic ecosystem (i.e., reduction in biodiversity).	Takla would like to note here, that we did provide comments and suggestions VC selection document - all of which were ignored. Is the proponent saying here in a meaningful and transparent manner that one of the likely effects of this project will not be "reduction in biodiversity"? As such, this case is made if, for example, adequate measures of the benthic community are not being measured (as one example)? As a reminder, biodiversity is generally more robust at the level of the small (what we generally don't measure and what we don't see). So how is it possible to make this statement? Please explain and provide adequate literature for support of this argument.	Biodiversity will be addressed in the Application by focusing the biological assessments on indicator species of concern to First Nations and stakeholders, and on species at risk. This approach ensures that a wide variety of species, habitats and ecological pressures are considered in the assessment. By mitigating potential adverse effects on both secure species and species of management concern, overall biodiversity will be protected.			
813	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Reduced Ecosystem Health and Resiliency" should be added to the Potential indirect effects column	The VC selection document has been superseded by the dAIR. Fish habitat attributes such as water quality, habitat availability, spawning substrates, cover and complexity are required to support fish populations. These attributes also provide the conditions necessary to support a healthy and functioning aquatic ecosystem. As such, establishing environmental protection measures to prevent or eliminate environmental effects on fish mortality and fish habitat is also likely to mitigate potential environmental effects on other aspects of the aquatic ecosystem (i.e., reduced ecosystem health and resiliency).	Takla would like to note here, that we did provide comments and suggestions VC selection document - all of which were ignored. Many FN's have made comments to the problems with this exact process and would like to note that VCs can be changed and added to based on input from the working group. We are asking the EAO to consider our input into the VCs (along with numerous requests from other FN's and working group members). See comments above and please elaborate by providing peer reviewed literature as to the efficacy of this approach.	Section 3 of the draft Selection of Valued Components document provides the methods PRGT used to identify a list of VCs its team believes should be considered in the Application. Recommended changes to the VCs have been made by Working Group members, which includes regulatory agencies and First Nations. Comments have been considered and have been responded to through this tracking table. Changes have been made where the recommendations are supported by past pipeline experience and/or project-environment interactions have been identified.			
814	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Metal Leaching" should be added to the Induced or Resultant Change Column	As the proposed Project pipeline will be coated both inside and outside to prevent it from corroding either from groundwater or the product carried in the pipeline, metal leaching has not been identified as a potential adverse impact from construction or operation of the proposed Project.	There are two parts to this question: 1. how is this tested (for corrosion) and over how many years has this been tested? and; 2. Metal leaching primarily during construction phase (i.e. Metals in soils and in bedrock). How is this not been identified?	An Integrity Management Plan, which includes corrosion related issues and mitigation, will be developed as part of the O&M pipeline and facility general application.			
815	VC Selection Document - Section 3, Table 1, Pg 10, Aquatic Environment	Anita Williams	Takla Lake First Nation	"Some soils in region have higher levels of Arsenic and Mercury that could affect certain populations and species of fish. It would be best practice to measure metal concentrations in streams pre-construction during at least two times annually (i.e. at peak and low water flows). For ML-ARD a good guidance document is "Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials" by Bill Price.	Naturally elevated surface sediment mercury/arsenic concentrations may be present in forms not readily available for uptake into the fish and aquatic community. For the PRGT Project, the adverse effects of increased sedimentation within watercourse crossings during trenching, installation, and filling of the pipeline will be short term in duration, and can be reduced using established erosion and sediment control measures.	The statement "MAY be forms not readily available into fish and aquatic community", highlights the requirement to take measurements of metals in water prior to and during construction.		Takla identifies that it is concerned with this approach.	PRGT acknowledges Takla's concerns.	
816	VC Selection Document - Section 3, Table 1, Pg 10, Terrestrial Environment	Anita Williams	Takla Lake First Nation	"Environmental Assessment Field Work" should be added to the Project Activity Column	Project activities summarized in Table 1 pertain to construction and operation of the pipeline only. Environmental assessment field work is not considered as a potential Project effect. Environmental Assessment Field Work will not have a significant effect on any measurable parameters.	How has "EA field work will not have a significant effect on any measurable parameters" been verified? How can the proponent say this when there was assistance to not following a clear invasive plant species protocol at the Nov 27, 2013 EAO meeting in Prince George?	With respect to the Vegetation and Wetland Resources VC, the vast majority of sites visited were accessed via helicopter, which is a mode of transport that has an extremely low potential to transfer invasive plant species from one area to the next. Trucks were used to access a very small proportion of the area and efforts were made to ensure vehicles were clean prior to deployment (e.g., excessive mud was removed from the undercarriage, wheel wells, and wheels). Truck use was also limited to existing roads, which minimizes the potential to introduce invasive plant species into undisturbed areas. In general, scopes of environmental assessment do not include scientific testing required to gather information to support the environmental assessment.	We agree with your statement "In general, scopes of environmental assessment do not include scientific testing required to gather information to support the environmental assessment". We appreciate your honesty and integrity on answering this question in a clear manner. Therefore, can one expand on how effects and impacts from this project are then measured and monitored for in a rigorous manner as identified in the BCEAO Guidelines?	Effects and impacts anticipated from the Project will be described in the Application (e.g., scope of assessment and analysis of residual effects sections), including the identification of follow-up monitoring if required.	
817	VC Selection Document - Section 3, Table 1, Pg 10, Terrestrial Environment	Anita Williams	Takla Lake First Nation	"Potential in changes in animal health and populations" should be added to the Potential Effects Column	See Standard Response 30.	See Takla comments under "standard responses".	PRGT response to comment by Takla Lake First Nation on Standard Response 30 is in Comment 1067. The Project is not expected to produce emissions, or cause contamination, that would adversely affect the health of regional wildlife populations, and therefore is excluded.		"Updated response to Round 2 working group comment" The most common effects of pipeline construction and operation are those included in the current version of the dAIR (e.g., change in habitat, change in mortality risk, and change in movement). As previously stated in the Round 2 PRGT Response, Project activities that might directly affect wildlife health would be generally associated with the production of emissions or the accidental release of contaminants. The Project is not expected to produce such emissions or cause contamination that would adversely affect the health of regional wildlife populations. The accidental release of contaminants will be discussed in general terms in the Accidents or Malfunctions section of the Application, and will include a discussion of potential environmental effects. Literature specifically validating the claim that wildlife health due to these particular activities will not be affected by the Project is not readily accessible at this time but will be presented in the Application if available and applicable.	
818	VC Selection Document - Section 3, Table 1, Pg 10, Terrestrial Environment	Anita Williams	Takla Lake First Nation	"Potential Loss of Biodiversity" should be added to the Induced Resultant Change Column	Loss of biodiversity is not a predicted Project effect and therefore is not included.	Please provide clear rationale for how the proponent has determined that "loss of biodiversity is not a predicted project effect". Takla maintains that this statement is highly suspect and insists on a "biodiversity" VC with appropriate KIs for this project.	Although not specifically framed as such, the VCs and indicators identified for the terrestrial environment (Vegetation and Wetland Resources in particular) could be interpreted in terms of the definitions of biodiversity used by the United Nations Environment Programme. Species diversity could be approximated using the three indicators that are at the species-level (e.g., plant species-at-risk, traditional use plants, and invasive plants). Diversity at the ecosystem level could be approximated using the wetlands, ecological communities at-risk, and old forests indicators. It is not clear what definition of "biodiversity" Takla Lake First Nation is using in this sense, however, as defined above, biodiversity is indeed being taken into account as part of the assessment of Vegetation of Wetland Resources VC.	Over the past decade (if not more) current literature and management practices are trending away from single species management approaches as there has been a great deal of literature disproving the effectiveness of single species approaches. Have these findings in recent literature been considered? In the last decade, a great deal of focus on how to measure biodiversity has now shifted to an ecosystem approach in which the "natural" state of the ecosystem (i.e. using ecosystem process) is compared to what has been disturbed by humans. There is then an identified "ecosystem threshold" that identifies the amount of ecosystem that can be disturbed without serious potential consequences to the ecosystem (i.e. Biodiversity). Although it is recognized here that both approaches do have their challenges, it would be prudent to apply both methods. Takla has provided ample input on how to approach this topic in the many letters and input we have sent to the EAO and urge the proponent to consider adding a valued component such as "Biodiversity" and/or "Ecosystem/Forest Health" to the VC document based on current scientific and management approaches.	PRGT is following a well-defined approach to Environmental Assessment. As stated previously, both species and ecological communities of interest can be seen as indicators of biodiversity and overall ecosystem health. It is not clear what current literature the Takla Lake First Nation is referring to nor how it would be incorporated into this assessment. PRGT strongly feels that the assessment approach developed for this project is effective at identifying potential environmental effects to vegetation and wetland resources.	
819	VC Selection Document - Section 3, Table 1, Pg 10, Terrestrial Environment	Anita Williams	Takla Lake First Nation	"Reduction in Biodiversity" should be added to the Potential Effects Column	Loss of biodiversity is not a predicted Project effect and therefore is not included.	See above comment. References Comment: Please provide clear rationale for how the proponent has determined that "loss of biodiversity is not a predicted project effect". Takla maintains that this statement is highly suspect and insists on a "biodiversity" VC with appropriate KIs for this project.	Sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application where relevant.	Over the past decade (if not more) current literature and management practices are trending away from single species management approaches as there has been a great deal of literature disproving the effectiveness of single species approaches. Have these findings in recent literature been considered? In the last decade, a great deal of focus on how to measure biodiversity has now shifted to an ecosystem approach in which the "natural" state of the ecosystem (i.e. using ecosystem process) is compared to what has been disturbed by humans. There is then an identified "ecosystem threshold" that identifies the amount of ecosystem that can be disturbed without serious potential consequences to the ecosystem (i.e. Biodiversity). Although it is recognized here that both approaches do have their challenges, it would be prudent to apply both methods. Takla has provided ample input on how to approach this topic in the many letters and input we have sent to the EAO and urge the proponent to consider adding a valued component such as "Biodiversity" and/or "Ecosystem/Forest Health" to the VC document based on current scientific and management approaches.	PRGT is not restricting the assessment of potential effects to single species, as shown by the inclusion of vegetation and wetland resources as ecosystem-level indicators. One of the admitted challenges of assessing diversity at the ecosystem level, however (according to the United Nations Environment Programme for example) has to do with the lack of ecosystem classification (and/or definition) at a global level. Ecosystem diversity can be assessed at a local or regional level. However, which is the approach taken by PRGT in the assessment of ecosystem-level indicators within the LAA and RAA (as part of the Vegetation and Wetland Resources VC). The identification of "ecosystem thresholds" to evaluate how much disturbance a particular ecosystem can withstand, however, is well beyond the scope of the environmental assessment and requirements of the dAIR and are more appropriately addressed by provincial, federal, and even global biodiversity planning and conservation mandates.	
820	VC Selection Document - Section 3, Table 1, Pg 10, Terrestrial Environment	Anita Williams	Takla Lake First Nation	"Reduced Ecosystem Health and Resiliency" should be added to the Potential indirect effects column	Comment noted. These will be incorporated into a discussion of the potential indirect effects to ecological communities in the application.	Please clearly state peer reviewed material used for discussion purposes				
821	VC Selection Document - Section 3, Table 1, Pg 11, Economic Pillar	Anita Williams	Takla Lake First Nation	"Local Labour Capacity" should be added to the Induced or Resultant Change Column	PRGT feels that current conditions as well as future potential effects of labour force are sufficiently covered.	See Standard Response 3.	PRGT response to comment by Takla Lake First Nation on Standard Response 3 is in Comment 1059. PRGT acknowledges the differences between Aboriginal and non-Aboriginal economic issues and feels that the dAIR will adequately address these concerns in the methodology as described in Standard Response 3.			
822	VC Selection Document - Section 3, Table 1, Pg 11, Economic Pillar	Anita Williams	Takla Lake First Nation	"Local barriers to accessing employment benefits" should be added to the Potential Effects Column	No change in the dAIR required.	See comment in standard response 3	PRGT response to comment by Takla Lake First Nation on Standard Response 3 is in Comment 1059. PRGT acknowledges the differences between Aboriginal and non-Aboriginal economic issues and feels that the dAIR will adequately address these concerns in the methodology as described in Standard Response 3.			

	VC Selection Document - Section 3, Table 1, Pg 12, Social Pillar	Anita Williams	Takla Lake First Nation	"Community and family well-being" should be added to the Induced and Resultant Change Column	Capacity for delivering community health services is included in the Infrastructure and Services section of the assessment. See Standard Response 1. No changes to the dAIR required.	see comment in standard response 1	PRGT response to comment by Takla Lake First Nation on Standard Response 1 is in Comment 1057. Comment acknowledged. PRGT will continue to engage with communities regarding concerns with camps.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edits to the dAIR required.
	VC Selection Document - Section 3, Table 1, Pg 12, Social Pillar	Anita Williams	Takla Lake First Nation	"Community effects" should be added to the Potential Effects Column	Please see Standard Response 1.	see comment in standard response 1	PRGT response to comment by Takla Lake First Nation on Standard Response 1 is in Comment 1057. Comment acknowledged. PRGT will continue to engage with communities regarding concerns with camps.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edits to the dAIR required.
	VC Selection Document - Section 3, Table 1, Pg 12, Social Pillar	Anita Williams	Takla Lake First Nation	"Community effects (disruption, lack of employment access, etc.)" should be added to the Potential indirect effects column	Please see Standard Response 1.	see comment standard response 1	PRGT response to comment by Takla Lake First Nation on Standard Response 1 is in Comment 1057. Comment acknowledged. PRGT will continue to engage with communities regarding concerns with camps.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edits to the dAIR required.
	VC Selection Document - Section 3, Table 1, Pg 12, Social Pillar	Anita Williams	Takla Lake First Nation	"Various effects result from employment, lack of access to employment, and project disruption to community"	Potential employment and / or contracting opportunities will be generally identified in the environmental assessment as well as training requirements, required skill level and experience. Barriers that may impede the local workforce, both Aboriginal and non-Aboriginal, from accessing employment and / or contractor opportunities (example: education attainment) will be identified along with proposed mitigation measures including aboriginal-specific mitigation measures where appropriate. Effects from Project employment are addressed in the Infrastructure and services VC in terms of changes in demand for accommodations, emergency and protective services, education services, health care services and facilities, recreation and leisure facilities and services and water and waste management facilities and services. Issues related to the quality and availability or level of usage of these infrastructures and services will also be covered. Information that may extend beyond the Land Use key indicators will be identified in Section 11 of this report. Community-specific socio-economic baseline data, including available land use plans is being collected, and will inform the assessment. This data and any data received through community-based data collection will be included, where available, in Section 11 of the application.	Does not address question. Takla will discuss this item in more detail with the proponent to seek solutions and will respond on the next dAIRs review.	Comment acknowledged.	Updated response to Round 2 comment: PRGT welcomes further dialogue with Takla on the subject. To date, Takla has not raised this matter in the course of ongoing discussions with PRGT.
	VC Selection Document - Section 3, Table 1, Pg 12, Heritage Pillar	Anita Williams	Takla Lake First Nation	"Potential migration pattern rerouting effects" should be added to the Potential indirect effects column	PRGT would welcome further clarification from TLFN to better understand this comment .	Takla will discuss this item in more detail with the proponent to seek solutions and will respond on the next dAIRs review.	Comment acknowledged.	
	VC Selection Document - Section 4, Table 2, Pg 15, Air Quality	Anita Williams	Takla Lake First Nation	"potential increase in road traffic can effect air quality" should be added to the Rationale Column	The air emissions from the potential increase in road traffic will occur primarily during construction. The construction air emissions will be assessed qualitatively in the Application. The Application will include the list of best management practices and standard industry mitigations that will minimize the potential effects of the construction air emissions. By their nature the construction emissions are short-lived and generally are rapidly dispersed into the ambient air because the construction equipment is mobile.	Qualitative measurements should be avoided where possible. Here is an example of where quantitative measures could be taken.	Quantitative measurements of construction air emissions are not justified due to the nature of the sources of the air emissions. The pipeline construction equipment is highly mobile due to the long length of the proposed pipeline corridor (>800 km). Construction air emissions are short term relative to the air emissions during operations from the compressor stations. The estimated duration of construction is 3 years and the estimated duration of operations is 40 years. Considering these factors there is not sufficient justification to conduct a quantitative assessment of the construction air emissions.	
	VC Selection Document - Section 4, Table 2, Pg 15, Air Quality	Anita Williams	Takla Lake First Nation	"Measurement of road condition and use" should be added to the Measurable Parameters column	"Measurement of road condition and use" is not a measurable parameter for air quality. The measurable parameters for ambient air quality are the criteria air contaminants (SO ₂ , NO _x , PM ₁₀ , PM _{2.5} and CO) for which there are provincial and national ambient air quality objectives (or standards). No changes to the dAIR are required.	This does not have to do with Air Quality. It could also mean more people, more access that identifies potential further impacts. We are requesting that baseline measures of road use be incorporated into the assessment so that access and increased traffic can be monitored for in a meaningful manner.	Baseline information will be collected on the current traffic volumes on major roads and highways within the LAA. Projected increased traffic will then be measured against the current traffic volumes, and will be assessed within the Transportation and Access VC section of the Application (Section 6.3 of the dAIR). Information will also be collected on capacity of emergency and protective services, which respond to road accidents and driving violations. This information will inform the assessment of Project effects in the Infrastructure and Services VC section of the Application (Section 6.2 of the dAIR).	
	VC Selection Document - Section 4, Table 2, Pg 15, Acoustic Environment	Anita Williams	Takla Lake First Nation	"Noise had potential to impact wildlife movement" should be added to the Rationale Column	See Standard Response 31.	Not clear as to how baseline or effects are measured here	Baseline conditions and the potential effects of noise on wildlife movement will be assessed using the "change in movement" effect and "avoidance of temporary equipment or permanent infrastructure" measurable parameter identified in section 4.5.3 (Potential Effects under the Wildlife and Wildlife Habitat VC) of the dAIR. Data compiled from literature reviews, habitat assessments, and wildlife surveys conducted specifically for the Project will be used to characterize baseline conditions and conduct the effects assessment.	
	VC Selection Document - Section 4, Table 2, Pg 15, Acoustic Environment	Anita Williams	Takla Lake First Nation	"Effect to Wildlife Populations" should be added to the Potential Effects Column	See Standard Response 30.	See comment on standard response.	PRGT response to comment by Takla Lake First Nation on Standard Response 30 is in Comment 1067. The Project is not expected to produce emissions, or cause contamination, that would adversely affect the health of regional wildlife populations, and therefore is excluded.	Updated response to Round 2 working group comment * A list of chemicals and reagents that are likely to be used for the Project will be provided in the Application; however, the list will be preliminary as the compilation of a more comprehensive list will depend on contractor requirements to be determined during the contracting stage. The handling of all chemicals and reagents will meet WHMIS and TDG requirements.
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add the following Species to the Recommended Indicators (or VCs) column as VCs or KIs: Bull Trout, Dolly Varden, White Sturgeon, Sockeye Salmon, Chinook Salmon, Burbot, Arctic Greyling, Mountain Whitefish	The listed species all fall within the species identified as key indicators for the assessment. The following Project-specific environmental effects were selected to assess overall environmental effects on the key indicator species: • Changes in fish habitat availability • Changes in fish mortality risk • Changes in water quality • Environmental effects on fish species at risk Potential impacts, mitigation and compensation measures for indicator species within the project assessment area (including but not limited to bull trout, Dolly Varden, white sturgeon, sockeye salmon, Chinook salmon, burbot, Arctic Grayling, and mountain whitefish) will be addressed within this framework.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Broadly speaking, the effectiveness and assumptions of the approach presented are based on the regulatory requirements of the Canada Fisheries Act, BC Water Act, and BC Fish Protection Act. Please refer to the regulatory and policy direction on the Projects Near Water section of Fisheries and Oceans Canada's Ecosystems website. Sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application where appropriate.	
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add "Effects on health and population" to the Potential effects column for all of the species listed in Comment 165 in this table	Changes in fish mortality risk was selected to assess overall environmental effects on fish, fish habitat, water quality and species at risk. Potential impacts, mitigation and compensation measures for individual fish populations or species at risk within the project assessment area (including but not limited to bull trout, Dolly Varden, white sturgeon, sockeye salmon, Chinook salmon, burbot, Arctic Grayling, and mountain whitefish) will be addressed within this framework.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Broadly speaking, the effectiveness and assumptions of the approach presented are based on the regulatory requirements of the Canada Fisheries Act, BC Water Act, and BC Fish Protection Act. Please refer to the regulatory and policy direction on the Projects Near Water section of Fisheries and Oceans Canada's Ecosystems website. Sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application where relevant.	
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	"recommend species as VCs that represent particular guilds and/or for watershed processes"	Changes in fish mortality risk was selected to assess overall environmental effects on fish, fish habitat, water quality and species at risk. Potential impacts, mitigation and compensation measures for individual fish populations or species representing particular guilds or watershed processes within the project assessment area will be addressed within this framework.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	The Fisheries Act protects all fish species that are part of a commercial, recreational or Aboriginal fishery and those fish that indirectly support the populations that are part of a fishery. In BC, the Wildlife Act requires a fishing licence for all fish species; therefore, all fish in BC are part of the recreational fishery and protected under the Fisheries Act. As it is not practical to assess effects on all species individually (the same effects and mitigations would be repeated for every species), the VC document is recommending a comprehensive and effective approach. To review environmental assessments that have taken various approaches to assessing effects on fisheries resources and aquatic habitats, please visit the BCEAD's website.	
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	"TLFN Assents that select species are more appropriate VCs"	Specific species are identified under the key indicators for the Freshwater Aquatic Resource VC. These species include regionally important fish, fish that are part of or support a fishery and fish species that are at risk. The presence of select fish species within watercourses crossed by the Project will be addressed within the framework of the following Project-specific environmental effects: • Changes in fish habitat availability • Changes in fish mortality risk • Changes in water quality • Environmental effects on fish species at risk	Please provide peer literature to identify both effectiveness and assumptions of this approach.	The Fisheries Act protects all fish species that are part of a commercial, recreational or Aboriginal fishery and those fish that indirectly support the populations that are part of a fishery. In BC, the Wildlife Act requires a fishing licence for all fish species; therefore, all fish in BC are part of the recreational fishery and protected under the Fisheries Act. As it is not practical to assess effects on all species individually (the same effects and mitigations would be repeated for every species), the VC document is recommending a comprehensive and effective approach. To review environmental assessments that have taken various approaches to assessing effects on fisheries resources and aquatic habitats, please visit the BCEAD's website.	
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add Area, TYPE OF HABITAT (i.e. Spawning grounds) and REPRESENTATION of habitat affected, to the Measurable Parameters column	Measurable parameters used to quantitatively assess potential effects to fish and fish habitat due to physical disturbance or hydrological changes include changes to the areal extent of important habitats including spawning grounds, rearing, and overwintering habitats. Spawning grounds within the context of changes in fish habitat availability were selected as a measurable parameter to assess the environmental effects on current habitat function and fish productive capacity. Further, the selection of spawning grounds as a measurable parameter meets the regulatory requirements of s. 35(1) and s. 36, of the Federal Fisheries Act and the June 2012 amendments to the Fisheries Act.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Please refer to the policy and guidance documents on Fisheries and Oceans Canada's website at: http://www.dfo-mpo.gc.ca/pnw-ppw/lpp-pps/guide-eng.html Sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application where relevant.	
	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add Water Temperature to the Measurable Parameters column	Water temperature will be added to the list of water quality parameters selected to assess Project impacts on fish and fish habitat function	Will climate change in decrease forest cover over project time be included in this assessment?	Estimating changes to forest cover as a result of climate change is beyond the scope of the environmental assessment for the Project.	Clarification. Request that stream temperature increase due to Climate Change AND Forest Cover Removal (based on presence or absence of clear cuts) to be added to cumulative effects. Estimating changes to stream temperatures as a result of climate change and forest cover removal is beyond the scope of the environmental assessment for the Project.

838	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add: "Quantitative above and below stream crossing measurements of water quality (include metals). Measurement should be taken at least twice per year, to the Measurable Parameters Column	Water quality data were collected from each wetted crossing sampled during the baseline aquatic field surveys. Water quality data were not collected from non-visible channels (NVCs), non-classified drainages (NCDs) where connectivity and/or fish habitat was not present. Winter water quality data will be collected only for those crossing locations visited during the winter survey where water is present. In-situ field measurements for pH, electrical conductivity, temperature, dissolved oxygen, and turbidity were collected for all watercourses during all seasons where water was present using a calibrated YSI Professional Plus water quality meter. Metals are not currently identified within watercourse crossings as a potential contaminant of concern. Further, the proposed Project is not expected to result in the addition of total or dissolved metals concentrations within freshwater environments intersected by the Project. A water quality monitoring plan to monitor for sediment events during in-stream construction activities as required by the applicable regulatory approvals (i.e., the DFO Letter of Advice) will be conducted during construction. If monitoring reveals sediment values are approaching threshold values, the water quality monitors will alert the Environmental Inspector(s) and work with them to develop corrective actions. If corrective actions are not successful, construction activities will be temporarily suspended until effective solutions are identified.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	The accepted methods for fish and fish habitat assessments in British Columbia, including water quality sampling to support these studies can be found on the BC Ministry of Environment in Integrated Land Management Bureau website: http://www.emw.gov.bc.ca/Fish/methods/toolskits/hookkits.html http://www.ilmw.gov.bc.ca/isic/ The sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application where relevant.	
839	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	Add: Radio telemetry measurements of species to understand and monitor health, populations and use by species, to measurable parameters column	The distribution and relative abundance of fish species within watercourses crossed by the Project is well known. Further, the proposed Project is not anticipated to impede fish movement or migration potential within watercourse crossings intersected by the Project. As such, PRGT does not anticipate the need for radio-telemetry studies on fish populations within the Project assessment area.			
840	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	In Proposed VC Column: "Note: Where is water being measured?"	See Standard Response 8.	Takla reiterates that it would like to see measures for metals and benthic species included in these water assessments.	PRGT believes the indicators identified for the Freshwater and Aquatic Resources VC and Water Quality VC are sufficient to address potential effects of the Project on these environmental components.	
841	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	In Proposed VC Column: "Add: Surface Flow"	See Standard Response 8.	Takla reiterates that it would like to see measures for metals and benthic species included in these water assessments.	PRGT believes the indicators identified for the Freshwater and Aquatic Resources VC and Water Quality VC are sufficient to address potential effects of the Project on these environmental components.	
842	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	In Proposed VC Column: "Add: Surface Water Quality"	See Standard Response 8.	Takla reiterates that it would like to see measures for metals and benthic species included in these water assessments.	PRGT believes the indicators identified for the Freshwater and Aquatic Resources VC and Water Quality VC are sufficient to address potential effects of the Project on these environmental components.	
843	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	In Proposed VC Column: "Add: Water quantity"	See Standard Response 8.	Takla reiterates that it would like to see measures for metals and benthic species included in these water assessments.	PRGT believes the indicators identified for the Freshwater and Aquatic Resources VC and Water Quality VC are sufficient to address potential effects of the Project on these environmental components.	
844	VC Selection Document - Section 4, Table 2, Pg 15, Freshwater Aquatic Resources	Anita Williams	Takla Lake First Nation	In Proposed VC Column: "Add: Ground Water"	See Standard Response 8.	Takla reiterates that it would like to see measures for metals and benthic species included in these water assessments.	PRGT believes the indicators identified for the Freshwater and Aquatic Resources VC and Water Quality VC are sufficient to address potential effects of the Project on these environmental components.	
845	VC Selection Document - Section 4, Table 2, Pg 16, Wildlife and Wildlife Habitat	Anita Williams	Takla Lake First Nation	Add the following species to the Recommended Indicators (or VCs) Column as VCs or Kis: Grizzly, Caribou, Fisher, Marten, Marmot, Porcupine, moose, Wolverine, Mountain Goat, Rabbit, Lynx	Potential effects of the Project on marmot, porcupine, wolverine, rabbit and lynx can be estimated from the effects assessment using currently proposed indicators. Several key indicators, namely wetland birds, grizzly bear, caribou, moose, fisher and marten are all examples of species indicators that would collectively have similar and overlapping habitat requirements. See Standard Response 16.	see comments in standard response	We are unable to find any comments submitted by Takla Lake First Nation on Standard Response 16.	Updated response to Round 2 comment: PRGT will follow-up with Takla to request their comments on Standard Response 16 and 32.
846	VC Selection Document - Section 4, Table 2, Pg 16, Wildlife and Wildlife Habitat	Anita Williams	Takla Lake First Nation	"recommend species as VCs that represent particular guilds and/or for watershed processes"	See Standard Response 32.	see comments in standard response	We are unable to find any comments submitted by Takla Lake First Nation on Standard Response 32.	Updated response to Round 2 comment: PRGT will follow-up with Takla to request their comments on Standard Response 16 and 32.
847	VC Selection Document - Section 4, Table 2, Pg 16, Wildlife and Wildlife Habitat	Anita Williams	Takla Lake First Nation	Add the following to the Measurable Parameters Column: Population Inventory, Food availability, Habitat Availability, Herbicide and Pesticide Use, Line of Sight, Migration Corridors, Predation and Predation risk, Acoustic disturbance.	Potential adverse effects resulting from the Project include change in habitat, change in movement, and change in mortality risk. The measurable parameter for change in habitat is hectares of effective habitat affected - this metric is the sum of all moderate to high suitability habitat affected after accounting for direct and indirect (e.g., acoustic) effects on patch size requirements, and connectivity. Change in movement considers migration or movement corridors in relation to habitat connectivity. Change in mortality risk includes factors related to increased human or predator access and collision potential. Change in population inventory or food availability, of effects of herbicide and pesticide use, were not identified as potential adverse effects or measurable parameters.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Broadly speaking, the effectiveness and assumptions of the approach presented are based on EA methods used within BC and across Canada that have been developed over a number of years. Specific references include Beaulieu and Duinker (1983) - An Ecological Framework for Environmental Impact Assessment in Canada, Federal Environmental Assessment Review Office (1994) - A Reference Guide for the Canadian Environmental Assessment Act, Determining Whether a Project is Likely to Cause Significant Adverse Environmental Effects, and the International Association for Impact Assessment and Institute of Environmental Assessment (1999) - Principles of Environmental Impact Assessment Best Practice. These references and many others have formed the basis of EA in BC including the EAD (2013) Guideline for the Selection of Valued Components and Assessment of Potential Effects Sources of information to support the assessment and approach will be included in the Application. Information sources will include peer-reviewed literature, provincial and federal standards for assessment, technical reports, and results of discussions with regulators. Assumptions and effectiveness of the approach will be provided and discussed in the Application, where relevant.	
848	VC Selection Document - Section 4, Table 2, Pg 16, Wildlife and Wildlife Habitat	Anita Williams	Takla Lake First Nation	"THIS VC IS EXTREMELY BROAD AND MAY NOT BE ADEQUATE TO MEASURE IMPACTS TO ABORIGINAL RIGHTS AND TITLE"	See Standard Response 4.	see comments in standard response	PRGT response to comment by Takla Lake First Nation on Standard Response 4 is in Comment 1060: Thank you for your comment. PRGT has responded to the specific comments submitted by the NAI as appropriate in the tracking table.	
849	VC Selection Document - Section 4, Table 2, Pg 16, Wildlife and Wildlife Habitat	Anita Williams	Takla Lake First Nation	Note: TLFN asserts that select species are more appropriate VCs given the potential impacts to wildlife species. Using guilds is more appropriate and follows the VC guideline as set out by the province.	See Standard Response 16 and Standard Response 32.	see comments in standard response	We are unable to find any comments submitted by Takla Lake First Nation on Standard Response 16 and 32.	Updated response to Round 2 comment: PRGT will follow-up with Takla to request their comments on Standard Response 16 and 32.
850	VC Selection Document - Section 4, Table 2, Pg 16, Vegetation and Wetland Resources	Anita Williams	Takla Lake First Nation	Add: Ecological Representation of Forested Ecosystems by Age class and Site Series to the Measurable Parameters Column	Structure class and site series will be defined within the project area by Terrestrial Ecosystem Mapping. This will identify old forest, wetlands and listed ecological communities (based on site series and structural stage) that will be used as measurable parameters. Structure class, but not age class, and site series will be included in the description of the current conditions but are not used as measurable parameters.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Terrestrial Ecosystem Mapping is a well established methodology used widely throughout the natural resources field. Methodologies used here follow provincial standards for mapping and data collection including the Standards for Terrestrial Ecosystem Mapping (RBC 1996), the Terrestrial Ecosystem Information Digital Data Submission Standards (RSC 2010) and all pertinent Province of BC Land Management Handbook field guides.	
851	VC Selection Document - Section 4, Table 2, Pg 16, Soil	Anita Williams	Takla Lake First Nation	Add: Soil erosion to the Proposed VC column	See Standard Response 22.			
852	VC Selection Document - Section 4, Table 2, Pg 16, Soil	Anita Williams	Takla Lake First Nation	Add: Terrain integrity to the Proposed VC Column	Terrain stability is a key technical input to routing and design of pipelines. Terrain and terrain stability mapping will be completed for the corridor and will feed into the routing and engineering design of the Project. Terrain stability considerations and the engineering methods to be used to protect the pipeline from damage will be discussed in the Effects of the Environment section of the Application, as outlined in Section 10.0 of the dAIR. Updates to the dAIR are not required.	Please provide peer literature to identify both effectiveness and assumptions of this approach.	Terrain analysis are being conducted by PRGT as part of the routing and engineering design. These studies are primarily based on industry design codes and best management practices developed over many years of pipeline engineering, including a design objective of continuous improvement. Terrain stability is explicitly addressed during pipeline routing and an evaluation of surficial geology to avoid potential for slope failures or highly erodible conditions. The relevant standards and codes of practice used to determine terrain suitability will be referenced in the Application where relevant.	
853	VC Selection Document - Section 4, Table 2, Pg 16, Soil	Anita Williams	Takla Lake First Nation	Add: Terrain Stability to the Proposed VC Column	Comment acknowledged. Terrain stability is a key technical input to routing and design of pipelines. Terrain and terrain stability mapping will be completed for the corridor and will feed into the routing and engineering design of the Project. Terrain stability considerations and the engineering methods to be used to protect the pipeline from damage will be discussed in the Effects of the Environment section of the Application, as outlined in Section 10.0 of the dAIR. Updates to the dAIR are not required.			
854	VC Selection Document - Section 4, Table 2, Pg 16, Economic Conditions	Anita Williams	Takla Lake First Nation	Add: Change in local economic conditions to the Potential Effects Column	See Standard Response 3.	see comments in standard response	PRGT response to comment by Takla Lake First Nation on Standard Response 3 is in Comment 1059: PRGT acknowledges the differences between Aboriginal and non-Aboriginal economic issues and feels that the dAIR will adequately address these concerns in the methodology as described in Standard Response 3.	
855	VC Selection Document - Section 4, Table 2, Pg 16	Anita Williams	Takla Lake First Nation	ADD: SOCIAL CONDITIONS AS A PROPOSED VC	See Standard Response 1.	see comments in standard response	PRGT response to comment by Takla Lake First Nation on Standard Response 1 is in Comment 1057: Comment acknowledged. PRGT will continue to engage with communities regarding concerns with camps.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edit to the dAIR required.
856	VC Selection Document - Section 4, Table 2, Pg 16, "Social Conditions" VC	Anita Williams	Takla Lake First Nation	Add: Potential adverse effects on community and family well-being to the Rationale Column	See Standard Response 1.	see comment in standard response	PRGT response to comment by Takla Lake First Nation on Standard Response 1 is in Comment 1057: Comment acknowledged. PRGT will continue to engage with communities regarding concerns with camps.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edit to the dAIR required.
857	VC Selection Document - Section 4, Table 2, Pg 16, "Social Conditions" VC	Anita Williams	Takla Lake First Nation	Add: Community Concerns to the Recommended Indicators Column	PRGT has been conducting a public consultation and engagement program. Concerns specific to Aboriginal communities will be addressed in Section 11 of this assessment. No changes to the dAIR required.	Takla has great concern with this process. Well articulated in Nak'zadi's recent response to dAIRs. Takla echoes these process concerns.	Comment acknowledged. Concerns with the process should be directed to the EAO.	Updated response to Round 2 comment: The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. Edit to the dAIR required.

VC Selection Document - Section 4, Table 2, Pg 16, "Social Conditions" VC 858 (Proposed by TLFN)	Anita Williams	Takla Lake First Nation	Add: Changes in community perceptions to the Potential Indicators Column	Under BC EAO, community perceptions falls within community wellness. See Standard Response 1.	Does not address question. Takla will discuss this item in more detail with the proponent to seek solutions and will respond on the next dAIRs review.	Comment acknowledged.			
VC Selection Document - Section 4, Table 2, Pg 16, "Social Conditions" VC 859 (Proposed by TLFN)	Anita Williams	Takla Lake First Nation	Add: Measure community input, crime rates to the Measurable Parameters Column	The dAIR supersedes the VC selection document. Qualitative data, criminal statistics are evaluated and are indeed measurable parameters. The existing list of measurable parameters is not exhaustive. The dAIR does not need to be revised to reflect this.			Updated response to Round 1 comment. The Infrastructure and Services VC will be updated to be called "Community Infrastructure and Services" as much of the information requested will be addressed in this section of the Application. Furthermore, a synopsis of effects related to quality of life, including economic hardship, children and youth at risk, crime, and well-being, will be provided as key context for the assessment area and included as a technical appendix to the Community Infrastructure and Services VC section of the Application. See to the dAIR required.		
VC Selection Document - Section 4, Table 2, Pg 16, Human and Ecological Health 860 (Proposed by TLFN)	Anita Williams	Takla Lake First Nation	It is recommended that these VCs be separated into 2 VCs "Human Health" and "Ecological Health" with appropriate Kis and Measures	The dAIR supersedes the VC Selection document. The VC has been renamed Human Health. The potential for chemical exposures that may be associated with ecological health risks will be evaluated within the human health and ecological risk assessment report which will support the Human Health and Marine VCs.	Takla would like to note here, that we did provide comments and suggestions VC selection document - all of which were essentially ignored. Many FNs have made comments to the problems with this exact process and would like to note that VCs can be changed and added to based on input from the working group. We are asking the EAO to consider our input into the VCs (along with numerous requests from other FNs and working group members). See comments above and please elaborate by providing peer reviewed literature as to the efficacy of this approach.	PRGT appreciates Takla's comments. A Human Health and Ecological Risk Assessment (HHERA) is being conducted in support of the Application. The results of the HHERA will support the evaluation of potential chemical effects to people (covered by the Human Health VC), and to ecological receptors (covered by the various biophysical VCs). Potential chemical effects that could result in health risks to people will be addressed as part of the Human Health VC, based on results of the human health risk assessment following the standard federal framework "Federal Contaminated Site Risk Assessment in Canada, Part 2: Guidance on Human Health Preliminary Quantitative Risk Assessment (PQRA), Version 2.0. Published by Ministry of Health, Health Canada 2010 and other Health Canada guidance documents as required. Potential chemical effects that could result in health risks to ecological populations or communities will be addressed by various biophysical VCs, based on the results of the ecological risk assessment following standard federal framework "A Framework for Ecological Risk Assessment: General Guidance. The National Contaminated Sites Remediation Program. Canadian Council of Ministers of the Environment, 1998. It will be supported by other guidance documents as required.	Takla notes here that the impacts to fish, plant and wildlife populations and the potential health impacts to the community are not part of the HHERA. Further, although the proponent identifies that this will be dealt in other VC categories, we still have difficulty understanding how this is done (i.e. how is "habitat availability" capable of determining populations of fish, wildlife and plants). A great deal of this problem clearly lies with the province's responsibility to update Biodiversity Inventory, in which in 2013 the BC Attorney General identified that there is a great deal of baseline inventory missing to monitor biodiversity and in this context not be capable of identifying the efficacy of mitigation measures in any meaningful way.	As stated in our response to the Round 2 comment, the findings of the HHERA will be used in the assessment of effects on the Human Health and Biophysical VCs. The Human Health and Ecological Risk Assessment will evaluate the plausible pathways for exposure in terrestrial, freshwater, and marine settings (including evaluating drinking water and traditional and country food pathways) - each of which contribute to "ecological health". Where complete exposure pathways are identified, and where these will result in increased chemical exposures to people, they will be carried forward into the Application under the human health effects assessment section.	
VC Selection Document - Shallow aquifers 861	John Locher	Chief Administrative Office, Hudson's Hope	Concerned about potential impacts on the Shallow aquifers in the proximity of the proposed pipeline within district boundaries. Many rural residents rely on these aquifers for potable water	See Standard Response 8.			Updated response to Round 1 working group comment Groundwater resources (i.e., aquifers) and groundwater users (i.e., water supply wells) along the land-based portion of the proposed Project route have been identified through a review of BCMOE databases. An inventory (i.e., mapbook) of aquifer and wells has been prepared. In the Hudson's Hope area, eight (8) water supply wells are located within 1,000 metres (m) of the proposed Project route. Seven (7) of these wells are constructed in BCMOE Aquifer 910, which is comprised of sand/gravel deposits that are naturally protected from surface activity by a laterally continuous sequence of fine-textured sediments ranging from 6 m (20 feet (ft)) to more than 60 m (200 ft) thickness. The eighth well is located at BC Hydro's Peace Canyon Dam site and is constructed in bedrock that is naturally protected from surface activity by low permeability silt/clay sediments that extend from ground surface to approximately 12 m (40 ft) below ground.		
VC Selection Document - De-commissioning of the pipeline 862	John Locher	Chief Administrative Office, Hudson's Hope	The Environmental Assessment deals with the construction and operation of the pipeline but does not deal with decommissioning. A small diameter pipeline can be left in place after de-commissioning without causing significant impact on the environment. The same does not hold true for the large diameter pipelines. Our question is - "How is decommissioning of the pipeline dealt with, is it subject to a separate Environmental Assessment or left to the discretion of the company as to the extent of de-commissioning"	The VC Selection document is superseded by the dAIR, which is more current. Please see Standard Response 34.					
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 863	Anna Usborne	Metlakatla EA Coordinator	The following Effect and associated indicator and measurable parameter should be added to the Air Quality Proposed VC: Construction traffic air emissions on sensitive vegetation; Sensitive vegetation along transportation route; moss concentration/health	Per the response to comment 870 (VC_192) the following item will be added to the rationale column for air quality in the VC selection document: potential increase in road traffic can effect air quality and dust deposition along the construction transportation route(s). No further changes are needed to the air quality VC selection rationale to address sensitive vegetation from construction traffic air emissions. Under this additional scope the Application will discuss, in, in qualitative terms, the potential effects of construction traffic air emissions on sensitive vegetation along the transportation routes. Construction best management practices (e.g., mitigation) will reduce air emissions on sensitive vegetation. Construction fugitive dust will be controlled by application of calcium chloride (or equivalent) or water - only water will be used for dust control on the right-of-way.					
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 864	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated indicator and measurable parameter should be added to the Air Quality Proposed VC: Climate change; greenhouse gas emissions; CO2 equivalents.	See Standard Response 23. Potential climate change effects will be discussed in the Application in the section relating to "Effects of the Environment on the Project", the scope of which is described in Section 10 of the dAIR.	Standard Response 23 states that GHGs will be assessed as a VC in the Application. However, there is some duplication of VCs as indicators for other VCs in the dAIR, and Metlakatla asserts that climate change, greenhouse gas emissions, and CO2 equivalents serve as both VCs and as indicators for Air Quality. Furthermore, the section relating to "Effects of the Environment on the Project" does not encompass the effects of the project on the environment, such as GHGs.	PRGT recognizes and accounts for the interrelated nature of the indicators across the atmospheric environment sections. To clarify, CO2 equivalents are the units in which the GHG will be presented. A GHG Assessment will be prepared to determine the project's contributions to provincial, national and global emission inventories. The "Effects of the Environment on the Project" section will discuss how the environment (i.e. predicted climate change) will impact the project.			
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 865	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated indicator and measurable parameter should be added to the Acoustic Environment Proposed VC: Peak noise effects on social and cultural values; Air/marine noise; peak noise volumes	See Standard Response 12.			The focus of the noise assessment is on the potential effects and anticipated sound levels from pipeline and compressor station construction and operation. Other construction activities will be assessed qualitatively using Health Canada (2010) guidelines. Baseline conditions for noise sensitive receptors within the LAA and RAA will be established based on the recommendations contained within the Oil and Gas Commission (2009) British Columbia Noise Control Best Practices Guideline. If noise overlaps with Aboriginal Interests (as described in Section 11.2.2 of the dAIR), the information from the noise section of the Application will be cross-referenced and summarized in Section 11 in the context of this particular Aboriginal Interest. An assessment of noise effects on social and cultural values will not be undertaken given the strict thresholds specified in the British Columbia Noise Control Best Practices Guideline (OGC 2009) and the varying judgments and definitions human receptors place on social and cultural values.		
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 866	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated indicator and measurable parameter should be added to the Marine Resources VC: Changes to littoral processes associated with submerged infrastructure; Littoral processes; longshore transport, Current & tidal changes	Littoral processes, longshore transport, current and tidal changes are a mechanisms driving change in fish habitat. Consequently, they will be fully considered within the potential effect of 'change to fish habitat'.					
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 867	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated measurable parameter should be added to the Wildlife and wildlife habitat VC: Changes in species composition; Prey species mortality	Whereas community composition may change as a result of change in habitat at the stand-level, a negligible change in species composition is predicted at the local (LAA) and regional (RAA) scales. Therefore, change in species composition was not identified as a measurable parameter. Change in prey species mortality will be assessed for indicators where residual or cumulative effects might be high magnitude, long term, not reversible, or affect the sustainability or recovery of a species of conservation or management concern. For example, caribou are known to be adversely affected (i.e., preyed upon) as access into "secure" caribou habitat increases and alternate prey (i.e., deer, moose) and primary predators (i.e., bear, wolf) encroach.					
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 868	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated measurable parameter should be added to the Land and Terrestrial Resource Use VC: Conflicts with Metlakatla Planning exercises; Planning objectives and criteria	Please see Standard Response 20.					
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 869	Anna Usborne	Metlakatla EA Coordinator	The following effect and associate indicator and measurable parameter should be added to a new VC "Marine resource Use": Conflicts with Metlakatla planning exercises, conflicts with exercise of traditional harvests; Navigation; Changes to navigation channels, area restrictions	Please see Standard Response 20.	Standard Response 20 refers to Aboriginal land use planning documents, whereas Metlakatla's original comment refers to conflicts between traditional marine activities and project marine use and shipping. Please address the original comment.	Effects on navigation will be addressed in the Transportation and Access VC, if available. Metlakatla land use planning documents will be discussed in the Land and Resource Use VC. In addition, any available and relevant Traditional Knowledge and Land Use information regarding marine resource use will be used to inform both of the above noted sections as well as section 11 of the Application.			
VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project 870	Anna Usborne	Metlakatla EA Coordinator	The following effect and associated measurable parameter should be added to the Marine use VC: Conflicts with existing and future use; Number of enforcement officers/1000 people	Existing and future marine use will be considered through the assessment of the land and resource use VC. The Project is not anticipated to cause a change to marine use that would put additional demands on enforcement capacity.	Metlakatla disagrees with PRGT's response. The construction and operation of the Project will most certainly cause a change to marine use (i.e. pipe-laying ships, on-going carrier arrivals, etc.). Some parameter must be included to assess potential conflicts in marine use.	Impacts to marine navigability due to the pipe-laying vessels and other related traffic will be assessed within the Transportation and Access VC. The parameter is "interruption of and change in access to navigable waterways". Available information on current use will be collected, which will inform the assessment.			

873	VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project	Anna Osborne	Metlakatla EA Coordinator	The following effect and associated indicator and measurable parameters should be added to the Heritage and Archaeological Resources VC: Restrictions/exclusions on harvesting areas, restrictions/exclusions on travel routes; marine navigation; navigable water notice/restrictions, Number of and areal extent of area excluded to fishing associated with construction and/or operation of submerged infrastructure	The discussion of Aboriginal Interests (including rights) and other concerns raised by Aboriginal groups will be included in Section 11 of the Application. As a result, PRGT does not propose to identify separate indicators with respect to each Aboriginal interest or concern. Notwithstanding this, PRGT would like to assure Metlakatla that it treats Metlakatla interests and concerns seriously.				
872	VC Selection Document - Table 2 - Proposed Valued Components, Indicators, Effects and Measurable Parameters for the Environmental Assessment of the Prince Rupert Gas Transmission Project	Anna Osborne	Metlakatla EA Coordinator	The following effect and associated indicators and measurable parameters should be added to the Social and cultural well-being VC (reference to NEB requirements): Effects on exercise of cultural transmission, effects on governance; Land Use, Temporary habitat alteration or destruction (and/or temporary restrictions to access); Exclusion areas (land and marine), length of time of habitat alteration	Habitat alteration and access will be considered in the Land and Resource Use VC through cross references with other VCs. Social and cultural well-being will also be addressed in Section 11 of this assessment.				
873.1		JF	Ministry of Environment EP LNG Team	The project may result in water quality changes due to site dredging that can cause sediment to enter the water column, as well as disturb contaminated sediments. Remedialization of historical contaminants into the water column is a potential issue.	See Standard Response 8.				
874	General Comments	No name provided	T'at'en Nation	The EA process seems to be focused on an accelerated timeline that puts a tremendous amount of pressure on T'at'en Nation who has limited human and financial resources to meet such timelines proposed by BCEAO.	PRGT recognizes the timing associated with the Application and appreciates the efforts of the T'at'en Nation to participate in this process. As PRGT has indicated in various discussions, it is very important from a commercial perspective that the Project continue to move forward through the EAO process or the commercial opportunity associated with the Project may no longer be available. PRGT is prepared to work directly with First Nations, including T'at'en to address issues that arise from this timing. To this end, PRGT has provided T'at'en with initial capacity funding to support their participation in consultation activities, including the EA process. PRGT and T'at'en are also actively negotiating further capacity funding arrangements. PRGT is confident that a complete Application can be filed with EAO within established timelines and informed by input from Aboriginal groups obtained through PRGT's consultation efforts, including information obtained through consultation with T'at'en.				
875	General Comments	No name provided	T'at'en Nation	T'at'en Nation does not agree with the development of the Selection of Valued Components, that was created by the proponent without T'at'en Nation input.	The VC document was provided to the Working Group, including the T'at'en Nation, to obtain input on the VCs prior to their inclusion in the Application. Comments on the VC document have been considered and the VCs revised as required.				
876	General Comments	No name provided	T'at'en Nation	T'at'en Nation has indicated numerous times to the BCEAO our disapproval of the proposed PRGT route to go under Middle River and the most sensitive area of the sockeye salmon spawning grounds	PRGT acknowledges the importance of Middle River sockeye salmon spawning grounds to T'at'en. PRGT and T'at'en have had - and continue to have - numerous discussions regarding T'at'en's interests in this area, and proposed measures to mitigate potential adverse effects on these interests. These interests, potential effects and mitigation measures will be described in Section 11 of the Application. The sections related to relevant VCs included elsewhere in the Application will, where appropriate, be cross-referenced in this section. In addition PRGT Engineering has/his working with T'at'en on both the crossing location and crossing methods to reduce or eliminate the potential adverse effects, to the extent practicable.				
877	Section 1.2	No name provided	T'at'en Nation	There are numerous concerns with air quality, greenhouse gas emissions, and negative human and wildlife health effects associated with current and future expansion locations of the compressor stations	PRGT has applied a strict set of compressor station siting criteria to reduce the potential adverse effects of the stations on VCs such as air quality, greenhouse gas, wildlife and human health. Potential adverse environmental effects that cannot be eliminated through compressor station siting will be addressed and appropriate mitigation measures applied to reduce or eliminate those potential effects within the respective VC sections of the Application.				
878	Section 1.4	No name provided	T'at'en Nation	Environmental constraints. T'at'en Nation has experienced unprecedented timber harvest activities due to the Mountain Pine Beetle (MPB) that have already created environmental constraints to the consideration of the PRGT line.	As per Section 3.3 of the dAIR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC (as appropriate). The timber harvesting associated with the Mountain Pine Beetle (MPB) epidemic would be included. In addition, as per Table 3-4, forestry activities will be considered in combination with residual Project effects in the Cumulative Effects Assessment. PRGT would welcome any further information from T'at'en regarding MPB and related timber harvest activities that may relate to the proposed Project. PRGT would welcome any further information from T'at'en regarding MPB and related timber harvest activities that may relate to the proposed Project.				
879	Section 1.4	No name provided	T'at'en Nation	Fish and wildlife habitat have already been impacted by MPB uplift; the construction of the PRGT line will add to ecosystem destruction that has not been a measurable scoping consideration in the EA process.	As per Section 3.3 of the dAIR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC (as appropriate). The effects of the MPB epidemic will be included in this analysis. In addition, as per Table 3-4, forestry activities will also be considered in the cumulative effects assessment. The assessment of fish habitat availability will consider the cumulative effects of other projects and activities that have impacted (or have the potential to impact) fish and fish habitat.				
880	Section 1.5	No name provided	T'at'en Nation	With a high unemployment rate and scarce financial resources in TN, what is PRGT's intention to build capacity and workforce development through the construction and operation phases of the Project? When will discussions begin with TN on such plans going forward?	PRGT recognizes the importance to local Aboriginal groups, communities and stakeholders of employment and training opportunities associated with the proposed Project. PRGT is committed to discussing such opportunities with interested parties, and has already initiated discussions with T'at'en to this end. Potential issues and mitigation related to employment are addressed in the Employment VC (dAIR Section 5.2). This includes barriers that may impede the local workforce, both Aboriginal and non-Aboriginal, from accessing employment and / or contractor opportunities (example: education attainment) will be identified along with proposed mitigation measures including aboriginal-specific mitigation measures where appropriate. No changes to the dAIR are required.				
881	Section 1.5	No name provided	T'at'en Nation	Where are the royalties for First Nations?	PRGT is prepared to discuss potential economic benefits associated with the proposed Project with potentially affected Aboriginal groups. Royalties are a federal and provincial matter and typically paid in resource extraction which is not a part of this environmental assessment. PRGT does feel, however that there will be economic benefits to communities. See Standard Response 3.				
882	Section 2.2	No name provided	T'at'en Nation	Due to the federal jurisdiction under the Department of Fisheries and Oceans; T'at'en Nation requests that federal CEAA is required.	Under the provisions of CEAA 2012, the PRGT Project is not subject to a CEAA environmental assessment. PRGT is subject to environmental review by the BCEAO and will be filing its Environmental Assessment Application with the provincial regulator in the first quarter of 2014.				
883	Section 2.2	No name provided	T'at'en Nation	Consideration must be given and administered under the DFO for Species At Risk Act regarding Nechako White Sturgeon habitat.	PRGT acknowledges the importance of Nechako white sturgeon habitat. Nechako white sturgeon habitat will be described in Section 11 of the Application. The sections related to Nechako white sturgeon and fish species at risk included elsewhere in the Application will, where appropriate, be cross-referenced in this section.				Updated response to Round 1 working group comment - Sturgeon have been included in Section 4.3 for assessment in the December 2013 version of the dAIR, the results of which will be transferred to Section 11 as well as part of the Application.
884	Section 3.0	No name provided	T'at'en Nation	Figure 3.1 Residual Effects. Consideration must be given to the environmental impacts of MPB uplift and any future proposed mine development.	As per Table 3-4, forestry activities (including those in response to MPB) will be considered in combination with residual effects of the proposed Project in the relevant cumulative effects assessment section of the Application. Reasonably foreseeable mining projects that: (a) have been publicly announced with a defined project execution period and with sufficient project details for assessment, (b) are currently undergoing an environmental assessment, or (c) are in a permitting process will be considered in the cumulative effects assessment. PRGT would welcome any further information from T'at'en regarding MPB and mining activities that may relate to the proposed Project.				
885	Section 3.1	No name provided	T'at'en Nation	Figure 3.2. At no time did PRGT consult with T'at'en Nation on the selection of the Valued Components.	The VC document was provided to the Working Group, including T'at'en, to obtain input on the VCs prior to their inclusion in the Application. Comments on the VC document have been considered, and the VCs revised as required. PRGT has developed a list of local traditional use species based on input from the TK/ULI program, which includes substantial input from Aboriginal groups, including the T'at'en Nation. These species will be included within the Vegetation and Wetlands assessment in the Application. PRGT welcomes further information from T'at'en regarding medicinal plants that may relate to the proposed Project.				
886	Section 3.1	No name provided	T'at'en Nation	Table 3.1. Consideration must be given to the risks to medicinal plant used by T'at'en Nation	See Standard Response 21. As per BCEAO requirements, Aboriginal groups will be presented with non-Aboriginal communities that fall with the LAA and RAA. Key indicators will be presented and evaluated. Where Aboriginal land use planning documents are available and describe use beyond traditional land use, these will be discussed in the Land and Resource Use VC as applicable and relevant. Information that may extend beyond the Land Use key indicators may be identified in Section 11 of the application if available and relevant. Aboriginal specific socio-economic baseline data will inform the assessment as available.				
887	Section 3.1	No name provided	T'at'en Nation	Table 3.1. Land and Resource Use. T'at'en Nation is currently developing a land use plan for it's traditional territory, the outcomes to date should be considered as part of the VCs					
888	Section 3.2.1	No name provided	T'at'en Nation	The RAA along the proposed route under Middle River should be expanded, in consideration of the sockeye salmon spawning grounds.	PRGT acknowledges the importance to T'at'en of sockeye salmon, including spawning grounds, within the Middle River and extending into Trembleur Lake. The RAA has been established to consider potential effects of construction and operation. Based on professional experience on previous similar projects no project specific environmental effects are likely to occur beyond this area. Accidents and malfunctions (i.e. frac-out) will be considered in Section 9.0. The area considered within Accidents and Malfunctions will include the full extent of the potential effects for that event.				
889	Section 3.3	No name provided	T'at'en Nation	Description of existing conditions. This should include the environmental impacts of the Mountain Pine Beetle uplift that has severely compromised wildlife habitat and impacts to water quality	As per Section 3.3 of the dAIR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC (as appropriate), the effects of the Mountain Pine Beetle epidemic will be included. PRGT welcomes further information from T'at'en regarding the MPB as well as potential wildlife habitat and water quality effects that may relate to the EA of the proposed Project. See Standard Response #36.				
890	Section 3.3	No name provided	T'at'en Nation	Water testing should be incorporated and conducted to determine current water quality and monitoring over the long term.					
891	Section 3.6	No name provided	T'at'en Nation	Characterization of residual project effects. T'at'en Nation requests input into such characterizations of residual effects due to MPB uplift and proposed future mine development in TN traditional territory.	As per Table 3-4, forestry activities (including those in response to MPB) will be considered in combination with residual effects of the proposed Project in the relevant cumulative effects assessment section of the Application. Reasonably foreseeable mining projects that: (a) have been publicly announced with a defined project execution period and with sufficient project details for assessment, (b) are currently undergoing an environmental assessment, or (c) are in a permitting process will be considered in the cumulative effects assessment. PRGT would welcome any further information from T'at'en regarding MPB and mining activities that may relate to the proposed Project.				
892	Section 3.8	No name provided	T'at'en Nation	Confidence and risk. T'at'en Nation will seek and include additional analysis from a chosen professional to review effects prediction and risks judgments, related to the sockeye salmon spawning grounds.	PRGT welcomes additional analysis from a T'at'en Nation chosen professional to review effects prediction and risks judgments related to sockeye salmon spawning grounds.				
893	Section 3.9.1	No name provided	T'at'en Nation	Project inclusion list. Does not include all forest licensees or proposed future mining proponent.	Table 3-4 has been updated and now includes proposed future forestry activity and mining projects. This table is still considered preliminary, and may be refined by PRGT (subject to confirmation from EAO) in the Application.				
894	Section 3.9.2	No name provided	T'at'en Nation	Cumulative Effects Assessment. There is definite overlap of effects of past, existing or future projects and activities in the area, including current MPB uplift and proposed future mine development. T'at'en Nation will seek and include impacts of such activities including any information and suggestions on how these other activities has impacted environmental, social, economic, heritage and health (the VCs) of T'at'en Nation.	The cumulative effects assessment for the Project will consider projects or activities with potential overlapping residual effects including forestry activities (including those in response to Mountain Pine Beetle) and mining within the T'at'en territory. Reasonably foreseeable projects that: (a) have been publicly announced with a defined project execution period and with sufficient project details for assessment, (b) are currently undergoing an environmental assessment, or (c) are in a permitting process will be considered in the cumulative effects assessment. PRGT would welcome any further information from T'at'en regarding MPB and mining activities that may relate to the proposed Project. Additional information pertaining to potential project effects on Aboriginal rights and title will be included in Chapter 11 of the Application.				

895	Section 3.9.2	No name provided	T'at'en Nation	Description of cumulative effects. This should include the current environmental impacts and assessments of the Mountain Pine Beetle uplift that has severely compromised wildlife habitat and impacts to water quality.	As per Section 3.3 of the sAR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC. Including the effects of the Mountain Pine Beetle infestation, where applicable. In addition, as per Table 3-4, forestry activities will be considered in the context of the cumulative effects assessment.				
896	Section 3.10	No name provided	T'at'en Nation	Follow-up strategy. PRGT will involve T'at'en Nation in identifying and developing any follow-up strategies to evaluate the accuracy of original effects predictions.	PRGT welcomes the T'at'en Nation to provide input on the follow-up strategies to evaluate accuracy of effects predictions. This input can be provided during pre-Application, Application Review, permitting, construction or operation phases of the project.				
897	Section 4.1.1	No name provided	T'at'en Nation	Introduction. Rationale must include how the compressor stations will impact air quality for Middle River residents, health of vegetation used for medicinal purposes and wildlife health.	Direct and indirect impacts to vegetation through clearing and other activities will be included in the assessment for Vegetation and Wetlands; however, air emissions from compressor stations are not seen as a viable pathway for vegetation impact. Compressor stations are included as part of the project footprint, and as such, will be included for assessment by the air quality VC. Air emissions from the proposed compressor stations will be evaluated using an air dispersion model, and the results will be compared with provincial and federal ambient air quality objectives (and standards) to determine potential effects. See Standard Response 30, and Standard Response 40.				
898	Section 4.1.2	No name provided	T'at'en Nation	Existing Conditions for air quality. Dispersion modelling discussions for current and proposed future compressor stations must include T'at'en Nation.	PRGT welcomes further input and discussion with T'at'en Nation in this regard. The air dispersion modelling will follow the recommendations in the BC MOE 2008 Guidelines for Air Quality Dispersion Modelling in British Columbia. This document provides the best available methods and is widely accepted for the purposes of regulatory applications.				
899	Section 4.1.3	No name provided	T'at'en Nation	Potential effects. What are the legal obligation requirements of the Canadian government for using the US Environmental Protection Agency best objectives? Without first considering the comparison between states, for safe emission levels and environmental repercussions, this component should be discussed further among PRGT BCEADWG.	For assessing potential Project effects for air quality the Application will use the provincial (BC) and federal (Canada) ambient air quality objectives (and standards) that are in effect at the time the Application is filed. The BC and Canadian ambient air quality objectives (and standards) have been developed to be protective of the environment and human health and are widely used for regulatory applications. The US EPA air quality standards do not apply to BC or Canada and therefore will not be considered in the Application.				
900	Section 4.2.1	No name provided	T'at'en Nation	Acoustic Environment. Potential on the acoustic environment should include proximity to Middle River community; and any potential adverse effects to the sockeye salmon migration and spawning success.	All human dwellings (occupied six weeks or more per year in accordance to the BC Noise Control Best Practices Guideline) within 1.5 km buffer of the proposed Project's footprint will be included in the assessment. Quantification of potential impacts to sockeye salmon migration and spawning success from the pipeline crossing of the Middle River (proposed method - horizontal directional drilling (HDD)) will be addressed within the assessment on permanent alteration or destruction of fish habitat and harm to fish species (physical injury or mortality).				
901	Section 4.2.1	No name provided	T'at'en Nation	Sites must include all current occupied sites such as Kroyoh cabins, and fisheries, hunting and gathering camps.	The discussion of Aboriginal Interests (including occupied and historic fisheries areas) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application, and informed by the analysis of relevant VCs and available TK and TIK information.				Updated response to Round 1 comment: PRGT has provided T'at'en Nation with the opportunity to identify these sites, however, none have been identified to date and therefore will not be included in the Application.
902	Section 4.3	No name provided	T'at'en Nation	Introduction. Linkages to the socio-economic benefits of freshwater aquatic resources must be considered for the wild foods still harvested and depended on for supplementary food security of T'at'en, and all other users of this resource to help support families, communities and industry.	Where relevant, the results of the Freshwater Aquatic Resources baseline and assessment will be referenced in the Land and Resource Use VC section of the Application. The discussion of Aboriginal Interests (including linkage between the socio-economic benefits of freshwater aquatic resources) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application. The discussion will be informed by the analysis of relevant VCs and available TK and TIK information.				
903	Section 4.3	No name provided	T'at'en Nation	LAA. Should include Middle River area extending into Trembleur Lake, and 500m along shore on either side of the exit of Middle River into Trembleur Lake.	PRGT acknowledges the importance to T'at'en of sockeye salmon spawning grounds within the Middle River and extending into Trembleur Lake. The LAA has been established to consider potential effects of construction and operation. Based on professional experience on similar projects no project specific environmental effects are likely to occur beyond this area. Accidents and malfunctions (i.e. frac-out) will be considered in Section 9.0. The area considered within Accidents and Malfunctions will include the full extent of the potential effects for that event.				
904	Section 4.3.2	No name provided	T'at'en Nation	Existing Conditions for freshwater aquatic resources. Should include the federal fiduciary responsibility to the Food, Social and Ceremonial (FSC) rights and title of First Nations, related to all known species in specific areas, that provide long term food security to a Nation.	Section 11 will identify specific Aboriginal Interests identified by Aboriginal groups or through secondary sources. Where there is overlap between an Aboriginal Interest and a VC (such as fisheries), the information from other sections of the Application will be cross-referenced and summarized in context of the specific Aboriginal Interest.				
905	Section 4.3.3	No name provided	T'at'en Nation	Potential effects. T'at'en Nation intends to seek whatever alliance, partnership or coalition necessary to protect the sockeye salmon spawning grounds.	PRGT acknowledges the importance of Middle River sockeye salmon spawning grounds to T'at'en. PRGT and T'at'en have had - and continue to have - numerous discussions regarding T'at'en's interests in this area, and proposed measures to mitigate potential adverse effects on these interests. These interests, potential effects and mitigation measures will be described in Section 11 of the Application. The sections related to relevant VCs included elsewhere in the Application will, where appropriate, be cross-referenced in this section. In addition, PRGT has been working with T'at'en on both the crossing location and crossing methods to reduce or eliminate the potential adverse effects, to the extent practicable.				
906	Section 4.5.1	No name provided	T'at'en Nation	Introduction. Linkages to the socio-economic benefits of wildlife must be considered for the wild foods still harvested and depended on for supplementary food security of T'at'en, and all other users of this resource to help support families, communities and industry.	See Standard Response 63 and Standard Response 21. Potential Project effects on wildlife and vegetation and their habitats, including species potentially used as wild foods by Aboriginal communities, will be evaluated in the applicable VC sections (e.g., freshwater, marine, wildlife and vegetation sections) including mitigation to reduce adverse effects.				
907	Section 4.5.1	No name provided	T'at'en Nation	Table 4-9: Indicator species for assessment of wildlife and wildlife habitat should include the species identified by T'at'en Nation.	See Standard Response 16.				
908	Section 4.5.2	No name provided	T'at'en Nation	Summary of available existing wildlife inventory and habitat use should include known calving areas for ungulates.	The assessment on the Wildlife and Wildlife Habitat VC will include a comprehensive review of available and relevant literature for each effect pathway and key indicator. The review will include identification of known calving areas where information is available, including any Wildlife Habitat Areas that are designated for calving.				
909	Section 4.5.2	No name provided	T'at'en Nation	Wildlife species used for supplemental food security should include the Food, Social and Ceremonial rights and title of First Nations.	See Standard Response 40. Section 11 of the Application will identify specific Aboriginal Interests and concerns identified by Aboriginal groups or through secondary sources. Where there is overlap between an Aboriginal Interest and a VC (such as wildlife), the information from other sections of the Application will be cross-referenced and summarized in context of the specific Aboriginal Interest. PRGT would welcome more information from T'at'en regarding wildlife species used for supplemental food security. PRGT would welcome more information from T'at'en regarding wildlife species used for supplemental food security.				
910	Section 4.5.2	No name provided	T'at'en Nation	Mitigation. Should consider all the wildlife species within T'at'en Nation that already are under management and/or recovery guidelines and plans.	Where available and applicable, PRGT will consider all recommended mitigation measures identified in management or recovery guidelines and plans.				
911	Section 4.6.1	No name provided	T'at'en Nation	Table 4-11: Indicator for assessment of vegetation and wetland resources. Should also include linkages to socio-economic benefits of medicinal plant use and berries.	The indicators shown in Table 4-11 are intentionally meant to be broad. Selected traditional use plants will be included in the Vegetation and Wetlands VC section. The assessment will be placed in the context of socio-economic benefits of medicinal use and berry-producing plants. As per Section 3.3 of the sAR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC (as appropriate).				
912	Section 4.6.1	No name provided	T'at'en Nation	A summary of rare plants identified through surveys. Should also include the Whitebark Pine.	Whitebark pine was included as a focal species for rare plant surveys; the results will be summarized in the Vegetation and Wetlands VC and appendices.				
913	Section 4.7.3	No name provided	T'at'en Nation	Table 4-14 Potential projects effects on soil should consider the cumulative effects of MPB uplift and associated erosion risks.	As per Section 3.3 of the sAR, natural and/or human-caused trends that may alter the environmental or socio-economic setting will be described within the existing conditions sections of each VC (as appropriate). The effects of the Mountain Pine Beetle infestation would be included. In addition, as per Table 3-4, forestry activities will be considered in combination with residual Project effects in the Cumulative Effects Assessment, and soil erosion will be assessed as part of Soil Quality.				
914	Section 5.1	No name provided	T'at'en Nation	What is PRGT's plan to ensure training for employment and economic development opportunities for T'at'en Nation. Discussion on such opportunities should begin so that T'at'en Nation can maximize full training benefits.	PRGT recognizes the importance to local Aboriginal groups, communities and stakeholders of employment and training opportunities associated with the proposed Project. PRGT is committed to discussing such opportunities with interested parties, including T'at'en. Potential issues and mitigation related to employment are addressed in the Employment VC (sAR Section 5.2). This includes barriers that may impede the local workforce, both Aboriginal and non-Aboriginal, from accessing employment and/or contractor opportunities (example: education attainment) will be identified along with proposed mitigation measures including aboriginal-specific mitigation measures where appropriate.				
915	Section 5.1	No name provided	T'at'en Nation	The economic value of wild foods-ungulates, bear, fish, plants and berries should be considered in this VC.	See Standard response 4.				
916	Section 6.2.1	No name provided	T'at'en Nation	LAA. route is proposed to be within close proximity to Middle River reserve/community, and therefore increased access in the area has the potential for negatively impact roads and community safety.	Transportation: increased access will be addressed within section 6.3, the Transportation and Access VC. Issues that may extend beyond the transportation and access VC will be identified in Section 11 of this report.				
917	Section 6.2.2	No name provided	T'at'en Nation	Should include kayo cabins used for hunting, fishing, trapping and other subsistence activities	See Standard Response 2.				
918	Section 6.3.1	No name provided	T'at'en Nation	Transportation and access. Should consider current Land Use Plan being developed by T'at'en Nation and how increased road density will put increased pressure on wildlife and wildlife habitat.	The discussion of Aboriginal Interests (including occupied and historic fisheries areas) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application, and informed by the analysis of relevant VCs and available TK and TIK information. No changes to the sAR required.				Updated response to Round 1 working group comment
919	Section 6.3.2	No name provided	T'at'en Nation	Consideration must be considered for the current traffic due to logging and forestry activities in the area. Roads are already at capacity, and increased traffic will put safety at risk.	See Standard Response 21. As per BCEAO requirements, Aboriginal communities will be presented alongside non-Aboriginal communities that fall with the LAA and RAA. Key indicators will be presented and evaluated. Where Aboriginal land use planning documents are available and describe use beyond traditional land use, these will be discussed in the Land and Resource Use VC. Information that may extend beyond the Land Use key indicators will be identified in Section 11 of the Application. Community-specific socio-economic baseline data, including available land use plans is being collected, and will inform the assessment. This data and any data received through Aboriginal community-based data collection will be included, where available, in Section 11 of the Application.				In response to this comment, PRGT has requested the T'at'en Land Use Plan and been advised by T'at'en that it is in draft and cannot be shared with PRGT at this time but is being used by T'at'en to inform consultation with PRGT in respect of the Project.
920	Section 6.3.3	No name provided	T'at'en Nation	Table 6-4 Potential project effects on transportation and access must include impacts to wildlife corridors and prime habitat areas.	Current traffic (including traffic due to logging and forestry activities) will be considered within the effect "increased demands on major roads and highway infrastructure" with measurable parameter "traffic volumes on highways and major roads".				
921	Section 6.5.3	No name provided	T'at'en Nation	Table 6-6: Potential project effects on land and resource use should consider current LUP objectives from T'at'en Nation.	Links will be made within the Transportation and Access VC with the Wildlife and Wildlife Habitat VC to address these potential project effects. Change in Mortality Risk is identified as a potential adverse effect. Collision potential with motor vehicles is expected to be negligible, particularly in light of mitigation (e.g., Traffic Management Plan, adherence to speed limits) and reporting requirements. Collision risk, and potential change in wildlife movement and on habitat will be discussed in the Application.				
922	Section 7.2.1	No name provided	T'at'en Nation	The AIA should not only be done in high predictive model areas but should also be based on known traditional knowledge areas identified by Kroyoh Holders.	As per BCEAO requirements, Aboriginal communities will be presented alongside non-Aboriginal communities that fall with the LAA and RAA. Key indicators will be presented and evaluated. Where Aboriginal land use planning documents are available and describe use beyond traditional land use, these will be discussed in the Land and Resource Use VC. Information that may extend beyond the Land Use key indicators will be identified in Section 11 of the Application. Community-specific socio-economic baseline data, including available land use plans is being collected, and will inform the assessment. This data and any data received through Aboriginal community-based data collection will be included, where available, in Section 11 of the application.				
923	Section 7.2.2	No name provided	T'at'en Nation	AIA should be conducted before any field work for investigative purposes is carried out.	Consistent with the AIA permit (HCA 2013-0258), target areas for survey will be established to capture all areas with model-predicted archaeological potential and will also include (at least 15%) areas modeled to have low potential for archaeological sites. If where traditional knowledge information indicates locations with potential for archaeological sites (not already identified by the model), these locations will also be targeted for inspection during the AIA.				
924	Section 7.2.3	No name provided	T'at'en Nation	Table 7-2: Potential project effects on heritage and arch resources should also include the discussion and planning with T'at'en Nation for the repatriation of artifacts found.	Archaeological assessment will be conducted prior to any ground/tree disturbing activities (including geotechnical investigations) in areas assessed as having potential for sites (assessment of potential at geotechnical investigation area is conducted through the OGC AAF process).				

950	Table 3-2: Potential for Substantive/Meaningful Project VCs Interactions	Leslie Beckmann	Metlakatla Stewardship Office	Additional potential for substantive interactions exist between: • Marine resources and Emissions, discharges and waste. • Wildlife and presence of physical facilities. • Soil and vegetation management. • Transportation and Access and presence of physical facilities • Watercourse crossings and Heritage/Archaeological Resources • Presence of physical facilities and the Metlakatla proposed VC "Marine and Marine Resource Use" • Maintenance programs and the Metlakatla proposed VC "Marine and Marine Resource Use" Please add these or provide a rationale for their exclusion.	•For Marine Resources and Emissions etc., related mechanisms (e.g. waste water from hydrostatic testing and underwater noise from vessels) are being considered within the activities described as 'site preparation...', 'ford crossing' and 'offshore pipe placement'. •Soil and vegetation management are recognized for their interactions, and will be addressed within the Vegetation and Wetlands sections of the Application. The interaction between soil and vegetation management will be covered by assessing soil quality and soil quantity, monitoring soil handling and evaluating reclamation success. • Interactions between the in situ pipeline and transportation and access are not anticipated. • Potential interactions between the proposed Project and Heritage/Archaeological Resources will be considered wherever ground (including land under water) and/or tree disturbing activities are proposed (including at Watercourse crossings). The discussion of Aboriginal Interests (including potential interactions between watercourse crossings and heritage/archaeological resources) will be described in Section 11 of the Application. The discussion will be informed by the analysis of relevant VCs and available TK and TER information. The sections related to interactions between watercourse crossings and heritage/archaeological resources included elsewhere in the Application will, where appropriate, be cross-referenced in this section.	With respect to in situ pipeline interactions, can the proponent clarify whether or not there will be harvesting and/or access exclusion areas in the immediate vicinity of the pipeline. If yes, how large will these exclusion areas be?	From a design perspective, there will be exclusions from areas that are under active construction for safety reasons, but once installed, there will be no exclusions in general on fishing/harvesting, including the marine environment. The pipeline will be marked on nautical charts for clarity. PRGT also anticipates there will be some areas where access and activities will be restricted during operations (e.g., in the vicinity of compressor stations and sections of the pipeline at the landowner's request). At this point, it is unknown how large these exclusion areas will be.	
951	Table 3-4: Preliminary Project Inclusion List	Leslie Beckmann	Metlakatla Stewardship Office	Please provide a map of these projects as a means to better understand the spatial quality of potential cumulative effects.	Only the Preliminary Project Inclusion List will be included in the dAAR. A map of the projects considered in the cumulative effects assessment will be included in the Application.			
952	Table 3-4: Preliminary Project Inclusion List	Anna Urborne	Metlakatla Stewardship Office	The description of the Westcoast Connector pipeline project must include that there is potential for two pipelines to be built under the EA for that project.	Stantec suggested response: The project inclusion list in the dAAR is preliminary. The description of all projects on the Project Inclusion List, including the Westcoast Connector Pipeline considered in the Application will be based on how each project has been publicly defined.			
953	3.6 - Characterization of Residual Project Effects	Jane Hauser	Metlakatla Stewardship Office	Using the "current condition of the VC" as the context for measuring the magnitude of residual project effects is inappropriate for several VCs. For example, for Marine Resources, the baseline case for fish and fish habitat should be pre-1987 to reflect a sustainable baseline case as opposed to current conditions.	In this context, "baseline" refers to the conditions present prior to the lifetime of the proposed Project, specifically before construction. Consequently, the most relevant information to characterize this baseline are current conditions, which will be fully quantified. The assessment of potential effects, the Application will consider the most likely outcomes, using a precautionary approach (i.e., overestimating the potential effects), including numerous potential outcomes with associated probabilities would create a false impression of accuracy and would likely confuse the effects predictions. The discussion of potential effects will explain the rationale of the determination such that the associated uncertainties and risks are clear. As reflected in the dAAR (Section 3.8), when there is a high degree of uncertainty, a possibility for significant effects, or follow up is not sufficient to manage risks, the EAO will be consulted for additional direction. With regard to the determination of significance for traditional use, it is acknowledged that for this Project, such a determination cannot be made by PRGT or its consultants; therefore, this determination will not be made, as stated in Section 11.2.3.	Metlakatla requests that the subject of appropriate baseline for marine resources is discussed further with the EAO or the working group level.	PRGT is open to this suggestion and directs the question regarding scheduling a working group meeting to EAO.	
954	3.8 Confidence and Risk	Anna Urborne	Metlakatla Stewardship Office	To help working group members and their respective constituents to understand uncertainty and risk, describing the range of possible outcomes and associated probabilities is much more effective than just stating prediction confidence. Further, for those predictions reliant on "professional judgment", the appropriate professionals (or suite of professionals) must be relied on. For example, significance of impacts on traditional uses can only be determined by traditional use practitioners.	PRGT does not have the authority or means to implement mitigation measures that would require policy changes at the government level, or broad-scale cooperation among industries. However, PRGT is committed to implementing mitigation measures on a project-specific level that will avoid or reduce the proposed Project's contributions to direct and cumulative residual adverse effects. This comment will also be forwarded to EAO for their consideration.			
955	3.9.2 - Cumulative Effects Assessment, Mitigation of Cumulative Effects	Jane Hauser	Metlakatla Stewardship Office	Listing, but not discussing in detail, the "mitigation measure that would require government action or a broader industry approach" offloads the responsibility of the proponent to develop mitigation strategies to combat the effects of the proposed project. Such mitigation measures should be identified in full, but not considered mitigation unless they will be implemented by government or industry more broadly.				
956	Table 4-4: Potential Project Effects on Acoustic Environment	Jane Hauser	Metlakatla Stewardship Office	Noise impacts on human health and wildlife health should be included as a Potential Adverse Project Effect.	See Standard Response 31.			
957	Table 4-4: Potential Project Effects on Acoustic Environment	Anna Urborne	Metlakatla Stewardship Office	Acoustic effects in the marine environment must also be assessed for impacts on marine life, and appropriate measurable parameters developed.	Underwater noise will be assessed within the scope of existing marine potential effects on harm to fish and marine mammals and change in behaviour. Please see Standard Response 12.			
958	4.4.3 - Introduction, 1st bullet	Jane Hauser	Metlakatla Stewardship Office	Please clarify whether or not the Project Footprint includes marine areas disturbed by the coming and going of construction vessels, as it should.	The Application will describe the marine areas that would be directly affected by construction activities. Vessel activity will be considered within the LAA.			
959	Table 4-6: Potential effects on Freshwater Aquatic Resources	Leslie Beckmann	Metlakatla Stewardship Office	The measurable parameter for change in habitat should include both the total area affected and the spatial location/distribution of effects. Please include or provide a rationale for exclusion.	The environmental effects related to freshwater aquatic resources have been updated in the November 12, 2013 dAAR to reflect recent DFO policy changes. The measurable parameter includes the total area of habitat change. The spatial location and distribution of effects will be described at a level appropriate for the Application, with supporting information (e.g., figures, survey result summaries). Additional location-specific detail will be provided during the permitting and detailed design phase.			Updated response to Round 1 working group comment The Application will provide geographical context for measured parameters for each VC. Geographical context will be provided either as text, or a combination of text and figures. Total area potentially affected will be reported wherever it is defined as a measurable parameter.
960	Table 4-6: Potential effect on Freshwater Aquatic Resources	Leslie Beckmann	Metlakatla Stewardship Office	This parameter is incorrectly described. It should read "Estimated change in number of dead and moribund fish as compared to the number of dead and moribund fish associated with commercial, recreational, or aboriginal fisheries."	PRGT is required to address the June 2012 amendments to the Fisheries Act within the freshwater aquatics assessment for the proposed Project. This includes expanding existing HADD assessments to also include the potential for serious harm to commercial, recreational, and Aboriginal fisheries.			It is PRGT's understanding that responses provided in tracking tables, including commitments, become part of the official record for the EA process. Therefore, PRGT considers the above commitment a requirement of the Application.
961	4.4 - Marine Resources	Leslie Beckmann	Metlakatla Stewardship Office	Please provide a rationale for the LSA for this VC: it is expected that submarine noise from construction will affect an area larger than 500 m from the pipeline centreline.	The expected mechanisms contributing to underwater noise are construction-related vessel traffic, and other marine-based construction activities, such as trenching. These activities will be short-lived and restricted to specific locations. For these types of mechanisms, which produce relatively low-magnitude and short-lived noises, 500 m ensures that the LAA is focused on the zone in which potential effects of underwater noise are most likely to occur on marine species. Should any construction activities become necessary that produce greater noise levels, a broader LAA will be considered.			Updated response to Round 1 working group comment The marine study team is confident that a 500 m buffer is sufficient to capture most environmental interactions associated with underwater noise.
962	Table 4-7 Indicators for Assessment of Marine Resources	Anna Urborne	Metlakatla Stewardship Office	Indicators for Marine Resources should include habitat-forming marine vegetation or substrate for fish species associated with commercial, recreational or Aboriginal fisheries—either associated with the first indicator "fish species"—or as a separate indicator.	These different habitats will be considered within the scope of existing indicators, namely Habitat-forming marine vegetation of cultural significance or at-risk, and through fish species associated with commercial, recreational or Aboriginal fisheries. For further context, please see Standard Response 13 and 14.			
963	4.5.2 Existing Conditions for Wildlife and Wildlife Habitat	Anna Urborne	Metlakatla Stewardship Office	Required wildlife study methods and priorities may be different for the length of the pipeline. Appropriate attention and methods must be applied in each different section and associated ecosystem. For example, for some coastal areas, little literature or study has been carried out to quantify wildlife use of different habitats. Increased field inventories, therefore, will need to be performed to have adequate data upon which to base the assessment.	Methods used to collect data for project-specific field studies follow provincial standards where available. Where new information would improve an existing standard, these methods, with justification, are included where relevant and applicable. Field studies do take into account regional differences along the length of the corridor, and include species-specific surveys (e.g., marine birds, tailed gull, yellow rail, American bittern) and stratification by habitat type. The literature review will include local and regional information sources.			
964	Table 4-10: Potential Project Effects on Terrestrial Indicators of Wildlife and Wildlife Habitat	Leslie Beckmann	Metlakatla Stewardship Office	The measurable parameter for change in habitat should include both the total area affected and the spatial location/distribution of effects. Please include or provide a rationale for exclusion.	The total area of habitat affected by the proposed Project will be provided for each indicator species within the Wildlife and Wildlife Habitat VC. Area summaries will be provided for each Land and Resource Management Plan (LRMP) area, and for caribou and grizzly bear, by herd range or population unit respectively.	Metlakatla remains concerned that data aggregation could obscure locally significant losses resulting in habitat corridor bottlenecks or increased sensitivity to further disturbance. A spatial representation of habitat loss is important to reveal these potential effects.	An objective of the environmental assessment is to assess Project contributions to change in habitat with consideration of existing (baseline) conditions. The magnitude of change in habitat as a result of the Project will be assessed, and will include consideration of habitat fragmentation and connectivity where appropriate.	Updated response to Round 2 working group comment The Application will provide geographical context for measured parameters for each VC. Geographical context will be provided either as text, or a combination of text and figures. Total area potentially affected will be reported wherever it is defined as a measurable parameter. It is PRGT's understanding that responses provided in tracking tables, including commitments, become part of the official record for the EA process. Therefore, PRGT considers the above commitment a requirement of the Application.
965	Table 4-12: Potential Project Effects on Vegetation and Wetland Resources	Leslie Beckmann	Metlakatla Stewardship Office	The measurable parameter for change in abundance for both species and ecological communities should include both the frequency/abundance and the spatial location/distribution of effects. Please include or provide a rationale for exclusion.	PRGT will complete a comprehensive assessment, given the nature of the measurable parameter and constraints of available data and field methods. Effects to populations of focal plant species within the proposed Project area will be described to the greatest precision available. Effects to ecological communities will be assessed based on their spatial locations and distributions.			Updated response to Round 1 working group comment The Application will provide geographical context for measured parameters for each VC. Geographical context will be provided either as text, or a combination of text and figures. It is PRGT's understanding that responses provided in tracking tables, including commitments, become part of the official record for the EA process. Therefore, PRGT considers the above commitment a requirement of the Application.
966	5.1 - Economic Background	Leslie Beckmann	Metlakatla Stewardship Office	Existing economic data are not sufficiently fine-grained to disaggregate between regional economic conditions and those faced by Metlakatla. Data must be collected to assess impacts at a local level.	See Standard Response 3.			
967	Land and Resource Use	Anna Urborne	Metlakatla Stewardship Office	As per earlier comment, the economy has many more factors that will be impacted by the project than just employment/ labour force. For example, what will be the impact on commercial fisheries and associated economies? Tourism economies? Local businesses in nearby communities? etc.	See Standard Response 3.			Updated response to Round 1 working group comment Potential effects on commercial fisheries is assessed through the Marine Resources VC (potential effects on fish), in the Transportation VC (potential effects on marine navigability), and in the Land and Resource Use VC (area and location of harvesting and catch levels). Potential effects on Tourism are considered in the Land and Resource Use VC. Potential effects of local businesses are addressed in the Employment VC, and also in the Project Benefits section.
968	6.2 - Infrastructure and Services	Leslie Beckmann	Metlakatla Stewardship Office	This section does not adequately address marine infrastructure and services. Gaps include: • Increased demand for marina services (including fueling and pump-out service) • Increased marine traffic and demand for marine safety infrastructure (e.g. channel and hazard markers; lighting) • Increased demand for marine emergency response services Please identify how these subjects will be addressed and assessed.	Adverse effects on marinas are not expected as a result of the Project and therefore have not been included as a measurable parameter. Increased demand for marine emergency response services, has been added to Table 6.2 of the dAAR. Watercourse navigability, which includes marine traffic and navigability, is included under section 6.3 Transportation and Access.	Increased population associated with the construction labour force may lead to greater pressure for recreational fishing. This may increase demand, and therefore price, for marina services and moorage. Increased marine service costs will have a direct economic effect on all fisheries. Moorage and access to marine services (e.g. fuel) is already very restricted in Prince Rupert and Port Edward. Proposed projects will definitely impact these services further and need to be considered.	Based on the way that the labour force will be managed during the construction phase of this project, we are not anticipating an effect on moorage. Potential for increased demand for recreation fishing will be addressed in section 6.2.3 of this report.	
969	Table 6-3: Indicators for Assessment of Transportation and Access	No name provided	Metlakatla Stewardship Office	The indicator should be "access", not "increased access". During construction and during operations in marine environments, decreased access may also have impacts.	Decreased access in marine environments will be addressed under the effect "Decreased navigability of marine waterways, rivers and lakes" rather than under access.			
970	Table 6.4: Potential Effects on Transportation and Access	Leslie Beckmann	Metlakatla Stewardship Office	Please include effects from increased recreational hunting/fishing associated with increased access in this section or indicate where this issue will be addressed in the Application.	Effects on access will be addressed in the Transportation and Access VC. This information will also be used in the Land and Resource Use VC to discuss changes in access related to the proposed Project in the context of land and resource use activities including recreational hunting/fishing.	This comment was intended to deal with the effects to biophysical resources associated with increased access (e.g.: is there increased pressure on deep population from increased recreational hunting). Please identify where effects on the biophysical environment associated with increased access will be assessed.	Potential Project effects on increased access will be included in the Wildlife and Wildlife Habitat VC. It will be assessed under the effect pathway: Change in Mortality Risk. Cumulative effects of recreational activities, including hunting, will be considered in the Land and Resource Use VC.	
971	Section 6.5 - Land and Resource Use	Leslie Beckmann	Metlakatla Stewardship Office	This section should be expanded or an additional section entitled "Marine and Marine Resource Use" needs to be added to the Application to address the following potential adverse effects: • Changes in access to marine protected areas (disaggregated from terrestrial parks/protected areas) • Changes in recreational and subsistence fishing activity (marine and intertidal species) • Changes in beach-based non-living resource harvesting • Change or incompatibility with Marine Use Plans	The discussion of Aboriginal Interests (including rights and title) as well as other concerns raised by Aboriginal groups will be included in Section 11 of the Application and informed by the analysis of relevant VCs and available TK and TLU information. As a result, PRGT does not propose to identify separate VCs with respect to specific Aboriginal interests or concerns.	Please note that all of the potential adverse effects identified by Metlakatla for addition to the dAAR apply equally to Aboriginal and non-Aboriginal peoples. If the potential effects proposed for study are not included in the dAAR, please provide a rationale for their exclusion.	The potential adverse effects raised will be discussed in the assessment, however, it should be noted that Project effects related to Aboriginal concerns and interests will be specifically discussed in Section 11. Addressing changes in access to marine protected areas and beach-based non-living resource harvesting are both beyond the scope of the Land and Resource Use VC.	
972	Section 11.0 - Aboriginal Consultation	Leslie Beckmann	Metlakatla Stewardship Office	Please see Letter dated September 17, 2013 and earlier comments made by Metlakatla.	PRGT has considered and provided responses to Metlakatla's September 17, 2013 comments. PRGT is unclear as to the "earlier comments" to which Metlakatla refers, and welcomes clarification from Metlakatla in this regard.			
973	11.2.1 - Consultation Activities	Jane Hauser	Metlakatla Stewardship Office	This section should read "Engagement Activities" as Metlakatla does not recognize all of the listed activities as fulfillment of the proponent's Consultation duties.	PRGT is of the view that all of the consultation activities that will be described in Section 11.2.1 of the Application will contribute to ensuring fulfillment of the procedural aspects of consultation with Aboriginal groups to be undertaken by PRGT as set out in the approved Section 11 Order.			
974	11.2.3 - Characterization of Residual Effects to Aboriginal Interests after Mitigation	Jane Hauser	Metlakatla Stewardship Office	While the proponent cannot determine the significance of adverse effects to Aboriginal Interests, this is not a good reason for excluding such a determination from the application. Instead, through communication and engagement with First Nations and support for First Nation's own assessments and inclusion of those assessments in the EA application, appropriate VCs can be identified for Metlakatla interests, and significance can be determined and should be included in this section. This step is particularly important, as cumulative impact assessment to First Nation impacts must be assessed. Please indicated how cumulative impacts are to be assessed given the current proposed approach to assessing impacts to First Nation interests.	If Metlakatla provides significance determinations on the VCs and on the Aboriginal Interests discussed in Section 11 of the Application, those determinations can be part of the EA Process. The cumulative effects from the effects assessment will be discussed in Section 11 of the Application as it relates to Aboriginal interests and concerns raised by Aboriginal groups.			

975	Section 2.2	Paula Doucette	Transport Canada			TC recommends that the proponent list which federal departments are involved in the project and are part of the provincial working group. TC also recommends that the proponent list any federal regulatory approvals that may be required. TC recommends that applicable federal legislation be listed (Transport Canada has interests with respect to the following pieces of legislation applicable to this project: Navigable Waters Protection Act, Transportation of Dangerous Goods Act/Regulations). TC recommends that any applicable regulatory and technical information, necessary for TC to make our regulatory decision be submitted during the conduct of the EA. This will ensure a timely completion of our regulatory review. TC also recommends that the AIR include information on the federal scope of the project referencing CEAA section 67. That way working group participants and the public are aware of the differences in federal/provincial scope.	A list of federal departments involved in the Project (including the provincial working group) will be provided in the Application. A list of federal regulatory approvals including the associated legislation that may be required will be provided in the Application (as per Section 1.4 - Applicable Authorizations of the dAIR) The dAIR (Section 2.2 - Federal Participation) will be updated to include reference to Section 67 of CEAA 2012			
976	Section 6.3.2	Paula Doucette	Transport Canada			For any pipeline watercourse crossings, access road crossings and any proposed transmission line crossings deemed navigable by Transport Canada's Navigable Waters Protection Program, TC may have a duty to issue regulatory approvals for "works" impacting navigable waterways under the NWPA. TC will require that the proponent assess the impacts of watercourse crossings against the Minor Works and Waters Order criteria (temporary works, bridges, pipelines). The Minor Works and Waters Order is a self assessment tool to determine if any of the waterways impacted by the project are navigable. For this navigability analysis, TC would need to see all of the waterways impacted by the pipeline project in a spread sheet showing the appropriate minor works and waters criteria listed and if the waterways fit (and do not) the criteria. For those waterways that do not fit the criteria, TC will require that the proponent submit applications pursuant to the NWPA which must include drawings of the works, methodology of construction (including contingency plans), describe baseline navigation use, including First Nations use, describe the level of impact and suggest appropriate mitigation for the impacts. TC will also need more information on crossing timings and methodology for further comment and discussion. TC reminds TransCanada that the common law right of navigation still exists on the non-scheduled waterways and must take appropriate measures to minimize impacts on that right.	The dAIR (Section 2.2 - Federal Participation) will be updated to include reference to Section 67 of CEAA 2012			
977	Section 6.3.2	Paula Doucette	Transport Canada			The following types of information should be considered to be included in this Section: • Identification of volumes, types and capacity of marine traffic in the area and impacts on such (in Potential Impacts Section). • Bathymetric surveys of the marine areas, navigational channels and any sediment disposal sites. • Any port infrastructure required for pipeline construction, assembly, storage or laydown areas. • Anchorage areas to be used. • Capital and maintenance dredging work, specifying the nature and volume of sediment, dredging methods (type of dredge, duration, frequency, etc.), surface area of the areas to be dredged, sediment management (land and aquatic) provisions, and sediment disposal area (if necessary), and navigation activities in Canadian waters (number and frequency of trips). • Ballast water management. • Describe how and for how long information was collected and from what sources in relation to current and traditional navigation uses. • Describe any recreational uses of natural waters (i.e., swimming, canoeing, fishing). • Describe existing commercial navigational usages including movement patterns of fishing vessels. • Provide information on current, historic and potential usage of all waterways and water bodies that will be directly affected by the project, including current Aboriginal uses, where available. • Proponent to provide information including type, size and frequency on all types of navigation using areas in vicinity of marine routes. • Identify and describe mitigation for vessel traffic likely impacted by the construction and operation of the physical works associated with this project.	The items related to Project information will certainly be considered in the VC where available. Additionally, detailed bathymetric surveys (multibeam and side-scan sonar, and sub-bottom profile surveys) of marine routes have been completed and will inform the assessment of the Marine Resources VC. The potential effects resulting from infrastructure, dredging, ballast water (inter alia) will be fully considered in all marine components of the Application, including the Marine Resources VC, Water Quality VC, and Acoustics VC, and will inform proposed mitigation measures. Transportation-related items will also be considered for inclusion within the Transportation and Access VC. Recreational and commercial uses of the marine environment, particularly fishing, will be considered in the Land and Resource Use VC.			
978	Section 6.3.3	Paula Doucette	Transport Canada			It states that this section will look at project effects on transportation and access however it should also include environmental effects resulting from transportation related components (i.e. transportation of dangerous goods, emissions from vessels during construction or servicing the pipeline during operations and maintenance, etc.). TC will also require the proponent to list which dangerous goods will be handled/transported, how they will be transported (by water or land); by land, what routes will be taken, will be the proponent who transports or another company and where the dangerous goods will be transported from.	Relevant information on vessel emissions will be discussed under air quality, marine resources and acoustic environment sections of the Application. Information on the anticipated transportation of dangerous goods (including those related to TGSAs) related to the Project will also be included in the Application as well as potential effects of hazardous material spills (in the Accidents and Malfunctions section).			
979	Preface	Jack R. Smith	Prince Rupert Port Authority			Preface: "Prince Rupert Port Authority" should be included in the list of Federal Agencies.	Agreed. The dAIR (Preface Section under Federal Agencies bullet) will be updated to include "Prince Rupert Port Authority". The Application will also include the Prince Rupert Port Authority as one of the agencies involved under Federal Participation (currently Section 2.2 of the dAIR). The updated dAIR will reflect this change.			
980	Section 2.2	Jack R. Smith	Prince Rupert Port Authority			Section 2.2 (Federal Participation): Reference to the applicability of Section 67 of CEAA 2012 can be added to this section for the portion of the Project completed on lands administered by the Prince Rupert Port Authority.	The dAIR Section 2.2 (Federal Participation) will be updated to include a bullet referencing the applicability of Section 67 of CEAA 2012 with respect to any work undertaken on federal lands. The updated dAIR will reflect this change.			
981	Section 6.3	Jack R. Smith	Prince Rupert Port Authority			Section 6.3 (Transportation and Access): "Navigability" is listed as a broad indicator for the assessment of transportation and access. Note the Prince Rupert Port Authority has interests in all forms of Port related uses, including those activities that are ancillary to marine navigation (i.e. anchorages, vessel traffic, maintenance of waterways, etc.). Although the existing AIR wording may be suitable as written, the proponent is encouraged to continue to engage with PRPA to ensure that all Port related activities are considered in project planning.	PRGT thanks PRPA for their comment and will be sure to continue to involve PRPA in all Port related activities as they concern Project planning.			
982	4.6.1	T. Van Spengen	Ministry of Forests Lands and Natural Resource Operations: Omineca			Additional Clarification Requested (new issue): I need some clarification on the consistency of information being present in the dAIR regarding LAA. Based on Figure 4-7: Vegetation and Wetland Resources Spatial Boundaries, the LAA is 200m. In Section 4.6.1 of the dAIR, it states the LAA is 120m plus the project footprint ROW, of which, the size of ROW/footprint is not indicated. Without knowing the ROW footprint, I am not certain if the proponent is committing to a 200m LAA (as per Figure 4-7) or something different. Please clarify.	The 200 m LAA shown in Figure 4-7 of an early version of the dAIR was an error and has been corrected. The correct width of the LAA for Vegetation and Wetland Resources is 120 m on either side of the Project Footprint.	Thank you for the clarification on the issues. I am satisfied with the response provided by the proponent. Issue resolved with some final clarification. After some discussion with the Regional Ecologist, Bruce Rogers, it will be important that rationale and clarification is provided on the selection of the 120m Local Assessment Area as it relates to vegetation surveys, monitoring and mitigating the impacts of plant and ecosystem communities, specifically when 200m is typically applied as the reasonably conservative (precautionary approach) estimate of edge effect.	The 120 m Local Assessment Area width (120 m buffer on the Project Footprint, not centreline) was chosen to take into account variation across the landscape, especially including stand age and structure (only 16% of the LAA is old forest; 56% is young forest or earlier structural stages) and orientation. The Project is a linear development, for every south-facing edge there will be a corresponding north-facing edge. As a result of these factors, a 120 m wide LAA is seen as a conservative width for assessing edge effects on average across the project area.	
983	4.5.3	Kevin Hoekstra	Ministry of Forests Lands and Natural Resource Operations			The dAIR indicates that potential effects for each terrestrial indicator will be quantified using the measurable parameter in Table 4-10. Several of the measurable parameters appear to be measures of changes to available habitat or in quality of habitat. I would like the proponent to further clarify how changes in mortality risk and movement would be quantified, when changes to mortality risk and movement seem more of a qualitative assessment based on changes in habitat.	To clarify, change in mortality risk will be assessed quantitatively for caribou and grizzly bear and qualitatively for all other kits through discussion and literature review. The assessment on caribou will be based on change in linear density and the assessment on grizzly bear will be based on change in linear density and change in core security. Change in movement will be qualitatively assessed for most key indicators, where relevant and applicable. However, if movement is potentially affected through a change in habitat connectivity (i.e., patch isolation), then that component of movement will be included in the assessment of habitat change.	comments adequately addressed		
984	4.8.3	Vanessa Foord	Ministry of Forests Lands and Natural Resource Operations			The proponent has stated it is "not possible to assess significance related to a measured environmental effect on climate change on a project specific basis". However, it is possible to assess significance of the project in relation to the Province of BC's commitments to reducing GHG emissions by 33% of 2007 levels by 2020 as well as the Province of BC's commitments to Zero Net Deforestation by 2015. (see the following legislations it is my understanding the proponent is subject to with regards to GHG measuring and reporting, and deforestation. http://www.leg.bc.ca/38th3rd/3rd_read/govt4-3.htm http://www.leg.bc.ca/38th3rd/3rd_read/govt19-1.htm http://www.leg.bc.ca/38th2nd/2nd_read/govt9-1.htm	The project will determine its contribution to the provincial GHG inventory and will also quantify the level of deforestation related to the construction and operation of the project. This information will allow the Province to assess contributions of the Project in relation to provincial targets.	comments adequately addressed. Please check spelling to Foord (MFLNRD's error)	dAIR to Foord has been made.	
985		No name provided	Halfway River First Nation			Following our review of the draft revised Application Information Requirements document (dAIR) for the proposed Prince Rupert Gas Transmission Project (Project) and participation in Project technical meetings in Terrace on Nov. 20, 2013 and Prince George on Nov. 27, 2013, Halfway River First Nation (HRFN) believes that further revision of the dAIR is required. HRFN believes that necessary changes to the October 2013 draft of the dAIR, as recommended by HRFN, were not incorporated into the November 2013 draft. Further, information provided by Prince Rupert Gas Transmission Ltd. (PRGT) during the meetings referenced above indicates that changes in addition to those previously recommended by HRFN are also required.	This Round 2 Comment (ID 985) is the introductory paragraph from a letter dated November 29, 2013 provided by HRFN addressed to the EAO. Specific suggested edits to the dAIR in this letter provided by HRFN are identified further in comments 986-1018 below.			
986		No name provided	Halfway River First Nation			There continues to be a lack of information regarding methods and standards proposed. Methods and standards proposed should be identified for comment during the dAIR review phase; review of methods and standards at the time of Application submission would be ineffective.	A detailed overview of the assessment methods PRGT proposes to use to conduct the environmental assessment is described in section 3 of the dAIR. Where relevant and available, the specific standards and guidelines developed by regulatory agencies that will be used to assess potential effects resulting from the proposed Project are described in each VC section. PRGT welcomes input from HRFN on these standards during the dAIR review period, and prior to the Application submission.			
987		No name provided	Halfway River First Nation			Many of the parameters proposed to measure potential Project effects are not "measurable".	PRGT requires clarification on which measurable parameters Halfway River First Nation is referring to in order to adequately respond to this comment. Due to the nature of some VCs and effects, measurable parameters are not always expressed quantitatively. For example, a qualitative measure will be provided for "harm to fish species" (likelihood).			
988		No name provided	Halfway River First Nation			There continues to be an over-reliance on best available information instead of new baseline information that is specific to the area.	The PRGT effects assessment will rely on existing information and new baseline information that has been collected during recent field studies in areas where potential effects may occur as a result of the proposed Project.			
989		No name provided	Halfway River First Nation			Certain management plans critical to the proper environmental assessment (EA) of the project have not been included within the dAIR. Also, the dAIR does not stipulate that management plans are to be submitted as part of the Application for an EA Certificate (Application).	A summary of the management plans that must be listed in the Application for all phases of the proposed Project are described in section 14 of the dAIR. PRGT welcomes HRFN's suggestions for additions or revisions to the list.			
990	Section 3.10	No name provided	Halfway River First Nation			Section 3.10 - Assessment of Cumulative Effects Table 3-4 should include future natural gas extraction and fracking projects.	Table 3-4, under "Other Potential Activities" lists existing and known future wellbore and facilities.			
991	Section 4.3.1	No name provided	Halfway River First Nation			Section 4.3.1 - Freshwater Aquatic Resources - Introduction HRFN feels that the proposed Local Area Assessment (LAA) boundaries (100 metres upstream and 300 metres downstream of crossing locations) for "Freshwater Aquatic Resources" is inadequate to assess negative impacts to fish and fish habitat should the construction of the pipeline or design or installation of a stream crossing structure result in a blockage to upstream fish movement. For example, undersized culverts can result in velocity barriers within culverts during high flow periods. Additionally, an undersized or improperly installed culvert can result in culvert scouring and the creation of a "bentler" culvert, which prevents fish from entering the culvert.	The boundaries of the LAA are intended to assess the area of each watercourse that may be directly affected by potential disturbance and increased sediment levels during construction. In some larger watercourses, the downstream LAA boundary extends more than 1,000 metres downstream. At pipeline watercourse crossings, there will be no installation of in-stream structures to prevent upstream passage of fish. Road crossings on watercourses providing habitat or migration routes for important fish species will be constructed using cleanpan bridges or other structures that will prevent the formation of barriers to fish passage. Culverts used in fish-bearing waters will be installed according to provincial guidelines to ensure upstream passage of fish is not inhibited. In the unlikely event that a culvert becomes a barrier to fish passage, the culvert will be removed and re-installed in a manner that permits year-round passage of fish.			
992	Section 4.3.1	No name provided	Halfway River First Nation			Although HRFN recognizes that PRGT intends to follow Provincial standards for stream crossing design and construction, unforeseen natural events, such as sudden accumulations of debris within a culvert, can result in the failure of a crossing structure to function as designed/installed, resulting in a blockage to fish movement. Certain fish species (e.g., salmon, trout, suckers) migrate large distances during spawning periods and the blockage of migrating fish, even a temporary blockage, could significantly affect fish production for a particular year class. Impacts could be significant if spawning success had been poor in successive previous years, perhaps due to low streamflow, or the fish blocked were part of a rare population.	At pipeline watercourse crossings, there will be no installation of in-stream structures to prevent upstream passage of fish. Road crossings on watercourses providing habitat or migration routes for important fish species will be constructed using cleanpan bridges or other structures that will prevent the formation of barriers to fish passage. Culverts installed in fish-bearing waters will be installed according to provincial guidelines to ensure upstream passage of fish is not inhibited. In the unlikely event that a culvert becomes a barrier to fish passage, the culvert will be removed and re-installed in a manner that permits year-round passage of fish.			

993	Section 4.3.1	No name provided	Halfway River First Nation		An upstream LAA boundary of 100 metres is clearly inadequate to assess impacts resulting from a blockage to fish movement. HRFN requests that, for streams containing migratory fish species that are listed as VC indicators, this boundary be changed to the boundary of the watershed.	The boundaries of the LAA are intended to assess the area of each watercourse that may be directly affected by potential disturbance and increased sediment levels during construction. In some larger watercourses, the downstream LAA boundary extends more than 1,000 metres downstream. At pipeline watercourse crossings, there will be no installation of in-stream structures to prevent upstream passage of fish. Road crossings on watercourses providing habitat or migration routes for important fish species will be constructed using clean-span bridges or other structures that will prevent the formation of barriers to fish passage. Culverts installed in fish-bearing waters will be installed according to provincial guidelines to ensure upstream passage of fish is not inhibited. In the unlikely event that a culvert becomes a barrier to fish passage, the culvert will be removed and re-installed in a manner that permits year-round passage of fish.		
994	Section 4.3.1, Table 4-5	No name provided	Halfway River First Nation		Also, since white sturgeon are present within the Nechako and Stuart River drainages, and the Nechako River population is listed as endangered under the Federal Species at Risk Act, HRFN requests that white sturgeon be included in Table 4-5.	White sturgeon will be added to Table 4-5 of the dAIR. Update to dAIR required.		Updated response to Round 2 working group comment White sturgeon and green sturgeon are included in Table 4-5 of the December 2013 version of the dAIR and will be included in Section 11 and elsewhere in the Application where applicable.
995	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: replacing the phrase, "permanent alteration", with "permanent harmful alteration", in recognition of the fact that some alterations to fish habitat are not harmful, e.g., in water bodies having organic substrates where aquatic production is limited by a lack mineral/aggregate substrate, the replacement of some organic substrate by mineral substrate would not be considered a harmful alteration of fish habitat.	PRGT agrees that some alterations to fish habitat may be beneficial as opposed to harmful, and the latter would be a welcome effect. However, under the Fisheries Act, the wording is such that we are required to assess the potential for all "permanent alteration or destruction fish habitat". If the assessment determines the alteration will have a positive effect on fish production, it is likely the alteration will be acceptable and will not be considered adverse within the assessment.		
996	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: replacing "in-stream" with "in-channel". The term "in-stream" is often interpreted to mean the wetted area of a stream channel. During certain periods of the year, e.g., late summer or fall, significant portions of a channel may not be wetted. Since all areas within a stream channel, whether they be wetted or dry, constitute fish habitat, it is important to use the term "in-channel" to make it clear that negative impacts to all areas of a channel, whether they be wetted or temporarily dry, should be quantified.	While "in-channel" seems to be a better description of the area of a watercourse - which may be dry or wet - "in-stream" is the common term used in provincial and federal regulations, guidelines, and best management practices (e.g. "Standard and Best Practices for In-stream Works", MWLAP, 2004) to describe the area below the high-water-mark in a watercourse, including seasonally dry portions. In order to be consistent with these documents, we have chosen to continue using the term "in-stream".		
997	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: replacing the phrase, "harm to fish species," with "harm to fish". "Harm to fish species" suggests that the project could significantly negatively affect a particular species of fish, which is unlikely. It is much more likely that individuals of a variety of fish species would be negatively affected.	The dAIR will be changed to read "harm to fish". Update to dAIR required.		
998	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: elimination of the phrase, "physical injury". "Physical injury" would include injury that is minor and not readily perceptible visually, therefore, it would be unlikely that monitoring staff could document the extent of "physical injury" with any accuracy. Rather, an accounting of moribund or dead fish would be more practically achievable.	The intent of including "physical injury" in the definition of harm to fish species is to ensure that we assess potential sublethal effects that may compromise fish health but not necessarily result in mortality (e.g., increased suspended sediments causing clogged or scarred gills).		PRGT acknowledges that the field monitoring of sub-lethal effects on fish will not be visually perceptible during Project construction at watercourse crossings. However, sub-lethal effects on fish from Project construction can be measured indirectly through measurement of turbidity and total suspended solids (TSS). The current BC guidelines state that, during clear flow periods, induced turbidity should not increase more than 8 NTU over background levels for a 24 hour period, or more than 2 NTU over background levels for a 30 day period. Suspended sediments should not increase more than 25 mg/L over background levels for a 24 hour period, or more than 5 mg/L over background levels for a 30 day period. These guidelines were based in part on the severity of ill effects (SEVI) model developed by Newcombe (Newcombe and Jensen 1996). The SEV model is a dose-response model that ranks qualitative descriptions of responses to suspended sediment load on a semi-quantitative scale. Responses are further grouped into 4 broad categories: (i) no effect, (ii) behavioural responses, (iii) sublethal effects, and (iv) lethal and/or sublethal effects. Because fish are more vulnerable at different life history stages, PRGT proposes applying different models during construction monitoring depending on species presence and life history stages present in the watercourse at the time of construction.
999	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: replacing the phrase, "likelihood of harming indicator fish," with "species and number of dead or moribund fish". A measurable parameter for documenting harm to fish would be to identify and count the dead or moribund fish. In contrast, "past project experience and professional judgement", as currently stated in Table 4-6, is not a measurable parameter for estimating harm to fish.	This measurable parameter will be added to read: "Estimated number of dead and moribund fish that are associated with commercial, recreational or Aboriginal fisheries." Update to dAIR required.		Fish species and total number of dead and moribund fish will be monitored and reported as part of the Project's construction monitoring program. In addition, monitoring of turbidity and total suspended sediments (TSS) will be measured throughout Project construction to identify potential ill effects on fish from Project-related increases in turbidity/TSS. Details of the methodologies that will be used for assessing changes to fish mortality and turbidity during Project construction will be addressed in detail within the project-specific environmental management plan (EMP).
1000	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		With respect to Table 4-6, HRFN recommends the following: adding "partial or complete blockage to fish movement" as a potential adverse project effect. It has been well-documented that a partial or complete blockage of fish movement may result from the installation of stream crossing structures on access roads and is clearly a potential adverse project effect that should be addressed within the Application.	In assessing potential "Permanent alterations or destruction of fish habitat", the assessment refers to pathways-of-effects which describe activities, mechanisms, and resulting effects for all project interactions with freshwater aquatic resources. These pathways include activities which may result in partial or full obstructions to fish habitat.		Even though a bridge or culvert may be designed and installed to provide fish passage, it is not unusual for unforeseen events, such as the construction of a beaver dam within a culvert, or sudden accumulations of debris, to cause either a partial or complete blockage to fish movement during the operations phase of a project. One of HRFN's fisheries consultants, with over 30 years of experience, has documented this on several occasions. Certain fish species (e.g., salmon, trout, suckers) migrate large distances during spawning periods and the blockage of migrating fish, even a temporary blockage, could significantly affect fish production for a particular year class. HRFN notes that "obstruction to migration" is listed as a potential negative effect on the "Fish and Fish Habitat" VC for the proposed Pacific Northern Gas Laying Project, and that "migration barriers" is stated as a "Measurable Parameter" associated with the VC. What would be unique regarding the PRGT Project that would preclude the potential for blockages to fish movement to occur at road crossings during the operations phase? Since culvert blockages that can impair fish passage are not unusual throughout the life of a culvert, and such blockages represent a legitimate potential impact, HRFN requests that "partial or complete blockage to fish movement" be added to Table 4-6 as a potential adverse project effect.
1001	Section 4.3.3, Table 4-4	No name provided	Halfway River First Nation		Referring to comments 995 to 1000. The changes recommended above better reflect potential negative effects to fish and fish habitat and eliminate the subjectivity associated with the potential effects as presented.	Comments 995-1000 have been addressed. The responses are intended to provide adequate answers and/or clarification.		PRGT does not anticipate a requirement for any permanent bridges at this time. PRGT acknowledges that temporary obstruction to fish migration will occur during Project construction, and obstruction to fish movement is identified as a potential Project-specific effect within the Freshwater Aquatics Section of the Environmental Assessment Application.
1002	Section 4.3.3	No name provided	Halfway River First Nation		The dAIR should state that, for each new pipeline or road crossing of fish habitat, the Application will identify a preferred crossing structure/methodology (e.g., directional drill) that would preclude or minimize impacts to fish or fish habitat, and an alternative installation (e.g., dry open cut) that would be installed in the event that the preferred installation could not be completed.	The Application will provide a detailed description of methods used to assess the sensitivity of stream habitat at crossing sites, and the process for selecting the most appropriate crossing method for each crossing. The criteria for selecting stream crossing methods include: fish species present, habitat sensitivity, effectiveness of mitigations at each location, feasibility of construction, and geotechnical considerations. Contingency crossing methods will also be provided for each stream crossing site.		HRFN is requesting that the dAIR specify that the Application identify: 1. when new road or pipeline crossings of fish habitat will occur, and 2. for each new crossing, the preferred crossing structure/methodology (e.g., directional drill) that would preclude or minimize impacts to fish or fish habitat, and an alternative installation (e.g., dry open cut) that would be installed in the event that the preferred installation could not be completed.
1003	Section 4.3.3	No name provided	Halfway River First Nation		The dAIR should also indicate that the Application will include criteria for determining the type of crossing structure installed at each water body crossing (e.g., fisheries values, channel width, geomorphology, streamflow), and crossing structure options (e.g., bridge, culvert, ford).	The Application will also specify the particular type of vehicle crossing method at each location and the rationale for the preferred option.		As noted above by the EAO, construction of crossings outside of timing windows is outside of the scope of the dAIR. Any variances to construction timing will be identified in required applications for Fisheries Act authorizations under section 35 of the Act, and requires that consultation with First Nations and communities occurs before the authorization is granted.
1004	Section 4.3.3	No name provided	Halfway River First Nation		HRFN further requests that they be notified of any request for a variance to construction timing windows and provided with a rationale for the variance request.	Crossings that are proposed outside of construction timing windows will be given when a request for a variance to a construction timing window is made after the completion of the Application, closer to the construction period, e.g., when operational constraints mandate that construction occur outside the established construction window.		
1005	Section 4.5.2	No name provided	Halfway River First Nation		The dAIR indicates that baseline information for ungulates, carnivores, and meso-carnivores will be derived from available literature, including various government databases, habitat suitability modeling based on Terrestrial Ecosystem Mapping; images from remote cameras; and incidental observations of wildlife or wildlife signs. HRFN notes that wildlife studies for the proposed Westcoast Connector Gas Transmission Project (Westcoast Project) will include aerial reconnaissance overflights/habitat feature surveys and winter track surveys, which are not proposed for the Project. This additional information would enable a better understanding of the availability and distribution of wildlife habitat, wildlife presence, relative abundance and distribution within the Local Study Area (LSA), species-specific habitat use within the LSA, and site specific habitats and features important to wildlife. HRFN therefore requests that the EA indicate that aerial and winter track surveys will be undertaken before and after construction.	While Winter Track Surveys would provide some additional information, the data would be limited to a single season (i.e. winter) and only a few of the species (predominantly moose, marten and fisher) that are identified as indicators in the assessment. The remote camera program (which covers multiple seasons), habitat models (which focus on different seasons among indicators), a comprehensive review of available literature on seasonal habitat use and distribution, consideration of species and seasonal land use planning objectives, and a review of designated areas (such as Ungulate Winter Ranges) are expected to result in a robust defensible assessment of potential project effects on wildlife.		Updated response to Round 2 working group comment PRGT feels that a single aerial ungulate survey or winter track survey is unlikely to provide much value to the assessment of potential Project effects on ungulates. TEM data collected by PRGT and existing provincial data is sufficient for developing habitat suitability models, and estimating potential project contributions to mortality risk. Ungulate habitat has also been identified in various land use plans and will be considered in the assessment of potential Project effects.
1006	Section 4.5.2	No name provided	Halfway River First Nation		During the Working Group meeting on November 27th, there were questions about the Wildlife Indicator Species listed in Table 4-9. Specifically, Working Group members felt that wolf and cougar could be affected by the Project. A PRGT representative explained how the indicator species chosen would be suitable surrogates for other species. However, it is unclear how the requirements of wolf, cougar, elk, deer and black bear would equate to those of the indicator species currently listed, and HRFN requires clarification as to how these species are already represented or a rationale as to why they would not be affected by the Project.	Important criteria for selecting indicator species were: 1) federal and provincial conservation status, 2) importance to Aboriginal groups and stakeholders, and 3) the likelihood that a Project effect would be adverse at the regional population level. Wolf, cougar, elk, deer and black bear are not provincially red- or blue-listed or on SARA Schedule 1, but several (or all) are likely important to Aboriginal groups or stakeholders. A potential change in habitat, movement or mortality risk as a result of the Project is not expected to adversely affect the regional population of any of these species. However, owing to the complex relationship between caribou and wolves, a discussion about these two species will be included in the assessment of potential effects on caribou.		
1007	Section 4.5.2	No name provided	Halfway River First Nation		In addition, in order to determine the effects of the Project on wildlife, it is important to obtain wildlife presence and habitat feature information immediately prior to construction/disturbance, i.e., within a week to a month prior to construction/disturbance, and immediately following construction. For example, if construction will occur within a forested area during the month of January, then winter habitat feature surveys undertaken before January would include bear den surveys. Similarly, construction undertaken during the spring/early summer would require that bird nesting surveys be conducted during the same year, prior to construction. However, there is no indication in the dAIR that such necessary, time-sensitive surveys will occur. HRFN therefore requests that the EA describe how wildlife/wildlife habitat surveys will be conducted in such a manner that the effects of construction on wildlife may be determined.	One of the requirements in the dAIR is to describe mitigation measures designed to avoid or reduce predicted effects (see Section 3.5). Details regarding specific mitigation measures such as den surveys or bird nesting will be described in the Application.		Mitigation measures will only be effective if the location of wildlife features to which they are being applied are known. HRFN requests that the EA include walking the pipeline route just prior to construction in such a manner that wildlife features such as dens and nests will be identified.
1008	Section 4.5.3, Table 4-10	No name provided	Halfway River First Nation		Section 4.5.2 of the dAIR indicates that the Application will describe and characterize wildlife habitat conditions along the pipeline corridor, including important habitat features such as dens. Halfway River First Nation - PRGT Project Revised dAIR Review and Comments However, there is no indication in Section 4.5.3 or in Table 4-10 that that impacts to terrestrial wildlife habitat features such as dens will be assessed. This apparent inconsistency should be reconciled. HRFN feels that there is little value in collecting information on important habitat features such as dens, mineral licks, wildlife trees, etc. if an assessment of likely impacts to such features will not be made. HRFN requests that the dAIR indicate that the Application will include an assessment of potential impacts to important wildlife habitat features.	The purpose of the dAIR is to identify the information that will be required in the Application. One of those requirements is to describe the mitigation measures designed to avoid or reduce predicted effects (see Section 3.0). PRGT recognizes that certain wildlife habitat features such as dens, stick nests, mineral licks, and hibernacula are important. As such, best management practices and environmental protection will be proposed in the Application to avoid or reduce adverse effects on these features. A Wildlife Mitigation Management Table (MMT) will identify potential constraints on routing and construction. The MMT includes important habitat features and mitigation measures such as setbacks and timing restrictions. Important habitat features will be geo-referenced on alignment sheets, with new information being added as when new habitat features are identified. In consideration of these mitigation measures, effects will be assessed for the above-named habitat features.		The construction surveys will be described in the Application.

Section 4.3.1, Table 4-1027/5	No name provided	Yekooche First Nation			Also, since white sturgeon are present within the Nechahe and Stuart River drainages, and the Nechahe River population is listed as endangered under the Federal Species at Risk Act, YFN requests that white sturgeon be included in Table 4-5. Update to dAAR required.	White sturgeon will be added to Table 4-5 of the dAAR. Update to dAAR required.	Updated response to Round 2 working group comment ' White sturgeon and Green sturgeon are included in Table 4-5 of the December 2013 version of the dAAR and will be included in Section 11 of the Application and other sections where applicable.
Section 4.3.3, Table 4-1028/6	No name provided	Yekooche First Nation			Replacing the phrase, "permanent alteration", with "permanent harmful alteration", in recognition of the fact that some alterations to fish habitat are not harmful, e.g., in water bodies having organic substrates where aquatic production is limited by a lack of mineral/aggregative substrate, the replacement of some organic substrate by mineral substrate would not be considered a harmful alteration of fish habitat.	I agree that some alterations to fish habitat may be beneficial as opposed to harmful, and the latter would be a welcome effect. However, under the Fisheries Act, the wording is such that we are required to assess the potential for all "permanent alteration or destruction fish habitat". If the assessment determines the alteration will have a positive effect on fish production, it is likely the alteration will be acceptable and will not be considered adverse within the assessment.	
Section 4.3.3, Table 4-1029/6	No name provided	Yekooche First Nation			Replacing "instream" with "in-channel". The term "instream" is often interpreted to mean the wetted area of a stream channel. During certain periods of the year, e.g., late summer or fall, significant portions of a channel may not be wetted. Since all areas within a stream channel, whether they be wetted or dry, constitute fish habitat, it is important to use the term "in-channel" to make it clear that negative impacts to all areas of a channel, whether they be wetted or temporarily dry, should be quantified.	While "in-channel" seems to be a better description of the area of a watercourse – which may be dry or wet – "instream" is the common term used in provincial and federal regulations, guidelines, and best management practices (e.g. "Standard and Best Practices for Instream Works; MWAP, 2004) to describe the area below the high-water-mark in a watercourse, including seasonally dry portions. In order to be consistent with these documents, we have chosen to continue using the term "instream".	
Section 4.3.3, Table 4-1030/6	No name provided	Yekooche First Nation			Replacing the phrase, "harm to fish species", with "harm to fish". "Harm to fish species" suggests that the project could significantly negatively affect a particular species of fish, which is unlikely. It is much more likely that individuals of a variety of fish species would be negatively affected.	The dAAR will be changed to read "harm to fish". Update to dAAR required.	
Section 4.3.3, Table 4-1031/6	No name provided	Yekooche First Nation			Elimination of the phrase, "physical injury". "Physical injury" would include injury that is minor and not readily perceptible visually, therefore, it would be unlikely that monitoring staff could document the extent of "physical injury" with any accuracy. Rather, an accounting of moribund or dead fish would be more practically achievable.	The intent of including "physical injury" in the definition of harm to fish species is to ensure that we assess potential sublethal effects that may compromise fish health but not necessarily result in mortality (e.g., increased suspended sediments causing clogged or scarred gills). We want to ensure we discuss these types of potential effects in the assessment.	YFN understands that the Proponent is proposing to assess potential sublethal effects. However, since "Physical Injury" has not been defined by the Proponent, "Physical Injury" would include injury that is minor and not readily perceptible visually. YFN understands how field monitoring staff could monitor the species and number of dead or moribund fish with reasonable accuracy. However, YFN fails to see how field staff could assess sublethal effects, many of which would be chronic in nature and not readily visually perceptible, with any accuracy. YFN therefore requests that the dAAR indicate that the Application will include the detailed methodology/protocol by which field monitoring staff will accurately document sublethal effects.
Section 4.3.3, Table 4-1032/6	No name provided	Yekooche First Nation			Replacing the phrase, "likelihood of harming indicator fish, professional judgement" with "species and number of dead or moribund fish". A measurable parameter for documenting harm to fish would be to identify and count the dead or moribund fish. In contrast, "past project experience and professional judgement", as currently stated in Table 4-4, is not a measurable parameter for estimating harm to fish, and.	This measurable parameter will be added to read: "Estimated number of dead and moribund fish that are associated with commercial, recreational or Aboriginal fisheries." Update to dAAR required.	PRGT acknowledges that the field monitoring of sub-lethal effects on fish will not be visually perceptible during Project construction at watercourse crossings. However, sub-lethal effects on fish from Project construction can be measured indirectly through measurement of turbidity and total suspended solids (TSS). The current BC guidelines state that, during clear flow periods, induced turbidity should not increase more than 8 NTU over background levels for a 24 hour period, or more than 2 NTU over background levels for a 30 day period. Suspended sediments should not increase more than 25 mg/L over background levels for a 24 hour period, or more than 5 mg/L over background levels for a 30 day period. These guidelines were based in part on the severity of effects (SEV) model developed by Newcombe (Newcombe and Jensen 1996). The SEV model is a dose-response model that ranks qualitative descriptions of responses to suspended sediment load on a semi-quantitative scale. Responses are further grouped into 4 broad categories: (i) no effect, (ii) behavioural responses, (iii) sublethal effects and (iv) lethal and/or paralytic effects. Because fish are more vulnerable at different life history stages, PRGT proposes applying different budgets during construction monitoring depending on species presence and life history stages present in the watercourse at the time of construction.
Section 4.3.3, Table 4-1033/6	No name provided	Yekooche First Nation			Adding "partial or complete blockage to fish movement" as a potential adverse project effect. It has been well-documented that a partial or complete blockage of fish movement may result from the installation of stream crossing structures on access roads and is clearly a potential adverse project effect that should be addressed within the Application.	In assessing potential "Permanent alterations or destruction of fish habitat", the assessment refers to pathways-of-effects which describe activities, mechanisms, and resulting effects for all project interactions with freshwater aquatic resources. These pathways include activities, which may result in partial or full obstructions to fish habitat.	The clause, "Estimated number of dead and moribund fish", is open to interpretation. Firstly, there is no indication in this clause as to whether or not dead or moribund fish will be identified as to species. The clause simply references "fish". It would be unacceptable for an incidence report, EA monitoring program, or provincial or federal permit, to not require that the accounting of dead or moribund fish include the identification of these fish. YFN expects that these fish be identified. Secondly, it is unclear if the "estimate" would involve a total count, or other enumeration method. As written, the clause could mean anything from an "eyeball" estimate from a person who has no fisheries background that is standing on the edge of a turbid stream, to an estimate provided by a trained fisheries crew that is conducting a fish salvage operation in accordance with government standards. Obviously, results obtained from the above methods would differ significantly. In YFN's view, the measurable parameter must be re-worded to provide clarity. If a total count of dead and moribund fish will not be made, then the protocol to be followed to provide an estimate must be presented in detail in the EA. It is extremely important that the species of fish and number of each species that are affected by the Project be documented. YFN therefore recommends that the measurable parameter be: "Species and number of dead and moribund fish". The EA should clearly describe how the "number" of fish will be determined.
Section 4.3.3, Table 4-1034/6	No name provided	Yekooche First Nation			With reference to comments 1028 to 1033. The changes recommended above better reflect potential negative effects to fish and fish habitat and eliminate the subjectivity associated with the potential effects as presented.	Comments 1028 to 1033 have been addressed. The responses are intended to provide adequate answers and/or clarification.	Even though a bridge or culvert may be designed and installed to provide fish passage, it is not unusual for unforeseen events, such as the construction of a beaver dam within a culvert, or sudden accumulations of debris, to cause either a partial or complete blockage to fish movement during the operations phase of a project. One of YFN's fisheries consultants, with over 30 years of experience, has documented this on several occasions. Certain fish species (e.g., salmon, trout, suckers) migrate large distances during spawning periods and the blockage of migrating fish, even a temporary blockage, could significantly affect fish production for a particular year class. YFN notes that "obstruction to migration" is listed as a potential negative effect on the "Fish and Fish Habitat" VC for the proposed Pacific Northern Gas Looping Project, and that "migration barriers" is stated as a "Measurable Parameter" associated with the VC. What would be unique regarding the PRGT Project that would preclude the potential for blockages to fish movement to occur at road crossings during the operations phase? Since culvert blockages that can impair fish passage are not unusual throughout the life of a culvert, and such blockages represent a legitimate potential impact, YFN expects that "partial or complete blockage to fish movement" be added to Table 4-4 as a potential adverse project effect.
Section 4.3.3, Table 4-1035/6	No name provided	Yekooche First Nation			The dAAR should state that, for each new pipeline or road crossing of fish habitat, the Application will identify a preferred crossing structure/methodology (e.g., directional drill) that would preclude or minimize impacts to fish or fish habitat, and an alternative installation (e.g., dry open cut) that would be installed in the event that the preferred installation could not be completed.	YFN is requesting that the dAAR specify that the Application identify: 1. where new road or pipeline crossings of fish habitat will occur, and 2. for each new crossing, the preferred crossing structure/methodology (e.g., directional drill) that would preclude or minimize impacts to fish or fish habitat, and an alternative installation (e.g., dry open cut) that would be installed in the event that the preferred installation could not be completed.	Updated response to Round 2 working group comment ' PRGT does not anticipate a requirement for any permanent bridges at this time. PRGT acknowledges that temporary obstruction to fish migration will occur during Project construction, and obstruction to fish movement is identified as a potential Project-specific effect within the Freshwater Aquatics Section of the Environmental Assessment Application.
Section 4.3.3, Table 4-1036/6	No name provided	Yekooche First Nation			The dAAR should also indicate that the Application will include criteria for determining the type of crossing structure installed at each water body crossing (e.g., fishery values, channel width, geomorphology, streamflow), and crossing structure options (e.g., bridge, culvert, ford).	The Application will also specify the particular type of vehicle crossing method at each location and the rationale for the preferred option.	As noted above by the EAO, construction of crossings outside of timing windows is outside of the scope of the dAAR. Any variances to construction timing will be identified in required Applications for Fisheries Act authorizations under section 35 of the Act, and requires that consultation with First Nations and communities occurs before the authorization is granted.
Section 4.3.3, Table 4-1037/6	No name provided	Yekooche First Nation			YFN further requests that they be notified of any request for a variance to construction timing windows and provided with a rationale for the variance request.	Crossings that are proposed outside of construction timing windows due to fish species assemblages or construction scheduling will be clearly identified within the Application.	The assessment incorporates results from field assessments, which follows Provincial standards for assessing and quantifying suitable habitat for a range of species, including ungulates, carnivores and meso-carnivores. These methods have been used extensively throughout BC as a means for completing components of environmental assessments.
Section 4.5.2, Table 4-1038/6	No name provided	Yekooche First Nation			The dAAR indicates that baseline information for ungulates, carnivores, and meso-carnivores will be derived from available literature, including various government databases; habitat suitability modeling based on Terrestrial Ecosystem Mapping; images from remote cameras; and incidental observations of wildlife or wildlife sign.	Agreed. The remote camera program (which covers multiple seasons), habitat models (which focus on different seasons among indicators), a comprehensive review of available literature on seasonal habitat use and distribution, consideration of species and seasonal land use planning objectives, and a review of designated areas (such as Ungulate Winter Ranges) are expected to result in a robust defensible assessment of potential project effects on wildlife.	Historical data, albeit in literature form, are also largely based on field surveys completed by other wildlife biologists and field technicians. PRGT uses a combination of historical field studies, results from its own field programs, TEE information, and input received from consultation with regulators to provide a comprehensive assessment of potential effects on indicators, and the VC as a whole.
Section 4.5.2, Table 4-1039/6	No name provided	Yekooche First Nation			YFN notes that wildlife studies for the proposed Westcoast Connector Gas Transmission Project (Westcoast Project) will include aerial reconnaissance overflights/habitat feature surveys and winter track surveys, which are not proposed for the Project. This additional information would enable a better understanding of the availability and distribution of wildlife-habitat, wildlife presence, relative abundance and distribution within the Local Study Area (LSA), species-specific habitat use within the LSA, and site specific habitats and features important to wildlife. YFN therefore requests that the EA indicate that aerial and winter track surveys will be undertaken before and after construction for the Project, as requested in YFN's First review of the dAAR.	While Winter Track Surveys would provide some additional information, the data would be limited to a single season (i.e. winter) and only a few of the species (predominantly moose, marten and fisher) that are identified as indicators in the assessment. The remote camera program (which covers multiple seasons), habitat models (which focus on different seasons among indicators), a comprehensive review of available literature on seasonal habitat use and distribution, consideration of species and seasonal land use planning objectives, and a review of designated areas (such as Ungulate Winter Ranges) are expected to result in a robust defensible assessment of potential project effects on wildlife.	Updated response to Round 2 working group comment ' PRGT feels that a single aerial ungulate survey or winter track survey is unlikely to provide much value to the assessment of potential Project effects on ungulates. TEE data collected by PRGT and existing provincial data is sufficient for developing habitat suitability models, and estimating potential project contributions to mortality risk. Ungulate habitat has also been identified in various land use plans and will be considered in the assessment of potential Project effects.
Section 4.5.2, Table 4-1040/6	No name provided	Yekooche First Nation			During the Working Group meeting on November 27th, there were questions about the Wildlife Indicator Species listed in Table 4-9. All species of wildlife are important to YFN culture and as caretakers of the environment. Therefore, YFN requests consideration of all wildlife species in the dAAR in the form of a complete list of species and how each will be assessed for Project effects, or rationale as to why a species would not require assessment.	PRGT acknowledges that each species within the assessment boundaries has important ecological and cultural values. However, it is not possible to assess all species that occur within the study corridor. To address this, the list of indicators has been chosen to represent a range of habitat types at various spatial (habitat-specific, regionally specific) and temporal (seasonal, annual) scales, including the representativeness of other species that use similar habitats at similar times. The conservation and management status of indicator species, as well as sensitivity to potential residual or cumulative effects has also been considered. The rationale for the indicators chosen will be provided in the Application. For example, grizzly bear has been chosen as an indicator because it is culturally important and represents top order carnivores. Rusty Blackbird has been chosen as an indicator because it is listed as a species of Special Concern on Schedule 1 of the Species at Risk Act (SARA). A complete list of species expected to occur within the terrestrial and marine RAA will be included in the Technical Data Report.	YFN asked for a rationale for species that were not chosen, not for the ones that were chosen to be indicators. Community representatives have asked for a list of all wildlife species within YFN consultation boundaries and a rationale of how they are covered by the chosen indicator species. This is a simple exercise which has presumably already been done during VC and KI selection.
Section 4.5.2, Table 4-1041/6	No name provided	Yekooche First Nation			In addition, in order to determine the effects of the Project on wildlife, it is important to obtain wildlife presence and habitat feature information immediately prior to construction/disturbance, i.e., within a week to a month prior to construction/disturbance, and immediately following construction. For example, if construction will occur within a forested area during the month of January, then winter habitat feature surveys undertaken before January would include bear den surveys. Similarly, construction undertaken during the spring/early summer would require that bird nesting surveys be conducted during the same year, prior to construction. However, there is no indication in the dAAR that such necessary, time sensitive surveys will occur. YFN therefore requests that the EA describe how wildlife/wildlife habitat surveys will be conducted in such a manner that the effects of construction on wildlife may be determined.	One of the requirements in the dAAR is to describe mitigation measures designed to avoid or reduce predicted effects (see Section 3.5). Details regarding specific mitigation measures such as den surveys or bird nesting will be described in the Application.	Mitigation measures will only be effective if the location of wildlife features to which they are being applied are known. YFN requests that the EA include walking the pipeline route just prior to construction in such a manner that wildlife features such as dens and nests will be identified.
Section 4.5.3, Table 4-1042/10	No name provided	Yekooche First Nation			Section 4.5.2 of the dAAR indicates that the Application will describe and characterize wildlife habitat conditions along the pipeline corridor, including important habitat features such as dens. However, there is no indication in Section 4.5.3 or in Table 4-10 that impacts to terrestrial wildlife habitat features such as dens will be assessed. This apparent inconsistency should be reconciled. YFN feels that there is little value in collecting information on important habitat features such as dens, mineral licks, wildlife trees, etc., if an assessment of likely impacts to such features will not be made. YFN requests that the dAAR indicate that the Application will include an assessment of potential impacts to important wildlife habitat features.	The purpose of the dAAR is to identify the information that will be required in the Application. One of those requirements is to describe mitigation measures designed to avoid or reduce predicted effects (see Section 3.0). PRGT recognizes that certain wildlife habitat features such as dens, sick nests, mineral licks, and hibernacula are important. As such, best management practices and environmental protection will be proposed in the Application to avoid or reduce adverse effects on these features. A Wildlife Mitigation Management Table (MMT) will identify potential constraints on routing and construction. The MMT includes important habitat features and mitigation measures such as setbacks and timing restrictions. Important habitat features will be geo-referenced on alignment sheets, with new information being added as/when new habitat features are identified. In consideration of these mitigation measures, effects will be assessed for the above-named habitat features.	The Application will include rationale for Species at Risk (i.e., species on Schedule 1 of SARA and BC red and blue-listed species) included as indicators.

4.0 Assessment of Potential Environmental Effects 1084	Marine Programs	Environment Canada					<p>Environment Canada recommends that a subsection on Sediment Quality be included in Section 4.0 of the AIR. All material to be disposed in the marine environment must be characterized in accordance with the Disposal at Sea Regulations of CEPA 1999 including the information described on line 6. Modeling of the waste distribution associated with the disposal method and the quantity of material may also be required. The Proponent should contact EC prior to developing a sampling plan to ensure that sampling will appropriately characterize the dredged material.</p> <p>The sampling plan should outline the project objectives, set out the study objectives, and detail the proposed sampling, analysis and quality assurance/quality control procedures (QA/QC). Once drafted, the sampling plan should be submitted to EC for review. It is critical that the proponent have EC endorsement of the sampling plan in advance of sampling. Applicants may be required to collect additional samples or supporting information if they do not have agreement from EC on the sampling approach, or fail to follow EC sampling advice. For the purposes of quality control, EC staff may participate both as on-site observers and advisors during the collection of samples by the Proponent or their representatives.</p> <p>For further information, please find attached the following documents: Disposal at Sea – Information to Support Sampling and Analysis; Disposal at Sea – Minimum Analytical Requirements; Disposal at Sea – Minimum Sample Collection Requirements.</p>	<p>Based on the current proposed marine engineering design and construction methods, PRGT does not anticipate that any waste, in the form of marine sediment, will be generated or require disposal at sea. As such it is not anticipated that a Disposal at Sea Permit, under subsection 12(1) of the Canadian Environmental Protection Act will be required. PRGT will continue to work closely with Environment Canada as the marine engineering and construction plans are refined to confirm that Disposal at Sea does not apply to the proposed Project. Should the need for a Disposal at Sea Permit change, PRGT understands that Environment Canada has very specific information requirements and will take into account the comments received from Environment Canada on the dAIR at that time.</p>
1084 3.1	Canada Wildlife Service (CWS)	Environment Canada				<p>Indicators - General Comments</p> <p>To assess impacts to terrestrial mammals, amphibians, and birds arising from this project, sixteen groups/species are listed as indicator groups/species in Section 3.1. To ensure that the groups/species listed are representative of the wildlife values along the pipeline right of way, EC recommends that a justification of why each group/species was chosen be provided in the Application. EC also notes the obligation to identify impacts to listed wildlife species in environmental assessments, under Section 79(2) of the Species at Risk Act (SARA), 2002. Where impacts to listed species that could occur along the pipeline right of way are not identified as part of the Application, and, accordingly, outlined in the dAIR, EC advises that clear justification needs to be provided. EC also recommends that the environmental assessment consider various life cycle periods for all potentially impacted indicator species (e.g. breeding, wintering, migration, etc) as temporal variation may affect a species sensitivity to disturbance and impacts.</p> <p>Avian Indicators - General Comments</p> <p>EC notes the bird guilds identified as indicators in Table 3-1 (song bird communities, dabbling ducks, alcids, diving ducks, loons and cormorants). EC recommends that specific bird species within each guild be listed as indicators, with a justification of why each species was chosen to represent that guild. This will add precision to the analysis of impacts in association with the proposed project and will help ensure that the selected indicators are representative of the avian values within the project footprint.</p> <p>EC notes that all of the proposed avian indicator species are listed under SARA. Although assessing potential project impacts on listed wildlife species is an obligation under SARA (as above), and an important consideration in environmental assessment, listed species may not fully represent the wildlife values or potential impacts along the pipeline right of way as they are typically already experiencing population declines. EC therefore recommends the inclusion of additional, non-listed bird species to the indicator list for the proposed project. When selecting non-listed bird species for the project, EC recommends the inclusion of species from representative bird groups (e.g. landbirds, waterfowl, shorebirds, waterbirds, etc) and also those from habitat types representative of those that will be encountered along the proposed right of way (e.g. wetland/marsh, coastal and marine area, coniferous forest, etc).</p>	<p>The Application will include justification for the inclusion or exclusion of species as indicators. In addition, species within indicator guilds (i.e., the songbird communities and marine bird groups) will be provided. Individual species within communities or guilds, however, will not be assessed as individual indicators.</p>	
3.1 Issues Scoping and Selection of Valued Components 1085	Canada Wildlife Service (CWS)	Environment Canada				<p>EC recommends the inclusion of bats as an indicator and valued component for the environmental assessment. EC further advises that the pipeline's right of way may overlap the range of Myotis keemii (Keen's Long-eared Bat) and Myotis septentrionalis (Northern Myotis Bat). Catastrophic declines of Northern Myotis Bat have been documented due to White Nose Syndrome, and the species is currently being considered for emergency assessment by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) as a result. Further information may be found online at http://www.sararegistry.gc.ca/virtual_sara/files/cosewic/ca_chauvesouris_nordique_northern_myotis_0212_e.pdf</p> <p>Marine Birds</p> <p>Alcids, dabbling ducks, diving ducks, loons and cormorants are currently identified as indicators within the wildlife and wildlife habitat valued components list. EC recommends that these bird groups with a marine component to habitat use be included within the marine resource valued components list. Further, EC recommends that all marine bird species listed under the Species at Risk Act (SARA) and considered under COSEWIC be added as indicators and valued components.</p> <p>EC highlights that the proposed submarine pipeline routes appear to be adjacent to multiple important marine bird areas, including Green and Grey Islands, Big Bay South to Delusion Bay and Lucy Island. More information on important bird areas is found at http://www.nacanada.ca. Aerial surveys data documents several marine bird groups within the project area, including scoters, mergansers, and loons.</p> <p>Caribou</p> <p>EC notes that the wildlife section of the project description (Section 8.6.3 page 45) identifies an overlap between the proposed pipeline right of way and the ranges of four Woodland Caribou herds, as follows: "The conceptual corridor overlaps four woodland caribou (northern ecotype) herd ranges: Graham, Moberly, Scott and Wolverine. Each of these herds is designated as threatened on Schedule 1 of SARA and Blue-listed in British Columbia. Within the Moberly herd range, the corridor overlaps one Ungulate Winter Range (UWR) designated for caribou..."</p> <p>Woodland Caribou (Northern Ecotype) herds are also known federally as the Southern Mountain Population of Woodland Caribou. While day to day management of caribou is generally a provincial responsibility, EC is responsible for developing a recovery strategy for</p>	<p>The Application will include justification for the inclusion and exclusion of indicator species. Marine birds will be assessed under the Wildlife and Wildlife Habitat VC. The dAIR will be updated to reflect current overlap of the proposed Project with caribou, which now includes the following herds: Moberly/Kim-Za, Kennedy-Siding, Scott and Tails. The Application will include an assessment of potential adverse effects on each caribou herd.</p> <p>Bats were not selected as an indicator for PRGT as there is no strong pathway for an adverse effect. Bat species also do not satisfy all of the criteria for selection as indicators under the BC EAO indicator attributes. Namey, not practical, measurable, or accurate in reflecting changes to the VC. If a bat den, roost site, or hibernacula is discovered during field programs or pre-clearing surveys, these features will be documented under the PRGT Wildlife Species of Concern Discovery Contingency Plan, and appropriate mitigation measures will be developed through consultation with the appropriate regulatory agency.</p> <p>Edits to the dAIR required.</p>	
4.5.2 Existing Conditions for Wildlife and Wildlife Habitat 1086	Canada Wildlife Service (CWS)	Environment Canada				<p>Eagle, Osprey, and American Bittern). It is not clear to EC why these species would be included in field studies, but not identified as indicator species. Completed baseline studies could provide information in support of these species as indicators, as potential project effects could be directly measured (against baseline conditions) and reported as part of the environmental assessment.</p> <p>Canada Warbler and Yellow Rail</p> <p>Although the range of the Yellow Rail may extend into extreme eastern British Columbia, the COSEWIC Assessment and Status Report for Yellow Rail (2008) shows that the species winterly lives in British Columbia in Dawson Creek, which is east of the proposed project's right of way. Similarly, in British Columbia, continuing summer sightings in the Peace River region near Dawson Creek and in the Kootenay region in southeastern British Columbia suggest it breeds fairly regularly in both areas (Settlington 1997; British Columbia Breeding Bird Atlas 2008; S. Kinsey pers. comm. 2008), where its status as a regular breeder was formerly uncertain (Aivo and Robert 1999).</p> <p>Similarly, Environment Canada notes the range of the Canada Warbler in the COSEWIC Assessment and Status Report for Canada Warbler (2008): "... its breeding range includes the extreme southwestern Yukon (Gendral et al. 2003), northeastern British Columbia (from Smith River in the north, south to Dawson Creek; Campbell et al. 2001; South Peace Bird Atlas Society 2006)."</p> <p>Based in the range information above, EC suggests each species representativeness as an indicator species may be reduced in association with the proposed project.</p> <p>Band Tailed Pigeon</p> <p>Band Tailed Pigeon may be encountered at low to mid-elevations along the Coast Range to the central coast, including coastal portions along the pipeline right of way. EC therefore recommends that Band Tailed Pigeon be considered as a sensitive species for the purposes of the environmental assessment. The COSEWIC Assessment and Status Report on the Band-tailed Pigeon contains distribution and relative abundance maps which may be helpful (http://www.sararegistry.gc.ca/documents/default.cfm?documentid=1780). Further information on North American Breeding Bird Survey results for this species may be found online at www.mbr-pwrc.usgs.gov/bbs/bbs.html.</p>	<p>route adjustments could be identified. For example, the nests of bald eagle, osprey, and great blue heron are protected year-round (inactive or not) under the BC Wildlife Act, and thus identifying the locations of these features and obtaining a basic understanding of their frequency has value. In addition, the BC Oil and Gas Commission prescribes setbacks for these species. For species such as American Bittern and Yellow Rail, PRGT expects these species to occur at very low densities in all or part of the Project LAA and RAA. However, if these species were present at certain sites, routing could be modified.</p> <p>PRGT reviewed the status report for Yellow Rail and understands that its distribution is restricted to extreme northeast British Columbia. Dawson Creek however is not the westernmost occurrence of the species in that area, as PRGT queried provincial data sources which reveal records from near Clewysud, Davies Lake (north of Hudson's Hope) and the Peace River southwest of Fort St. John. As noted above, PRGT completed surveys for Yellow Rail as part of early routing and mitigation planning but agrees with Environment Canada that the species would not be a suitable indicator.</p> <p>PRGT did include Canada Warbler as an indicator because it is known to occur in the Project LAA and RAA. PRGT acknowledges that the species is range-restricted, and thus the assessment of potential Project effects are considered only for the portion of the assessment areas in which the species is expected to occur. Similar considerations are made for other range-restricted indicators, such as Western Screech-Owl, Great Blue Heron (Jomni), Marbled Murrelet, Band-tailed Pigeon and Coastal Tailed Frog.</p> <p>PRGT is unclear as to what Environment Canada means by "sensitive species" for Band-tailed Pigeon. However, as indicated in the dAIR, Band-tailed Pigeon is an indicator species. The referenced COSEWIC report and Breeding Bird Survey data have been reviewed, along with other data sources.</p> <p>PRGT agrees with Environment Canada that Great Blue Heron is not common along the right of way.</p>	
4.6 Vegetation and Wetland Resources 1087	Canada Wildlife Service (CWS)	Environment Canada				<p>Wetland Project Specific Comments</p> <p>EC notes the wetland assessment indicator identified in Table 4-11 is limited to habitat functions. EC recommends that the hydrological and biogeochemical functions of wetlands within the study area be included as part of the wetlands effects assessment</p> <p>Ecosystem Mapping A survey intensity level of 5 is identified for the TEM mapping in Section 4.6.2 for the project (5-10% of polygons inspected). To complete the TEM mapping, EC recommends, in general, that a survey intensity level 4 (15-25% of polygons inspected) is completed, to provide a reasonable balance of the cost and reliability of the data. However, for ecosystems at risk, a Level 3 survey intensity level is recommended, particularly for wetlands, rather than the less rigorous Level 4. Level 3 increases the polygon inspection rate to 26-50%. In addition to the TEM standards for ecosystem mapping, as above, Environment Canada highlights the SEI mapping standards (Standard for Mapping Ecosystems at Risk in British Columbia (http://archive.slm.gov.bc.ca/files/jvash/hecocli/habitat/assets/standards_for_mapping_eir_version1.pdf), for the consideration of the proponent in completing habitat mapping baseline studies.</p>	<p>Wetlands are an existing indicator in the Vegetation and Wetland Resources VC. PRGT believes the assessment of effects to wetlands is sufficient to understand potential effects of a pipeline on wetland function. The assessment will consider potential effects on both wetland communities (habitat) and will include a hydrology assessment (considering changes in flows and drainage patterns). PRGT feels that if wetland habitat and hydrology are maintained, there should be no impact to any biogeochemical cycles such as carbon, nitrogen or oxygen. Based on the environmental assessment of other pipeline projects, there is no rationale for a broader assessment. PRGT confirms that a follow-up and monitoring plan will be in place for wetlands; this commitment will be reflected in the Application as well as the Environmental Management Plan. Post-construction monitoring will be conducted during the first, third and fifth complete growing seasons following construction. The Company will record locations of concerns identified during construction related to weeds, vegetation establishment, general right-of-way conditions, water crossing stability, and reclamation success. This issues list will be used to measure success of mitigation measures used during construction of the Project, and to ensure outstanding issues are investigated, resolved and reported during the PCMP for the Project.</p> <p>The final survey intensities for all mapped polygons was 11.4%, which is above the range for SL 5 but not quite equivalent to SL 4. Within the LAA, 325 polygons were identified that had wetlands as their leading ecosystem component. Of these, 102 were surveyed for a survey intensity of 31% within this population. PRGT believes that these survey intensity levels are more than adequate for a project of this size and nature.</p>	
4.6 Vegetation and Wetland Resources 1088	Canada Wildlife Service (CWS)	Environment Canada				<p>Environment Canada recommends that vegetation species listed under SARA and considered under COSEWIC, with the potential to occur in the project area, be added as indicators and valued components for the project. Specifically, Environment Canada advises that the pipeline's right of way may overlap the range of Nephroma occulium (Cryptic Paw Lichen). This SARA-listed lichen grows in the mid to lower canopy of old growth coastal and interior humid cedar-hemlock forests. Nephroma occulium is endemic to western North America and Canada accounts for more than 50% of the range of this species. More information on Nephroma occulium may be found online at http://www.sararegistry.gc.ca/virtual_sara/files/cosewic/ca_cryptic_paw_lichen_e.pdf.</p> <p>Environment Canada recommends rare plant surveys (vascular and non-vascular plants for bryophytes and lichens - noting that lichens are not technically plants) be conducted by a qualified biologist (botanist) as part of baseline studies for the project. Survey methodology information is available through the following link: http://www.geog.ubc.ca/biodiversity/efora/ProtocolsforRarePlantSurveys.html</p> <p>Mughha Marsh</p> <p>The proposed pipeline has a number of alignment options, some of which may transit near Mughha Marsh, an important wetland complex located approximately 14 kilometres from Mackenzie, BC. The marsh is recognized nationally as a key stopover site for migratory birds and is a significant long-term monitoring site of the Canadian Migration Monitoring Network. Long-term monitoring, research and conservation for birds has occurred at Mughha Marsh for the past nineteen years, recognizing the value of the marsh for local, regional and continental bird populations. Over 100 bird species and close to 50,000 individuals have been banded at Mughha Marsh during the fall months alone with regular birds extending across the continent from Alaska's Aleutian Islands, California, South Dakota, Minnesota and North Carolina through to Latin America. Many priority birds for conservation regularly use the area including, but not limited to, Bird Conservation Region (BCR) priority species Blackpoll, Townsend's and Wilcott's Warblers, and species assessed by COSEWIC as threatened or endangered including Bank and Barn Swallows, Olive-sided Flycatchers, Common Nighthawk, Canada Warbler and Rusty Blackbirds, to name a few. Little brown Myotis, Wolverine and Grizzly Bear, also listed species, have known occurrences in the Mughha Marsh.</p> <p>The Province of British Columbia has also recognized the ecological importance of the Mughha Marsh through the establishment of the Sensitive Area Plan for Mughha Marsh (Mackenzie Forest District, 2001). This plan specifically notes that: "The Mughha Marsh area has a high value for many wildlife species, particularly birds. Waterfowl, songbirds, and raptors use the area intensively throughout the migration and nesting periods. A few species of warblers and flycatchers use the area in very high numbers in late summer. These species apparently congregate here after the breeding season to molt and prepare for their southward migration."</p> <p>Given the Marsh's ecological importance and EC's responsibilities under the Migratory Birds Convention Act, the department</p>	<p>All SARA-listed vegetation species within potential to occur in the project area, including Nephroma occulium were included as target species for rare plant surveys and were conducted by qualified botanists following Ferry and Kinkenberg (2013) as cited above. While vascular plants were the primary focus of rare plant surveys, surveys also completed searches for listed bryophyte species. PRGT also recognizes the concerns raised by Environment Canada with respect to the local, regional, provincial and national status for birds and other wildlife at Mughha Marsh and continues to work with the District of Mackenzie and the Mackenzie Nature Observatory with regards to nesting in this area.</p> <p>All SARA-listed vegetation species within potential to occur in the project area, including Nephroma occulium were included as target species for rare plant surveys and were conducted by qualified botanists following Ferry and Kinkenberg (2013) as cited above. While vascular plants were the primary focus of rare plant surveys, surveys also completed searches for listed bryophyte species. PRGT also recognizes the concerns raised by Environment Canada with respect to the local, regional, provincial and national status for birds and other wildlife at Mughha Marsh and continues to work with the District of Mackenzie and the Mackenzie Nature Observatory with regards to nesting in this area.</p> <p>A conceptual fish habitat compensation (offsetting) plan will be included with the application. In areas where residual effects are predicted after all mitigations are applied, an authorization application under Section 35 of the Fisheries Act will be compiled and will include details of specific habitats that are affected and specific components of an offsetting plan to compensate for those adverse effects. Additional field studies, if necessary, will be implemented at the permitting stage to obtain any outstanding details required to inform a detailed offsetting plan, which will be included within the authorization application.</p>	
3.6 Characterization of Residual Project Effects 1089	Darren Chow	Fisheries and Oceans Canada				<p>When the proposed project is anticipated to result in residual effects in the freshwater and marine environments (i.e. serious harm to fish), it would be beneficial to collect additional habitat information (i.e. species present and all life cycle stages that could utilize that habitat) to assist in the development of an Offsetting Plan. An Offsetting Plan would be required as part of an application for authorization under Sec 35 of the Fisheries Act. Offsetting Plan guidance can also be found on DFO's National Projects Near Water website.</p>	<p>A conceptual fish habitat compensation (offsetting) plan will be included with the application. In areas where residual effects are predicted after all mitigations are applied, an authorization application under Section 35 of the Fisheries Act will be compiled and will include details of specific habitats that are affected and specific components of an offsetting plan to compensate for those adverse effects. Additional field studies, if necessary, will be implemented at the permitting stage to obtain any outstanding details required to inform a detailed offsetting plan, which will be included within the authorization application.</p>	

1137	Table 4-16	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Management of climate change and GHG emissions is not only a provincial issue, it is of course international. This section must include the relevant Canadian and international legislation, policy and direction around climate change. The Project should then be compared to the entire body of legislation and policy to determine whether it is in line or whether it is leading BC away from the various climate targets.	Canadian targets following the international efforts made at the Copenhagen Accord will be discussed. In the absence of federal sector based regulations, provincial regulations and policies will be considered in this assessment.
1138	4.8.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Residual Effects and Their Significance: It is clear that both PRGT and EAO are attempting to find a way to dodge a true assessment of the climate change and GHG emissions impacts of this, and therefore for other LNG projects planned for BC. We agree with the start of this section, up until this sentence: "The project emissions of GHG will contribute to the significant cumulative environmental effects but the contribution, although measurable and potentially important in comparison to local and provincial levels, will be small in the global context." We see these types of comparisons in every EA application that we review, where the Proponent will compare a potential impact that is large, to another impact that is larger, in order to downplay its significance. This argument is seriously lacking in any kind of intelligence or awareness of climate change as an issue. Climate change is not a single-source problem. It is, by nature a perfect example of a cumulative effects issue. PRGT cannot reasonably claim that this project, which will involve GHG production resulting from the shipping and eventual burning of 18.68 million tonnes of LNG per year for 25 years, in addition to the GHGs produced from the natural gas production at the source, the liquefaction of it at the coast and the shipping of it overseas, is an insignificant contributor to GHG emissions at any level - including the global level. Again, for the sake of this assessment, because of the reasons laid out by PRGT in the first four sentences of section 4.8.3, the comparison should be made to BC's climate change targets for another metric as determined by consensus of the working group. Policies and regulations are being developed by the Government of Canada for regulating GHG emissions for specific sources and/or industry sectors."	The comment is respectfully noted, this section of the dAR has been revised since this comment was submitted. Estimated GHG emissions will be estimated for the Project and compared to the provincial and national emission totals. Cumulative effects of the Project in combination with LNG projects and other pipelines in the Project vicinity will be assessed.
1139	4.8.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						The final sentence in the first paragraph of section 4.8.3 is a misleading and pointless sentence to include in this section or anywhere in this document: "Policies and regulations are being developed by the Government of Canada for regulating GHG emissions for specific sources and/or industry sectors." If the federal government, whose reputation on fighting climate change has become a source of international embarrassment for Canada, actually is developing any meaningful policy for regulating GHG emissions, and if that policy actually will affect the natural gas industry and will be created in time to affect this particular project and this EA process, then PRGT should specifically outline this in the AIR. Gitanyow has dealt with numerous promises of higher level government initiatives that would supposedly deal with difficult issues such as cumulative effects, during EA processes, none of which have actually materialized to the point of having any effect on the process or on the conditions any project.	As a result of edits to the GHG VC section, this sentence has been removed from the dAR.
1140	Table 5-2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add effects of lowering the Allowable Annual Cut (AAC) and access to timber for the Gitanyow, in particular the potential impact to each Wip. Gitanyow is actively involved with forestry companies in both employment and economic benefits such as the local sawmill. How will the potential lowering of the AAC impact accessibility to timber for the local sawmill? Gitanyow have currently being developing a business plan for a bioenergy plant. Will the potential lowering of the AAC affect availability of fibre in the area?	The AAC is being discussed generally in the context of the TSA that are in the LAA. The effects of this on employment and economy have not been discussed in this section however, potential employment and/or contracting opportunities will be generally identified in the Social Effects sections of the Application.
1141	Table 5-2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add change in tourism: will the project impact the volume of tourists to the area?	Potential effects to access will be addressed in the Land and Resource Use section of the Application so inferences can be made with respect to potential spin-off effects to accessibility to timber.
1142	Table 5-2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add change to pine mushroom economy. Will the project potentially impact the amount and access to pine mushroom harvesting areas? The pine mushroom is a significant source of income to many Gitanyow members. The local industry has been developing from just a harvest and export model to a value added product, therefore producing increased employment.	The potential effects of the Project on tourism are being assessed as part of the Land and Resource Use VC (see Section 6.5 of the December 2013 version of the dAR).
1143	Table 5-2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add change to fur harvesting economy. Fur harvesting is a significant source of income to some Gitanyow. Will the project potentially impact access to harvesting areas and size of harvesting areas, in particular impacts to the affected Wip.	Potential effects to access will be specifically addressed in the Application. Potential effects to access will be addressed in the Land and Resource Use section of the Application so inferences can be made with respect to potential spin-off effects in regards to access to pine mushroom harvesting areas.
1144	Table 5-2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add impacts to local governments and services due to wage competitiveness.	The Land and Resource Use section of the Application will discuss trapping in general but will not specifically address Aboriginal trapping or its commercial value.
1145	6.2.1	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Terrace should be recognized as a service hub, particularly for our members.	Potential effects to access will be addressed in the Land and Resource Use section of the Application so inferences can be made with respect to potential spin-off effects in regards to access to fur harvesting areas.
1146	6.2.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on accommodations should also include RV parks.	The wage competitiveness issue will be dealt with under the Economic VC. Changes in wage rates is one of the indicators being considered.
1147	6.2.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on emergency services should also include the lack of availability of community volunteer first responders and firemen. With the increase of remote employment, such as camps, the ability of Gitanyow to respond to an emergency has been affected negatively. There needs to be a plan how to address this issue.	Terrace is included in the RAA for the Infrastructure and Services VC and has been identified as a community that may serve as staging community, or service hub to the Project.
1148	6.2.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on community recreation should also take into account the potential increase in recreational activities such as fishing and hunting. Gitanyow has seen the recreational increases impact our rights to hunt and fish in areas traditionally used by Gitanyow, now being heavily utilized by non-First Nations.	Accommodations includes RV risks as indicated in Table 6-2 - see the Measurable Parameters for Change in Accommodations'.
1149	6.3.2	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on road use and traffic volumes. Gitanyow Fisheries Authority have conducted road use studies on Highway 37. The application should utilize this information and the proponent should allocate funding for additional studies.	Fire department services, ambulance services, and search and rescue services are included in the VC under the Indicator Emergency and Protection Services. Project effects on Emergency and Protection Services are assessed based on baseline conditions described using publicly available documents and statistics as well as key informant interviews with local stakeholders. The effects are assessed by first identifying potential effects of the Project on these services and then identifying mitigation measures to limit adverse effects on the services.
1150	6.3.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						An increase in traffic can negatively impact First Nation's rights. The area of Highway 37 lies directly on top of the main trail Gitanyow would use to access their territories for various resources. Some of the resources, utilized traditionally and in current times, near Highway 37 area include kufko berries, huckle berries, salalton berries, fly roof, fireweed, sun to name a few. The increase in traffic will make it increasingly dangerous to travel to areas where we harvest these resources, many areas of which are in close proximity to the highway. What measures can be taken to mitigate this issue?	Consumptive recreation activities, such as fishing and hunting, are included under the Community Recreation and Leisure Facilities indicator (Infrastructure and Services Valued Component).
1151	6.3.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						An increase of non local drivers who are not aware of the local driving conditions, particularly winter conditions, have been observed by local members as posing increased risks to commuting on the highways. How can the proponent require contractors and subcontractors to take the proper measures to avoid this issue?	Community recreation is also discussed in the Land and Resource Use section of the Application in the context of potential changes in access. This is considered to be both a positive and adverse effect that will be managed by a fairly broad set of mitigations including access management and hunting prohibitions for project employees and contractors.
1152	6.4.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Will visual quality take into account smoke from clearing and burning of the BOW. The Northwest Transmisson Line affected the quality of vision in many areas from the burning of wood waste. How can the proponent minimize the amount of wood waste to be burnt on the project?	The assessment will use the BC Ministry of Transportation traffic volume data as it is available for all segments assessed. This will allow for standardized assessment of all segments.
1153	6.4.3	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						How can the proponent minimize the landscape visual degradation?	An assessment of Project-related traffic and effects on highway infrastructure and the flow of existing traffic will be provided in the Transportation section of the EA. Mitigation measures to reduce potential adverse effects will also be presented. We appreciate the comment on a particular area of concern to be noted.
1154	6.5.1	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Project Footprint: should read to include new roads and re-activated roads because many roads are in advanced state of regrowth and by re-commissioning them it could have potential impacts on land and resource use.	A transportation plan will be developed specific to each project component. The plan will cover the transportation of personnel, equipment and materials to and from the work locations. Efforts will be made to reduce the volume of vehicles travelling in the area by consolidating travel of personnel to the extent possible. The project orientation will include a significant focus on driving and the Traffic Management Plans will identify the issues of concern and the planned mitigation of these risks. Driving risks will be covered in the Project Specific Safety Plans and will be part of daily Job Safety Analysis for workers on the project. Driver qualifications, training, disciplinary actions and local speed restrictions will also be addressed in our contractor specific safety management plans to minimize any traffic risks posed to local residents resulting from increased traffic volumes.
1155	Table 6-7	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add Gitanyow Lax'Yip Land Use Plan.	Smoke from clearing and burning of debris along the right of way is anticipated to be a temporary effect and as such will not be assessed in the visual quality section of the Application. A qualitative discussion of burning will be provided in the air quality mitigation section of the Application. Measures taken to limit smoke production include limiting the size of the burn pile, minimizing the moisture content of the pile and maintaining loose burning piles with minimal soil content. Additionally, the Guide to the Open Burning Smoke Control Regulation (MOCS) will be followed should wood waste be disposed of in this manner. Alternative means of disposing of wood waste include mechanical chipping or mulching.
1156	Table 6-8	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Available information on outdoor recreational activities should also take into account aboriginal rights to hunt and fish.	Mitigation measures for visual quality that are being considered include minimizing the widths of cleared areas where possible, optimizing infrastructure placement on the landscape to work with topographic features in a way that masks or blends infrastructure into the background, and locating infrastructure, where possible, away from areas identified as being visually sensitive in the provincial Visual Landscape Inventory database.
1157	Table 6-8	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on forestry activities should take into account the lowering of the Allowable Annual Cut (AAC) and access to timber for the Gitanyow, in particular the potential impact on Wip Sustainability. Gitanyow is actively involved with forestry companies in both employment and economic benefits such as the local sawmill. How will the potential lowering of the AAC impact accessibility to timber for the local sawmill? Gitanyow have currently being developing a business plan for a bioenergy plant. Will the potential lowering of the AAC affect availability of fibre in the area?	The Project Footprint includes all areas that will be directly disturbed by construction activities, which would include any existing roads that require re-activation or upgrading.
1158	Table 6-8	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Information on trapping should include change to fur harvesting economy. Fur harvesting is a significant source of income to some Gitanyow. Will the project potentially impact access to harvesting areas and size of harvesting areas, in particular impacts to the affected Wip. Gitanyow do not recognize BC's trapline holders as the right to trap belongs to the Wip of the particular territory.	The Gitanyow Lax'Yip Land Use Plan will be considered as part of the Application (see Section 1.3 of the December 2013 version of the dAR).
1159	Table 12-1	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Add a reference to Section 33 of the Nisga'a Final Agreement (NFA) (non-derogation clause) which ensures the NFA will not affect any other First Nations rights and title. Misinterpretation of the NFA rights within the Nass Wildlife Area has resulted in impacts/infringements to Gitanyow rights and title, and specific and agreed to measures to avoid this need to be undertaken by both the Proponent and the Province. As stated by Mr. Justice Tsoy and Madam Justice Nelson of the British Columbia Supreme Court that Gitanyow has a good to strong prima facie claim of title and a strong prima facie claim of aboriginal rights to at least part of the Gitanyow Lax'Yip. Also, as demonstrated in the Gitanyow Recognition and Reconciliation Agreement section 6.5 states "British Columbia recognize that in the absence of a treaty that defines the responsibility and rights of the Parties, the duty to consult and to seek workable accommodation of Gitanyow's Aboriginal Rights within the Gitanyow Lax'Yip is an ongoing duty." Further, section 6.6 of the Gitanyow Recognition and Reconciliation Agreement states, "British Columbia acknowledges that it and Canada provides in modern treaties with British Columbia First Nations that those treaties do not "affect any rights under section 35 of the Constitution Act 1982 for any aboriginal people other than" the Nation with whom it has made a Treaty". If PRGT and BC are committed to mitigating the potential impacts to aboriginal rights and title the insertion of the non-derogation clause will be necessary.	Information on outdoor recreational activities will take into account Traditional Knowledge information about hunting and fishing where that information is available.
1160	Wildlife	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						(Submitted in letter) Regarding wildlife, we see that many of our requests/comments have not been incorporated into the dAR, specifically around the need for quantitative assessments of key wildlife populations as part of developing a robust baseline for this project. We are not asking for population assessments for all species in the territory. We have, however, laid out in numerous meetings and in our comments the seriousness of the Nass moose population decline (~65% decline between 2001 and 2011). There is no question that linear corridors can have a significant effect on predator-prey relations, most often resulting in a predator advantage. The Nass moose population is already considered to be in a "predator-pit" situation, meaning that in spite of harvest reductions, predators will be able to keep the population from rebuilding. We expect that this and other potential linear projects will only add to this. To determine effects on the threatened Nass moose population will require solid, quantitative data on wolf, bear and moose populations over time. To date, our various explanations of this issue and requests for inclusion of this type of assessment in the AIR have fallen on deaf ears with both the EAO and PRGT. This is an issue that will not go away and that we will not give up on.	As directed by the Supreme Court of Canada, any Crown decision that may adversely affect the Aboriginal Interests of the Gitanyow will require consultation with the Gitanyow, and accommodation as required. As a result, PRGT does not believe that it is necessary to include reference to Section 33 of the Nisga'a Final Agreement (the non-derogation clause) in the dAR.
1160	Wildlife	Glen Williams - Chief Mali	Gitanyow Hereditary Chiefs						Accents to harvesting areas (where identified by TK or TLU studies) will be included in the Land and Resource Use section of the Application, particularly the effect of changes in access as a result of the Project. Aboriginal trapping and the fur harvesting economy will not be discussed specifically in this section, however, potential effects to access addressed in the Land and Resource Use section of the Application will be used to draw inferences with respect to potential spin-off effects in regards to access to trapping areas.	A quantitative assessment of change in mortality risk for moose will be included in Section 34.10 of the Application. This assessment includes a portion of the Nass Wildlife Area, within which a portion of the Cranberry SRMP is included. Consideration of predator-prey relationships will be included and described in the Application.

1212	3.1	Dave Radley	Takla Lake First Nation					Please make a list of all considered VCs by aboriginal groups and provide clear rationale for excluding them.	The selection (inclusion/exclusion) of Valued Components has been documented through the VC Selection Document and the comments and responses through three rounds of review on the DAIR. This process is considered sufficient justification for selected VCs.
1213	3.1	Dave Radley	Takla Lake First Nation					Where is the "considered" list. Or is this the same?	Table 3-1 is the list of Valued Components for the PRGT Project. The word "proposed" will be removed from the table 3.1 heading.
1214	3.1	Dave Radley	Takla Lake First Nation					Add Ecosystem Health VC, with appropriate KIs	The potential effects of the project on VCs and indicators that contribute to Ecosystem Health are assessed within the biophysical VCs. Adding Ecosystem Health as a VC would likely result in duplication of the assessment for many of the environment VCs.
1215	3.5	Dave Radley	Takla Lake First Nation					Please include a transparent and clear peer review of the efficacy of the mitigation measure. Following this review for each mitigation measure proposed, ensure "assumptions" and "risks to assumptions" are clearly stated in the application. How and why has this wording [of "context" and "frequency"] changed from original DAIR? Based on Working Group comments? Based on all the 700+ comments from WG members, and WG meetings, please explain how this change reflects the concerns brought forward by WG members. Further to this, please provide rationale for this change within the context of the "EAO guidelines". In your rationale please be specific to how this change in "context" versus original language (deleted "context" language below) is more transparent, rigorous and scientific in approach.	Efficacy of mitigation measures will be supported by appropriate references including peer reviewed literature where appropriate. Uncertainty around efficacy will be captured in confidence predictions and in some cases by recommendations for follow-up.
1216	3.6	Dave Radley	Takla Lake First Nation						The definitions in section 3.6 of Context, frequency, etc. will be changed to match exactly the definition of these terms in the EAO guidance.
1217	3.7	Dave Radley	Takla Lake First Nation					Qualitative terms need to be verified by an independent panel of experts, and not be defined by the proponent or its client – due to the potential of bias and the seriousness of the consequences of these qualitative terms on the potential residual effects brought by the project.	Qualitative terms will be defined by the proponent and its subject matter experts who are experienced professional environmental consultants. The qualitative terms will be justified in the EA. Additionally the environmental assessment will be subject to a rigorous 180 day review by the working group.
1218	3.8	Dave Radley	Takla Lake First Nation					Preferably, and it is recommended here that there be two "thresholds" identified: 1. That is accepted by peer review, based on current literature and 2. Based on management standards. Current literature and peer review, as it is defined, should supersede management standards – if there is to be any dialog that ensures transparency and rigor in this process.	Significance determinations cannot be made on a two tiered significance threshold. Priority is given to management standards, as these are recognized government or industry regulations that reflect the limits of an acceptable state for an environmental component. It is where there is a lack of standards that thresholds would be derived based on peer reviewed literature.
1219	3.8	Dave Radley	Takla Lake First Nation					Standards will need to clearly illustrate their efficacy.	As stated in this section, standards are recognized government or industry regulations or objectives for physical aspects such as air quality, water quality or effluent release.
1220	3.9	Dave Radley	Takla Lake First Nation					Can there be clarification of who would likely make the "profession judgment" and how this would apply to the "prediction confidence"?	Professional judgment would be made by the team of subject matter experts for each particular VC. This includes PRGT environment staff, discipline leads and the EA authorship team. All EA actions are further reviewed by a team of senior EA specialists.
1221	3.9	Dave Radley	Takla Lake First Nation					Is there not the potential for bias here? How will the EAO ensure this bias of the "Additional analysis" is not influencing interpretation?	To minimize potential for bias, PRGT has engaged a team of subject matter experts whose analysis, where possible, will be based on peer reviewed literature, publicly available information, past experience and professional judgment. Scientific methods are used, where applicable, along with conservative assumptions. All EA sections are further reviewed by a separate group of senior EA practitioners who provide an additional check against bias.
1222	3.10.1	Dave Radley	Takla Lake First Nation					Should it not just be "effects" and not "residual effects" here? If it is "residual effects" then there has been a great deal of "filtering" that has occurred which potential reduces the transparency of dialog on cumulative effects (see comments on methods above). Please delete "residual" here.	Residual effects is correct. If there is no residual effect then there is no potential for interaction with other projects or activities. Good EA practice is to apply proposed mitigation after the discussion of potential interactions. The proposed mitigation will be clearly applied for transparency for an understanding of the residual (i.e., remaining) effects.
1223	3.10.1	Dave Radley	Takla Lake First Nation					Is past forestry impacts considered? Noted below, only current, and future. For VCs such as "wildlife and wildlife habitat", as well as discussion on impacts to "fisheries, erosion, and slide potential" it is prudent that past forestry activity is included in the dialog of cumulative impacts.	Past forestry impacts are considered as part of existing forestry activity to the extent that an area was logged recently enough to still have a residual effect on the habitat within the cutblocks. Past forestry activity that has recovered beyond that point is not considered.
1224	3.10.1	Dave Radley	Takla Lake First Nation					(In the Table) How are forestry roads and mineral exploration roads and road networks not included in "linear infrastructure". Please explain using clear rationale	Forestry roads and mineral exploration roads are secondary components of "Forestry Activity" or "mineral exploration projects". The projects listed under linear infrastructure are where the linear development is the primary activity.
1225	3.10.1	Dave Radley	Takla Lake First Nation					(Forestry Activity" in Table) Please add past activity, future known roads, and future known removal of primary forest cover (this can be determined using current AAC models in combination with current tenure allocation and merchantability of forest stands (based on current industrial forestry activities).	"Forestry Activity" encompasses past activity and future known clearing activity.
1226	3.10.2	Dave Radley	Takla Lake First Nation					Who determines the "process and methodology" and how is this verified? (i.e. is it through scientific rigor, or is it based on subjectivity by the proponent). It is highly recommended here that this process and methodology highlight how current peer reviewed literature on cumulative effects was considered. Following this, the application then needs to be clear as to the risks of these assumptions (if not following generally accepted peer review on cumulative effects) and the implications to the accuracy of the assessment by not following current peer review on cumulative effects. It is reiterated here, that we are requesting this process in advance of the determination of the AIR, if, for example, something as obvious as past forestry and future forestry (based on AAC and merchantability of forest stands) is removed from the assessment.	The process and methodology for the cumulative effect assessment based on EAO guidance, peer reviewed literature, environmental policy, publicly available information on residual effects of other projects, past experience and professional judgment. There is a preliminary project inclusion list that will be included in the AIR however the full list can not be determined until the assessment is complete and interactions between the PRGT project and other projects can be fully considered.
1227	3.10.2	Dave Radley	Takla Lake First Nation					There appears to be a number of "convenient" rules here that are not grounded in scientific rigor in methodological approach. We are requesting that if scientific rigor is not being applied, that it be clearly stated. On the other hand, if it is, then it needs to be clearly identified (ie. As to what and where have these methods been arrived from based on what peer reviewed material).	This approach is consistent with standard environmental assessment best practice. Where possible this will be based on peer reviewed literature followed by environmental policy, publicly available information on residual effects of other projects, past experience and professional judgment.
1228	3.10.2	Dave Radley	Takla Lake First Nation					What kind of assessment and who will design this assessment?	The assessment of adequacy of existing data will include determining if adequate spatial information is available regarding the other projects. The nature of residual effects from these other projects will need to be understood on a VC by VC basis. For example for a cumulative effects assessment on Air Quality either the results of air quality modelling from the other projects or a strong understanding of the location, type and quantities of anticipated emissions would be required. This assessment is done by PRGT and its team of subject matter experts who are experienced professional environmental consultants.
1229	3.10.2	Dave Radley	Takla Lake First Nation					What are the expectations for what will be included in the rationale? Will it be grounded in the review of current peer reviewed literature? Will it be transparent and rigorous.	The rationale for the level of cumulative effects assessment is based on the potential for spatially and temporally overlapping environmental effects between those caused by the PRGT project and other past, present and likely future projects and activities. If there is no overlapping effects, a cumulative effects assessment is not required. Where there is a reasonable likelihood of overlapping effects, the level of cumulative effects assessment is determined by the degree of overlap and sensitivity of the VC/receptor. In some cases a qualitative assessment is sufficient. In other cases (e.g., consideration of grizzly bear and caribou) a more detailed cumulative effects assessment is required including consideration of multiple stressors on a sensitive community.
1230	3.10.2	Dave Radley	Takla Lake First Nation					There seems to be a lot of defensiveness in the approach to cumulative effects that is almost completely controlled by the proponent and/or the EAO (industry and/or government). Since both these parties have a vested interest in moving this and many other industrial projects forward, we are concerned with the tendency of these approaches to be biased in nature. Notwithstanding that First Nations and their views and methods for identifying cumulative effects in this assessment are not verified or in any meaningful way considered, it is our recommendation that in the least, a cumulative effects assessment should simply be grounded in rigor that is acceptable by scientific standards and that these methods are vetted through a third party panel to remove any potential bias from determining environmental effects and impacts brought about by this project in the context of "other" project and activities in the area (past, present, and future).	The cumulative effects assessment methodology proposed by PRGT is based on a rigorous and well recognized approach that has been improved (i.e. addition of other projects and activities) based on feedback from the PRGT Working Group. This includes the inclusion of forestry activities that Takla FN highlighted as a concern.
1231	3.11	Dave Radley	Takla Lake First Nation					There seems to be a lot of defensiveness in the approach to cumulative effects that is almost completely controlled by the proponent and/or the EAO (industry and/or government). Since both these parties have a vested interest in moving this and many other industrial projects forward, we are concerned with the tendency of these approaches to be biased in nature. Notwithstanding that First Nations and their views and methods for identifying cumulative effects in this assessment are not verified or in any meaningful way considered, it is our recommendation that in the least, a cumulative effects assessment should simply be grounded in rigor that is acceptable by scientific standards and that these methods are vetted through a third party panel to remove any potential bias from determining environmental effects and impacts brought about by this project in the context of "other" project and activities in the area (past, present, and future).	PRGT agrees that cumulative effects assessment should be scientifically defensible and rigorous. The cumulative effects assessment methodology proposed by PRGT is based on an approach that considers past, present and likely future projects. These methods were developed to meet the most stringent requirements of environmental assessment legislation in Canada, including BCEAA. The inclusion list has been improved (i.e. addition of "other" projects and activities) based on feedback from the PRGT Working Group. This includes the inclusion of forestry activities that Takla FN highlighted as a concern. With respect to the recommendation that methods be vetted through a third party panel to remove any potential bias from determining environmental effects and impacts brought about by this project in the context of "other" project and activities in the area (past, present, and future) - this is the role of the Working Group and therefore the EAO is meeting this request.
1232	4.0	Dave Radley	Takla Lake First Nation					The TFLN have provided ample input into our concerns with section 4.0 – and in particular a request for clear rationale for the exclusion of particular VCs left out of the assessment. We reiterate that we would like this rationale clearly outlined before the determination of the AIR.	The selection (inclusion/exclusion) of Valued Components to be included in Section 4.0 has been documented through the VC Selection Document and the comments and responses through three rounds of review on the DAIR. PRGT believes this process has provided ample rationale for the VC selection process.