



Skeena Watershed Conservation Coalition

*Cultivating a sustainable future from a sustainable environment rooted in our culture
and thriving wild salmon ecosystem*

February 20, 2019

BC Environmental Assessment Office
Box 9246,
Stn Prov Govt
Victoria, B.C.
V8W 9V1

Attn: Sheldon Foote

PRGT Certificate Extension Request by TransCanada

Skeena Watershed Conservation Coalition (SWCC) presents these comments regarding the extension request for the Environmental Assessment Certificate #E14-06 issued to the proposed Prince Rupert Gas Transmission project.

About SWCC

The Skeena Watershed Conservation Coalition was founded in 2004 by a diverse group of people living and working in the Skeena River watershed. Our board of directors and membership reflects the broad interests of the people in this region. We are united in understanding that short-term, industrial development plans, even 50 year plans, will not benefit our region in the long run if they undermine the social, cultural and environmental fabric that holds the watershed and its communities together. Our range of activities reflects this vision. They include:

- Informing our communities on proposed development plans that may compromise our vision of a sustainable regional economy;
- Working to develop long-term stewardship plans for the Skeena Watershed
- Organizing information meetings between regional/provincial governments, corporate developers and local communities;
- Contributing to baseline research of wildlife, water quality, and cultural heritage resources in the Upper Skeena Watershed;

- Developing sustainable employment opportunities that are compatible with the globally significant values of the region;
- Providing educational programs for the region's children and youth (school programs and a summer conservation camp) to learn about the values within the Skeena watershed;
- Sponsoring gatherings for stories, music, and art celebrating the Skeena Watershed.

SWCC Concerns & Issues

SWCC put forth a relatively large amount of time and effort when the original EA process was occurring. Many of those concerns have yet to be addressed. Currently SWCC does not endorse the Extension to the #E14-06 Certificate for the following reasons.

1. There is an absence of information regarding the end of pipeline that will require environmental assessment activity (ie - where is this pipeline going?);
2. There is an absence of information of where will the gas supply come from and as well, where will the revamped pipeline start;
3. The National Energy Board needs to redetermine whether the PRGT comes under federal or provincial jurisdiction as directed by the Federal Court of Appeal ruling delivered in Ottawa, July 19, 2017;
4. If the National Energy Board determines that the PRGT falls under federal jurisdiction, a subsequent process will unfold, which will likely have implications on BC EAO decision-making;
5. There are outstanding Indigenous issues that have yet to be resolved along this pipeline route. Our northern communities were sickened by the Province and TransCanada's behavior in regard to the militarized policing activities in Wet'suwet'en territory. BC has continued to marginalize Gitksan and Wet'suwet'en concerns around mis-representation, social justice, chronic unemployment, continuous resource extraction, and failure of the BCEAO to prevent bad projects from going forward. Community members hear the political speeches but it hasn't improved conditions on the ground;
6. Hazelton has one of the highest unemployment rates in the Province despite the billions of dollars in resource extraction leaving our region. Consequently, there is little trust or comfort in the BC government doing the right thing for its local citizens and communities;
7. Despite promises to the contrary and Ministries charged with the wellbeing of water, wildlife and fish, we are seeing steady declines across the board in our forests, wildlife, water quality/quantity and fish.

8. The original project description and this extension fail to consider the cumulative effects of this project and climate change, the time is now to utilize the cautionary principle when considering development in this region;
9. The Skeena Watershed has been deemed one of the top 5 watersheds in the world for resilience to climate change due to its vast and intact system. Linear disturbances to the land decrease our resiliency;
10. Sustainable multi-million dollar industries dependent on a healthy ecosystem in our region are being put at risk with gas pipeline development and associated infrastructure;
11. Several BC government initiatives such as CleanBC puts our province on a clear path to a cleaner, better future. However, if PRGT is approved as a LNG supply pipeline to an unknown location and unknown LNG facility, the Clean BC plan as well as other initiatives including the Climate Charter, Carbon Neutral Government, and the Clean Energy Act will not be worth the paper they are written on. Given the question as to whether BC can meet its targets established by the Greenhouse Gas Reduction Targets Act with the construction and operation of the LNG Canada project, it appears as any future proposed LNG facility would be required to have significant reductions in GHG emissions;
12. Continuing to force communities, First Nations, and stake holders to spend their time and energy responding to ill-advised project extensions like this one, is exercise in futility and a waste of tax-payer dollars.

We therefore recommend:

BC EAO not extend the PRGT #E14-06 EA Certificate.

When PRGT knows the what, the where, and the how regarding a proposed LNG facility on the North Coast and where the gas is to be sourced from, it is suggested that PRGT then make application for a renewed Certificate or an Amendment.

Fell free to contact if you have questions or comments,

Sincerely,



Shannon McPhail,
Executive Director