



DRAFT

Consultation Summary Report

Land Use Plan Update

September 2020

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Engagement Summary Report

1 BACKGROUND

The Prince Rupert Port Authority is responsible for the overall planning, development, marketing, and management of the commercial port facilities within the Port of Prince Rupert. This includes ensuring competitive, efficient, and timely responses to customer needs and business opportunities. It also means ensuring that we facilitate these opportunities in a manner that is safe, responsible, and sustainable.

By working closely with our partners and customers, we deliver supply chain innovation that adds value to Canadian products and increases Canada's global competitiveness. Through careful stewardship, we have created sustainable prosperity for our communities, local First Nations, our province, and our country. In 2018, the Port handled over 26 million tonnes of volume, valued more than \$50 billion.

The Land Use Plan is a document that lays out the Port Authority's plan for managing lands under its jurisdiction for the next 20 years. The update is the latest in a continual effort to ensure that lands are managed effectively for the current and future benefit of the Port, its stakeholders, and the community. The plan allows the Port Authority to take stock and update its vision for the future as the economy evolves and new opportunities present themselves.

Specific Objectives for the Land Use Plan Update are to:

- » Provide an effective long-term direction for land use, development, and the overall management of the PRPA administered lands and waters for a 20-year plus timeframe.
- » Focus on examining historical and recent developments related to the PRPA operations, expansions and forecasted growth.
- » Include environmental, social, and economically sustainable development practices.

The purpose of this document is to detail the methods and responses from the engagement activities that took place throughout the planning process.

2 PURPOSE AND TIMELINE

PRPA's current Land Use Plan was adopted in 2010 to chart the port's growth to 2020. In 2019, PRPA began the process to develop a vision for the next 20 years. Future development of the port will have far reaching effects on the region in terms of employment, the environment, and the economy. PRPA took great care to provide meaningful opportunities with First Nations, local governments and other public stakeholders and agencies.

With the update, PRPA recognized the process as a unique opportunity to not only engage with its key partners, First Nations, Local Governments, and other stakeholders but to educate participants on the function, jurisdiction and activities of the port authority in general. Many of the engagement activities for the Land Use Plan Update included an education component to clearly communicate various functions of PRPA.

The objectives of the engagement activities were to:

- » Conduct a robust consultation program to ensure local Indigenous communities, the City of Prince Rupert, District of Port Edward, North Coast Regional District (NCRD), key stakeholders, government agencies and the broader public are actively involved throughout all tasks of the project.
- » Foster the relationship with the broader northwest community (municipalities, local First Nations, and other project stakeholders).
- » Communicate that the Plan is intended to manage land use for lands under PRPA jurisdiction for the next 20 years.
- » Communicate the current status of the Port, its recent successes, environmental sustainability, and contributions to the community.

The Update process included two phases of engagement. The objective of the first phase was to inform participants about the project and provide an opportunity for feedback in various forms. In Phase 2, the draft plan was shared and participants were invited to provide comments. Phase 2 engagement activities had to be altered to ensure the health and safety of participants considering the COVID-19 pandemic. Public engagement activities were moved online, and interviews with key partners, First Nations and local governments were held via teleconference.



3 NOTIFICATION

The content and format of communication material took several forms to maximize engagement reach and participation. Engagement tools used during the process were meant to be used throughout the project as needed to ensure that all stakeholders (First Nations, government, industry, public) had the opportunity to engage with the project.

3.1 CONTENT STRATEGY

Key messages were reinforced through marketing and communication material throughout the planning process. These materials used PRPA branding and communications standards. Key messages promoted audience recall and retention, and supplementary ongoing communications answered specific questions about the Plan and provided detailed information about engagement activities. Communication and marketing materials included:

- » FAQs
- » Informational/educational materials
- » Posters
- » Newspaper Ads
- » Social Media Posts
- » Direct Communication

Examples of websites, newspaper ads and social media posts are available in **Appendix A-1 and B-1**.

3.2 LAND USE MANAGEMENT PLAN PROJECT SITE

A project webpage, hosted on the PRPA website, was used to share information related to the process and promote opportunities for engagement both online and in-person. The page was the primary location for project-related updates and information. Information housed on the website reiterated the key messages on the project's purpose and was updated during each phase of the project, as required. The project website took on added importance in Phase 2 with the onset of the COVID-19 pandemic and became an even more central part of the overall project communication strategy. In Phase 2 the project website was bolstered with video, a continually updated FAQ section and several digital information boards. A mock-up of the project website is available in **Appendix B-1**.

3.3 SOCIAL MEDIA

The Port's existing social media channels were highly active, leading up to and during each round of engagement. Social media was used to share project updates, raise awareness for the Plan, and communicate opportunities for engagement. The use of social media included both postings to PRPA's official social media accounts as well as paid ads. Examples of social media posts shared throughout the process are available in **Appendix A-1 and B-1**.

4 METHODS

PRPA engaged a full range of First Nation, local government, and public stakeholders. Its targeted approach ensured that appropriate communications and engagement tools were matched with specific objectives, issues, and stakeholders. This consultation approach was based on the International Association for Public Participation (IAP2) spectrum pictured below.

	INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL	To provide the public with balanced and objective information to assist them in understanding the problem, alternatives and/or solutions.	To obtain public feedback on analysis, alternatives and/or decision.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision-making in the hands of the public.
PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

Figure 1 IAP2 Spectrum of Engagement [[https://iap2canada.ca/Resources/Documents/0702-Foundations-Spectrum-MW-rev2%20\(1\).pdf](https://iap2canada.ca/Resources/Documents/0702-Foundations-Spectrum-MW-rev2%20(1).pdf)]

4.1 ACTIVITY 1: PRE-ENGAGEMENT RELATIONSHIP BUILDING

Purpose	Introduce the project and develop an understanding of how to best involve these primary stakeholders throughout the process to build and maintain trust.
Format	Personal communication with key representatives In-person meetings with key representatives
Timing	October 2019
IAP2 Spectrum	Involve: To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.

4.2 ACTIVITY 2: PUBLIC MEETINGS

Purpose	Phase 1: To Introduce the project and set expectations for what the plan and the process is intended to do / not do Phase 2: Illustrate what was heard through Phase 1 and communicate a draft of the new plan
Format	Open House with Boards, survey form for feedback
Timing	Phase 1: November 2019 Phase 2: June 2020-August 2017
IAP2 Spectrum	Consult: To obtain public feedback on analysis, alternatives and/or decision.

Due to the impacts of the COVID-19 pandemic, in person public engagement activities were replaced with online opportunities. Additional materials were added to the project website to replicate an online open house format. Open house materials including 5 videos, information boards and a FAQ were available on the project website between June and September 2020.

The draft plan was also available on the project website for download and comment during this time. PRPA staff were available to communicate via phone and email with those that had additional questions and comments throughout Phases 1 and 2 of engagement.

4.3 ACTIVITY 3: STAKEHOLDER MEETINGS

Purpose	Phase 1: To Introduce the project and set expectations for what the plan and the process is intended to do / not do Phase 2: Illustrate what was heard through Phase 1 and communicate a draft of the new plan
Format	Large format session with a presentation at the beginning, group discussion on plans and hopes for the process
Timing	Phase 1: November 2019 Phase 2: June -August 2020
IAP2 Spectrum	Involve: To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.

4.4 ACTIVITY 4: FIRST NATIONS CONSULTATION

Purpose	Phase 1: To Introduce the project and set expectations for what the plan and the process is intended to do / not do Phase 2: Illustrate what was heard through Phase 1 and communicate a draft of the new plan
Format	Meetings with each Nation individually
Timing	Phase 1: October/November 2019 Phase 2: June – August 2020
Targeted Stakeholders	Lax Kw'alaams Band Metlakatla First Nation Kitsumkalum Kitselas First Nation Gitxaala Nation Gitga'at Nation
IAP2 Spectrum	Involve: To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.

4.5 ACTIVITY 5: LOCAL GOVERNMENT CONSULTATION

Purpose	Phase 1: To assess specific concerns that local government (the City of Prince Rupert, District of Port Edward and the NCRD) may have related to the project. Introduce the project and set expectations for what the plan and the process is intended to do / not do.; understand and relationship with other planning processes such as Redesign Rupert Phase 2: Illustrate what was heard through Phase 1 and communicate a draft of the new plan
Format	Meetings with staff and council of each municipality
Timing	Phase 1: October/November 2019 Phase 2: June – August 2020
Targeted Stakeholders	City of Prince Rupert – Staff, Council District of Port Edward – Staff, Council North Coast Regional District - Staff, Board
IAP2 Spectrum	Involve: To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.

4.6 ACTIVITY 6: COMMUNITY SURVEY

Purpose	Phase 1: To introduce the project and set expectations for what the plan and the process is intended to do / not do
Format	Community survey hosted online and linked from the project website and PRPA social media channels. Paper copies of the survey were made available at public events and were available at PRPA's office at Atlin Terminal.
Timing	During Phase 1 consultation
Targeted Stakeholders	Public, First Nations, Industry
IAP2 Spectrum	Consult: To obtain public feedback on analysis, alternatives and/or decision.

5 PARTICIPATION

A full spectrum of First Nations, local governments, agency, advocacy, local business, and public stakeholders participated in Phases 1 and 2 of engagement on the Prince Rupert Port Authority Land Use Plan Update. A full summary of Phase 1 and 2 activities with some key metrics are presented below:

5.1 PHASE 1 ENGAGEMENT SUMMARY



The first phase of engagement took place between October and December 2019. It included a series of meetings with partner First Nations, municipalities, and the public to identify key themes and principles for consideration in the Land Use Plan update.

Phase 1 activities included the following:

- » Public Open House in Prince Rupert on November 19, 2019
- » Public Open House in Port Edward on November 20, 2019
- » Public Survey (PRPA Offices/Open Houses/Project Website) from November 4 to December 15, 2019.
- » Meetings with partner First Nations (Metlakatla, Lax Kw'alaams, Kitsumkalum and Kitselas), Meetings with local municipalities (Prince Rupert and Port Edward)
- » Project Notification and Invitations for Input from Project Stakeholders: Invitations to comment to the broader stakeholder list that included:
 - PRPA tenants
 - Environmental groups
 - Local advocacy groups

- Provincial and Federal Government agencies
- First Nation communities
- Municipal communities in the Skeena Watershed.

Advertising of the public open houses was distributed through the Northern View, PRPA website and social media channels (Twitter, LinkedIn, and Facebook).

The open house events in Prince Rupert and Port Edward were attended by members of the public, local officials, and community advocates. Feedback from attendees was encouraged and community surveys were provided to capture input.

Another key component of Phase 1 was the preparation and distribution of a community survey designed to capture public feedback and input. Physical copies of the survey were made available at public open house events and at PRPA's office in Atlin Terminal. The majority of survey responses were collected online using the project website. A total of 321 survey responses were received.

The survey asked respondents their perspectives on port development in terms of its current impacts on the community (positive and negative), as well as things they would like to see in the future. Below are some of the key takeaways from the survey results. The full results can be found in **Appendix A**.

The infographic on the following page summarizes the major findings of the public survey that was made available in Phase 1 of the community engagement process. The top of the figure lists the top priorities and key issues that were listed by respondents. The middle section of the figure illustrates aspects of the Port that respondents liked or did not like as well as their favourite PRPA contributions. The bottom of the figure lists respondents' top concerns and interests. Top concerns regarding port development are related to the environmental and social well being of the community and local First Nations. These are echoed in the Top Future Projects, which are initiatives that respondents would like to see PRPA have a larger role in. Survey respondents provided valuable insights, ideas, issues, and concerns related to port development however, some of the priorities highlighted in the survey results fall outside of the scope of the Land Use Plan. Topics and issues that fall outside of the scope land use plan process are still valuable and PRPA will continue to work with communities to address these issues through other avenues.

NEW PRPA LAND USE PLAN SURVEY (Fall 2019)

NOW!

TOP PRIORITIES & KEY ISSUES

- 1 Public Access to Waterfront
- 2 Habitat Protection / Compensation from Port Development
- 3 Marine Ecosystem Impacts from Vessel Activities
- 4 Preservation of Cultural / Historical Places of Interest
- 5 Community Investments, Sponsorships and Donations
- 6 Opportunities for Other Local Businesses
- 7 Public Infrastructure Impacts from Port Activities
- 8 Airshed Impacts from Port Activities
- 9 Greenhouse Gas Emissions from Port Activities
- 10 Attractiveness of Port Properties in Public Areas
- 11 Noise Impacts from Port Activities
- 12 Local First Nations Participation in Port Activities
- 13 Port-Related Job Creation
- 14 Light Impacts from Port Activities
- 15 Port Diversification
- 16 Maintaining Port Competitiveness and Efficiency
- 17 Supporting Innovation in Global Supply Chains

Favorite PRPA contributions

-  Economic, Employment, Business Opportunities
-  Community Support Projects
-  Marine, Vessel and Harbour Safety
-  Contribution to Municipal Tax Base
-  Environmental Stewardship Initiatives

Positive & Negative of Port Development

COMMUNITY INVESTMENT
JOB CREATION



LACK OF WATERFRONT ACCESS

DISTURBANCES FROM TRUCK TRAFFIC

NOISE & ENVIRONMENTAL CONTAMINATION



FUTURE

TOP FUTURE CONCERNS

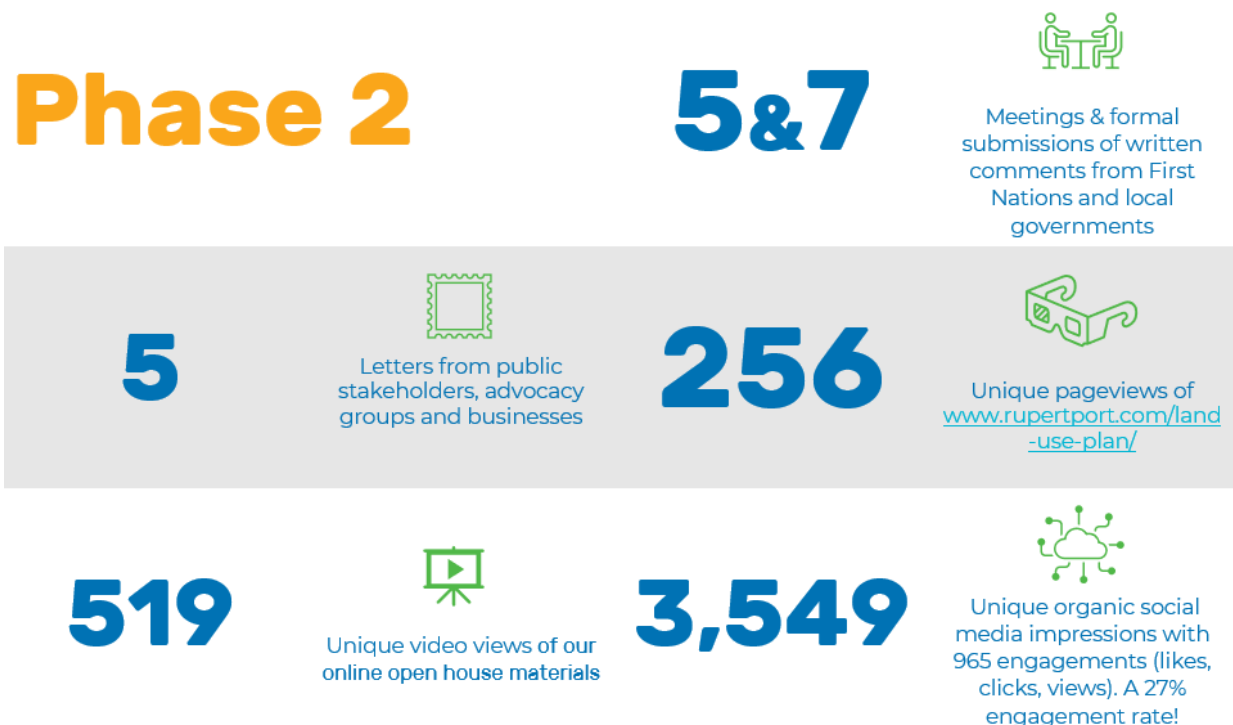
- 1 Community Integration
- 2 Environmental Health
- 3 First Nations Relationships
- 4 Waterfront Access



TOP FUTURE PROJECTS

- 1 Improve Access to Waterfront
- 2 Recreation Areas and Trails
- 3 Environmental Remediation

5.2 PHASE 2 ENGAGEMENT SUMMARY



Phase 2 engagement is focused on gathering feedback on the draft Land Use Plan. The first draft of the new Land Use Plan was completed in April 2020 and was distributed to project stakeholders for feedback. Key activities that marked Phase 2 engagement included:

- » Virtual Open Houses (June - August)
- » Referral to Partner Agencies and Governments
- » Draft Review and Feedback Forums
- » Follow up meetings with local governments and local First Nations

As required by the *Canadian Marine Act*, PRPA opened a 60-day public comment period from June 18 to August 17, 2020. During this time, PRPA continually promoted the Land Use Plan Update through social media and traditional communications. Due to the COVID-19 pandemic, traditional public open houses could not be held safely. As an alternative, the project website hosted an enhanced online presentation of the Land Use Plan draft, including a summary of key changes in the videos and summary documents on this page, as well as a section to incorporate 'Frequently Asked Questions' that was updated regularly.

Key feedback received during Phase 2 engagement largely followed four key themes.



Key partners expressed a lot of interest in increased **interjurisdictional collaboration** when it comes to land use planning at the Port of Prince Rupert. Feedback was generally supportive of increased opportunities for collaboration and transparency around future decision making.

Reconciliation with First Nations was a key part of Phase 2 discussions. PRPA strives to align itself with the themes of reconciliation in the Government of Canada's Principles Respecting the Government of Canada's Relation with Indigenous Peoples and the UN Declaration for the Rights of Indigenous People.

The topic of **cumulative effects monitoring and management** was also very well received in Phase 2. Feedback generated a lot of enthusiasm for developing a new regional wide program. Opportunity to integrate existing programs run by key partners were also identified.



Ongoing **environmental management** was a key theme. Actions taken on comments about environmental management include improving the accessibility of monitoring data, collaboration with partners on regional initiatives, and continued investments in the community via the Community Investment Fund.

6 PUBLIC AND STAKEHOLDER ENGAGEMENT SUMMARY

PRPA reached out to the three neighbouring local governments, 8 provincial and federal government agencies, 5 environmental organizations and 23 industry stakeholders throughout the planning and engagement process. Key themes heard from these groups included:

- » Interjurisdictional collaboration
- » Importance of environmental protection and the value of the marine environment (especially flora banks)
- » Local governments as a key service provider for employees
- » Importance of neighbourly monitoring activities to track and respond to concerns around noise, air quality and light pollution.
- » Importance of historical and heritage structures and the potential for an interpretation platform
- » Access to the waterfront

Public Open Houses:

- » Prince Rupert on November 19, 2019
- » Port Edward on November 20, 2019

Meetings with Local Governments:

- » Prince Rupert October 28, 2019
- » Port Edward October 28, 2019
- » Port Edward July 7, 2020
- » North Coast Regional District July 14, 2020

A full record of communications with local governments and First Nations is presented in **Appendix C**. Formal responses can also be found in **Appendix A-2 and B-2**.

7 FIRST NATIONS ENGAGEMENT SUMMARY

PRPA is a federal agency which is required to conduct meaningful consultation with First Nations and Indigenous peoples whose traditional treaty rights may be impacted by its activities.

PRPA sent out letters to six First Nations whose traditional territory overlaps PRPA jurisdiction and conducted in person, telephone, and teleconference meetings as appropriate with each. The full list of dates and times of these meetings can be found in **Appendix C**. Formal responses can also be found in **Appendix B-2**.

Key questions and themes that came out of consultation and engagement activities with First Nations partners are summarized below.

1. Cumulative Effects science, monitoring and management are very important. Several nations already have cumulative effect monitoring programs of their own that track things like vessel movements, underwater noise, greenhouse gas emissions, ecosystem health and wildlife impacts.
2. First Nations are squeezed by their capacity to participate in project and plan reviews. It should be recognized that this limited capacity in terms of time, workforce and funds impacts First Nations ability to participate in the proceedings.
3. The concept of "emergence" is important when looking towards the future. As new facilities are built, and new technology is incorporated they enable things that have not yet been imagined.
4. A lot of work was put into the MaPP and Great Bear Rainforest Initiatives and these should be integrated into PRPAs understanding of the regional environment.
5. Economic Partnerships and Employment for community members are key considerations for several local First Nations.

Meetings with First Nations Partners

- » Lax Kw'alaams First Nation October 29, 2019
- » Metlakatla First Nation October 29, 2019
- » Kitsumkalum First Nation December 19, 2019
- » Kitsumkalum First Nation July 2, 2020
- » Kitsumkalum First Nation August 10, 2020
- » Kitselas First Nation January 13, 2020
- » Kitselas First Nation June 12, 2020
- » Gitxaala Nation August 6, 2020

APPENDIX CONTENTS

Appendix A – Engagement Phase 1

Appendix A-1 - Engagement Materials

- » Letters
- » Boards
- » Survey
- » Social Media Posts
- » Newspaper Ad

Appendix A-2 – Engagement Feedback

- » Survey Results
- » Prince Rupert Open House Sign-in Sheet
- » Letters from Stakeholders

Appendix B – Engagement Phase 2

Appendix B-1 - Engagement Materials

- » Social Media Posts
- » Website content
- » FAQ
- » Online Open House Boards

Appendix B-2 – Engagement Feedback

- » Letters from First Nation stakeholders
- » Letters from Municipalities
- » Letters from the Public and Other Stakeholders

Appendix C: Communications Log

APPENDIX A PHASE 1 MATERIALS AND RESPONSES

APPENDIX A-1 - ENGAGEMENT MATERIALS

Addressee
Business name
Address line 1
Address line 2

Dear, Lorem ipsum dolor sit amet,

The Prince Rupert Port Authority (PRPA) has begun the process of reviewing its Land Use Plan. The Land Use Plan is a document that lays out the Port Authority's plan for managing lands under its jurisdiction for the next 20 years. The update is the latest in a continual effort to ensure that lands are managed effectively for the current and future benefit of the port, its stakeholders and the community. The plan allows PRPA to take stock and update its vision for the future as the economy evolves and new opportunities present themselves.

PRPA is committed to ensuring this update has communication with and involvement of local First Nations, local governments, neighbouring communities, residents, businesses, government agencies, and other members of the public. As part of the review process, PRPA is engaging with the community to raise awareness and understanding about the process, as well as receive feedback during the preparation of the new Future Development Plan.

PRPA values [Insert name of organization] as a key component towards the success of the port, and there will be several opportunities to engage throughout the Land Use Plan review process. This letter marks the beginning of the first phase of engagement where we would like to invite you to learn about the current planning process and share your own aspirations for the port. The first open house events will be on November 19th and 20th in Prince Rupert and Port Edward respectively. We will provide more details via email in the coming weeks. A secondary phase of engagement planned for the new year will give the community a chance to comment on the draft plan before it is finalized.

The PRPA's existing land use plan details where the port has come from and provides the starting point for this update. The current land use plan can be found here:
<https://www.rupertport.com/app/uploads/2019/09/prpa-land-use-management-plan.pdf>

Please let us know if there is a different or additional contact(s) from your organization who we should connect with.

Sincerely,

About the Land Use Plan Update

The Prince Rupert Port Authority is responsible for preparing a detailed land use plan that contains objectives and policies for the physical development of the real property that it manages, holds, or occupies and that it takes into account relevant social, economic and environmental matters and zoning by-laws that apply to neighbouring lands. The “2020 Land Use t Plan” was implemented in 2011, and adopts a time frame of approximately 10 years, to the year 2020. Many aspects of this plan remain valid, but there have been important changes to operating context, strategic direction and land portfolio. Given this, the Port Authority has initiated the process of updating its Land Use Plan.

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The Prince Rupert Port Authority is responsible for the overall planning, development, marketing, and management of the commercial port facilities within the Port of Prince Rupert. This includes ensuring competitive, efficient, and timely responses to customer needs and business opportunities. It also means ensuring that we facilitate these opportunities in a manner that is safe, responsible, and sustainable. By working closely with our partners and customers, we deliver supply chain innovation that adds value to Canadian products and increases Canada’s global competitiveness. Through careful stewardship, we have created sustainable prosperity for our communities, First Nations, our province, and our country. In 2018, the Port handled over 26 million tonnes of volume, valued in excess of \$35 billion.

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Support from the City of Prince Rupert has been and will continue to be, a critical differentiation factor that will enable our success. As we move forward with the Land Use Plan review process, we would like to arrange regular opportunities to meet and discuss the review of the Plan. In anticipation of the formal public project launch, we would like to meet with City representatives for a preliminary conversation. We will follow up with a phone call in the coming days to arrange this meeting.

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LAND USE PLAN UPDATE

COMMUNITY SESSION
NOVEMBER 2019



DRAFT

WELCOME!

Thank you for attending the first Community Session for the update of the Prince Rupert Port Authority Land Use Plan. Please take this opportunity to learn about the project and provide feedback to inform the preparation of the refreshed Plan. We are excited to hear from you!

SIGN IN

Please sign in and indicate whether you would like to be added to the project contact list.

SURVEY

Please fill out a survey to share your thoughts and ideas. You can also complete the survey online at www.rupertport.com/land-use-plan

RUPERTPORT.COM



PRINCE RUPERT PORT AUTHORITY

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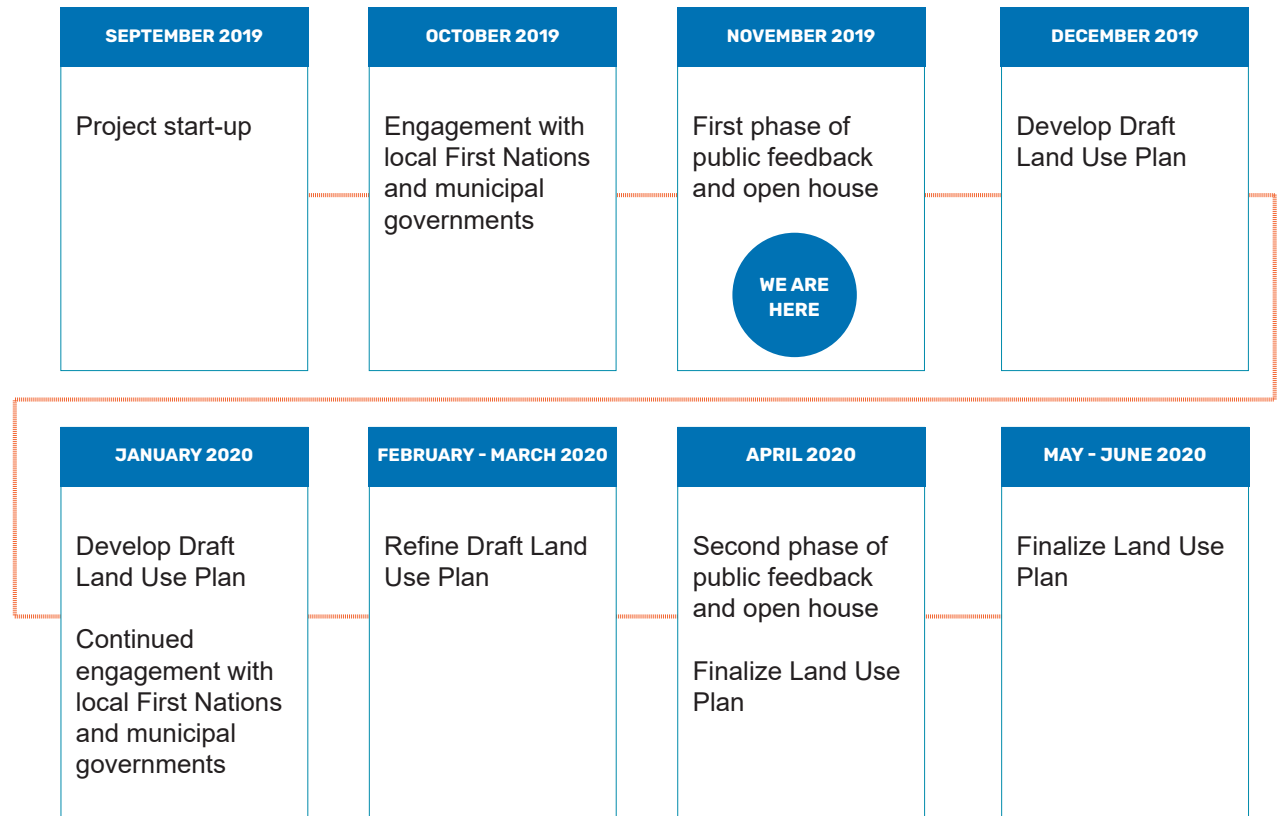
This event will provide an overview of the exciting innovation, growth and environmental initiatives that the PRPA is undertaking. The Land Use Plan Update will capture these initiatives and more to form the vision for the future of the Port of Prince Rupert.



PUBLIC ENGAGEMENT

PRPA is committed to ensuring this update includes communication with and involvement of local First Nations, municipal governments, community residents, businesses, government agencies, and other members of the public. As part of the review process, PRPA is engaging with the community to raise awareness and understanding about the process, as well as receive feedback before the preparation of the Plan.

TIMELINE

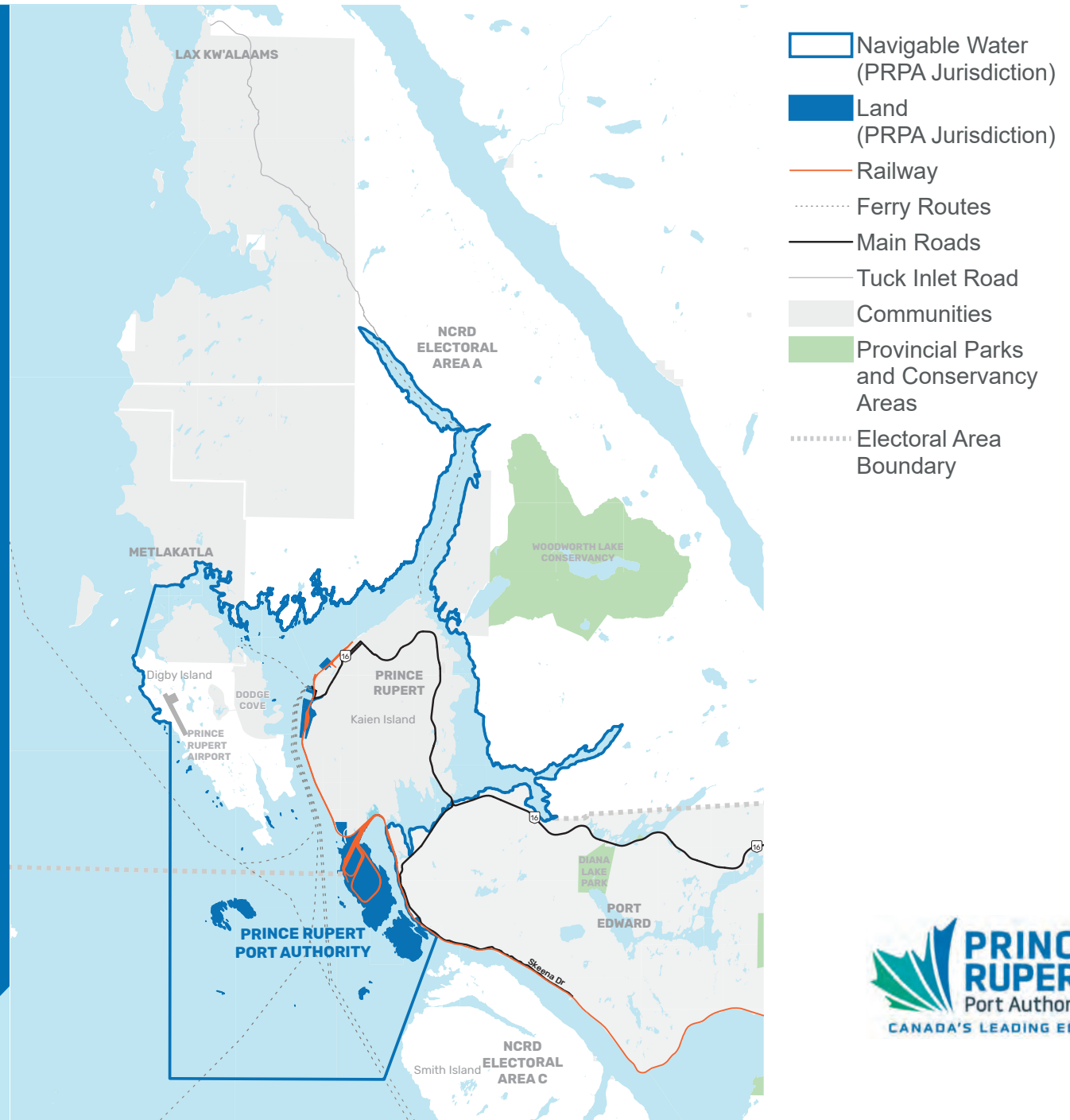


PRPA REGULATORY BOUNDARIES

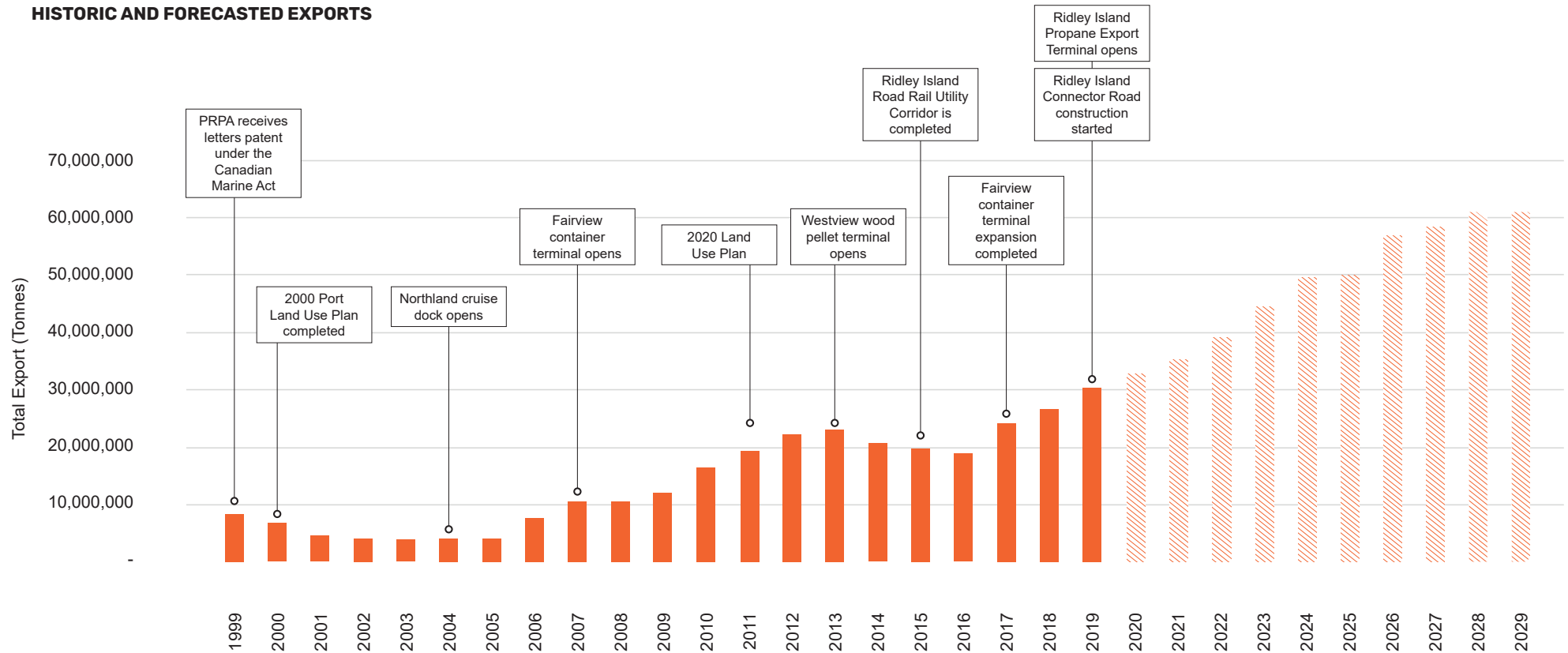
The PRPA's Letters Patent describe two forms of jurisdiction for the Prince Rupert Harbour:

- A** - Navigable Water under PRPA jurisdiction
- B** - Land under PRPA jurisdiction

Navigable waters refer to the water and the PRPA's role as a regulator for the movement of vessels. Land under PRPA jurisdiction refer to lands that the PRPA administers on behalf of the federal government. On these lands, the PRPA builds improvements to attract industrial tenants.



HISTORIC AND FORECASTED EXPORTS



HISTORY AND GROWTH

Prince Rupert was originally chosen for its strategic location as a port. The port has seen a number of changes and milestones since it was first established, and it continues to grow and change today.



EXISTING 2020 LAND USE MANAGEMENT PLAN

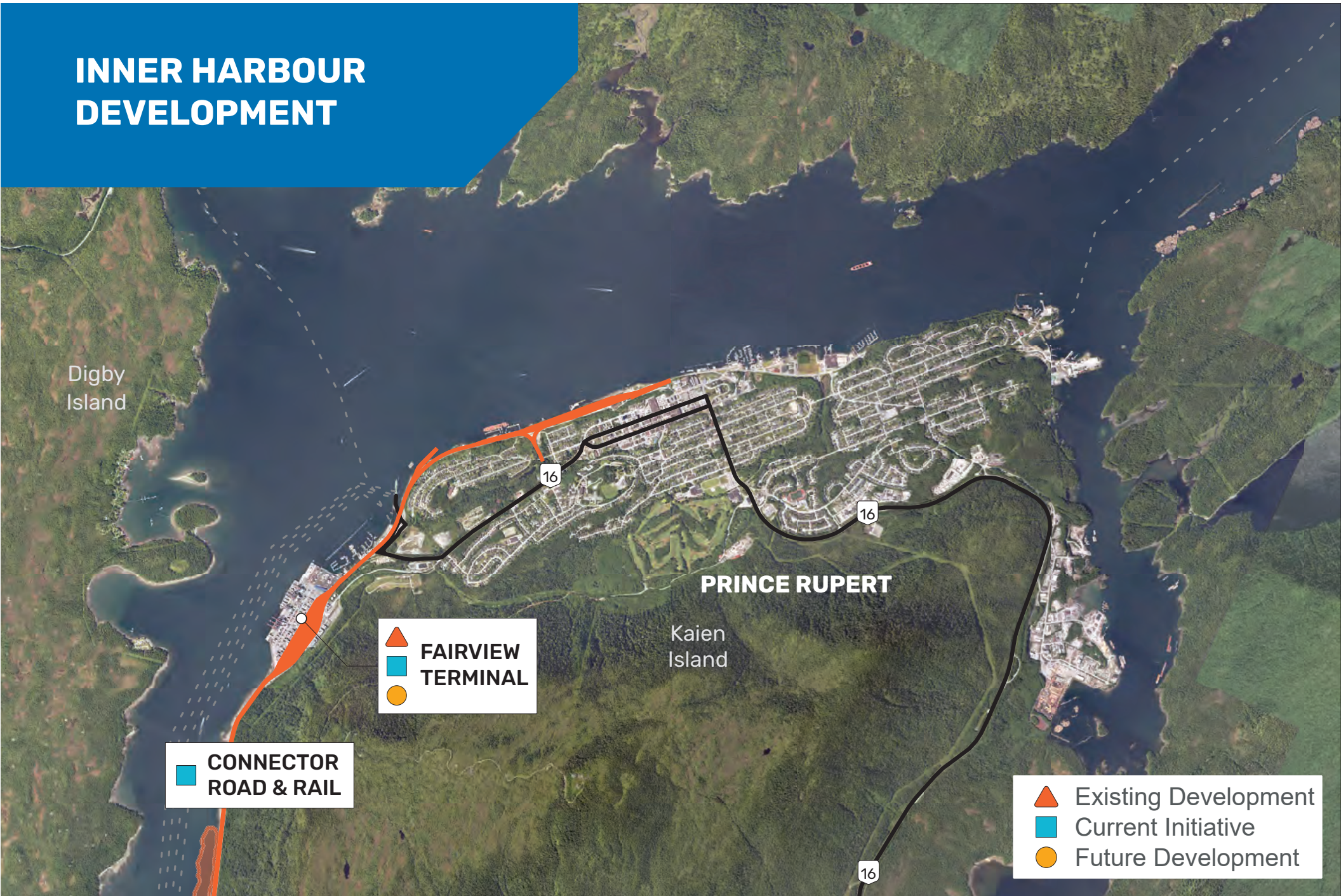


AECOM

Port of Prince Rupert 2020 Land Use Management Plan



INNER HARBOUR DEVELOPMENT



▲ FAIRVIEW
TERMINAL

CONNECTOR
ROAD & RAIL

▲ Existing Development
Current Initiative
Future Development

PRINCE RUPERT

PORT EDWARD

Smith Island

Lelu Island

Kitson Island

Kaien Island

Ridley Island

Skeena Dr

IMPORT LOGISTICS PARK

ZANARDI BRIDGE EXPANSION

PORPOISE HARBOUR REEFS

RIDLEY RAIL CAUSEWAY EXPANSION

RIDLEY EXPORT LOGISTICS

CONNECTOR ROAD & RAIL

SKIT

CN REEFS

RUPERT GRAIN

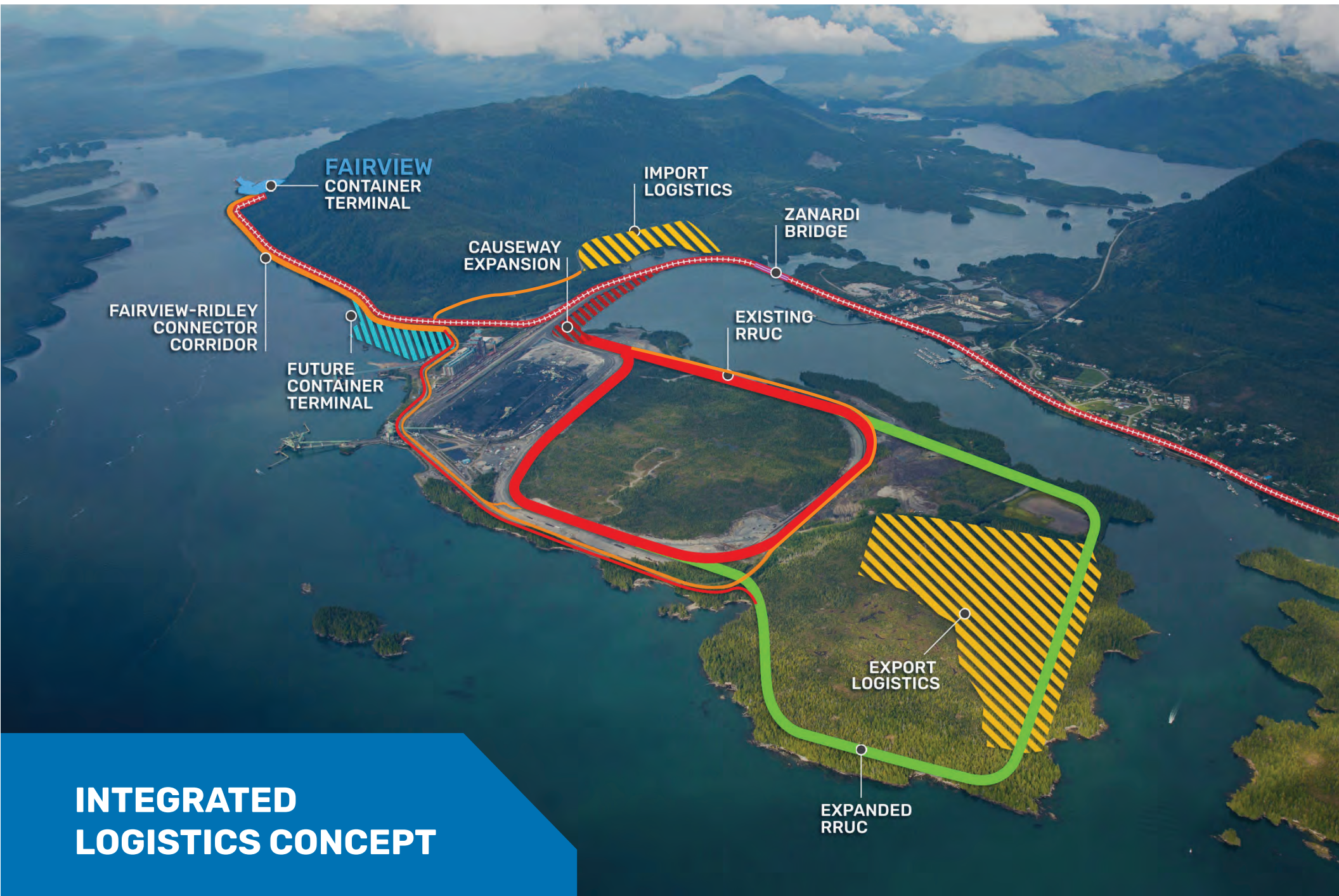
RTI

RRUC

FLORA, AGNEW, AND HORSEY BANKS DEVELOPMENT MORATORIUM

OUTER HARBOUR DEVELOPMENT

- Existing Development
- Current Initiative
- Future Development



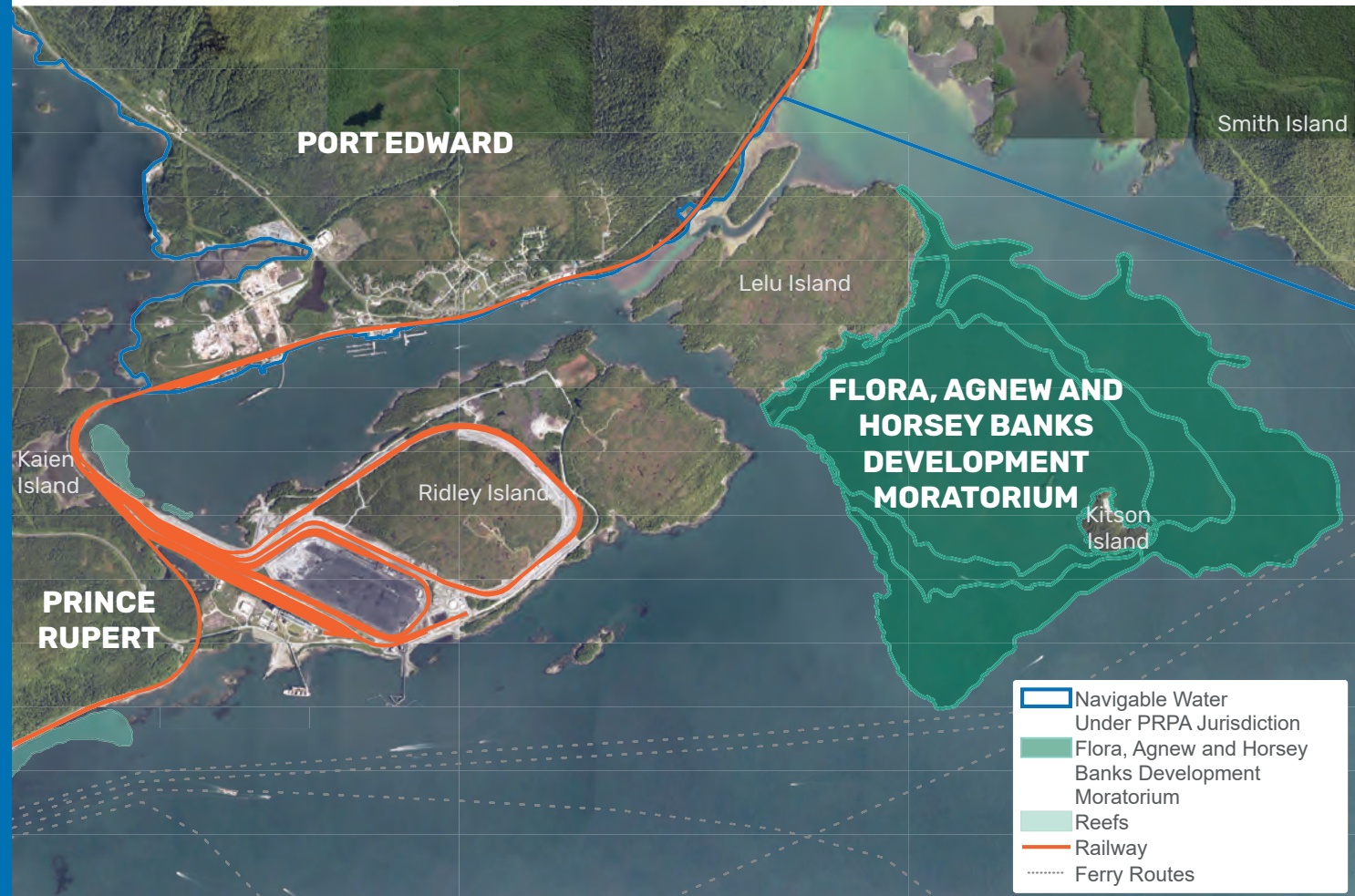
**INTEGRATED
LOGISTICS CONCEPT**

FLORA, AGNEW AND HORSEY BANKS DEVELOPMENT MORATORIUM

In January 2019 the PRPA enacted a development moratorium on the Flora, Agnew and Horsey Banks at the mouth of the Skeena River.

The area is rich in biodiversity and is a critically important marine habitat and it plays an essential role in the lifecycle of Skeena River salmon.

The land use plan update will define and formalize this development moratorium.



THANK YOU!

Thank you for attending!
Please fill out a Survey before you leave today.
The survey is also online at www.rupertport.com/land-use-plan

CONTACT US

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Port of Prince Rupert Land Use Plan Update Survey

The Prince Rupert Port Authority (PRPA) is seeking input from the community to aid in the development of the update to a Land Use Plan for the Port of Prince Rupert. We are in the first phase of engagement and invite you to share your ideas on what the Port of Prince Rupert will look like in the future before we begin the update. In addition to this period of public input, we will also be seeking public feedback on a draft Land Use Plan update when it is completed in Spring 2020.

The Land Use Plan is a document that lays out PRPA's plan for managing lands under its jurisdiction for the next 20 years. The update is the latest in a continual effort to ensure that lands are managed effectively for the current and future benefit of the port, its stakeholders and the community. The plan allows PRPA to take stock and update its vision for the future as the economy evolves and new opportunities present themselves.

This survey is also available on the project website at <https://www.rupertport.com/land-use-plan/>

Community Considerations

1. How important are each of these PRPA development considerations to you personally?

	1 Not at all important	2 Slightly important	3 Important	4 Fairly Important	5 Very Important
Port-related Job Creation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct and indirect opportunities for other local businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise Impacts from port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Port Diversification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local First Nations Participation in port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Light impacts from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public Infrastructure Impacts from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	1 No at all important	2 Slightly important	3 Important	4 Fairly Important	5 Very Important
Maintaining port competitiveness and efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greenhouse Gas Emissions from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitat Protection/Habitat Compensation from Port development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Ecosystem Impacts from Vessel activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Airshed impacts from port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public Access to Waterfront	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preservation of cultural/historical places of interest	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where? _____					
Community Investments, sponsorships and donations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting innovation in global supply chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Attractiveness of Port Properties in Public Areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Prince Rupert Port Authority and the Community

2. Are you employed or have a family member employed at PRPA or a port related business?

- | | |
|--|------------------------------|
| <input type="radio"/> Yes, I am employed | <input type="radio"/> No |
| <input type="radio"/> Yes, I have a family member employed | <input type="radio"/> Unsure |

3. In your opinion, how does PRPA and its activities contribute positively to your community? (select all that apply)

- ☐ Economic, employment and business opportunities
- ☐ Municipal tax base
- ☐ Environmental Stewardship Initiatives
- ☐ Marine, vessel and harbour safety
- ☐ Community Support, donations, and education
- ☐ Investing in large Community Projects (e.g. recreation facilities, waterfront trails, medical equipment, etc)
- ☐ Other, please list_____

4. What do you perceive as the most positive aspects of port development over the last 10 years? (open ended)

5. What do you perceive as the most negative aspects of port development over the last 10 years? (open ended)

6. As the Port of Prince Rupert grows and develops in the future, what do you think PRPA should be most aware of as it makes its decisions? (open ended)

7. What is one initiative, project or objective that you would like to see PRPA undertake in the next 10-20 years? (open ended)

Engaging with the Prince Rupert Port Authority

8. Were you involved in the PRPA's previous Land Use Planning initiative and related engagement activities conducted in 2011?
 - ☐ Yes, I participated in a project activity(s)
 - ☐ Yes, I was aware but did not participate in a project activity
 - ☐ I was not aware of the project
 - ☐ I was not in the community at this time

9. How would you rate the Port's communication and sharing of information on PRPA developments and activities with local communities and stakeholders?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor	Fair	Good	Very Good	Excellent

10. If you attended the Open House on November 19 or 20 in Prince Rupert or Port Edward, did you find it helpful in providing a better understanding of the land use plan project?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not Helpful at All	Not So Helpful	Neither	Somewhat Helpful	Very Helpful	Did Not Attend

11. How did you hear about PRPA's land use plan update?

<input type="radio"/> PRPA Website	<input type="radio"/> Word-of-Mouth
<input type="radio"/> Social Media	<input type="radio"/> Newsletter
<input type="radio"/> Newspaper	<input type="radio"/> Other, please indicate _____
<input type="radio"/> Radio	

12. How do you normally find out information about community events and developments?

<input type="radio"/> My Community's Website	<input type="radio"/> Word-of-Mouth
<input type="radio"/> Social Media	<input type="radio"/> Other, please indicate _____
<input type="radio"/> Newspaper	
<input type="radio"/> Radio	

13. What suggestions do you have for conducting future engagement activities related to this project? (open ended)

14. Do you have any other comments, ideas or thoughts you would like to provide the project team? (open ended)

About You

15. Which community do you reside in?

- | | | |
|-------------------------------------|---|--|
| <input type="radio"/> Prince Rupert | <input type="radio"/> Dodge Cove | <input type="radio"/> Kitselas |
| <input type="radio"/> Port Edward | <input type="radio"/> Gitxaala(Kitkatla) | <input type="radio"/> North Coast
Regional District |
| <input type="radio"/> Metlakatla | <input type="radio"/> Gitga'at (Hartley
Bay) | <input type="radio"/> Other, please
list_____ |
| <input type="radio"/> Lax Kw'alaams | <input type="radio"/> Kitsukalum | |

Thank you for completing this survey. Please stay tuned for news and information on future project and engagement activities. If you would like to receive updates on this project please include your contact information below.

Name:_____

Phone:_____

Email:_____

You can also follow us on social media to learn about the project and other PRPA news.

 <https://www.facebook.com/rupertport/>

 <https://twitter.com/rupertport/>

 <https://www.linkedin.com/company/prince-rupert-port-authority>

Email: landuseplan@rupertport.com



Prince Rupert Port Authority

Published by Katherine Voigt [?] · November 19, 2019 · 



Today's the day!

Join us at this afternoon's Open House, taking place between 4:00PM and 8:00PM at the Port Interpretive Centre in #PrinceRupert's Cow Bay.

Unable to attend? There's a second Open House happening in Port Edward tomorrow. Check out the poster for event details.

Hope to see you there!

LAND USE PLAN

Open House

The **Prince Rupert Port Authority** has begun the process of updating its **Land Use Plan**.

We're inviting **all residents** of our local communities to come out and learn about the plan, the process, and share their thoughts!

COMMUNITY SESSIONS:

November 19th, 2019, 4-8PM

Port Interpretive Centre
215 Cow Bay Rd

November 20th, 2019, 5-7PM

Port Edward Community Hall
770 Pacific Ave



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For more information:
LANDUSEPLAN@RUPERTPORT.COM





Prince Rupert Port Authority

Published by Katherine Voigt [?] · November 6, 2019 · 

...

We want to hear from you at www.rupertport.com/land-use-plan!

We are seeking input from the community to aid in the development of the update to a Land Use Plan for the Port of Prince Rupert.

We are in the first phase of engagement and invite you to share your ideas on what the Port of Prince Rupert will look like in the future before we begin.

There are a variety of ways to engage in the process, including a quick and easy online survey.

To participate in the survey and learn more about the Land Use Plan, go to www.rupertport.com/land-use-plan.

LAND USE PLAN

Have Your Say!

Your voice matters. As part of the development of an update to the Land Use Plan for the Port of Prince Rupert, the Prince Rupert Port Authority invites all residents to share your views and learn more about this important initiative.



Go to:

www.rupertport.com/land-use-plan

to participate or to learn more about this important initiative.

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For more information:
LANDUSEPLAN@RUPERTPORT.COM



The Prince Rupert Port Authority invites the community to learn about the current update to its Land Use Plan. All residents are invited to learn about the process and share their thoughts!

COMMUNITY SESSIONS:

November 19th, 2019, 4-8PM

Prince Rupert at the Port Interpretive Centre
215 Cow Bay Rd

November 20th, 2019, 5-7PM

Port Edward at the Community Hall
633 Sunset Dr.

For more information visit www.rupertport.com



APPENDIX A-2 – ENGAGEMENT FEEDBACK

MEMORANDUM

Date: January 15, 2020
To: Krista Ediger
cc: Ken Veldman
From: Andrew Cuthbert, Andrew Baigent
File: 4767.0001.01
Subject: PRPA Community Survey – Summary

As part of Phase 1 community consultation activities for the PRPA Land Use Plan Update a community survey distributed for public comment. Physical copies of the survey were made available at public open house events and were available at the PRPA office in Atlin Terminal. The majority of survey respondents filled out the survey online. In total, 321 survey responses were received between November 4th and December 15th 2019.

The results from the community survey are summarized in this document and a copy of the survey is in **Appendix A.**

1. Community Considerations

1.1 Question 1 How important are each of these PRPA development considerations to you personally?

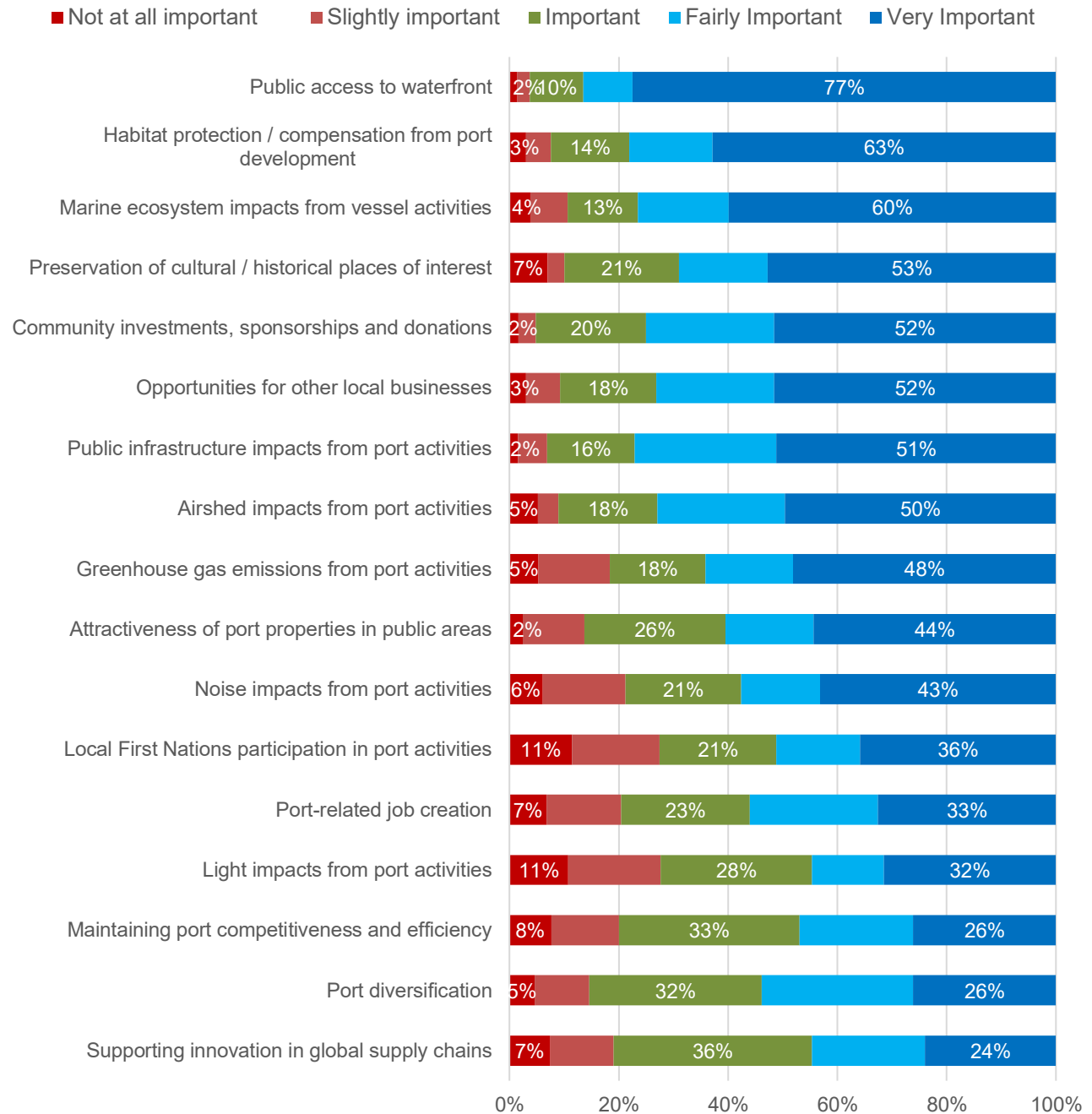
Survey participants were asked to rate the importance of specific PRPA development considerations according to their personal preferences. In total, the participants were asked to rate 17 different issues as (1) not important at all, (2) slightly important, (3) important, (4) fairly important and (5) very important. The top 3 issues identified were:

- *Public access to the waterfront*
- *Habitat protection/compensation from Port Activities*
- *Marine ecosystem impacts from vessel activities*

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Figure 1: Importance of issues related to the development of the PRPA perceived by survey participants.



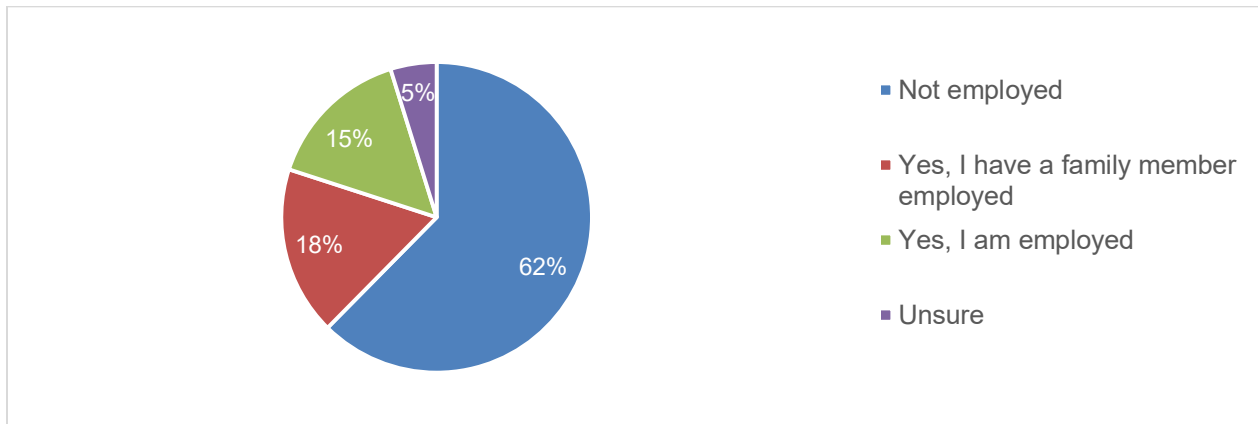
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2. Prince Rupert Port Authority and the Community

2.1 Question 2 - Are you employed or have a family member employed at PRPA or a port related business?

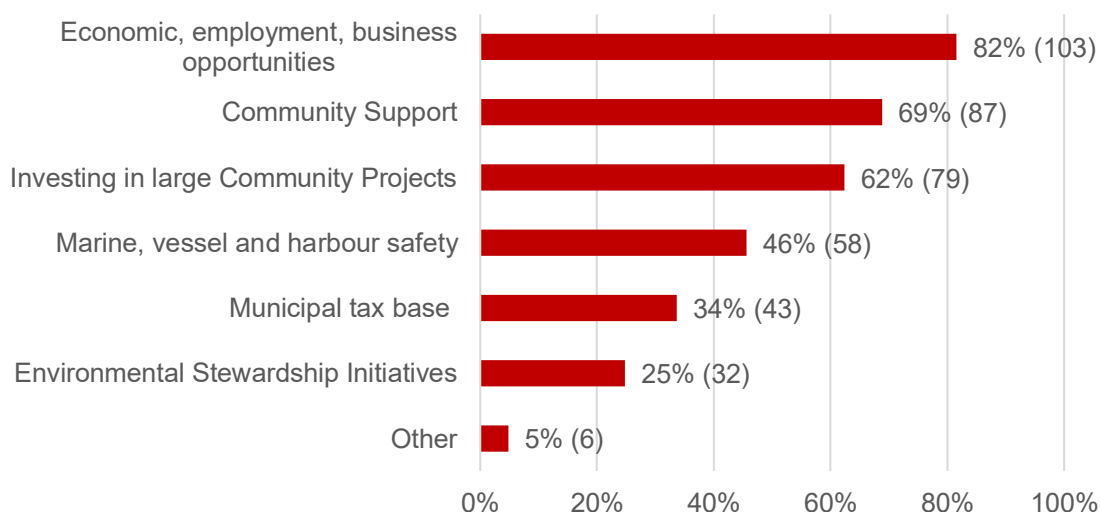
Most survey respondents were not employed by the PRPA or a port related business.



2.2 Question 3 In your opinion, how does PRPA and its activities contribute positively to your community?

Survey participants were asked how the PRPA's activities positively contribute to their community. Over 80% of respondents said the PRPA and its activities have a positive effect on the local economy, level of employment and local business opportunities. Almost 70% said the port positively supports the community through donations, education, etc. The least participants (25%) said the PRPA positively contributes to the local Environmental Stewardship Initiatives. Additional five% selected *other* and described different option in open-ended response – two of them did not see any positive contribution of the PRPA to their community (see Figure 2).

Figure 2: Positive contribution of PRPA and its activities to communities.



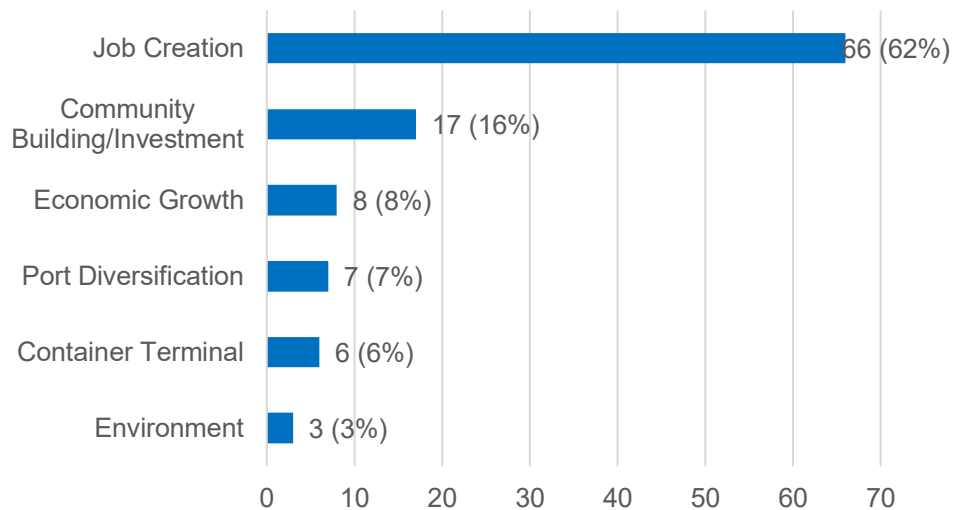
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Subject: PRPA Community Survey – Summary
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2.3 Question 4 What do you perceive as the most positive aspects of port development over the last 10 years?

In general, the most commonly reported aspects of port development by participants were the *creation of new jobs, community building and investments*, a positive effect on the *economic growth* and the *port diversification* (see Figure 3).

Figure 3: Positive aspects of the Port development identified by at least three survey respondents.

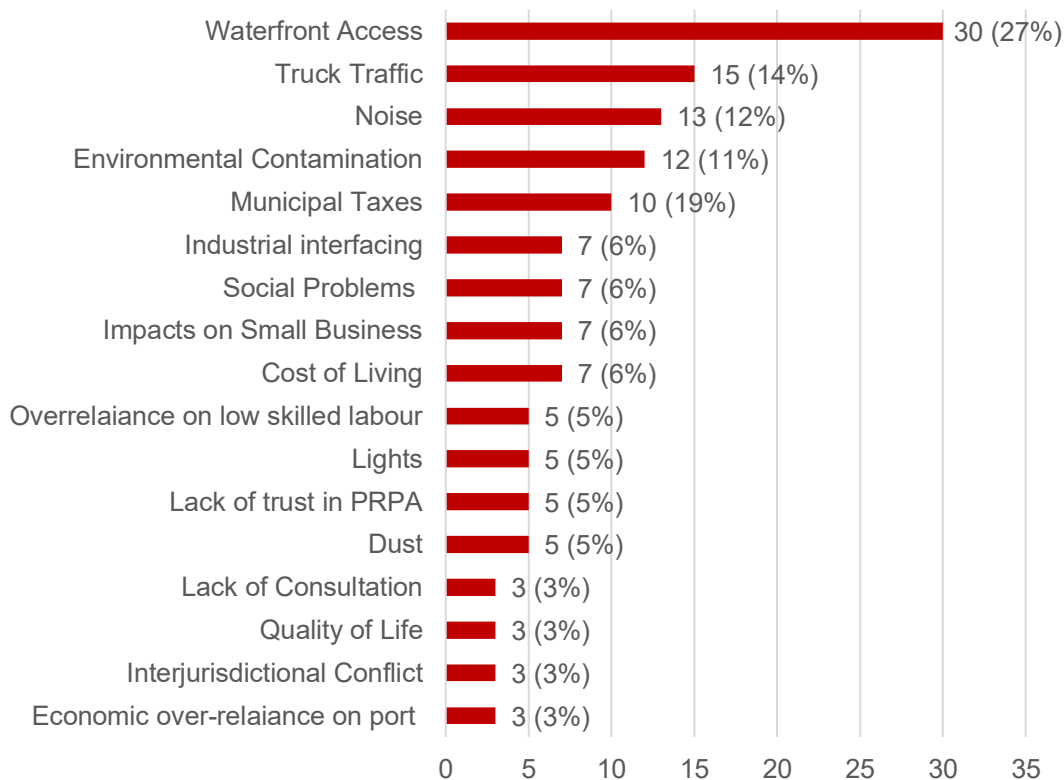


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2.4 Question 5 - What do you perceive as the most negative aspects of port development over the last 10 years?

In general, participants identified more negative aspects compared to positive ones. Participants often described poor *access to the waterfront*, high *truck traffic volumes*, *noise* and *environmental contamination* (see Figure 4).

Figure 4: Negative aspects of the Port development identified by at least three survey respondents.

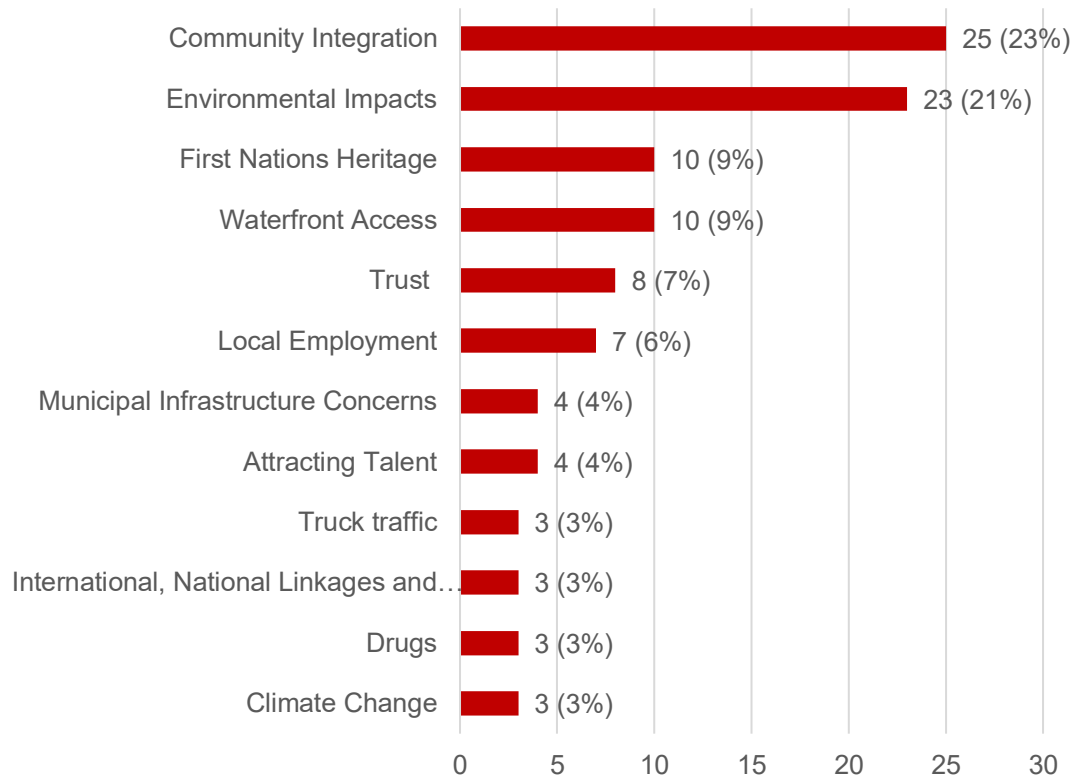


2.5 Question 6 - As the Port of Prince Rupert grows and develops in the future, what do you think PRPA should be most aware of as it makes its decisions?

Survey respondents could identify issues and challenges which the PRPA should be aware of when making decisions about its future growth and development. In total, participants identified 113 topics. The most frequently named issues were related to *community integration*, *environmental impacts*, *First Nations heritage* and *access to the waterfront* (see Figure 5).

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Figure 5: Issues the PRPA should be aware of when making decisions related to the future development identified by at least three survey respondents.



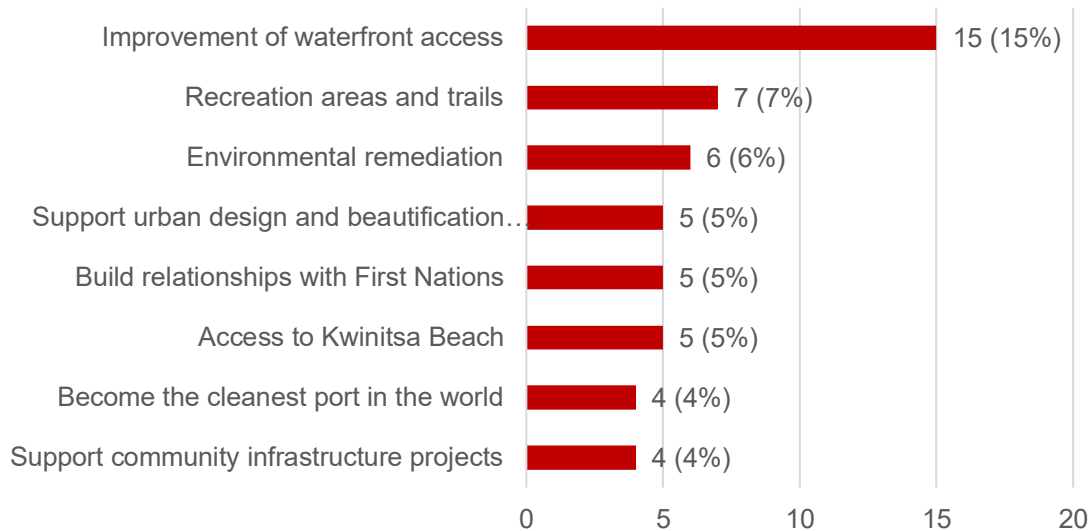
2.6 Question 7 - What is one initiative, project or objective that you would like to see PRPA undertake in the next 10-20 years?

Participants identified 110 different projects or topics related to future development. The most frequent issue identified was improving *access to the waterfront* in Prince Rupert, and specifically the beach next to Kwinitsa Railway Museum. The next most mentioned projects were related to *recreation areas and trails*, *environmental remediation*, *support of urban design*, and to *build relationships with local First Nations* (see Figure 6).

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Figure 6: Projects or initiatives the PRPA should undertake in the future.

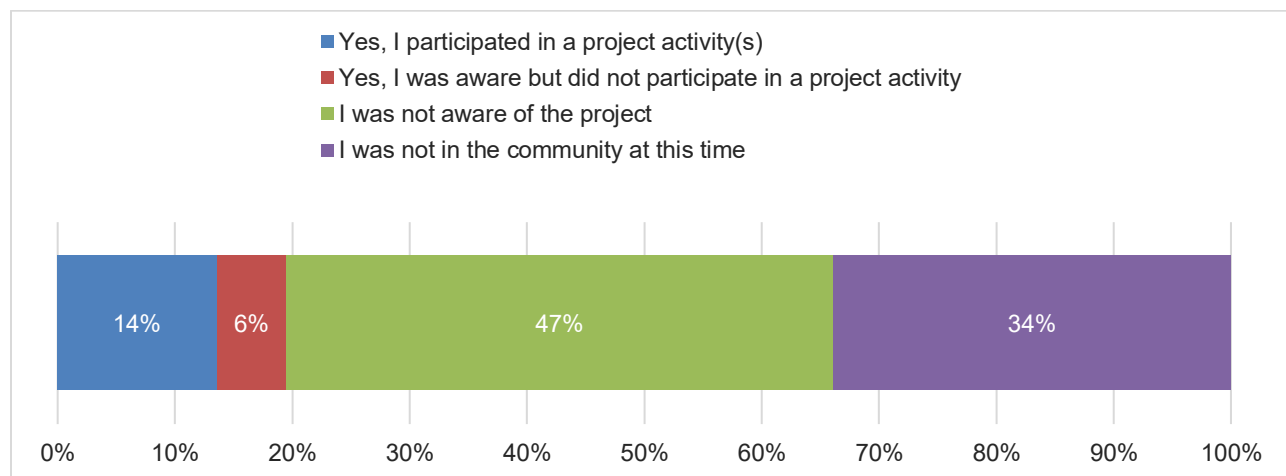


3. Engaging with the Prince Rupert Port Authority

3.1 Question 8 - Were you involved in the PRPA's previous Land Use Planning initiative and related engagement activities conducted in 2011?

The vast majority (over 86%) of survey respondents did not participate in the previous Land Use Planning initiative of the PRPA in 2011. Only 14% of survey participants said they were involved in the initiative (see Figure 9).

Figure 9: Previous participation of survey respondents in the PRPA Land Use Planning engagement initiatives.

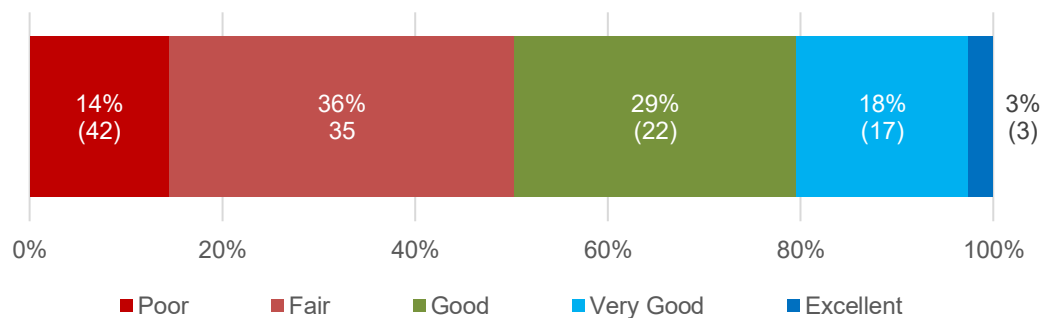


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 File: 4767.0001.01
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3.2 Question 9 How would you rate the Port's communication and sharing of information on PRPA developments and activities with local communities and stakeholders?

About half of the participants rated the way PRPA communicates with the public as good, very good or excellent. Fourteen percent perceive the PRPA communication as poor and about 35 percent rated it as fair.

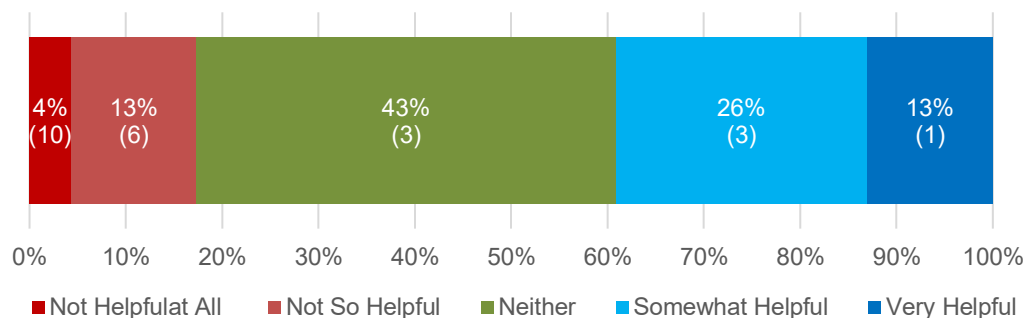
Figure 13: Evaluation of PRPA communication.



3.3 Question 10 - If you attended the Open House on November 19 or 20 in Prince Rupert or Port Edward, did you find it helpful in providing a better understanding of the land use plan project?

Survey participants who attended PRPA Open House meetings in Prince Rupert (November 19, 2019) or Port Edward (November 20, 2019) were asked to evaluate the events. About 80% of survey participants did not attend these meetings. About 20% of survey participants said they did take part in at least one of the meetings – 39% perceived the event as helpful, and 17% rated the event as not helpful. (see Figure 12).

Figure 12: Evaluation of PRPA Open House events.



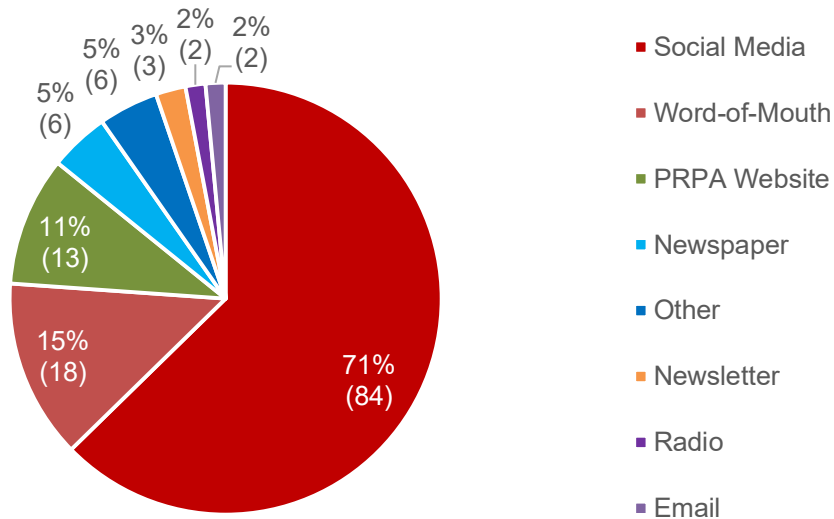
3.4 Question 11 - How did you hear about PRPA's land use plan update?

Survey participants were asked to specify how they heard about the current PRPA Land Use Plan update. Over 70% of respondents described *social media* as the source of information, about 15% heard about the LUP update from other people, and 11% did find the information on the *PRPA website* (see Figure 10).

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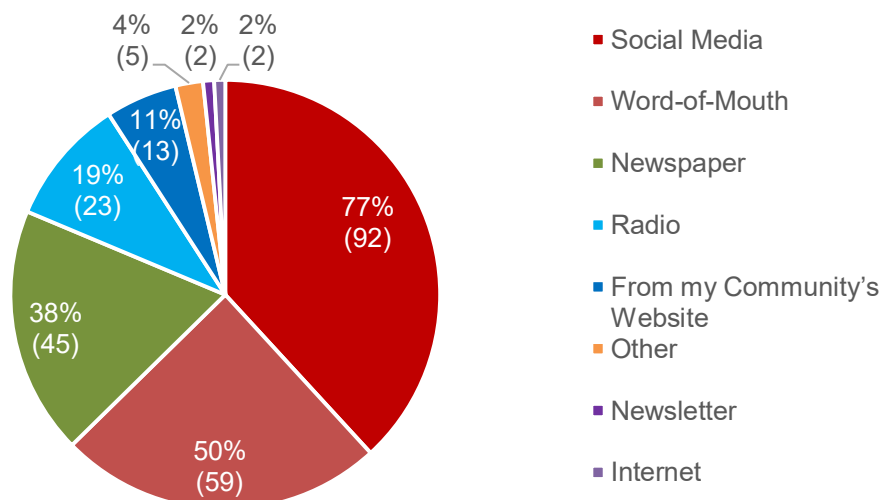
Figure 10: Information channels about current PRPA Land Use Plan update.



3.5 Question 12 How do you normally find out information about community events and developments?

Participants were asked to specify how they usually obtain information about community events. The vast majority (77%) selected *social media* and 50% mentioned *word-of-mouth*. About 40% also said they get the information from a *newspaper*, and 20% described *radio* as their source of information (see Figure 11).

Figure 11: Usual source of information of 119 participants about community events and developments.



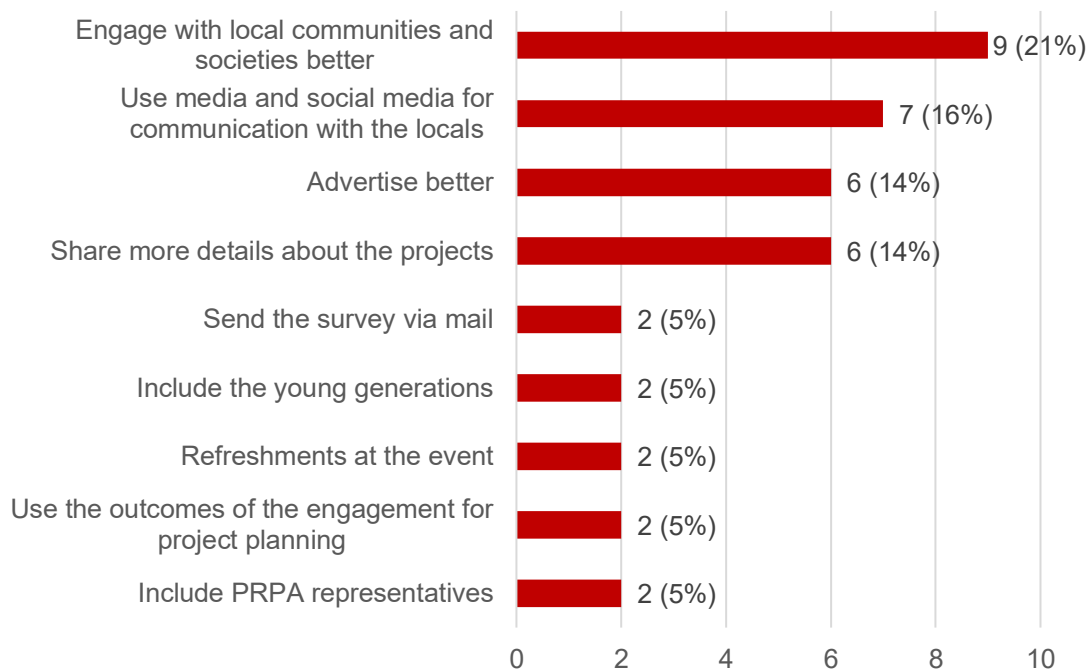
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3.6 Question 13 What suggestions do you have for conducting future engagement activities related to this project?

Survey participants suggested improvements to how the PRPA handles future engagement related to the PRPA Land Use Plan update. 21% of respondents said the PRPA should engage better with local communities and societies. 16% suggested PRPA should use social media for communication with local inhabitants and stakeholders regularly and six participants said PRPA should advertise future engagement activities better and that it should share more details about planned projects before and at the engagement meetings and other events (see Figure 14).

Figure 14: Suggestions for conducting future engagement activities.

4. About You



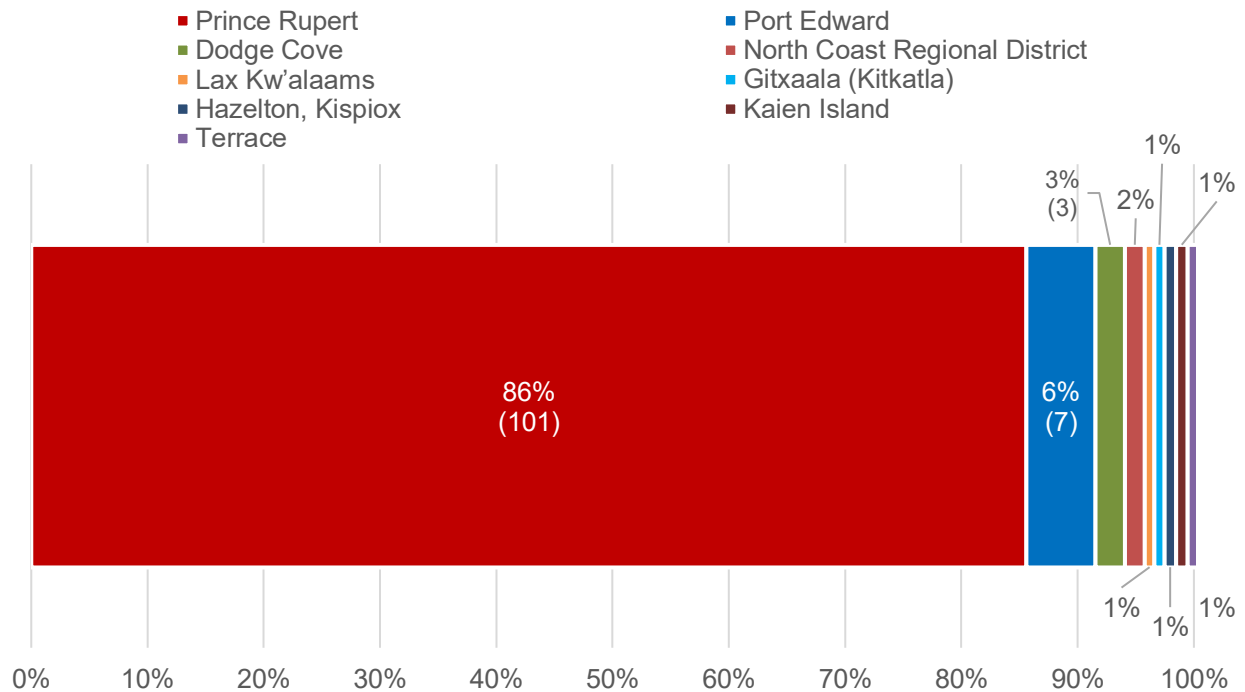
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4.1 Question 15 - Which community do you reside in?

The majority of survey participants said they live in Prince Rupert (85%) and 6% were from Port Edward. The rest of the participants lived in Dodge Cove, North Coast RD, or other communities (see Figure 7).

Figure 7: Community of residence of 118 survey participants.



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5. Appendix A PRPA Survey

Port of Prince Rupert Land Use Plan Update Survey

The Prince Rupert Port Authority (PRPA) is seeking input from the community to aid in the development of the update to a Land Use Plan for the Port of Prince Rupert. We are in the first phase of engagement and invite you to share your ideas on what the Port of Prince Rupert will look like in the future before we begin the update. In addition to this period of public input, we will also be seeking public feedback on a draft Land Use Plan update when it is completed in Spring 2020.

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Community Considerations

1. How important are each of these PRPA development considerations to you personally?

	1 Not at all important	2 Slightly important	3 Important	4 Fairly Important	5 Very Important
Port-related Job Creation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct and indirect opportunities for other local businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Noise Impacts from port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Port Diversification	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Local First Nations Participation in port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Light impacts from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public Infrastructure Impacts from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	1 No at all important	2 Slightly important	3 Important	4 Fairly Important	5 Very Important
Maintaining port competitiveness and efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greenhouse Gas Emissions from Port Activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitat Protection/Habitat Compensation from Port development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Ecosystem Impacts from Vessel activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Airshed impacts from port activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public Access to Waterfront	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preservation of cultural/historical places of interest	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where? _____					
Community Investments, sponsorships and donations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting innovation in global supply chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Attractiveness of Port Properties in Public Areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Prince Rupert Port Authority and the Community

2. Are you employed or have a family member employed at PRPA or a port related business?

- | | |
|--|------------------------------|
| <input type="radio"/> Yes, I am employed | <input type="radio"/> No |
| <input type="radio"/> Yes, I have a family member employed | <input type="radio"/> Unsure |

3. In your opinion, how does PRPA and its activities contribute positively to your community? (select all that apply)

- ☐ Economic, employment and business opportunities
- ☐ Municipal tax base
- ☐ Environmental Stewardship Initiatives
- ☐ Marine, vessel and harbour safety
- ☐ Community Support, donations, and education
- ☐ Investing in large Community Projects (e.g. recreation facilities, waterfront trails, medical equipment, etc)
- ☐ Other, please list_____

4. What do you perceive as the most positive aspects of port development over the last 10 years? (open ended)

5. What do you perceive as the most negative aspects of port development over the last 10 years? (open ended)

6. As the Port of Prince Rupert grows and develops in the future, what do you think PRPA should be most aware of as it makes its decisions? (open ended)

7. What is one initiative, project or objective that you would like to see PRPA undertake in the next 10-20 years? (open ended)

Engaging with the Prince Rupert Port Authority

8. Were you involved in the PRPA's previous Land Use Planning initiative and related engagement activities conducted in 2011?
 - ☐ Yes, I participated in a project activity(s)
 - ☐ Yes, I was aware but did not participate in a project activity
 - ☐ I was not aware of the project
 - ☐ I was not in the community at this time

9. How would you rate the Port's communication and sharing of information on PRPA developments and activities with local communities and stakeholders?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor	Fair	Good	Very Good	Excellent

10. If you attended the Open House on November 19 or 20 in Prince Rupert or Port Edward, did you find it helpful in providing a better understanding of the land use plan project?

<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not Helpful at All	Not So Helpful	Neither	Somewhat Helpful	Very Helpful	Did Not Attend

11. How did you hear about PRPA's land use plan update?

<input type="radio"/> PRPA Website	<input type="radio"/> Word-of-Mouth
<input type="radio"/> Social Media	<input type="radio"/> Newsletter
<input type="radio"/> Newspaper	<input type="radio"/> Other, please indicate _____
<input type="radio"/> Radio	

12. How do you normally find out information about community events and developments?

<input type="radio"/> My Community's Website	<input type="radio"/> Word-of-Mouth
<input type="radio"/> Social Media	<input type="radio"/> Other, please indicate _____
<input type="radio"/> Newspaper	
<input type="radio"/> Radio	

13. What suggestions do you have for conducting future engagement activities related to this project? (open ended)

14. Do you have any other comments, ideas or thoughts you would like to provide the project team? (open ended)

About You

15. Which community do you reside in?

- | | | |
|-------------------------------------|---|--|
| <input type="radio"/> Prince Rupert | <input type="radio"/> Dodge Cove | <input type="radio"/> Kitselas |
| <input type="radio"/> Port Edward | <input type="radio"/> Gitxaala(Kitkatla) | <input type="radio"/> North Coast
Regional District |
| <input type="radio"/> Metlakatla | <input type="radio"/> Gitga'at (Hartley
Bay) | <input type="radio"/> Other, please
list_____ |
| <input type="radio"/> Lax Kw'alaams | <input type="radio"/> Kitsukalum | |

Thank you for completing this survey. Please stay tuned for news and information on future project and engagement activities. If you would like to receive updates on this project please include your contact information below.

Name:_____

Phone:_____

Email:_____

You can also follow us on social media to learn about the project and other PRPA news.

 <https://www.facebook.com/rupertport/>

 <https://twitter.com/rupertport/>

 <https://www.linkedin.com/company/prince-rupert-port-authority>

Email: landuseplan@rupertport.com

Friday, January 17, 2020

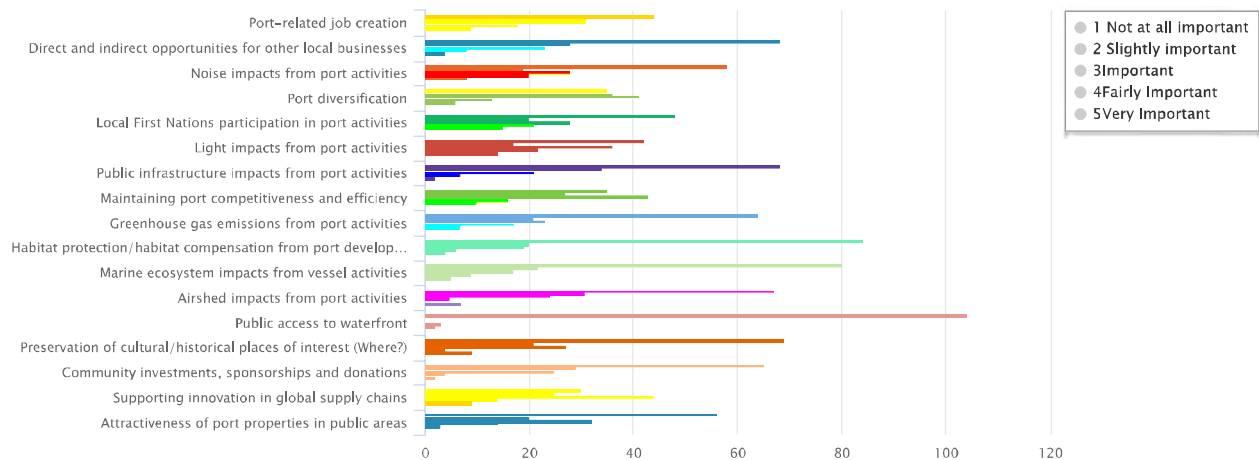
Total Today This Week This Month Custom

Disposition Code All

Filter by Responses

COMMUNITY_CONSIDERATIONS

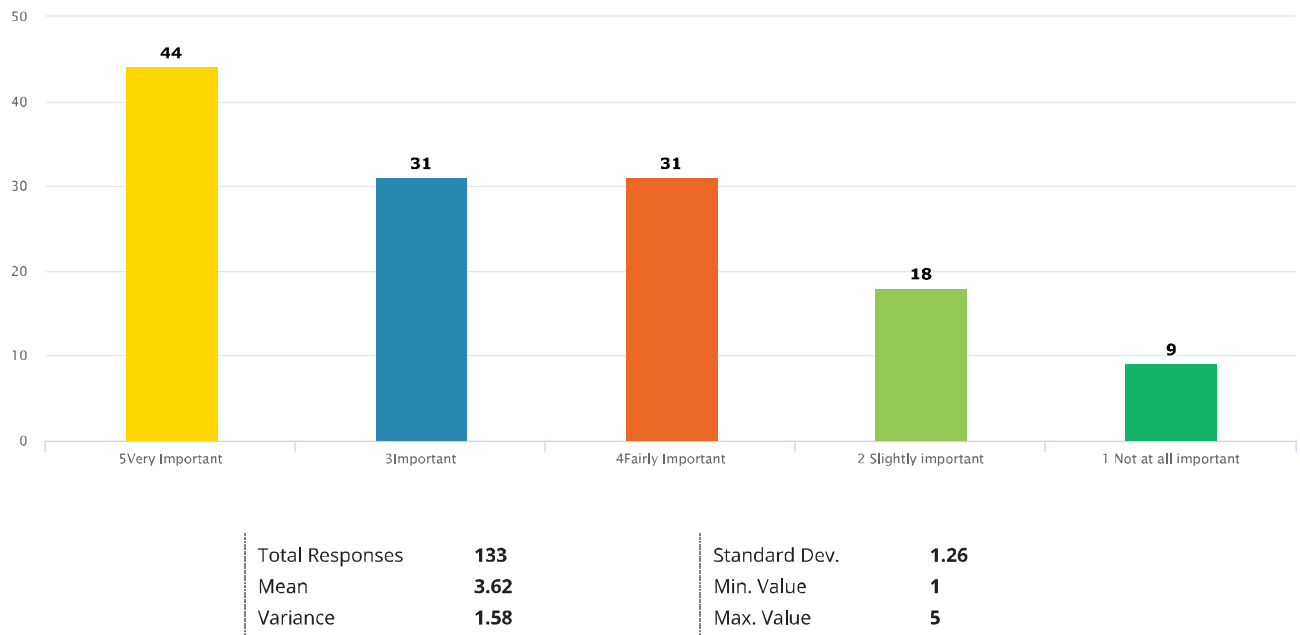
Community Considerations 1. How important are each of these PRPA development considerations to you personally?



	Total Cases	Mean	Variance	Standard Dev.	Min. Value	Max. Value
Port-related job creation	133	3.62	1.58	1.26	1	5
Direct and indirect opportunities for other local businesses	131	4.13	1.21	1.1	1	5
Noise impacts from port activities	133	3.74	1.74	1.32	1	5
Port diversification	131	3.62	1.25	1.12	1	5
Local First Nations participation in port activities	132	3.49	1.99	1.41	1	5
Light impacts from port activities	131	3.39	1.87	1.37	1	5
Public infrastructure impacts from port activities	132	4.2	.99	.99	1	5
Maintaining port competitiveness and efficiency	131	3.47	1.5	1.22	1	5
Greenhouse gas emissions from port activities	132	3.89	1.65	1.29	1	5
Habitat protection/habitat compensation from port development	133	4.31	1.14	1.07	1	5
Marine ecosystem impacts from vessel activities	133	4.23	1.3	1.14	1	5
Airshed impacts from port activities	134	4.09	1.3	1.14	1	5
Public access to waterfront	134	4.59	.76	.87	1	5
Preservation of cultural/historical places of interest (Where?)	130	4.05	1.49	1.22	1	5
Community investments, sponsorships and donations	125	4.21	.96	.98	1	5
Supporting innovation in global supply chains	122	3.43	1.42	1.19	1	5
Attractiveness of port properties in public areas	125	3.9	1.37	1.17	1	5

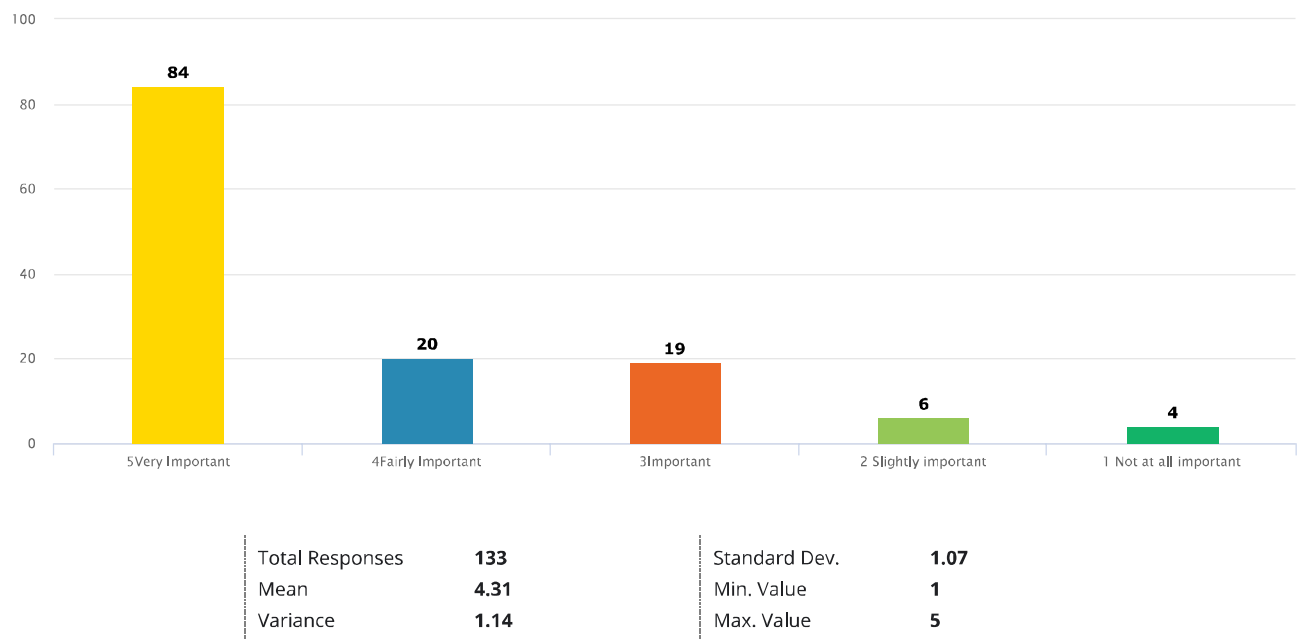
COMMUNITY_CONSIDERATIONS_A1

Port-related job creation



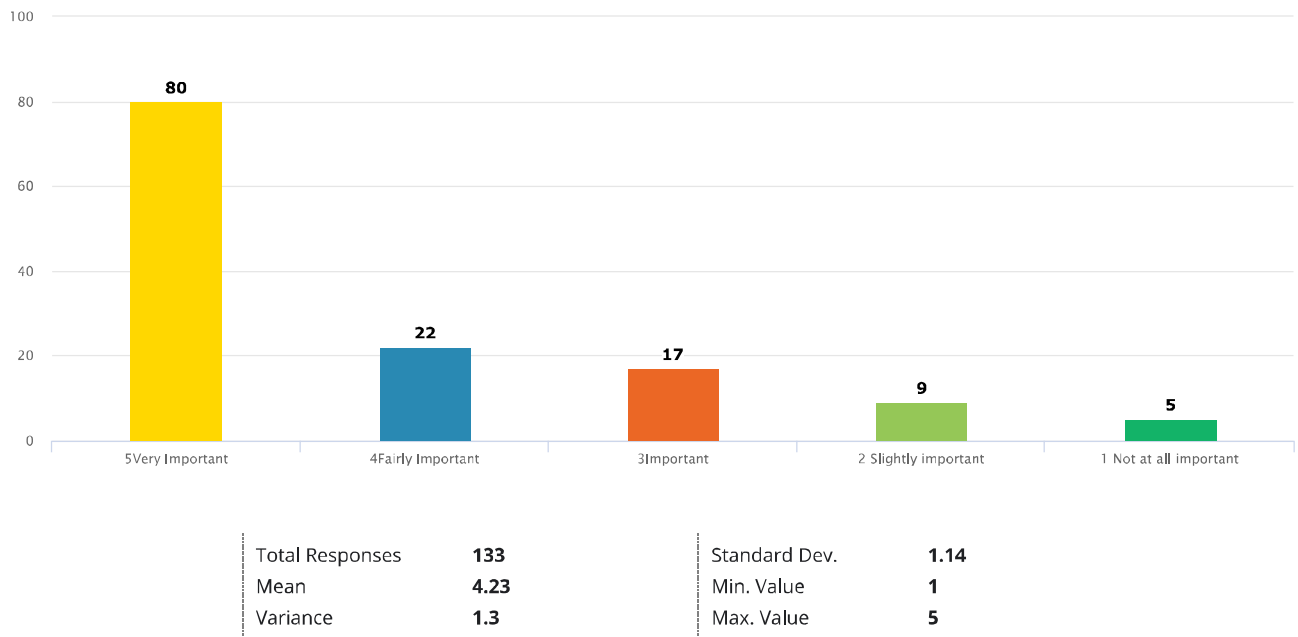
COMMUNITY_CONSIDERATIONS_A10

Habitat protection/habitat compensation from port development



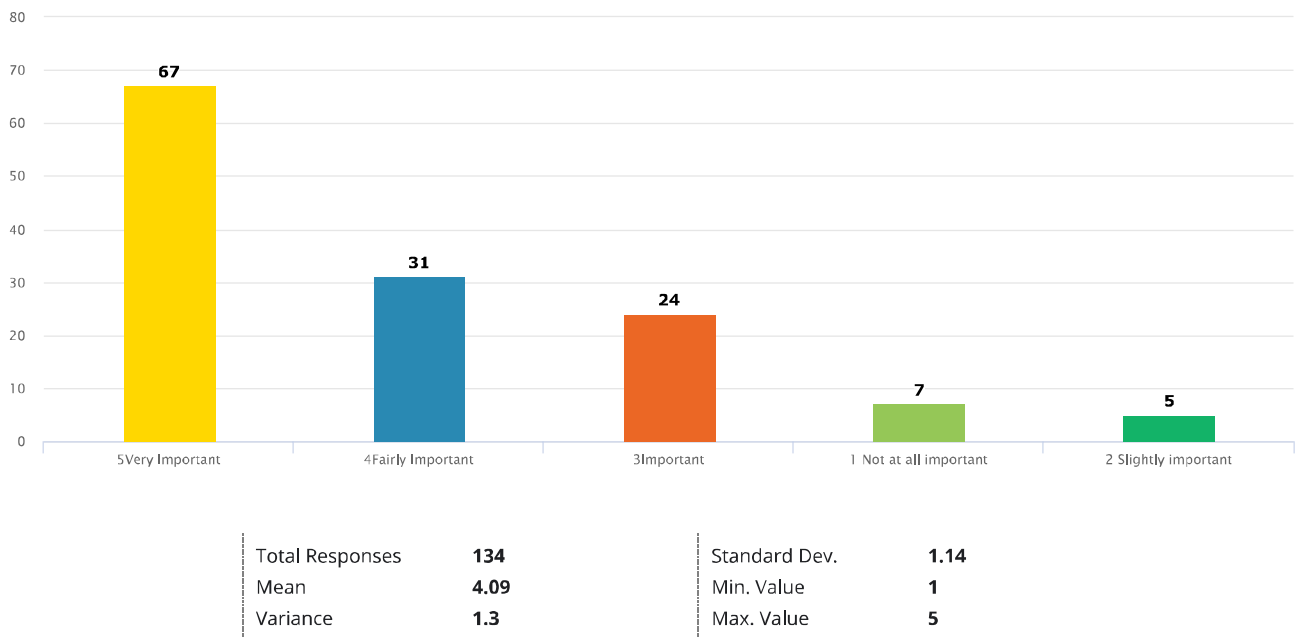
COMMUNITY_CONSIDERATIONS_A11

Marine ecosystem impacts from vessel activities



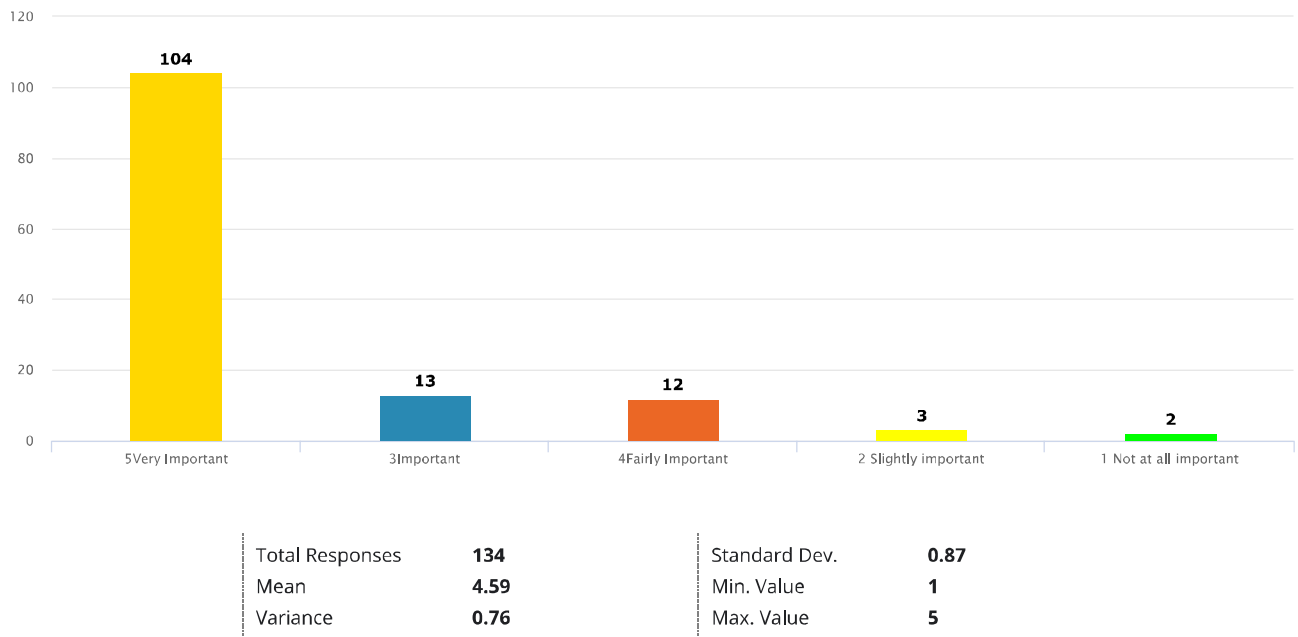
COMMUNITY_CONSIDERATIONS_A12

Airshed impacts from port activities



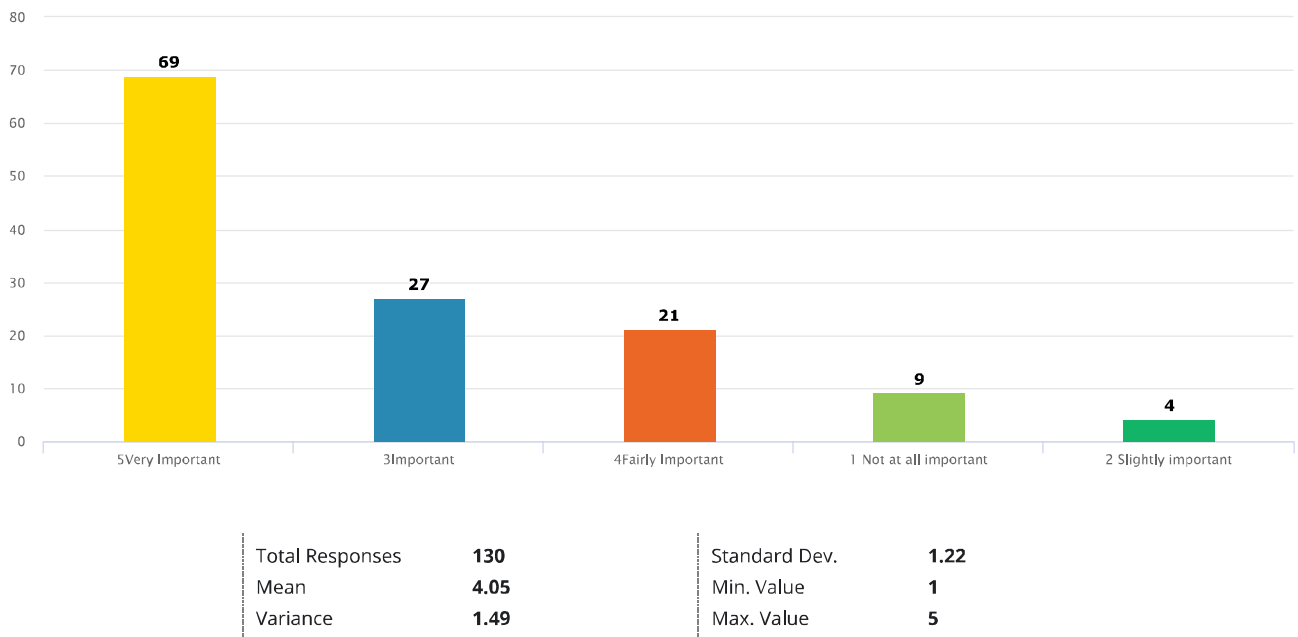
COMMUNITY_CONSIDERATIONS_A13

Public access to waterfront



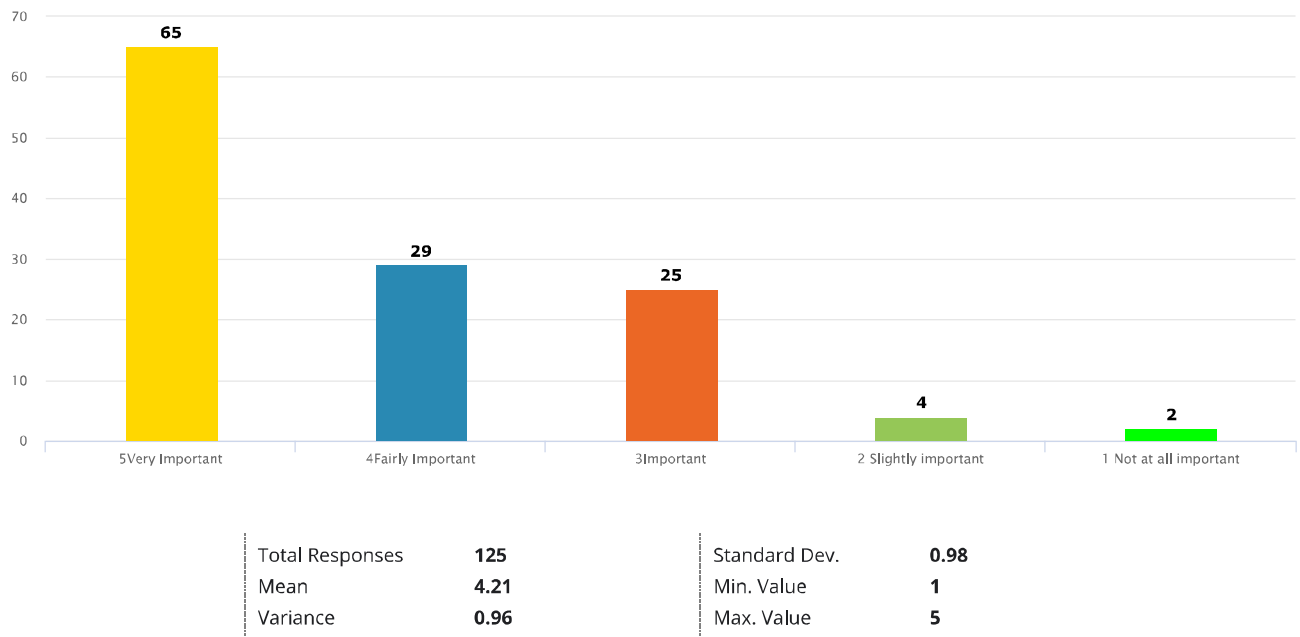
COMMUNITY_CONSIDERATIONS_A14

Preservation of cultural/historical places of interest (Where?)



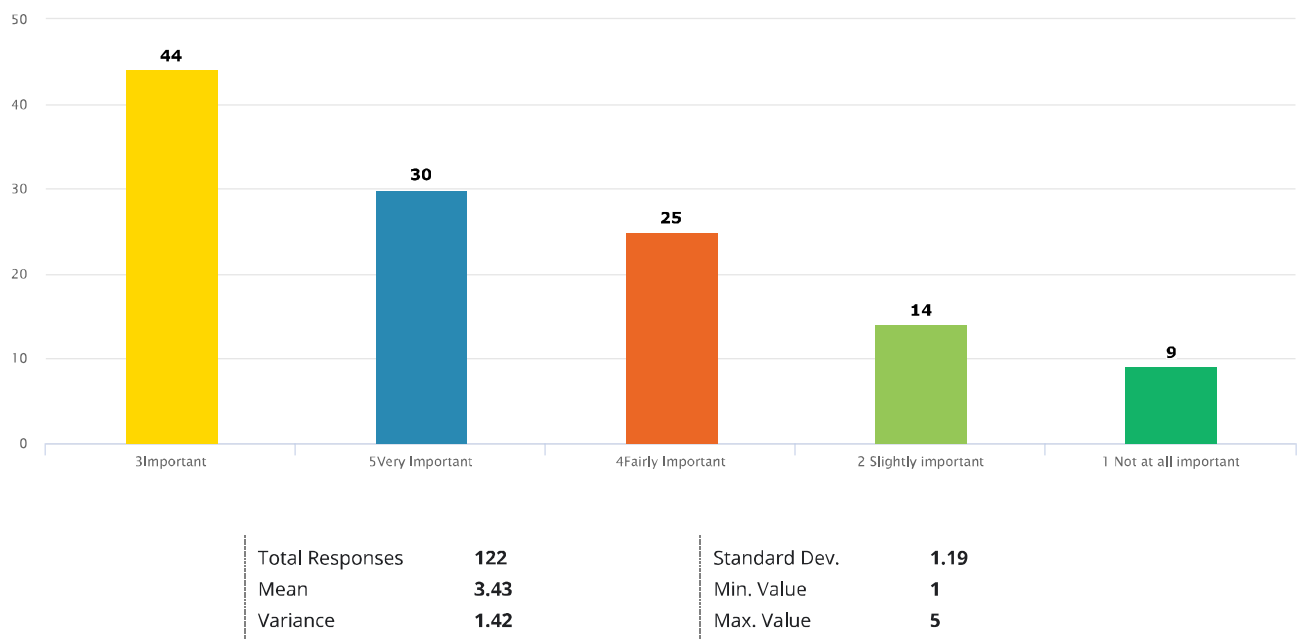
COMMUNITY_CONSIDERATIONS_A15

Community investments, sponsorships and donations



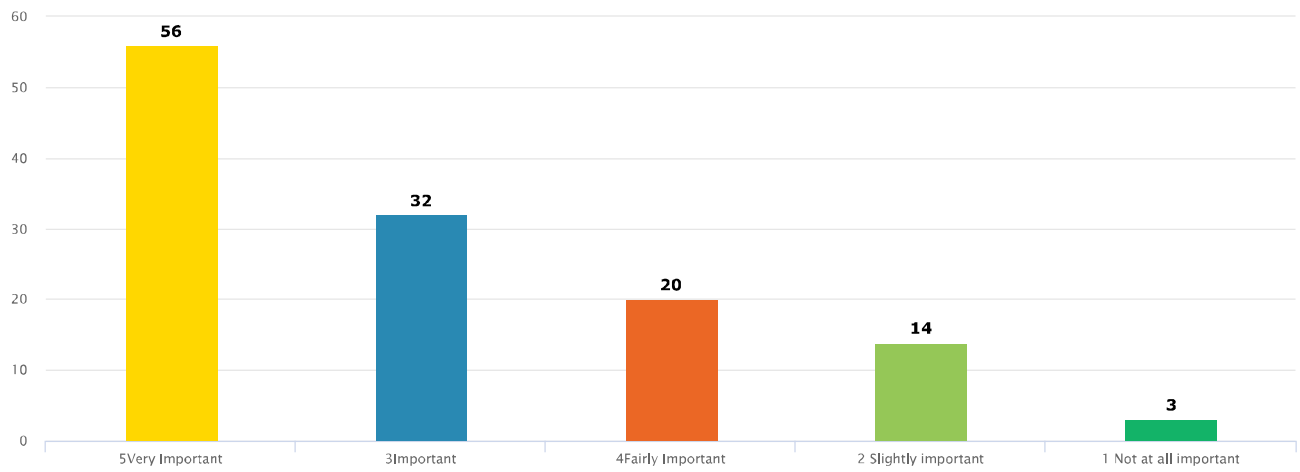
COMMUNITY_CONSIDERATIONS_A16

Supporting innovation in global supply chains



COMMUNITY_CONSIDERATIONS_A17

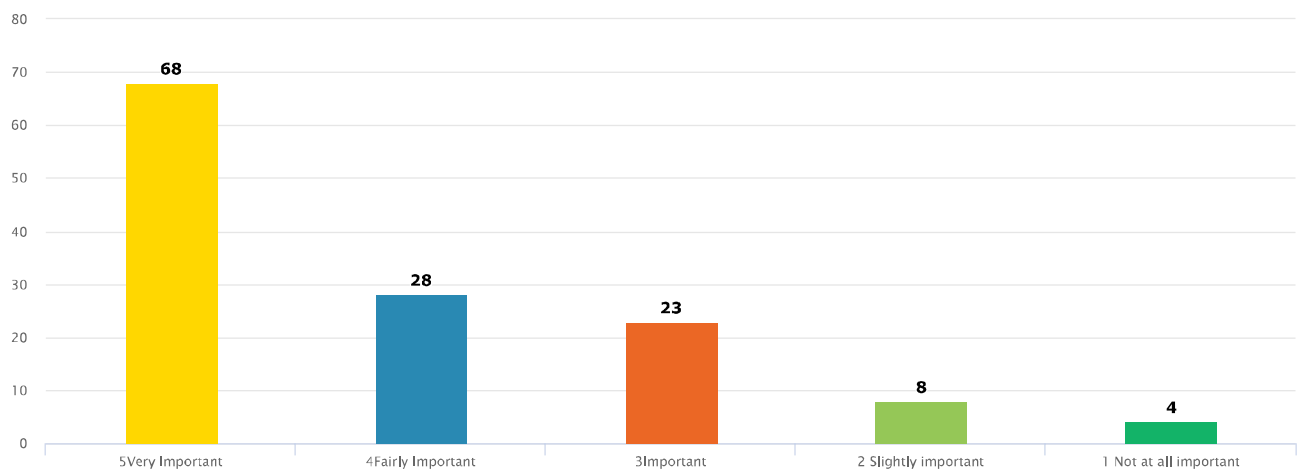
Attractiveness of port properties in public areas



Total Responses	125	Standard Dev.	1.17
Mean	3.9	Min. Value	1
Variance	1.37	Max. Value	5

COMMUNITY_CONSIDERATIONS_A2

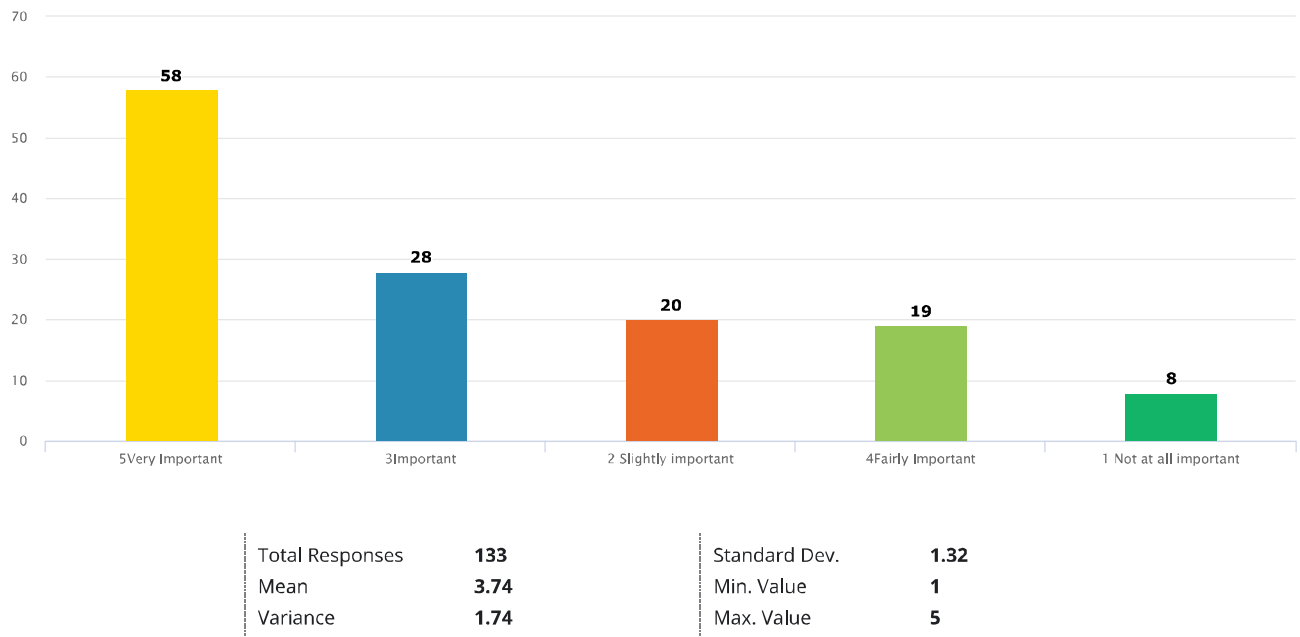
Direct and indirect opportunities for other local businesses



Total Responses	131	Standard Dev.	1.1
Mean	4.13	Min. Value	1
Variance	1.21	Max. Value	5

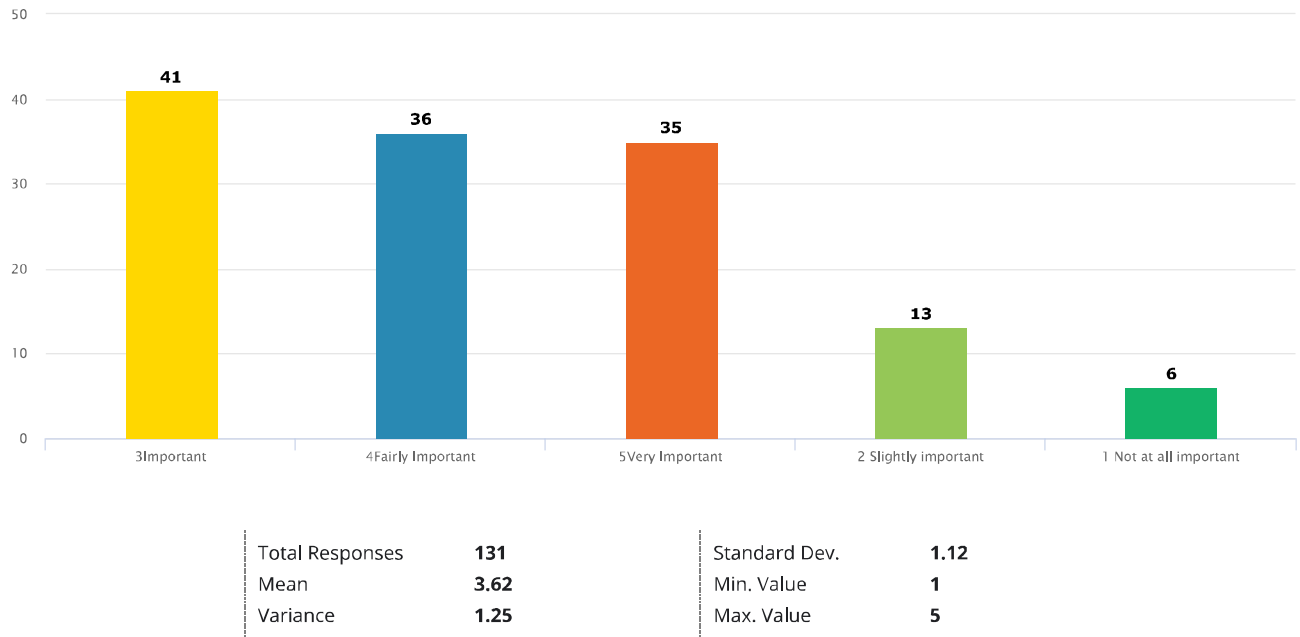
COMMUNITY_CONSIDERATIONS_A3

Noise impacts from port activities



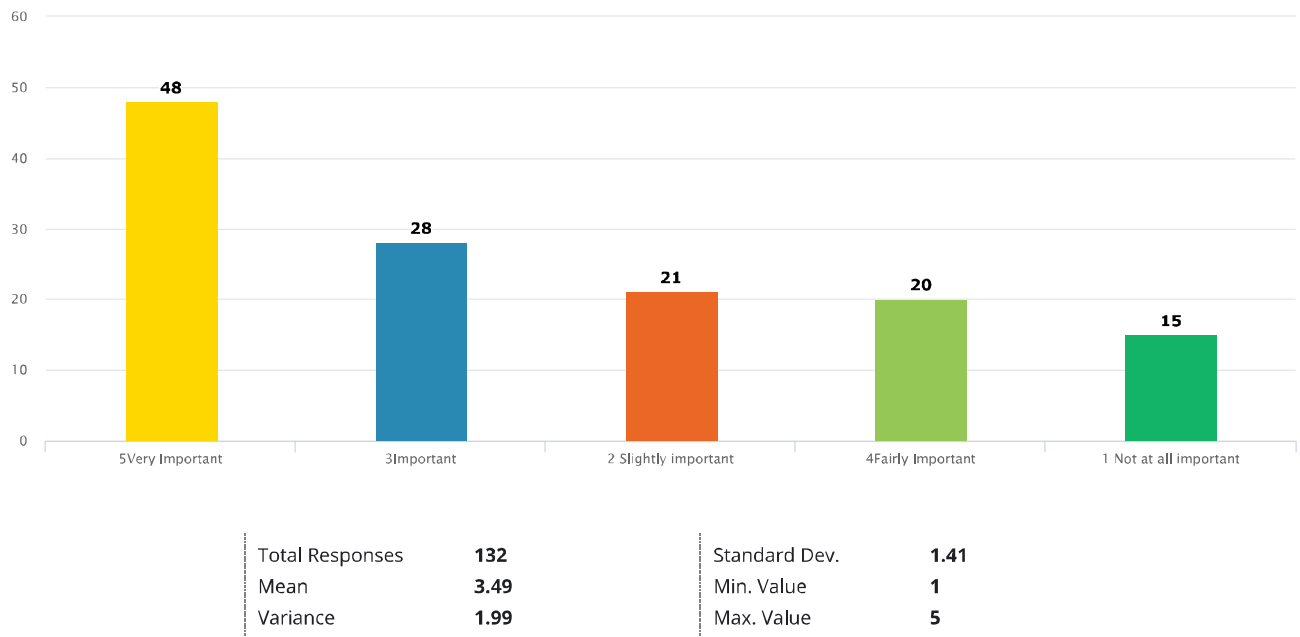
COMMUNITY_CONSIDERATIONS_A4

Port diversification



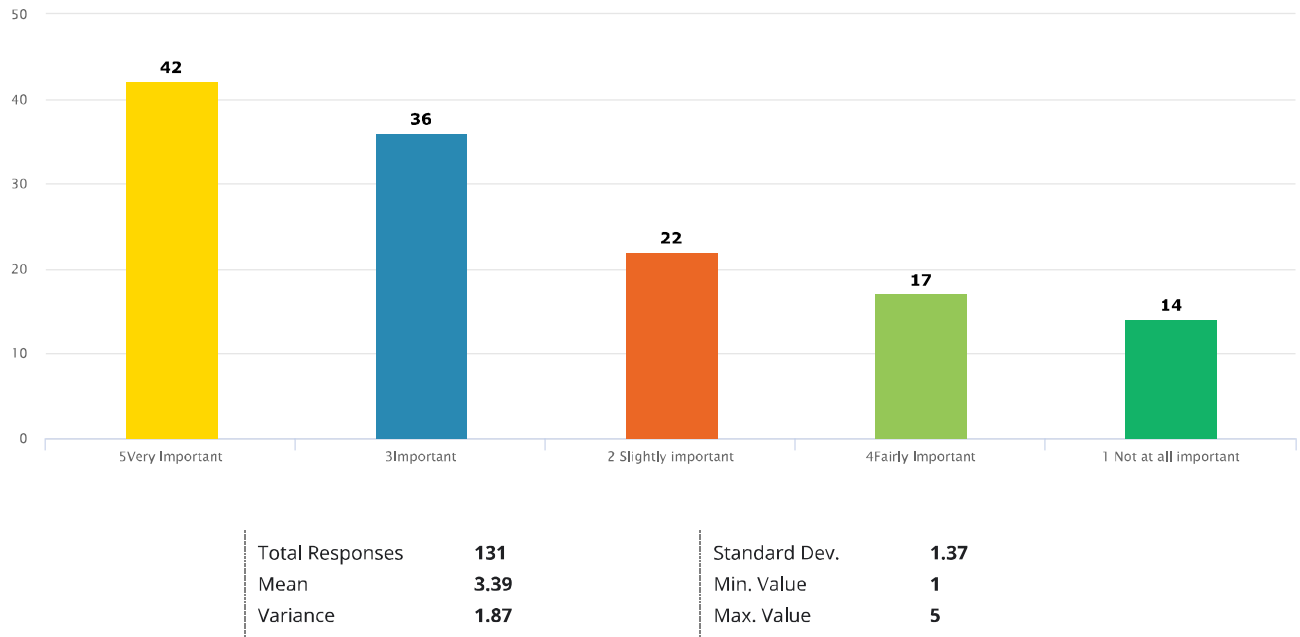
COMMUNITY_CONSIDERATIONS_A5

Local First Nations participation in port activities



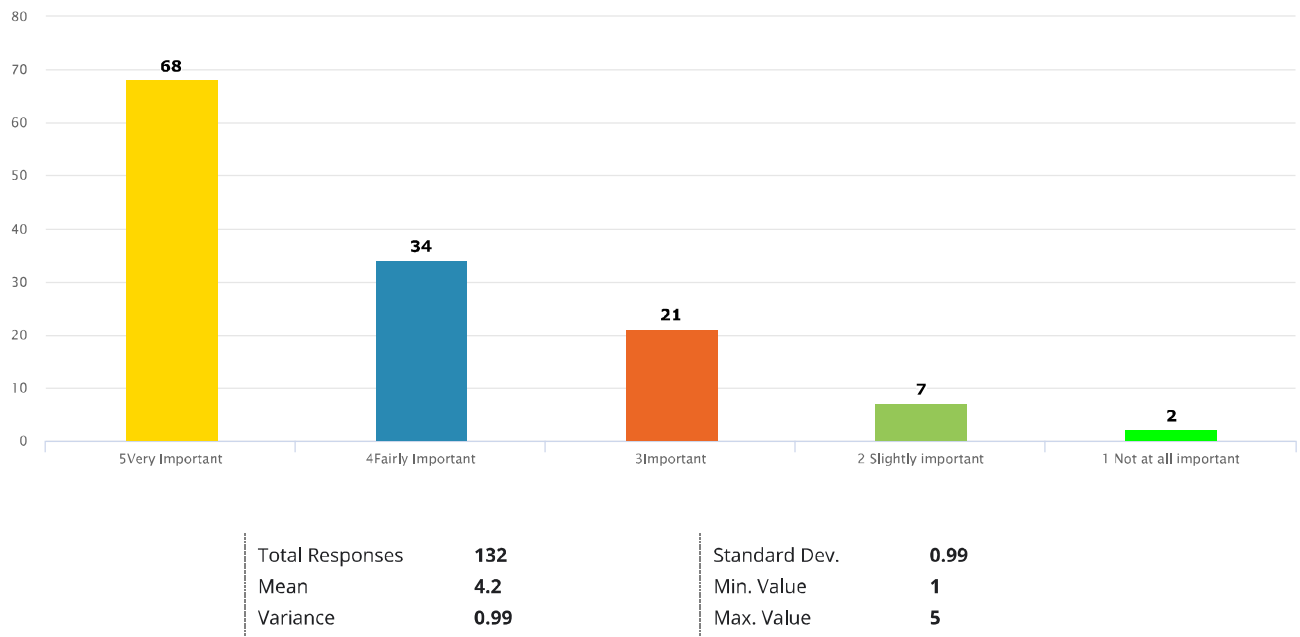
COMMUNITY_CONSIDERATIONS_A6

Light impacts from port activities



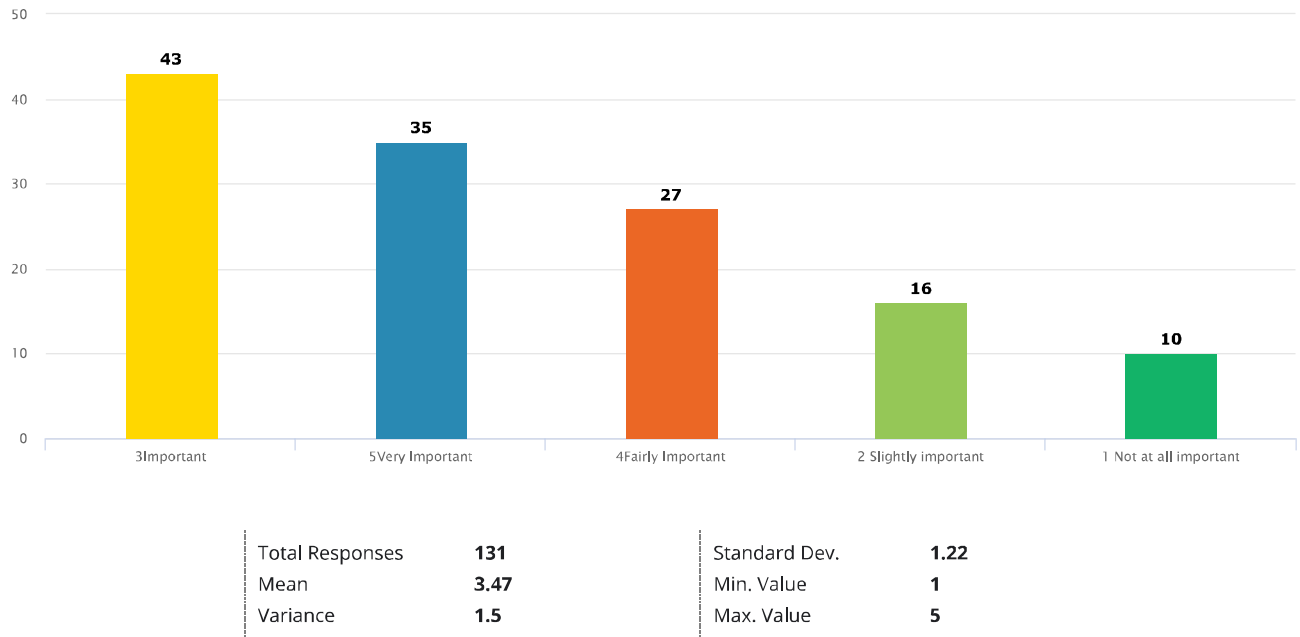
COMMUNITY_CONSIDERATIONS_A7

Public infrastructure impacts from port activities



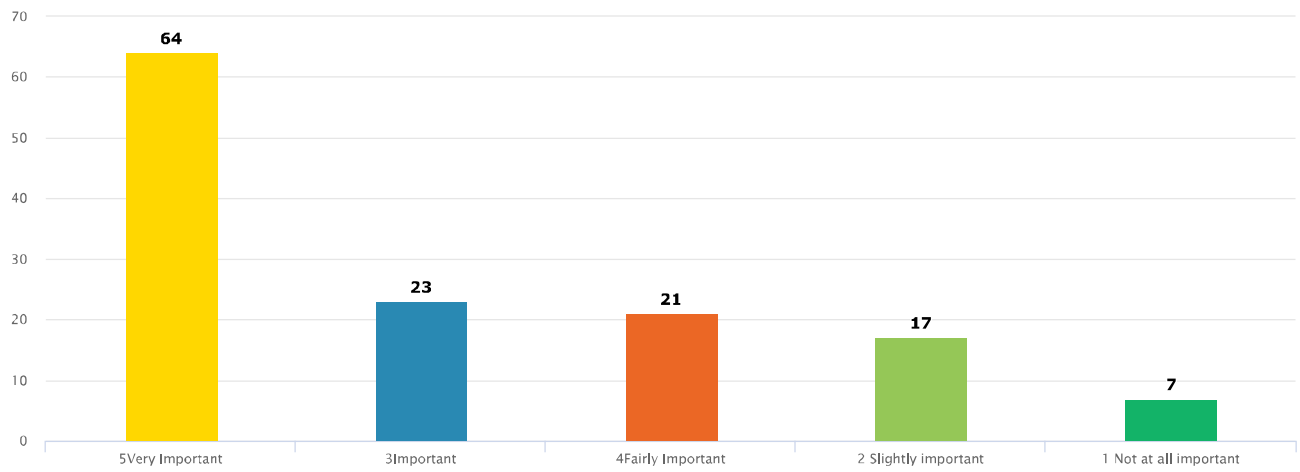
COMMUNITY_CONSIDERATIONS_A8

Maintaining port competitiveness and efficiency



COMMUNITY_CONSIDERATIONS_A9

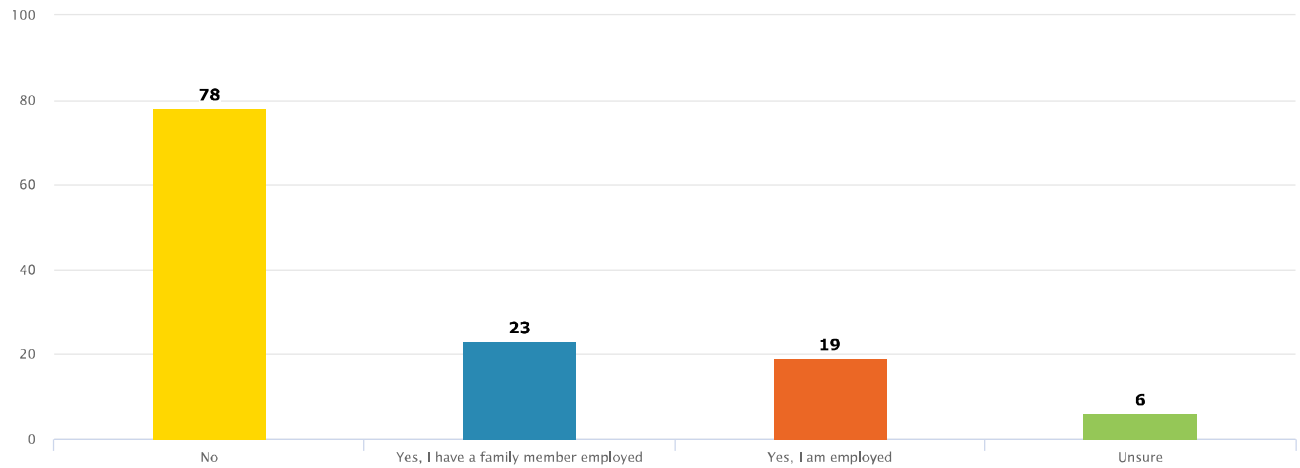
Greenhouse gas emissions from port activities



Total Responses	132	Standard Dev.	1.29
Mean	3.89	Min. Value	1
Variance	1.65	Max. Value	5

YOUR_INVOLVEMENT

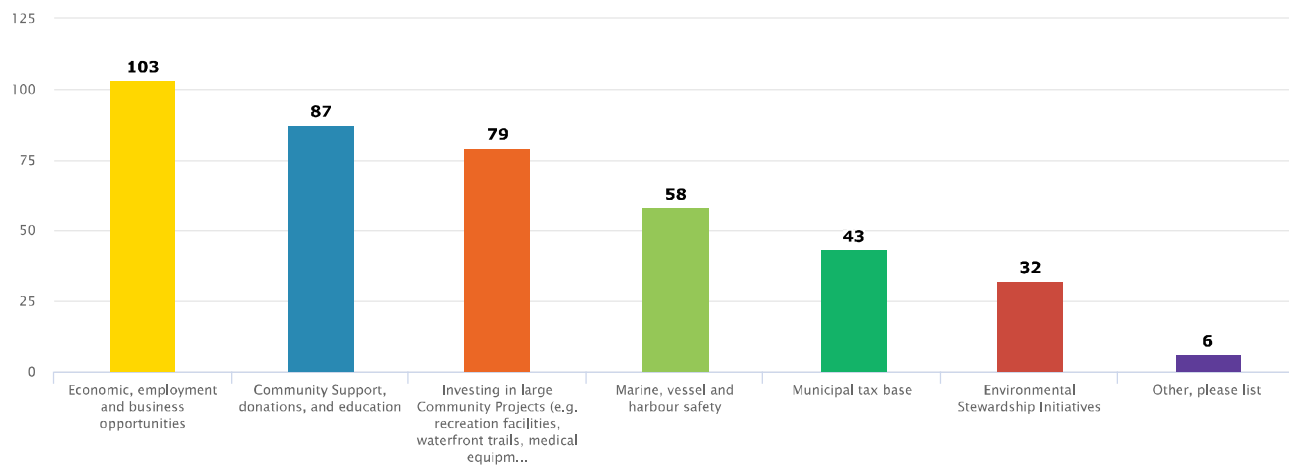
Prince Rupert Port Authority and the Community 2. Are you employed or have a family member employed at PRPA or a port related business?



Total Responses	126	Standard Dev.	0.8
Mean	2.56	Min. Value	1
Variance	0.65	Max. Value	4

CONTRIBUTION_TO_THE_COMMUNITY

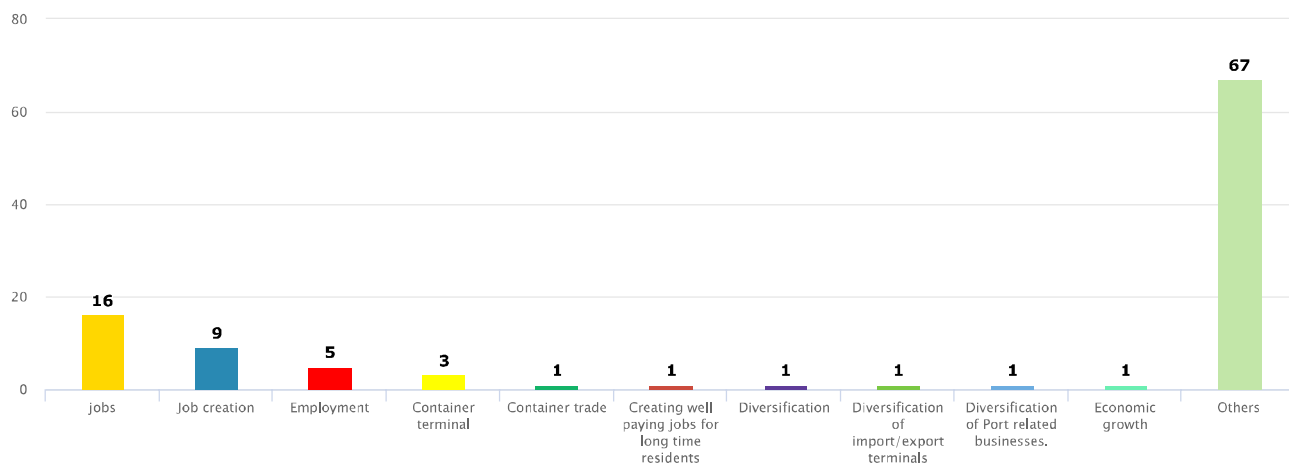
3. In your opinion, how does PRPA and its activities contribute positively to your community? (select all that apply)



Total Cases	126	Standard Dev.	1.93
Total Responses	408	Min. Value	1
Mean	3.6	Max. Value	7
Variance	3.74		

POSITIVE_ASPECTS

4. What do you perceive as the most positive aspects of port development over the last 10 years?



Total Responses	106	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

▼ Detailed Answers

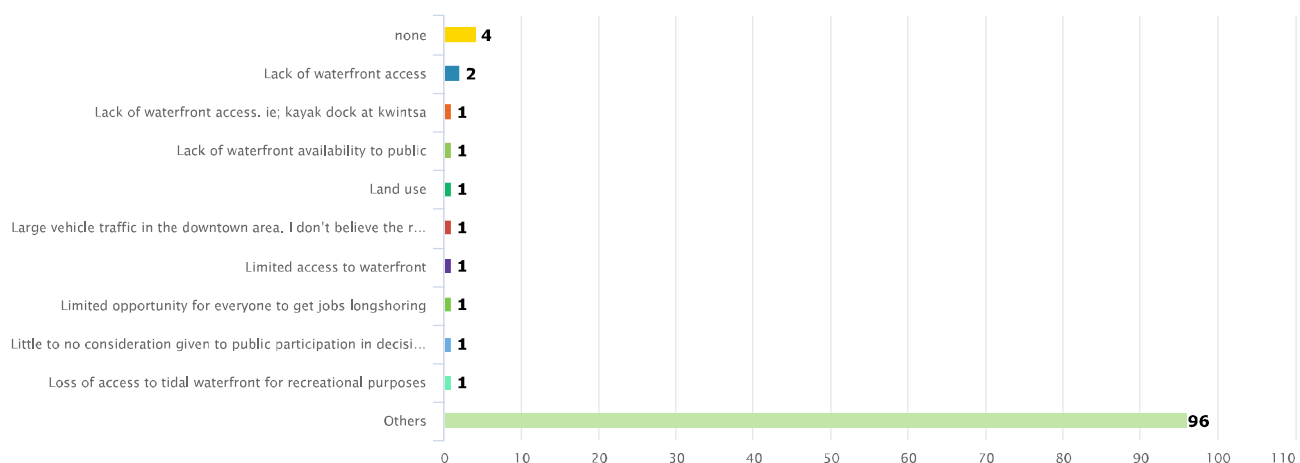
Answer	Frequency	Percentage
Total	106	
jobs	16	15.09
Job creation	9	8.49
Employment	5	4.72
Container terminal	3	2.83
Ability to work in the North	1	0.94
Bringing in jobs.	1	0.94
Community building	1	0.94

Community investment	1	0.94
Community Investment Fund, diversifying port investments (over reliance on one industry gets us into trouble!)	1	0.94
Community investments	1	0.94
Community sponsored events for community (eg swimming, skating).	1	0.94
Completion of containerport	1	0.94
container port	1	0.94
Container Port Expansion	1	0.94
Container trade	1	0.94
Creating well paying jobs for long time residents	1	0.94
Diversification	1	0.94
Diversification of import/export terminals	1	0.94
Diversification of Port related businesses.	1	0.94
Economic growth	1	0.94
Economic prosperity and community support for recreation projects and infrastructure projects eyc	1	0.94
Economic, Employment and business opportunities	1	0.94
Economy, poverty reduction, more opportunities	1	0.94
employment	1	0.94
Employment & quality of life	1	0.94
Employment ,yet with the threat of automation in future I guess employment for locals will be reduced drastically	1	0.94
Employment and community reinvestment	1	0.94
Employment in a post Pulp Mill era. Good paying jobs	1	0.94
Employment opportunities	1	0.94
Environmental Considerations	1	0.94
Finally started giving some money to Community, apparently to buy some good will since we know they don't pay taxes, and are not bound by City refs like everyone else.	1	0.94
Funding for science and environmental restoration	1	0.94
Good jobs for residents	1	0.94
growth	1	0.94
Huge job creation and support for the local community	1	0.94
I HAVEN'T LIVED HERE LONG ENOUGH TO KNOW	1	0.94
Increase investment in local employment	1	0.94
Invest in area, jobs, helping to promote all of the area.	1	0.94
I've found that the Port has diversified quite well with industry.	1	0.94
job creation and help in supporting the city of prince rupert financially	1	0.94
Job creation and stability in our community.	1	0.94
Job creation, growth of municipal tax base	1	0.94
Job growth and community investments	1	0.94
job security and community donations	1	0.94
job security for those working at the port	1	0.94
Job stablization in the local area	1	0.94
jobs to local people	1	0.94
Jobs, Economy	1	0.94
Jobs, jobs, jobs	1	0.94
Keeping the city alive	1	0.94
Local economy	1	0.94
Local jobs	1	0.94
Longshore job creation	1	0.94
m	1	0.94
Money earned is money spent in town	1	0.94
More attention to rupert	1	0.94
More certainty around community - as in growth has actually happened instead of just talking about it happening	1	0.94

more jobs	1	0.94
More jobs to local residents	1	0.94
na	1	0.94
New LPG terminal and expanding DP world	1	0.94
None	1	0.94
Not sure	1	0.94
other than employment?	1	0.94
Second phase development and continued growth	1	0.94
Some jobs, enthusiasm in our town	1	0.94
Steady/increasing employment	1	0.94
Strong employment, but limited to who can get in	1	0.94
The expansion at Fairview.	1	0.94
the expansion of facilities	1	0.94
the new public warf	1	0.94
Their donations	1	0.94
Unaffordable housing for anyone NOT working at the port	1	0.94
Union jobs	1	0.94
Uplands development. Jobs.	1	0.94
Very happy to hear PRPA's plan to clean up and improve Seal Cove area!	1	0.94
Work,	1	0.94

NEGATIVE_ASPECTS

5. What do you perceive as the most negative aspects of port development over the last 10 years?



Total Responses	110	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

▼ Detailed Answers

Answer	Frequency	Percentage
Total	110	
none	4	3.64
Lack of waterfront access	2	1.82
Adverse impacts. Noise from container port, dust from pellets, loss of access to Ridley	1	0.91
An Economy based on unloading container's could be the first victim of a Trade War and Recession.	1	0.91

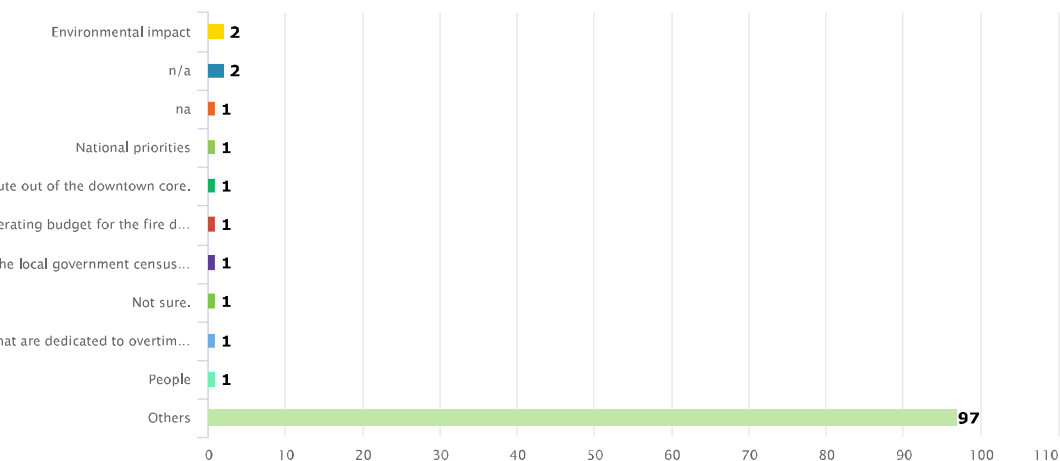
Between PRPA and CN , quality of life has deteriorated in PR and Port Ed. Lack of regulation or authority over controlling industrial impacts on citizens. Big business does what it wants, taxpayers listen to intense train noise, smell and breathe diesel and coal, can't access the ocean anywhere. Our two communities are becoming industrial wastelands. It's completely disgusting.	1	0.91
Cancellation of LNG project on Lelu island	1	0.91
Cost of living increase	1	0.91
Cost of living- no where to rent. Rents are high for non port workers to survive	1	0.91
Cost of rent has gone up dramatically because of the port. Loss of access to Ridley Island and waterfront. Employees with drug addictions. Influx of traffic in Harbour. Pollution	1	0.91
Development of pellet storage silos on the waterfront, adjacent to residential neighbour hoods. Created an eyesore, noise, and air pollution in the process. Not to mention, a MINIMUM number of permanent full time jobs.	1	0.91
Drugs and entitlement of employees	1	0.91
Effects on small businesses being able to recruit & retain staff	1	0.91
Environment, social and mental well being of port workers, cleanliness in the community	1	0.91
Environmental Contamination	1	0.91
Environmental impacts, noise, lights, drug use, crime, homelessness, I can go on	1	0.91
Environmental issues	1	0.91
Grant's in lieu of taxes	1	0.91
Habitat degradation. Coal dust - health, property value. Lack of waterfront access.	1	0.91
haves/have nots	1	0.91
High paying jobs to people who don't live in prince rupert full time, then moving away once they have their experience.	1	0.91
High traffic downtown	1	0.91
Homelessness	1	0.91
Hr in every other sector, noise and light pollution, poor management decision with land use ie lelu island and pellet plant in front of nice residential	1	0.91
I am unsure	1	0.91
I feel that the Port's wish for unbridled expansion will impact our community life, i.e. taking over all the waterfront, long waits for trains. I think the Port is doing well, but I don't see the need for unbridled expansion.	1	0.91
I HAVEN'T LIVED HERE LONG ENOUGH TO KNOW	1	0.91
Increase in rent. Not everyone can afford high rent, as landlord wants more rent for same rental. Affordable housing is difficult to find. More rig/truck traffic through town. Some of these drivers have a tendency to speed, not stopping to let pedestrians cross at crosswalks.	1	0.91
Increase in rental prices that lead to low income individuals becoming homeless.	1	0.91
Increased truck traffic through downtown, huge wait times on passenger trains due to freight train volume	1	0.91
increased truck traffic through town	1	0.91
insufficient tax contributions, and lack of waterfront access	1	0.91
Lack of access and diminished access to waterfront	1	0.91
lack of access to waterfront	1	0.91
Lack of direct revenue for the City of Prince Rupert from our own land and water access. Also the truck traffic through downtown	1	0.91
Lack of diversification for the city.	1	0.91
Lack of employment opportunities that require higher education (trades, diplomas, degrees). Most Port related jobs have high wages but very little educational requirements. A generation will grow up thinking they don't need to go to school to get a job.	1	0.91
Lack of environmental considerations when bringing in new projects	1	0.91
Lack of public access to the water	1	0.91
Lack of space. Loosing waterfront	1	0.91
Lack of waterfront access. ie; kayak dock at kwintsa	1	0.91
Lack of waterfront availability to public	1	0.91
Land use	1	0.91
Large vehicle traffic in the downtown area. I don't believe the roads were meant to support the weight of those trucks on a steady basis. Also, the trucks are often going well over the speed limit in town and I worry about pedestrians.	1	0.91
Limited access to waterfront	1	0.91
Limited opportunity for everyone to get jobs longshoring	1	0.91
Little to no consideration given to public participation in decision making that affects local quality of life	1	0.91
Loss of access to tidal waterfront for recreational purposes	1	0.91
Loss of areas to go for a walk on Ridley. Hard to keep employees at lower wage jobs: ie: safeway and small businesses.	1	0.91
Loss of services	1	0.91
Loss of waterfront access	1	0.91
Loss of waterfront access for citizens	1	0.91

m	1	0.91
Mafia like control of waterfront	1	0.91
Marine water access	1	0.91
N/A	1	0.91
na	1	0.91
need to increase the tax sharing to the city to help improve city operations	1	0.91
No waterfront access, taken over Cow Bay from small businesses	1	0.91
Noise .. renovictions	1	0.91
Noise and habitat destruction	1	0.91
noise and light pollution	1	0.91
Noise from trains, truck traffic, coal dust	1	0.91
Noise, traffic, losing access to land, focus on only the port	1	0.91
noise.	1	0.91
not allowing public input through the local government census of the land use rules and regulation... OCP... BC...	1	0.91
Not enough contribution to the overall city	1	0.91
nothing	1	0.91
OKing pellet plant with glue and particulates along shorefront especially in summer. Threatening art gallery with removal. Ignoring sushi bar access to rent office area for seafood restaurant..	1	0.91
Other businesses can't compete with port workers wages	1	0.91
Over paid longshoreman, pulling skills out of community.	1	0.91
Overpaying and NEPOTISM. Lost access to waterfront, no actual improvement to the city overall.	1	0.91
Pellet loading terminal	1	0.91
pellet plant - blocking views and creating downtown noise/smell. Also future fueling station noise, smell and blocked views for residential.	1	0.91
Pinnacle Pellet is a difficult location for that area of town (maybe painting the silos would help?), port jobs cannibalize the service sector (not your fault, but it's hard for small business to contend with), tax caps inhibit the municipality's opportunity to keep up - result of port development is net positive, but there are opportunities for improvement	1	0.91
Pollution and restricted access to the natural area such as water front and views	1	0.91
Pollution, cut off of water access (eg ridley)	1	0.91
Poor consultation with First Nations and the Community. Very poorly done initial land use plan.	1	0.91
Public access to waterfront locations is almost non-existent. We are a port city, for recreation purposes we need access to the water and beach areas. This will help attract and retain workers in the area.	1	0.91
reduced access to waterfront	1	0.91
Renovictions	1	0.91
restricted access to Ridley island sand beach	1	0.91
Ridley island	1	0.91
Taxation restrictions	1	0.91
The constant worry of losing more access to the limited waterfront we can access	1	0.91
The heavy-handed, intimidating manner employed to deal with land defenders at Lelu Island. I notice you don't make public the suit you have filed against them, rather than engaging in direct discussion and mediation with those served with the suit. The positions and titles of Aboriginal and Indigenous Relations appear to be window dressing. Particular individuals are cherry-picked for photo ops, but meaningful engagement and consultation is missing. It is clear that direction of the Port comes from Ottawa, following an agenda that is politically driven, based on corporate interests. I suspect the recent spate of hefty local donations to a broad array of groups is setting the stage for announcement of industrial development on Lelu Island. The halt to development around Flora Banks was only a moratorium. All of the Port sits on unceded Tsimshian Territory, a fact rather assiduously ignored by the Port in all their publicity and in the Interpretive Centre in Cow Bay. The Port has assumed 'ownership' of the breadbasket of the local and surrounding First Nations, largely dismissing its impact on the primary food source and economic driver of fishing, prioritizing commercial and industrial development for the benefit of the federal government. In summary, the Port has been the key actor in supplanting the local traditional economy and social structure with a corporate agenda and projects, a continuation of colonialism that is built on unfettered 'free' access to the natural resources of the continent.	1	0.91
The hiring system . If you don't know someone you can't get a number .	1	0.91
The lack of waterfront access.	1	0.91
The pellet terminal's light, dust, and noise pollution. It is an eyesore in the middle of Prince Rupert. Industrial activity should take place on Ridley, not in town.	1	0.91
The Port I think don't realize the importance of the environment when developing projects. The amount of noise created when working at night. Another very real problem is the very high increase of train traffic along the highway 16 corridor and especially in Port Edward and Prince Rupert when they blast their horns. Maybe automatic barriers at each crossing would be more effective.	1	0.91
The propane facility on Ridley Island	1	0.91
The shitty cokeheads that work there	1	0.91
Traffic	1	0.91
Traffic through downtown and infrastructure usage without fair compensation.	1	0.91
Truck traffic	1	0.91
Truck traffic through the city	1	0.91

Trucking through downtown	1	0.91
Trucking through town	1	0.91
Trucks in town	1	0.91
Trucks running through the centre of town. Taking all the skilled and employable people away from jobs. Participation in the escalation of tensions between local First Nations.	1	0.91
Unfair port tax cap & shift work schedules decimate volunteerism	1	0.91

WHAT_TO_BE_AWARE_OF

6. As the Port of Prince Rupert grows and develops in the future, what do you think PRPA should be most aware of as it makes its decisions?



Total Responses	109	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

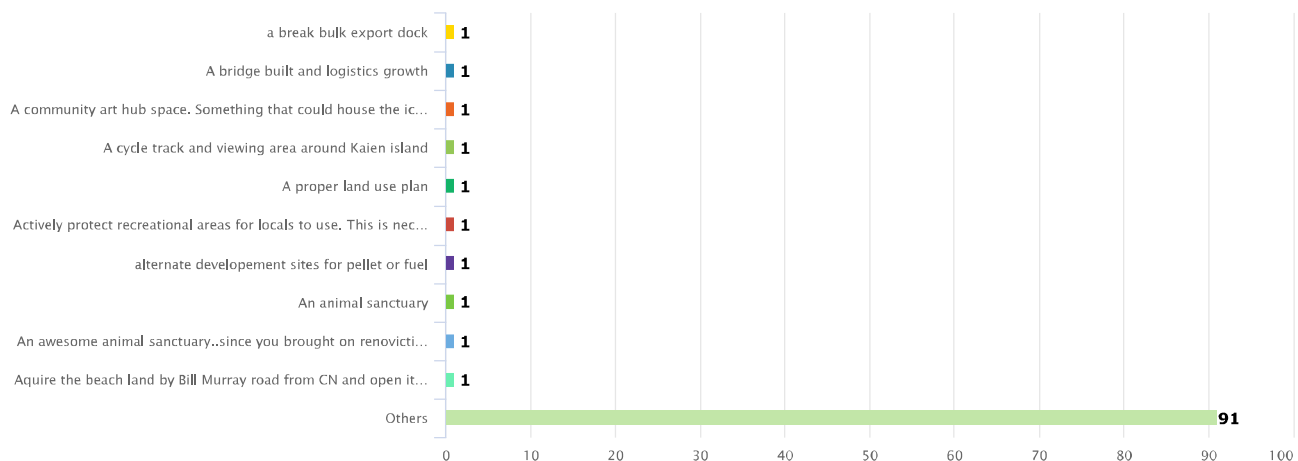
▼ Detailed Answers

Answer	Frequency	Percentage
Total	109	
Environmental impact	2	1.83
n/a	2	1.83
attracting people	1	0.92
being part of the community with less paternalistic hedging: I opine that the Port feels that it already does this, but that is not the impression or the experience many community members have	1	0.92
Benefiting all citizen not just employers and employees.	1	0.92
Climate change is the biggest issue of our time. The prpa musttake emission mitigation seriously, promote clean renewable energy	1	0.92
Community input and needs- eg. waterfront access.	1	0.92
Concern for landscaping around its current and future facilities. The new Scott Road Port Authority facility is an eye sore, By all appearances, zero work was done to make the facility appear presentable to the many tourists who pass by the facility as they enter Prince Rupert for the first time (from the airport or B C Ferries).	1	0.92
decisions are made in interest of public good for local area; driving focus should not solely be economic	1	0.92
Diversification & community impacts	1	0.92
Diversification, as well as limiting automation	1	0.92
Do the work and really learn the history of the land as told by First Nation stories. This will help ease tensions between local First Nations. When you genuinely try to understand the role of PRPA and where you direct your recognition of history.	1	0.92
Don't cram in large, unsafe, unsightly industry in areas that will directly impact residents and the ecological integrity of the area.	1	0.92
dont limit your options	1	0.92
Drug testing	1	0.92
Economic Issue's in Asia. The future of water consumption in Asia	1	0.92
Engaging community	1	0.92

Ensuring development employs locals	1	0.92
Environment	1	0.92
Environment - First Nations	1	0.92

FUTURE_PROJECTS

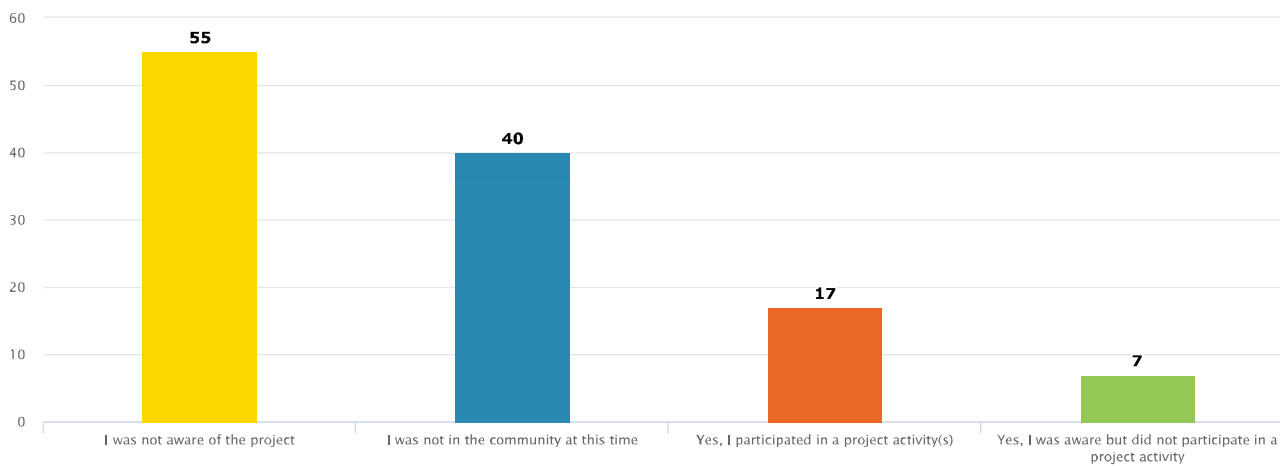
7. What is one initiative, project or objective that you would like to see PRPA undertake in the next 10-20 years?



Total Responses	101	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

PREVIOUS_PARTICIPATION

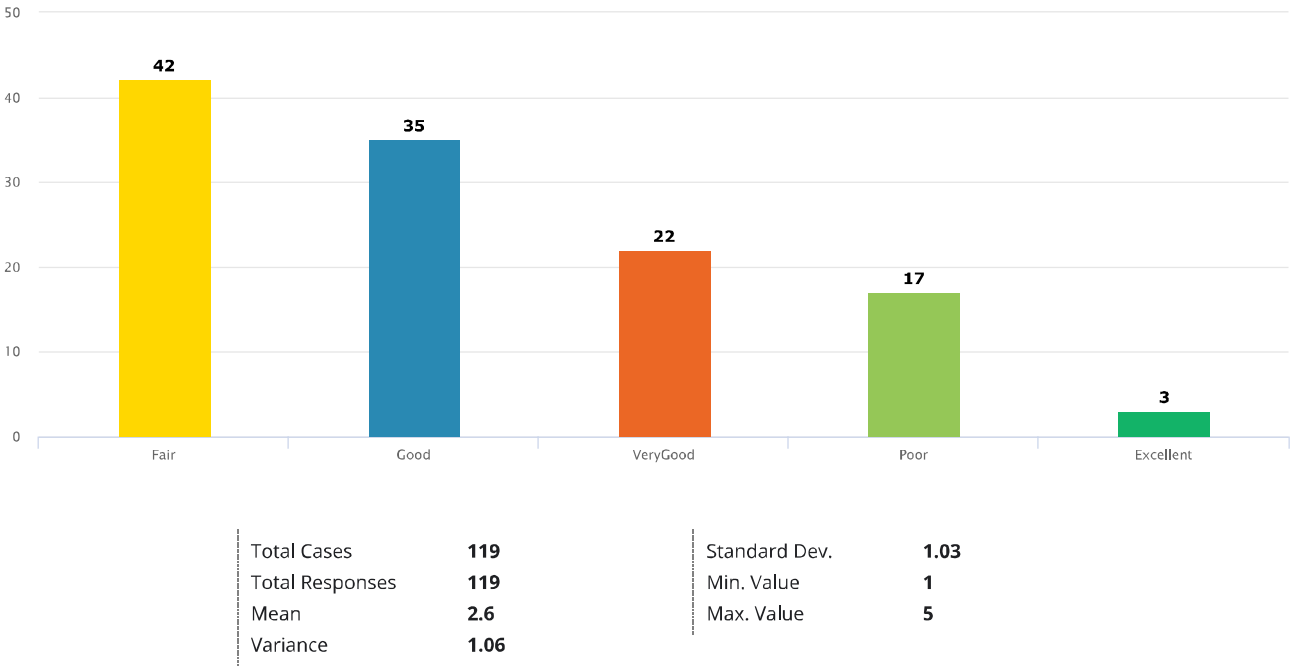
Engaging with the Prince Rupert Port Authority 8. Were you involved in the PRPA's previous Land Use Planning initiative and related engagement activities conducted in 2011?



Total Responses	119	Standard Dev.	0.99
Mean	2.99	Min. Value	1
Variance	0.97	Max. Value	4

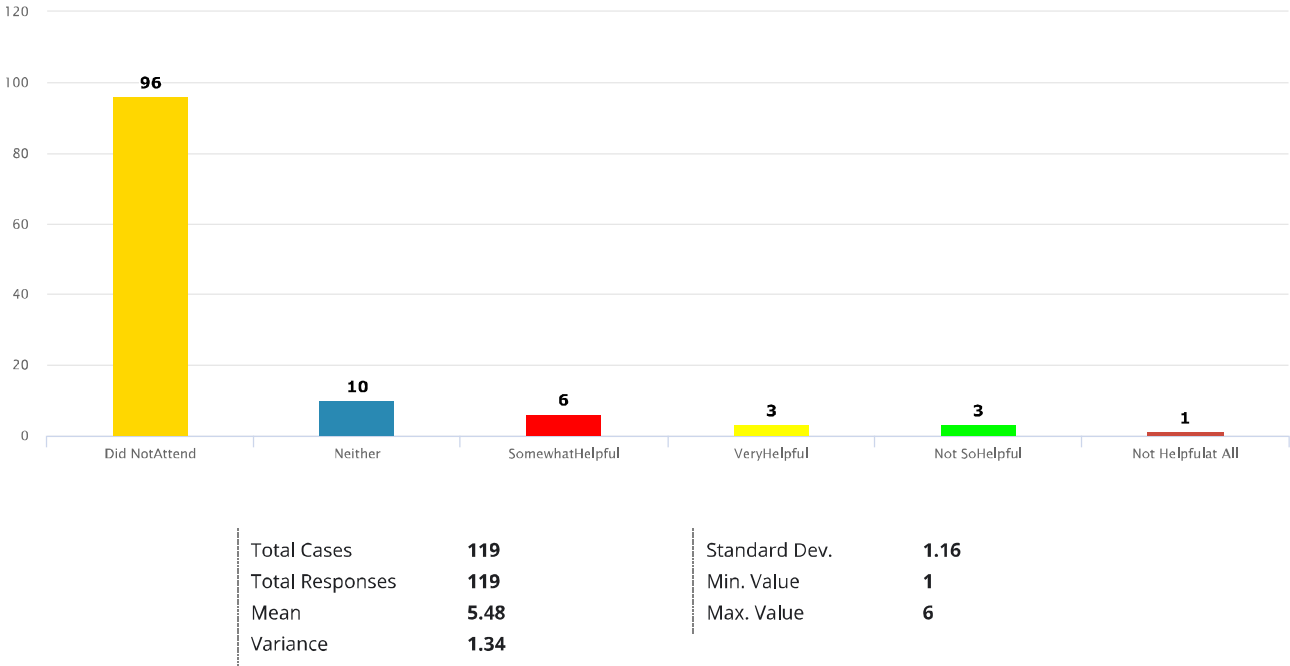
COMMUNICATION_OF_THE_PORT

9. How would you rate the Port's communication and sharing of information on PRPA developments and activities with local communities and stakeholders?



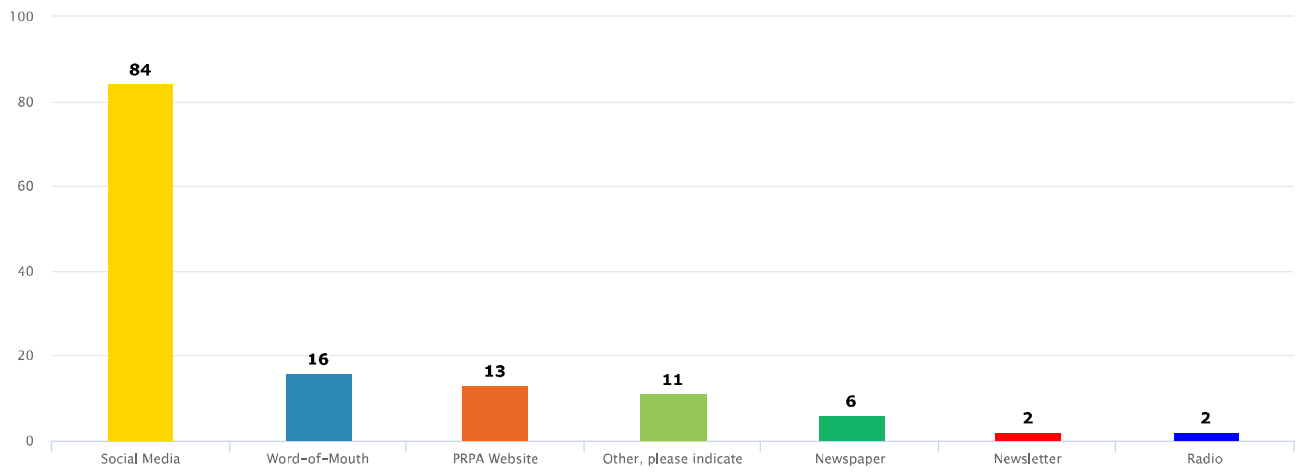
IS_THE_MEETING_HELPFUL

10. If you attended the Open House on November 19 or 20 in Prince Rupert or Port Edward, did you find it helpful in providing a better understanding of the land use plan project?



HOW_DID_YOU_HEAR_ABOUT_EVENT

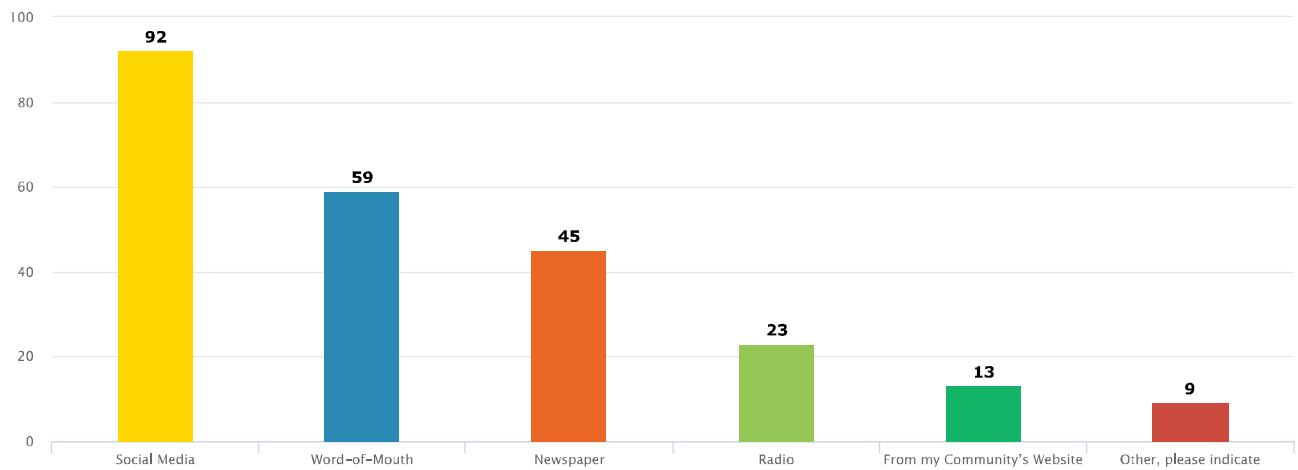
11. How did you hear about PRPA's land use plan update?



Total Cases	119	Standard Dev.	1.71
Total Responses	134	Min. Value	1
Mean	2.81	Max. Value	7
Variance	2.94		

INFORMATIONS_ABOUT_COMMUNITY

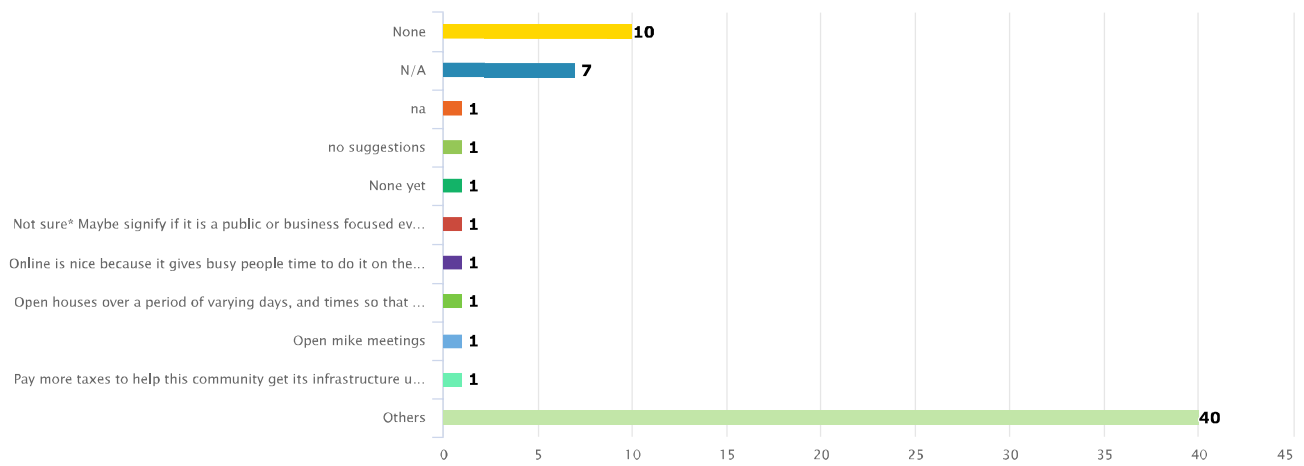
12. How do you normally find out information about community events and developments?



Total Cases	119	Standard Dev.	1.4
Total Responses	241	Min. Value	1
Mean	3.21	Max. Value	6
Variance	1.97		

SUGGESTIONS

13. What suggestions do you have for conducting future engagement activities related to this project?



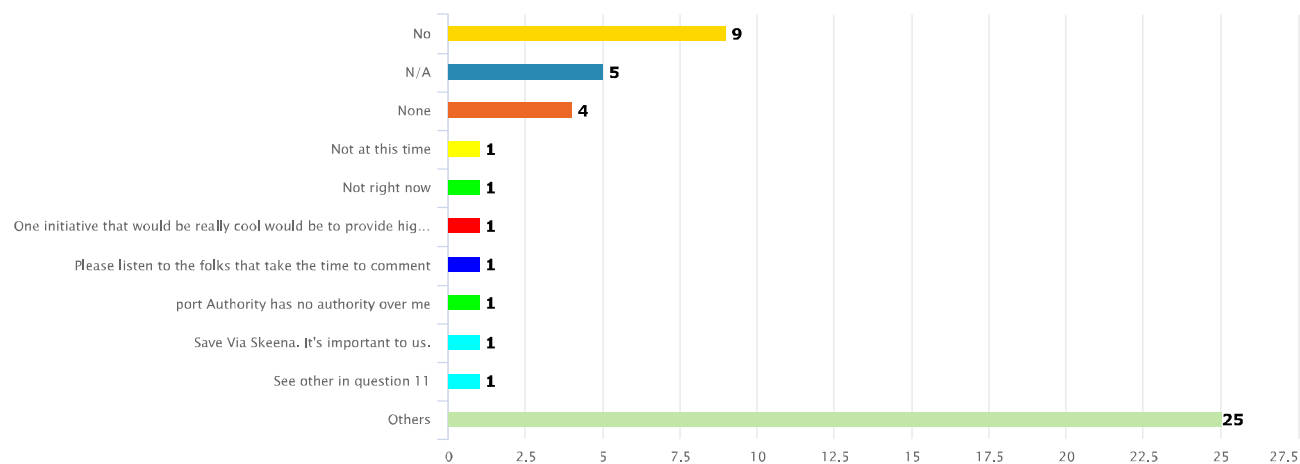
Total Responses	65	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

▼ Detailed Answers

Answer	Frequency	Percentage
Total	65	
None	10	15.38
N/A	7	10.77
A clear engagement plan, with details about what the plan will contain, and how it will link to potential future development.	1	1.54
Actively recruit and engage with First Nations instead of pretending to have it on paper	1	1.54
Advertise in local business	1	1.54
Advertise more	1	1.54
Bring forward more information to engage on. As it stands, this survey is just information gathering and too broad to be of use when it comes to land use planning. Why not provide the old plan, so people know what they are working to improve? Also provide a map of PRPA, highlighting areas that have yet to be developed and areas that are developed.	1	1.54
Bring the Middle East owner's meet the people	1	1.54
Communicating far enough in advance that people feel included	1	1.54
Don't just do it to appear that you're seeking input to appease the public, actually take the information and use it.	1	1.54
Earlier advanced advertising	1	1.54
Finger foods... water	1	1.54
Food!	1	1.54
Fundraiser for SAR	1	1.54
I would like to see more emphasis placed on how PRPA's Land Use Plan is complimentary to the City of Prince Rupert's Official Community Plan, and what aspects of it are at odds with it	1	1.54
Include pt edward ..social media	1	1.54
Is there a "face" of the port? Someone who is out and about meeting people?	1	1.54
Keep it the same	1	1.54
Listen to the people you have open houses and listen and then do what you want knock on doors in upper Graham and atlin ave you will get an ear full	1	1.54
Mail in survey	1	1.54

OTHER_COMMENTS

14. Do you have any other comments, ideas or thoughts you would like to provide the project team?



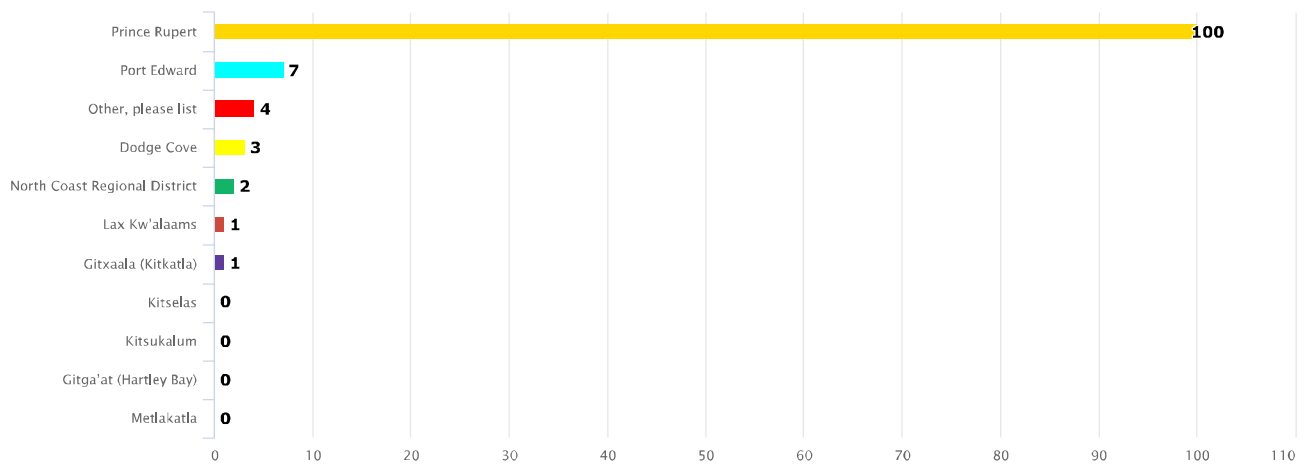
Total Responses	50	Standard Dev.	N/A
Mean	N/A	Min. Value	N/A
Variance	N/A	Max. Value	N/A

▼ Detailed Answers

Answer	Frequency	Percentage
Total	50	
No	9	18.00
N/A	5	10.00
None	4	8.00
An animal sanctuary	1	2.00
Better consideration for residents and impacts from port development. Environment is critical	1	2.00
Don't assume you can 'win' the Public Relations war with lots of money, while at the same time filing suits quietly on courageous local land defenders who have conducted themselves with integrity.	1	2.00
Donate Company shares to the Prince Rupert Fund	1	2.00
Help the marine industry get access to waterfront from which the port is severely encroaching on	1	2.00
Hire local design people. Our city is full of examples of ideas from Vancouver that don't look good here or are not functional.	1	2.00
I appreciate that this opportunity was provided to learn more.	1	2.00
I expect to hear a lot more about this planning process in the community.	1	2.00
I realize that you are not in control of all materials going through, but it would be fabulous if Canada would stop shipping raw materials to other countries, just to buy back finished products.	1	2.00
I think that environment and climate change are at the forefront of any development planning at this point and I'd like to see the Port take a lead in addressing this and tying new development to climate and SDG's.	1	2.00
I'm overall happy with the work PRPA is doing in the community and look forward to seeing how they continue to work with PR in the future	1	2.00
Improve our waterfront access	1	2.00
It would be proactive to work hand in hand with the City of Prince Rupert. Keep communications transparent	1	2.00
Keep making Prince Rupert an amazing place to live!	1	2.00
Move out of the cow bay waterfront and encourage tourism friendly businesses to occupy the space.	1	2.00
na	1	2.00
Not at this time	1	2.00

WHICH_COMMUNITY_DO_YOU_RESIDE_IN

About You 15. Which community do you reside in?



Total Responses	118	Standard Dev.	2.25
Mean	1.72	Min. Value	1
Variance	5.04	Max. Value	11

Prince Rupert Open House.

Sign In Sheet

Name

Email Address

Ryan OToole	ccp@gitxaclaration.com
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HAPPY WOOD	—
ZENB KHEKIC	—
Christine Smith-Martin	christie.smithmartin@gmail.com
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10- Taylor Zeeg	—
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Prince Rupert Port Authority Land Use Plan Update

Submission by SkeenaWild Conservation Trust

December 13, 2019

Executive Summary

SkeenaWild Conservation Trust appreciates the opportunity to provide input to the Prince Rupert Port Authority's (PRPA) land use plan update. We recognize the importance of the Port of Prince Rupert for the local, regional and national economy. PRPA lands and waters are also situated over top of some of the most important salmon habitat on the West coast of Canada. Further, the area supports critical habitats for oolichan, crab, herring, surf smelt, shellfish and many other species important to indigenous food, recreational and commercial fisheries.

We believe the PRPA can enable development while also protecting critical marine habitats. To achieve this we urge the PRPA to:

- Permanently protect the area currently under the development moratorium (Flora, Agnew, Horsey Banks and the Foreshore of Lelu Island)
- Minimize development impacts in areas identified by DFO / WWF / PRPA as high value habitat (red) by putting in place stronger protection measures
- Avoid any development atop eelgrass habitats
- Minimize impacts to foreshore by using avoidance wherever possible, and construction techniques with least impacts
- Leave a shoreline buffer of vegetation, 50 meters in width or greater, wherever possible
- Protect water quality by increasing spill response capacity, reducing anchor dragging, and improving protections for dredging

Introduction

Past conflict in the PRPA area has arisen largely from public and First Nations concerns regarding the impacts of placing large-scale industrial development overtop of critical estuary habitats. The leadership that the PRPA has shown recently - announcing a development moratorium for Flora, Agnew, Horsey Bank, initiating an update to its land use plan, and providing funding to salmon conservation efforts - has done much to reduce conflict.

While initiating proactive measures to ensure that future development is not impeded, and that critical habitats are protected, is sincerely appreciated, there remains significant work to do. SkeenaWild believes that the process to update the land use plan

provides an important opportunity to implement proactive protection measures that will enable PRPA expansion projects, give certainty to industry, and provide the necessary protections for critical habitats. We hope that our recommendations will be taken seriously by the PRPA, and the mechanisms that we put forward will be incorporated into the land use plan.

Ecological Importance of the area

The Skeena estuary (Figure 1) is a place where salmon congregate in spring and summer, at a time when they are most vulnerable - transitioning from fresh to salt water. Over 300 salmon populations depend on this place, journeying here from throughout the entire Skeena watershed (Figure 2), an area the size of Switzerland. The young salmon that use the estuary also come from other parts of the BC north coast, including the Nass watershed.



Figure 1. Skeena River watershed and primary human communities. Red circle denotes the area of the Skeena estuary related to our submission.

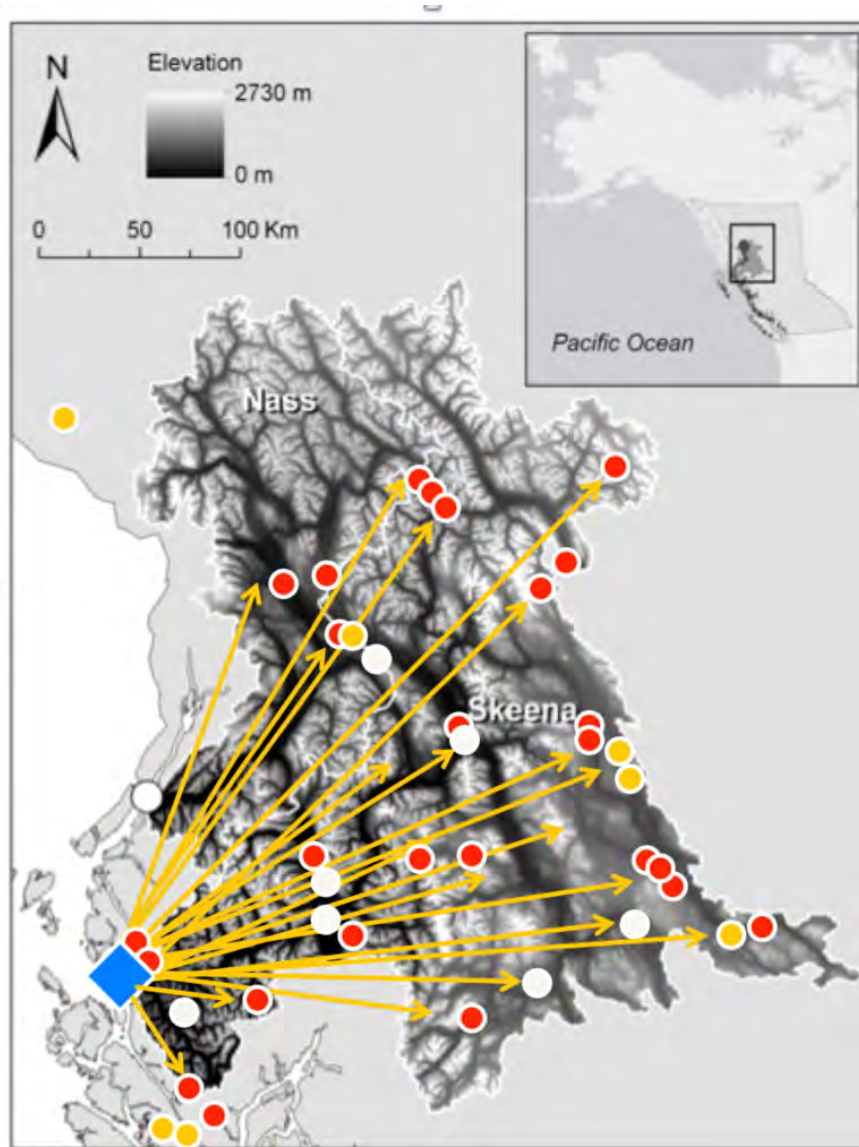


Figure 2. Distributions of salmon populations caught in the Skeena estuary (blue box) originating from the Skeena and Nass watersheds; red & yellow circles denote sockeye, and white circles denote Chinook. From Carr-Harris et al. (2015).

The Skeena estuary, and in particular many of the limited eelgrass (Figure 3) areas within the estuary, provide some of the most important habitats for these young salmon. This place must remain intact for Skeena salmon to thrive in the future. Filling, diking, dredging, and infrastructure development can damage or alter important near-shore or estuarine habitat, including macroalgae (seaweed), eelgrass and riparian (shoreline) vegetation. Early marine survival of wild salmon depends on sheltered, intact, coastal habitats and the abundant food resources found within these habitats.

https://salmonwatersheds.ca/libraryfiles/lib_432.pdf



Figure 3. Juvenile chum (left) and pink (right) salmon sheltering in eelgrass habitat of the Skeena estuary during their marine migration.

Recently published research by Simon Fraser University (SFU) and Skeena Fisheries Commission (SFC; Sharpe et al. 2019), based on two years of intense sampling by SFU and Lax Kw'alaams Fisheries found:

“Simple classifications of estuary habitat currently used in environmental risk assessment may not reflect the complex nature of fish–habitat associations. Understanding biophysical factors associated with estuary fish abundance can inform management of estuary habitat to support their nursery function for important fish.”

“The combination of variables that best predicted abundance differed across fish species. Pelagic fish were associated with near-shore sites, increased temperature (herring), and increased salinity (smelt). Juvenile coho and sockeye salmon (but not Chinook), were more abundant in higher turbid waters. Chinook and sockeye salmon used eelgrass habitat more frequently than other habitat types, whereas coho salmon were more abundant in areas with high macroalgae cover.”

<https://onlinelibrary.wiley.com/doi/full/10.1002/aqc.3142>

The SFU / SFC study found that the highest densities of juvenile salmon were observed in habitats around Flora Bank / Agnew / Horsey Bank and the Western and Southern foreshore areas of Ridley and Lelu Islands (Figure 4). These Skeena estuary habitats – which also are important for Shellfish, crab, oolichan, waterfowl, and other species - are the highest priority for protection.

<http://mappocean.org/at-the-mouth-of-the-skeena-a-unique-estuary/>

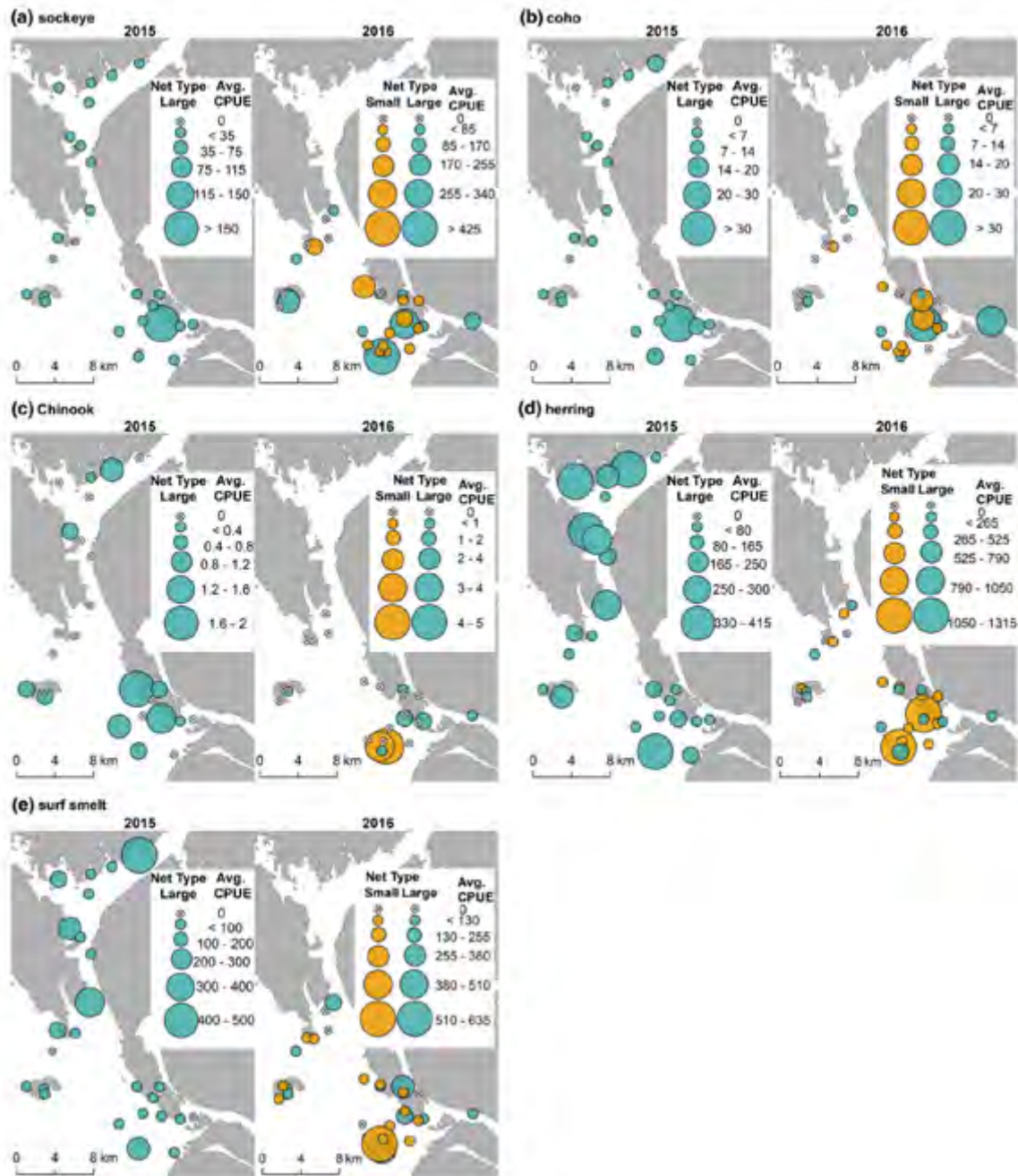


Figure 4. Mean fish abundance of (a) sockeye, (b) coho, (c) Chinook, (d) Pacific herring, and (e) surf smelt at sampling locations in the Skeena River estuary in 2015 and 2016. Fish abundance plotted during peak migration in the estuary: early May – late June for salmon (a-c) and early May – mid July for herring and smelt (d,e). Colours indicate the different net types (orange: small purse seine; blue: large purse seine). Legend showing point area representative for average fish catch-per-unit-effort (CPUE) abundance. Point area represents different average fish CPUE in 2015 and 2016. From Sharpe et al. (2019).

Mechanisms to ensure development protects critical habitats

Permanent protection for area under the development moratorium

Last January, PRPA announced a development moratorium on Flora, Agnew, Horsey Banks and the foreshore of Lelu Island. The PRPA stated [it] “will prohibit any industrial development in this marine area adjacent to Lelu Island”.

<http://nationtalk.ca/story/prince-rupert-port-authority-announces-development-moratorium-on-flora-agnew-and-horsey-banks>



Figure 5. Area of the Skeena estuary (red outline) currently under a development moratorium, but in need of permanent protection.

The habitats under the moratorium have been identified as some of the most unique and important salmon habitat on the west coast of Canada (Carr-Harris et al. 2015).

This area is also a geologic anomaly - created 8,000 years ago during the last ice age - restrained from erosion by the unique, opposing, river and ocean currents and wave patterns (McLaren 2016). The unique salinity and turbidity profile of this area also help make it prime habitat for young salmon. <https://www.biographic.com/the-nursery/>



Of concern, the PRPA's development moratorium is not permanent and can be lifted at any time. If any place in the Skeena estuary requires permanent protection status, the area under the current development moratorium is top of list. PRPA's updated land use plan should describe the extremely high ecological value of this area and state that PRPA will work with the Tsimshian First Nations, government agencies to implement permanent protection.

Options for permanent protection include:

- Working with Tsimshian Nations to develop a Tribal Park. This can be accomplished through planning work and an application under Environment Canada's Target 1 Challenge. <https://www.canada.ca/en/environment-climate-change/services/nature-legacy/fund.html>
- Working with DFO and Tsimshian Nations to develop a Marine Protected Area <https://www.dfo-mpo.gc.ca/oceans/mpa-zpm/index-eng.html>
- Working with Tsimshian Nations and BC Parks to establish a Conservancy <http://www.env.gov.bc.ca/bcparks/about/park-designations.html#Conservancy>

Protect high-value habitat / eelgrass

Foreshore habitat identified as high value by DFO / WWF / PRPA (Figure 6) requires increased protection in the new land use plan (LUP). The current LUP states, "In areas identified as having high values, avoidance of impacts on habitat or increased mitigation is required during development and post-development operations." There are no further details that define exactly what "avoidance of impacts on habitat" and "increased mitigation," mean. For high value habitat areas that could be impacted by a project, the PRPA LUP should require:

- Proponents assess multiple / alternative locations and design methods.
- Locations and designs be reviewed by independent technical experts and the results made public.
- Enhanced indigenous and public consultation.

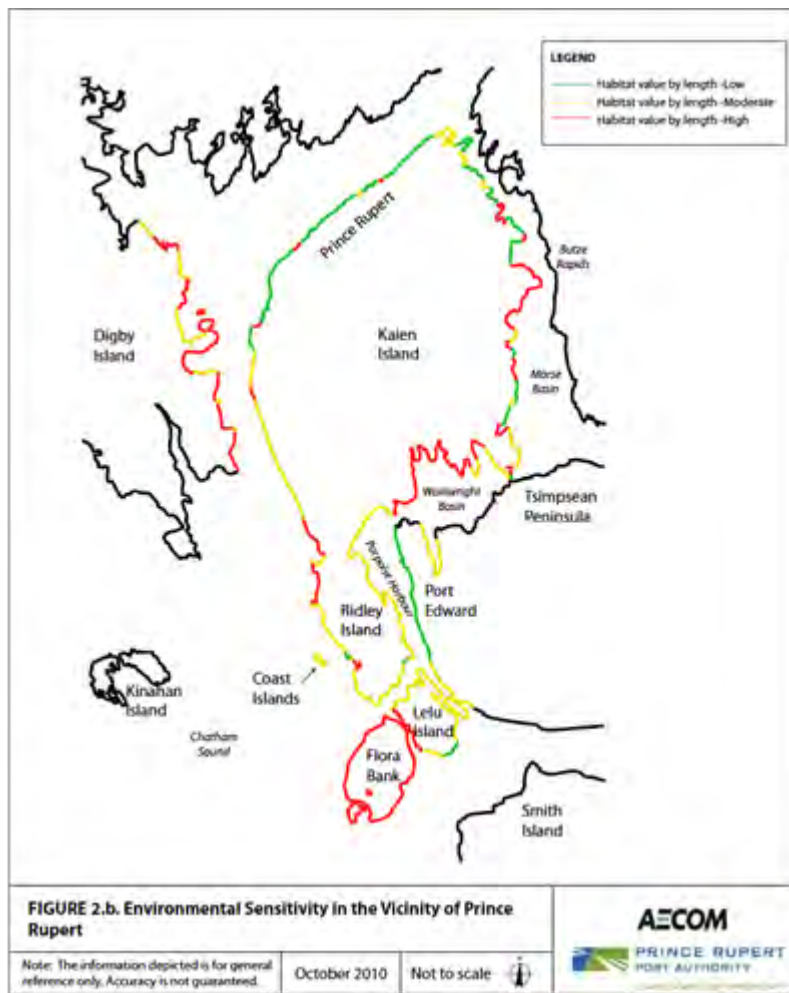


Figure 6. Prince Rupert harbour foreshore classification of various habitat values (red, yellow, & green lines), and proposed development study. Black lines indicate areas not assessed in the 1999 study.

Other than the area currently under the development moratorium, eelgrass habitats receive no mention or protections under the current LUP. Eelgrass habitats are limited in the region (Figure 7), very important for marine life, and are sensitive to disturbance (Ocean Ecology 2009). The new LUP should highlight the importance of eelgrass, and include protective measures - such as avoidance requirements for all development projects in the vicinity of eelgrass habitat, and outright protection. In essence, *no* infrastructure should be placed ovetop of these critical and sensitive habitats. While the Pacific Northwest LNG project that was proposed for Lelu Island had planned to mitigate the loss of eelgrass habitat to infrastructure by creating new eelgrass habitat elsewhere, such mitigation measures are most often ineffective (Palmer et al. Freshwater Biology 2010; Moore et al, 2015). Therefore, all eelgrass habitat must be protected to ensure thriving marine wildlife communities.

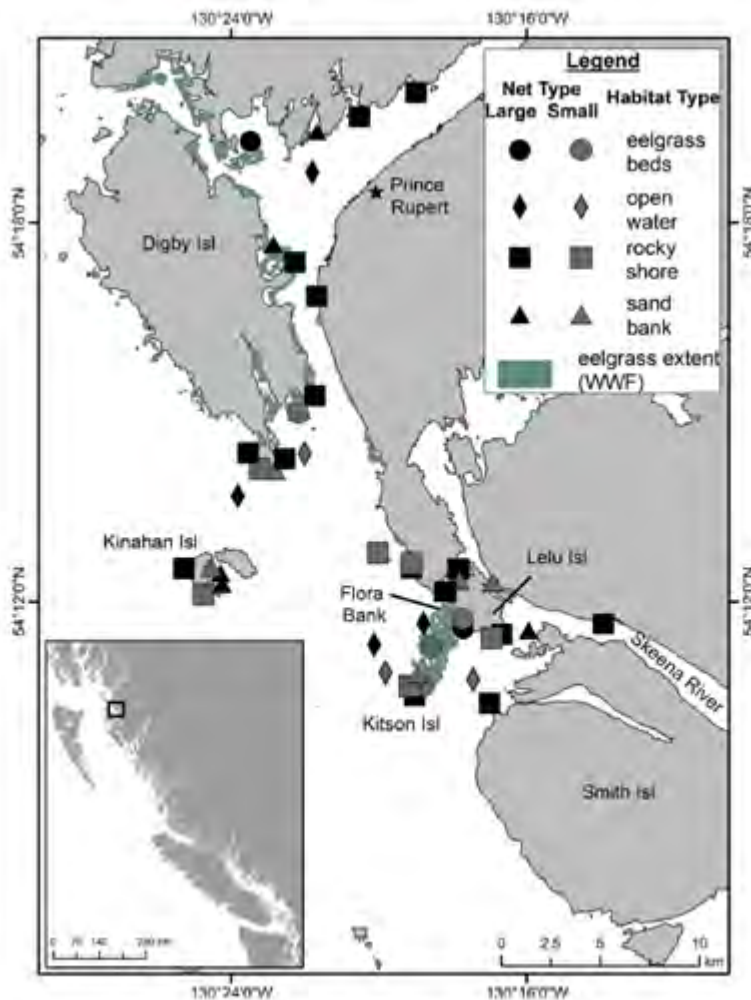


Figure 7. Map of eelgrass habitat across the Skeena River estuary, and sampling locations from various surveys. From: Ambach & Casey, 2011; Forsyth, Borstad, Horniak, & Brown, 1998; Ocean Ecology, 2013; WWF-Canada, 2009.

We are deeply concerned with PRPA's infrastructure development plans that propose to place a future container terminal (Figure 8) otop of the eelgrass and high-value habitat identified by DFO / WWF / PRPA. The current LUP states [pg. 14] that PRPA will try to avoid areas designated as high value habitat (red lines on Figure 6). We strongly recommend that an alternate site be used for future container port expansion; all existing high-value eelgrass habitat should be protected. Given that this eelgrass habitat would likely be destroyed by the development, mitigation is unlikely to be successful. As stated above, habitat offsetting (creating new eelgrass habitat to replace eelgrass destroyed by development) also is unlikely to be successful. Indeed, there is no evidence to suggest that salmon will simply move to a newly created eelgrass habitat in a different part of the estuary. According to the SFU / Lax Kw'alaams Fisheries surveys, juvenile Chinook salmon prefer this specific eelgrass habitat location.

Minimize impacts to foreshore

Areas classified as moderate and low-value habitat (DFO, WWF, PRPA – see figure 6) are also important for juvenile salmon, marine life, and waterfowl (Sharpe et al 2019). The new LUP should require avoidance to foreshore habitats wherever possible, and construction techniques with least impacts where construction is unavoidable. This is especially important considering the large amount of port infrastructure expansion projects and industrial projects underway and planned.



Figure 8. Locations of proposed development projects in the Skeena estuary.

Leave vegetation buffer

The interface between the foreshore and forested areas is important for wildlife, birds, and fish. These areas often contain nesting sites, and resting and hunting areas for birds. Vegetation near the foreshore also is important to juvenile salmon, providing an important source of food. It has been shown that terrestrial insects can provide a substantial portion of young Chinook salmon diet in estuarine environments during all months of the first marine year (Duffy et al. 2010). We recommend the PRPA mandate



the retention of a 50-meter width or greater vegetation buffer, wherever possible, adjacent to foreshore habitats. Planned infrastructure should be assessed to try to leave a buffer.

Protect Water Quality

Protecting water quality is essential for the health and vitality of the Skeena estuary. Port expansion has resulted in a significant increase in marine traffic in recent year. Increased shipping results in greater potential for fuel and cargo spills. New petrochemical offloading facilities (e.g., Vopac Pacific Canada, Wolverine Terminals) also pose significant risk of spills. Regardless of any future development projects, there is an urgent need for increased spill response capacity now.

Incidents of anchor dragging have been increasing in recent years. (Det Norske Veritas, 2012; TBuck, 2019). While most of these incidents are minor, the risk of groundings, and therefore the risk of fuel and cargo spills are on the rise. We urge the PRPA to take proactive measures to minimize the risk of anchor dragging as outlined in a recent TBuck Suzuki report. Recommendations include; installing mooring buoys, minimizing fuel reserves for onboard bulk carriers and restricting vessels over 50,000 DWT to safe anchorage areas.

http://friendsofwildsalmon.ca/images/uploads/Anchor_Safe_Prince_Rupert_FINAL.pdf

Several projects require dredging of marine sediments during the construction of offloading facilities. Dredging can be very harmful to salmon and other marine organisms by suspending large amounts of sediments and altering and destroying important habitat (Dara et al, 2001). Dredging is particularly concerning in areas of the Prince Rupert Harbor (Figure 9 – pink area) where sediments contain large amounts of dioxins, furans, PAH's and other harmful chemicals. These toxins were deposited from the Skeena Cellulose pulp mill for over six decades. Significant amounts of these toxins, which are extremely harmful to marine organisms, could be re-suspended during dredging. We recommend avoiding dredging activities in areas known to contain pulp mill effluent contaminants. If dredging is necessary, it should be minimized and care should be taken to isolate and dispose of contaminated sediment on proper land based toxic waste sites.

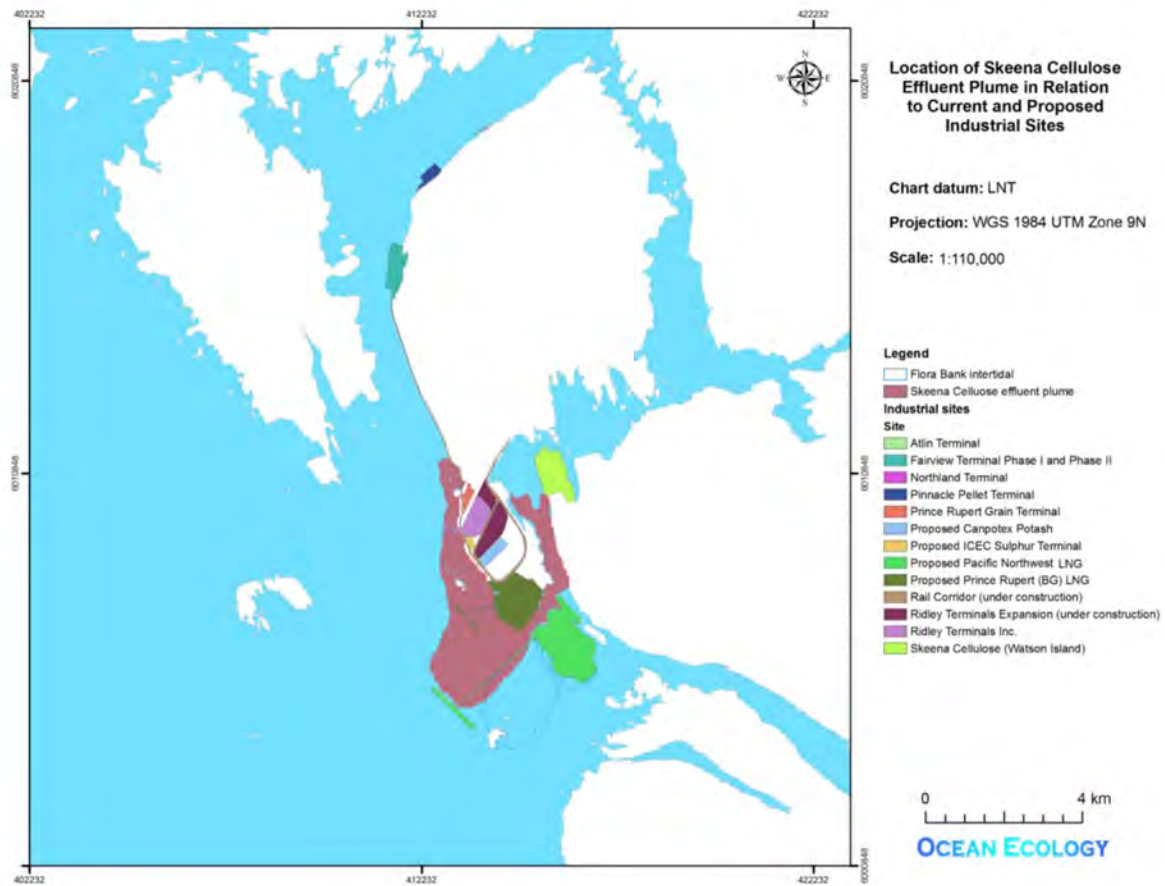


Figure 9. Area identified as having sediments containing significant toxins from Skeena Cellulose effluent. From: Ocean Ecology (2013).

In addition to the above measure to minimize impacts on water quality, PRPA should continue to invest in comprehensive water quality monitoring throughout the Skeena estuary. Enforcement capacity to ensure tanker traffic and port operators are adhering to the Green Marine program is also important. Details on these monitoring and enforcement programs should be articulated in the updated PRPA LUP.



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TBuck Suzuki, 2019. Report: Anchor Safe Prince Rupert – Alarming and Increasing Anchored Incidents in Prince Rupert.

http://friendsofwildsalmon.ca/images/uploads/Anchor_Safe_Prince_Rupert_FINAL.pdf

APPENDIX B PHASE 2 MATERIALS AND RESPONSES

APPENDIX B-1 - ENGAGEMENT MATERIALS



Prince Rupert Port Authority

Published by Hootsuite [?] · August 1 · 🌐



Deadline to submit your feedback is August 17th.

Watch our virtual open house and share your comments:

rupertport.com/land-use-plan/

| LAND USE PLAN

PUBLIC COMMENT PERIOD

The Prince Rupert Port Authority is inviting the community to participate in PRPA's next phase of updating its Land Use Plan by reviewing and providing feedback on a draft that has been prepared for public comment.

To participate:

Visit **rupertport.com/land-use-plan**

- Access the draft Land Use Plan update
- Review summaries of important updates
- Find answers for common questions
- Provide us with your comments

All feedback can be sent to:

- Email: **landuseplan@rupertport.com**
- Mail: 200-215 Cow Bay Road, Prince Rupert BC, V8J 1A2

Due to the COVID-19 pandemic, a public information session will not be available. Alternatively, PRPA has enhanced its engagement online at **rupertport.com/land-use-plan**



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Prince Rupert Port Authority



Published by Olivia Mowatt [?] · July 3 ·

We've prepared a draft of our Land Use Plan Update, reflecting the public feedback received so far. We are committed to addressing the community's concerns in a number of areas including future job creation, improved waterfront access, and environmental sustainability.

Learn more and provide your comments: www.rupertport.com/land-use-plan/



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Land Use Plan Key Changes

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PRPA Land Use Plan Update

The Prince Rupert Port Authority (PRPA) is updating its Land Use Plan. The existing Land Use Plan was implemented in 2011, and set out a development plan for the subsequent 10 years.

A land use plan is a strategic document that helps guide PRPA in carrying out its mandate to grow the Port in support of Canada’s trade with the world, while ensuring we also maintain our commitment to sustainable environmental stewardship, operational safety, and healthy local communities.

The plan is a high-level vision of what the Port of Prince Rupert will look like in the future, and refers to the general type of uses and activities it plans to incorporate on different properties within its jurisdiction. It does not predetermine how those uses will specifically be developed, or what specific terminals, operations or cargoes will be, or replace project-level reviews of proposed developments.

This is the second phase of public engagement within this update process, and PRPA encourages the community to participate and provide feedback on this draft before it is finalized later this summer. This is an opportunity to ensure your voice is considered as we balance economic, environment and social objectives to create a sustainable future for the port within our communities.

PRPA has opened a 60-day public comment period from June 18 to August 17, 2020.

Submissions, comments, and questions should be sent to PRPA via email at landuseplan@rupertport.com before the August 17 deadline. We will acknowledge receipt of your feedback.

Due to the COVID-19 pandemic, we will not have the opportunity to conduct a traditional open house as part of our engagement process. As an alternative, we have incorporated an enhanced online presentation of the Land Use Plan draft, including a summary of key changes in the videos and summary documents on this page, as well as a section to incorporate ‘Frequently Asked Questions’ that we will update on an ongoing basis.

[The draft Land Use Plan update can be found here:](#)

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[For comparison purpose, the current Land Use Management Plan can be found here:](#)

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Land Use Plan Frequently Asked Questions

WHAT IS A LAND USE PLAN?
WHAT ARE THE DIFFERENCES BETWEEN SCHEDULE A, B, AND C LANDS DESIGNATIONS USED BY THE PRINCE RUPERT PORT AUTHORITY?
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HOW WILL PORT EDWARD BE IMPACTED BY INCREASED BY INCREASED INDUSTRIAL USE ON RIDLEY ISLAND?



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While the Land Use Plan only considers land use designations on properties within the port jurisdiction, and does not directly consider CN mainline operations, rail connectivity is a key principle with PRPA’s land use planning. Investing in gateway infrastructure that ensures rail traffic remains fluid, and ensures that future port terminals can continue to facilitate unit trains, will minimize the number of trains required, keep them moving through urban areas, and minimize the number of long-haul trucks needed as an alternative.



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DOCUMENTS

- Port Information Guide
- Public Documents
- Transparency

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PORT AUTHORITY HIGHLIGHT



The Prince Rupert Racquet Centre has a bright new look thanks to an investment from the Prince Rupert Port Authority (PRPA).

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Land Use Plan Frequently Asked Questions

www.rupertport.com/land-use-plan

WHAT IS A LAND USE PLAN?

A Land Use Plan is a strategic document used by Canadian ports to provide a framework for port designated lands and navigable waters for future use. For more information, please refer to section 2 “Purpose of the Land Use Plan”.

WHAT ARE THE DIFFERENCES BETWEEN SCHEDULE A, B, AND C LANDS DESIGNATIONS USED BY THE PRINCE RUPERT PORT AUTHORITY?

PRPA has been granted three categories of jurisdiction over land and water through the Canadian Marine Act to enable trade through the Port of Prince Rupert. Schedule A lands are navigable waters under the Prince Rupert Port Authority jurisdiction, Schedule B lands are federal land administered by PRPA, and Schedule C lands are owned directly by the Prince Rupert Port Authority. For more detail, please refer to section 5.1.2 “Prince Rupert Port Authority Letters Patent”.

DOES THE LAND USE PLAN REPLACE AN ENVIRONMENTAL ASSESSMENT ON PROPOSED PROJECTS ON LANDS THAT PRPA MANAGES?

No, the Land Use Plan does not replace the need for environmental assessments, project reviews, and regulated permits as legislated by the Government of Canada. The Land Use Plan is used by Canadian Ports to help shape future land and water use but does not address project-specific requirements.

HOW DOES THE UPDATED LAND USE PLAN ADDRESS WATERFRONT ACCESS, INCLUDING RECREATIONAL AREAS AND TRAILS?

During phase 1 of engagement, PRPA heard the importance of waterfront access for the community. PRPA has incorporated in the Land Use Plan update ways to recognize and increase public waterfront access, including a “Waterfront Recreation” land use designation that recognizes current and future access as a specific use found within all three planning districts. For more details, please see section 4.2.2 “Social Sustainability Projects”, section 8.3.2 “Land Use Designation Descriptions”, and section 8.4 “Planning Districts” of the plan and section 9.1 “Implementation Measures”.

AS THE PORT OF PRINCE RUPERT CONTINUES TO GROW, HOW IS THE PRINCE RUPERT PORT AUTHORITY MITIGATING CUMULATIVE EFFECTS ON THE ENVIRONMENT?

PRPA is committed to leading increased cumulative effects modelling and monitoring as it relates to port activities, including cumulative impacts on the airshed, water quality, greenhouse gas emissions, habitat and biodiversity. Information on cumulative effects and current PRPA monitoring can be found in section 4.5 “Cumulative Effects Monitoring”.

IN 2019, THE PRINCE RUPERT PORT AUTHORITY ANNOUNCED A MORATORIUM ON FLORA BANK, HOW MANY YEARS WILL THAT MORATORIUM BE IN PLACE?

This update formalizes and defines an industrial use moratorium on Flora, Agnew and Horsey Banks, and is being put in place for a minimum of 20 years. The moratorium will be reviewed every 5 years, at which time a decision will be made whether to reset another 20 year period.

WHY IS LELU ISLAND NOT INCLUDED IN THE MORATORIUM?

While Lelu Island has inherent development challenges, it is included in the federal land designated to the port’s core mandate of facilitating Canadian trade, and is considered important for future industrial development within the port. Any potential development on Lelu Island is subject to the development moratorium on Flora, Agnew and Horsey Banks. For more Information on Lelu Island, please refer to Section 8.4.2 “Ridley & Lelu Island Planning District”. An overview on the development moratorium is available in Section 4.2.1 “Environmental Sustainability Projects”.

DOES THE LAND USE PLAN OUTLINE THE PROTECTION OF HERITAGE SITES?

Impacts on cultural and heritage values are considered within individual project reviews. Similar to environmental impacts, the projects consider ways to avoid, manage or compensate for impacts. Heritage values can be difficult to quantify, and PRPA has committed to investigating ways to better identify and evaluate these values, which should lead to improved mitigation options and solutions. Please refer to Policy Direction 4.4.3 in Section 8.2 “Land Use Objectives & Policy Directions”.

HOW WILL PORT EDWARD BE IMPACTED BY INCREASED INDUSTRIAL USE ON RIDLEY ISLAND?

Ridley Island's land use has always been designated industrial, and continues to be designated as such. In addition to considering those impacts within project-specific reviews, the land use plan update incorporates a new "Viewscape Buffer" land use designation on Ridley Island across from Port Edward that is designed to recognize the value of a physical separation from industrial activities, and should improve potential visual and acoustic impacts. Please see section 8.4.2 "Ridley & Lely Island Planning District" and figure 46 "Ridley & Lelu Island Map"

DOES THE LAND USE PLAN CONSIDER THE IMPACTS OF MORE TRAINS IN AND OUT OF THE PORT?

While the Land Use Plan only considers land use designations on properties within the port jurisdiction, and does not directly consider CN mainline operations, rail connectivity is a key principle with PRPA's land use planning. Investing in gateway infrastructure that ensures rail traffic remains fluid, and ensures that future port terminals can continue to facilitate unit trains, will minimize the number of trains required, keep them moving through urban areas, and minimize the number of long-haul trucks needed as an alternative.

| LAND USE PLAN INTRODUCTION

The Prince Rupert Port Authority (PRPA) is updating its Land Use Plan, which was implemented in 2011 and set out a development plan for the next 10 years.

A land use plan is a strategic document that helps guide PRPA in carrying out its mandate to grow the Port in support of Canada's trade with the world, while ensuring we also maintain our commitment to sustainable environmental stewardship, operational safety, and healthy local communities.

Its similar to a municipality's 'Official Community Plan', in that it provides a high-level vision of what the Port of Prince Rupert will look like in the future. It's a valuable tool in providing the public and commercial sectors with certainty about how PRPA intends to manage and use various areas of the land under its jurisdiction.

Importantly, it does not get specific enough to detail what specific terminals, operations or cargoes will be, nor does it replace the need to conduct individual project reviews, environmental assessments, or authorizations.

This is our second phase of public engagement during this update, and we strongly encourage community participation and feedback on this draft before we finalize it this summer.



COMMUNITY & FIRST NATIONS

PRPA invited and received early feedback from meetings, submissions, and surveys about topics of local importance that should be considered in the land use plan update.

We have been able to incorporate much of it in our land use plan objectives, and manifested it in land use designations and associated implementation measures. .



Community Feedback & Response:

- **More waterfront recreation**
 - New land use designation in Cow Bay
 - Kitson Island designated as recreation area
 - Commitment to identify new projects & trails
- **More environmental protection & compensation**
 - Flora Bank moratorium
 - New land use designations for marine habitat and viewscape and shoreline buffers
 - Commitment to proactively model and monitor cumulative effects of operations
- **More public engagement**
 - Increased frequency of land use plan updates
 - Establishment of multi-party regional planning and referral processes
 - Investigate new approaches to manage local social/cultural/historical impacts from port development



| SUMMARY OF MAJOR CHANGES

- **NEW DEVELOPMENT SINCE 2010** — Ridley Island Road Rail Utility Corridor, Westview, Fairview Expansion, Ridley Island Propane Export, Fairview-Ridley Connector Corridor
- **ROOM FOR GROWTH AND DIVERSIFICATION** — Identifying expansion lands for containers, logistics, and liquid bulk
- **INNOVATIVE INFRASTRUCTURE** — Identifying road and rail transportation plans to separate port traffic from public traffic, and avoiding congestion and improving safety
- **ENVIRONMENTAL POLICY** — Formalizing a 20-year industrial development moratorium on Flora Bank
- **WATERFRONT ACCESS** — New land designations, including Kitson Island waterfront recreation area
- **LAND USE PLAN UPDATES AND AMENDMENTS** — Formalizing a new 5-year update cycle on a 20-year land use plan, and including an interim amendment process



FLORA BANK MORATORIUM

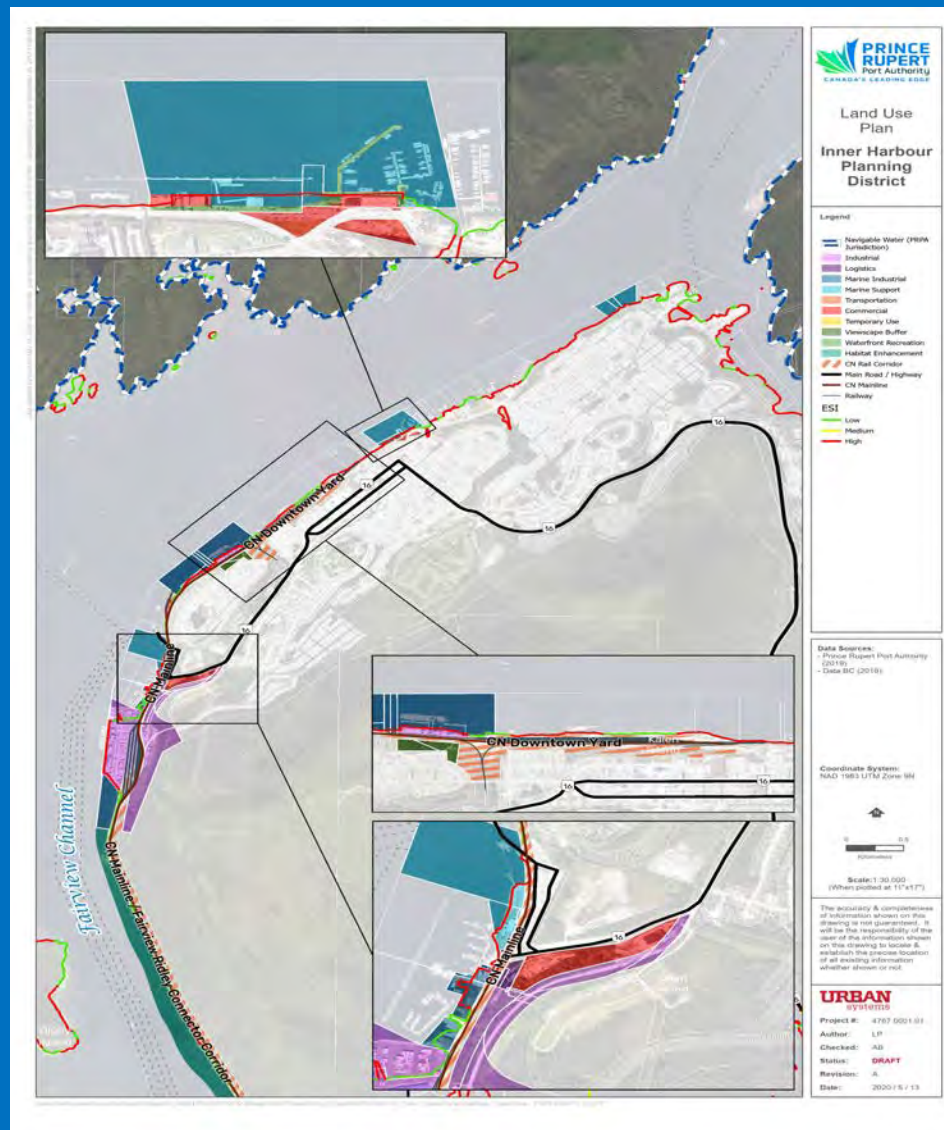
- Industrial Development moratorium applied to marine areas defined by Flora, Agnew and Horsey Banks.
- Lelu Island remains designated as future industrial property
- Terminals, berths, jetties and causeways and other marine industrial uses cannot be developed in the moratorium area.
- Future use of Horsey Bank allowed for approved projects designated as utilities and equipment, including pipe.
- Twenty-year initial moratorium period
- Moratorium period will be revisited by PRPA every five years, and a decision made whether to reset the twenty-year period.



INNER HARBOUR LAND USE



Current Land Use Plan (2011)

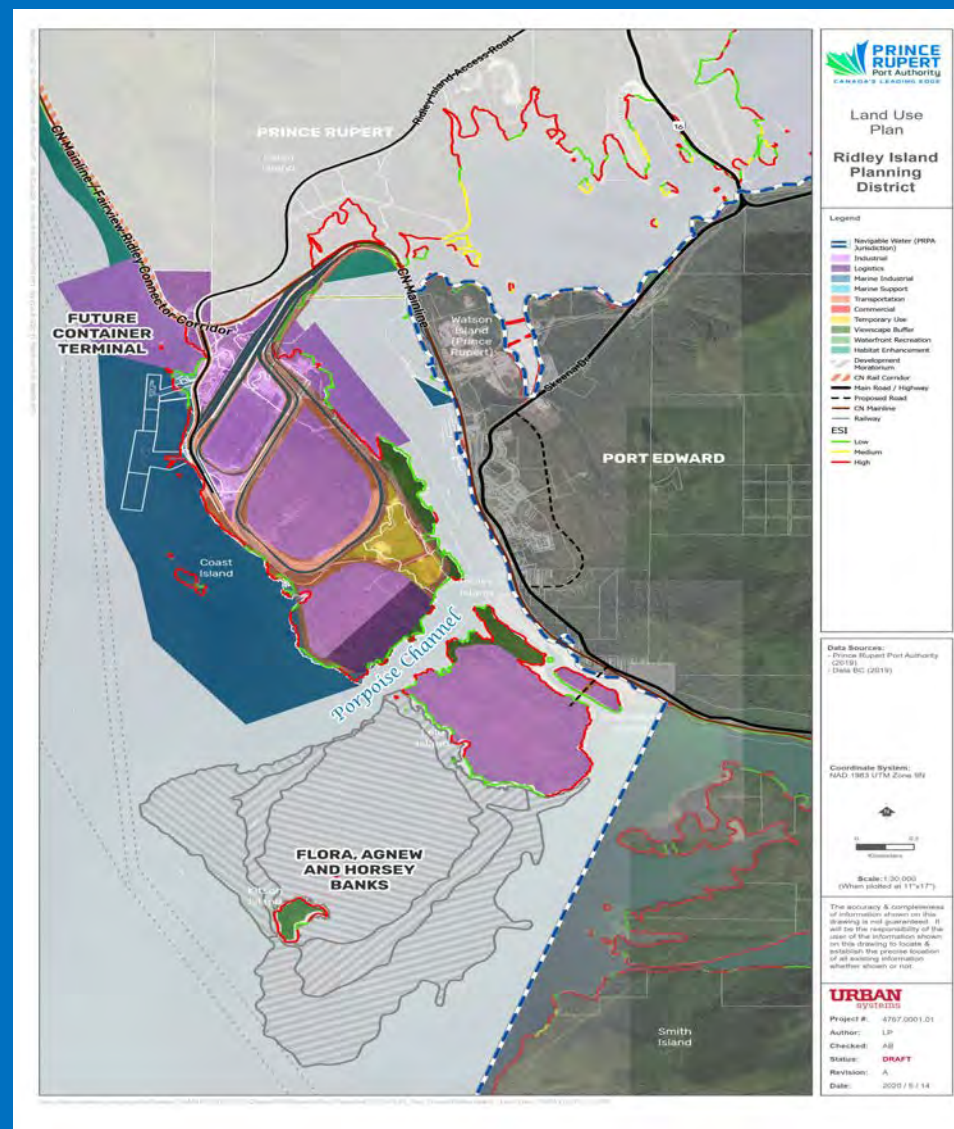


Updated Land Use Plan (2020)

RIDLEY & LELU ISLAND LAND USE



Current Land Use Plan (2011)



Updated Land Use Plan (2020)



| LAND USE DESIGNATIONS

The update proposes a much more detailed approach to land use within the port, reflecting PRPA's increasingly sophisticated approach to forecasting and planning. Several new land uses have been created to achieve this.

| EXISTING LAND USES

- **Industrial**
- **Marine Support**
- **Logistics**
- **Commercial**
 - Converted from "Cruise/Mixed Use"

| NEW LAND USES

- **Marine Industrial**
 - Water side of industrial uses
- **Transportation & Utilities**
 - Road, rail, pipelines and power
- **Habitat Enhancement**
 - Protection for sensitive habitat areas
- **Viewscape Buffer**
 - Visual & acoustic barrier for residents
- **Waterfront Recreation**
 - Recreation and interpretive use
- **Temporary Use**
 - e.g. organic and sediment storage



APPENDIX B-2 – ENGAGEMENT FEEDBACK



KITSELAS LANDS AND RESOURCES DEPARTMENT

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P: (778) 634-3517 ♦ www.kitselas.com

June 24, 2020

Prince Rupert Port Authority
200-215 Cow Bay Rd
Prince Rupert, B.C. V8J 1A2

ATTN: Ken Veldman, VP Public Affairs & Sustainability, Prince Rupert Port Authority

RE: Draft Land Use Plan Update Comments

Thank you for providing the draft PRPA Land Use Plan April 2020. Kitselas has reviewed the document and has identified some areas of concern, both broad and specific, outlined in the table below.

Topic or Issue	Kitselas First Nation Comment
Phase 2 Community Engagement	Please describe how comments from Phase 2 Community Engagement will be addressed. Kitselas expects areas of concern to be discussed and potential solution/recommendations to be collaborative.
2020 Environmental Sustainability Plan	<p>"The 2020 Environmental Sustainability Plan was created to help enact some of the recommendations from the 2011 Land Use Management Plan. Environmental sustainability is a key objective of PRPA and guides future development plans and PRPA's response to public concern." Pg 13</p> <p>Please provide Kitselas a copy of this plan. Is there intention to update this plan to reflect the new Land Use Plan?</p>
Flora, Agnew and Horsey Bank Development Moratorium	<p>"However, the Development Moratorium may allow access for the addition of utilities and equipment such as pipelines, undersea cables, weather monitoring, scientific equipment, or navigational aids on the outer edge of Horsey and Agnew banks where eelgrass habitat is less evident. Eelgrass meadows are sensitive and ecologically productive habitats, and function as important feeding grounds, nurseries and refuges for numerous aquatic and terrestrial species, including juvenile salmon. If utilities and/or equipment are proposed for Agnew or Horsey Banks, the project will be carefully reviewed and would be required to meet strict development criteria and environmental performance measures, and would be located in an area that best avoids significant impact to eelgrass habitat." Pg 16</p> <p>Kitselas is concerned with the level/severity of potential impacts of different utilities (e.g. pipeline vs cable). In addition, "may allow access for the addition of utilities and equipment such as" is not an encompassing list of all the possibilities, what others might there be? Mooring lines?</p>



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GHG Monitoring	Kitselas is concerned with up-stream and down-stream emissions, is there an intention to examine these in the future?
Carbon offsets	Kitselas is supportive of PRPA's initiative to carbon offset. One thought, could carbon offsets be applied closer to home? What programs might facilitate this and include Nation and local community involvement (e.g. habitat restoration)?
Cumulative effects monitoring	<p>"PRPA will work with its First Nation partners and tenants to further develop cumulative effect modelling and monitoring. An outcome of this plan is to begin developing these programs in greater detail with all PRPA partners." Pg 26</p> <p>Please provide more detail, Kitselas would be interested. In addition, has PRPA considered being tied into ESI or is there potential collaboration in the future?</p>
Planning Policy Documents	<p>"PRPA's update to the Land Use Plan recommends that PRPA, local First Nations and local governments in the Prince Rupert region commit to including each other in the review of new and/or updated land use planning policy documents." Pg 35</p> <p>Kitselas has recently completed a Land Use Plan for Reserve Lands (see below) and is in the process of completing a Comprehensive Community Plan.</p> <div data-bbox="560 1159 612 1222"></div> <p>Adobe Acrobat Security Settings Doc</p>
Regional planning meetings	<p>"The updated PRPA Land Use Plan recommends the establishment of a biannual Regional Planning Meeting to be attended by planning officials from all 10 jurisdictions. These meetings would operate on the principle of a rotating Chair and Location to ensure each jurisdiction has the opportunity to host and chair meetings. It is further recommended that the Regional Planning Meeting be held in the Spring and Fall of each year and establish a long-term schedule that rotates hosts and chairs." Pg 36</p> <p>Kitselas is supportive of the idea of regional planning meetings to foster collaboration but is concerned with capacity (both time and funding). As discussed in a meeting with PRPA on June 12, 2020, Kitselas flags the opportunity to discuss this in the Relationship Agreement currently being negotiated between Kitselas and PRPA.</p>



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Figure 16, Pg 43	The legend colours in this Figure are not aligned (two green colours in legend and no mention of what the blue represents).
Plan length	<p>“The Plan is designed to support development and decision making on Port Lands for the next 20 years.” Pg 55</p> <p>Why is the current plan’s temporal scale 20 years given that the last one was for 10 years?</p>
Objective 3.3. Achieve a net positive impact on biodiversity through local leadership in priority areas such as marine conservation and environmental management.	Kitselas is concerned that none of the policy directions listed below the objective directly address how PRPA will “achieve a net positive impact on biodiversity”. Please elaborate further.
Objective 4.6	<p>“4.6.1 Implement relationship protocols with local First Nations to guide our interactions and facilitate the advancement of shared interests.” Pg 61</p> <p>Kitselas supports this and continues to be committed to a Consultation Agreement with PRPA.</p>
Temporary use designation (pg 65)	Is the time length of “temporary” defined? If so, please indicate the time length in the plan.
Outer Harbour Planning District	Given the limited land in this planning district, would a supplementary Marine Use Plan be useful in the planning process?
Table 5 Implementation Measures (pg 77-78)	<p>Initiative 3 “Establish framework for land use plan referrals with local First Nations and local governments (Section 5.2.2)” Pg 77</p> <p>Kitselas is supportive of the commitment to LUP referrals but is concerned with capacity (both time and funding). Furthermore, all implementation measures identified in Table 5 take time and resources. As discussed in a meeting with PRPA on June 12, 2020, Kitselas flags the opportunity to discuss this in the Relationship Agreement and Consultation Agreement currently being negotiated between Kitselas and PRPA.</p> <p>Kitselas is concerned that not all policies identified in Section 7.2 are associated with an initiative in Table 5. Kitselas expects that all policies identified in the LUP have a plan in place in order to achieve the objectives. Furthermore, some initiatives are related to Sections that Kitselas cannot cross reference in the plan (i.e. they do not appear to exist). For example,</p>



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	Initiative 17 "Establish a waterfront recreation area on Kitson Island (Section 8.4.3)" does not have a Section 8.4.3 to refer to.
Amending the Plan	"Minor Amendments may not require consultation from project partners or stakeholders but can be brought forth by them." Pg 79 Kitselas is flagging this for discussion piece for the Consultation Agreement.

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

Kind regards,

S Ouchi

Sachiko Ouchi
Project Assessment Officer, Kitselas Lands and Resources Dept.
PAO@Kitselas.com

CC:

Chris Apps, Director, KLRD
Cedar Welsh, Manager, KLRD
John Balough, Kitselas Negotiator
Krista Ediger, PRPA



GITXAALA ENVIRONMENTAL MONITORING
#280-110 1st Ave West, Prince Rupert, BC V8J 1A8
Phone: 250-624-3339 Fax: 250-624-3338
GITXAALA NATION



Aug 19, 2020

Krista Ediger
Community Relations Associate
Prince Rupert Port Authority

Emailed to KEdiger@rupertport.com

Dear Krista Ediger,

Re: Additional Marine Field Survey for the Marine Resource Value Component

Gitxaala Environmental Monitoring, on behalf of Gitxaala Nation, has reviewed the draft Land use Plan provided on May 21st, 2020. The Nation has also reviewed the Environmental Sustainability Plan provided to our staff after our meeting on August 6th, 2020. The Nation understands that, as the Land Use Plan relies on heavily on the Environmental Sustainability Plan, concerns with both plans will need to be resolved in-order to finalize the current draft of the Land Use Plan.

As identified during our discussion on August 6th, our concerns with the plan center around the need for a better understanding regarding the nature and involvement of the Nation in the continued development of Port activities, especially in consideration of the lack of clear and transparent involvement of the Nation in Port activities to date. We are hopeful that the attached comments on both the Land Use Plan (Appendix A) and the Environmental Sustainability Plan (Appendix B) provide clarity regarding these concerns and we look forward to engaging with the Port during the creation of a final plan that provides clarity and increased certainty regarding the Port's future developments and their commitments to partnership with the Nation.

Sincerely,

A handwritten signature in black ink, appearing to read "James Herbert".

James Herbert

Gitxaala Environmental Monitoring

Cc: Chief Councillor Lind Innes (chiefcouncilor@gitxaalanation.com)
James Witzke – Gitxaala Nation (jamesw@gitxaalanation.com)

Appendix. Gitxaala Nation's Comments on The Second Draft of the PRPA Land Use Plan

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
1	2.2 Plan Vision and Goals for the Future	"The Plan will guide the responsible management of land to develop the Port of Prince Rupert to catalyze the competitiveness, growth and prosperity of Canadian trade, the continued growth and diversification and more than double its cargo volumes by 2040"	Gitxaala Nation has previously expressed concern regarding the unmitigated growth of marine shipping through its traditional territory, which includes the lands and Waters under jurisdiction of PRPA. The stated growth in cargo volumes is alarming to the Nation, as the ability to assess and manage the potential impacts, especially cumulatively, has not been adequately addressed. This is especially concerning, given the lack of regulatory requirements for cumulative effects assessments and management of incremental development.
2	2.2 Plan Vision and Goals for the Future	"PRPA will make efficient use of land by maximizing land use value, intensity and density through careful and progressive planning and land allocation"	The lands under the jurisdiction of the Port include those that Gitxaala nation has both rights and title to, under section 35 of the Canadian Constitution. Development of these lands without the consent of Gitxaala has the potential to infringe on the Nations Rights and Title and would be in opposition to the UN Declaration on the Rights of Indigenous People, which the federal government has committed to upholding. The inclusion of local First Nations in the "economic participation" as identified in goal number 4 does not properly respect the commitment toward reconciliation made by the federal government, nor properly respect that Gitxaala holds unceded Rights and title to lands under PRPA jurisdiction.
3	2.2 Plan Vision and Goals for the Future	Goal 3 - PRPA will protect the gateway environment by developing responsibly and sustainably and minimizing environmental impacts of operations.	The term 'gateway environment' needs to be properly defined. The goal should reflect a commitment to responsible development that protects the environment. Using the term 'gateway environment' allows for interpretation over whether the goal is to protect the 'gateway' or the 'environment' if these two may become at odds with each other.
4	2.3	"Long before the founding of present-day Prince Rupert, the	This is an inappropriate characterization. Gitxaala Nation is a sovereign Nation the use of the broader anthropological term has lead to a

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
		area was inhabited by the Ts'msyen peoples who had long established winter villages spread throughout Prince Rupert Harbour."	number of incorrect interpretations regarding the nature of the nation's rights and title Gitxaala Nation territory includes the entirety of the Prince Rupert Harbour area and this section should clearly this by avoid the use of the term "Ts'msyen" and refer each Nation individually.
5	2.7	"Six Ts'msyen First Nations have asserted rights and title within PRPA's jurisdiction-- Metlakatla First Nation, Lax Kw'alaams First Nation, Gitxaala First Nation, Gitga'at First Nation, Kitselas First Nation and Kitsumkalum First Nation."	See comment 4 for concerns over the use of the term "Ts'msyen". Additionally, the Nation prefers to be identified as "Gitxaala Nation" and not "Gitxaala First Nation".
6	3.1	"The 2020 Environmental Sustainability Plan details the port's programs and procedures to monitor, mitigate and respond to issues that arise in both human and natural environments."	In a review of our records, we can not determine if a copy of this plan was shared with the Nation before it was requested on Aug 6 th 2020 by the GEM office. The Nation has since reviewed the document and found it to be largely deficient for the stated purposes. To address the deficiencies in the Environmental Sustainability Plan (ESP), an additional table of specific comments detailing concerns specific to the ESP has been appended. The draft Land Use Plan (LUP) leans heavily on the ESP, and as such, it necessitates revisions before the LUP can be finalized and the Nation's concerns should be reflected in the revisions. This is especially true when considering that the Nation's involvement in the monitoring, mitigation and management of "issues that arise from human and natural environments" stem from commitments included in a number of federal environmental assessments relating to Port activities, and would make up a considerable part of the Port's commitments to involve the Nation as a key partner in the success of the port, as outlined in section 2.7.
7	3.2.1 Environmental	"The Development Moratorium prohibits industrial development on Flora, Agnew and Horsey	It should be noted that the threshold for a "significant impact" to the eelgrass habitat located on Flora, Agnew and Horsey Banks would include any impact to the function of the environment, and that the

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
	Sustainability Projects	Banks. It does not prohibit industrial development on Lelu Island."	development moratorium was put in place with the expectation that the pristine nature of this environment would be maintained.
8	3.3 Environmental Programs	Table 3.1	A number of these programs are no longer operational and relate to the time-period covered under the 2020 Land Use Plan. It would be more appropriate to see a list of only current and forward-looking environmental programs PRPA is engaged in that are relevant to the time-period covered under this Land Use Plan.
9	3.4 Shoreline Mapping of Environmentally Sensitive Habitats	Figure 12	Please clarify why this figure depicts the shoreline currently under review for a DFO FAA amendment as high value habitat when PRPAs FAA amendment classifies it as low to moderate value habitat?
10	3.5 Cumulative Effects	"PRPA is committed to leading the way for cumulative effect monitoring as it relates to port activities."	This section should be revised to include the need to both assess and manage cumulative effects, not just monitor. Monitoring the cumulative impacts is meaningless with the ability to adaptively management these effects. The Nation's experience with cumulative effects management programs, federally, provincially, and internally has resulted in a number of strategic approaches to cumulative effects management. The appropriate <i>management</i> of the cumulative impacts of all Port related development activities represents a key initiative in order to promote the sustainable development promoted by this plan.
11	3.6 Project Related Impact Assessments and Environmental Reviews	"At all levels of the project level assessment, PRPA staff are engaged with proponents to guide them through the process, make them aware of legislative and regulatory requirements and ensure adequate consultation with Indigenous groups and opportunities for input from the public and impacted parties."	This section should provide more detail on exactly how PRPA intends on involving Nation during the process outlined on page 27. A lack of clear and transparent assessment process and consultation has resulted in significant issues during past on on-going assessment processes lead by PRPA. The Nation has previously expressed concern regarding PRPA's review process and the lack of transparency. Identifying exactly when in this process notification, comments, and consensus-seeking activities will occur would bring this section more inline with modern review process.

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
12	4.1.1 Canada Marine Act	“In the land use planning context, the CMA provides specific direction for PRPA to ensure that the land under its jurisdiction is well managed, well serviced and well connected to major transportation systems in order to fulfill its mandate of supporting Canadian trade. The organization and use of land at the Port of Prince Rupert reflects and adheres to the policy directions of the CMA.”	It is the Nation’s understanding that, under section 48 of the CMA, a Land Plan can prohibit or regulate structures or works, but the act does not identify the use of a plan to identify specific works for future development. Approval of any new development would require an assessment under the Impact Assessment Act 2020. While this was identified in section 2.1, it would be helpful to outline the legislative limits of this plan in this section.
14	4.1.3 Strategic Framework	“PRPA has several other strategic documents and plans that provide specific details on how new projects are implemented to maintain its high standards for the environment, the community, safety and the economy”	PRPA should include the development of a Reconciliation Plan as part of the list of strategic documents. A plan on how the Port intends on involving Nations as key strategic partners would be suitable as part of this strategic framework. Identifying the intentions to formulate relationship agreements with Gitxaala, and identifying how this agreement (and relevant sub-agreements) would fit in into the Port’s strategic Framework and long-term vision would be beneficial to the Nation. This may be the intention behind Initiative number 3, in table 2 of section 8.1, however it should be made more explicit if this is the case.
15	4.2.1	“The Port interacts with each of these governments on a regular basis and presents a framework for enhanced (two-way) Inter-Jurisdictional Cooperation.”	More information about this framework for enhanced (two-way) Inter-Jurisdictional Cooperation should be shared with Gitxaala Nation, a key partner listed in section 2.1 of this document. The final plan should also contain commitments to developing this framework in collaboration with all partners. Highlighting the importance of a transparent framework is a larger part of the unresolved concerns Gitxaala has with the PRPA’s regulatory processes.
16	4.2.2.	“PRPA’s update to the Land Use Plan recommends that PRPA,	Please provide further information specifying how Gitxaala Nation’s involvement in future revisions of this document will be coordinated.

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
		local First Nations and local governments in the Prince Rupert region commit to including each other in the review of new and/or updated land use planning policy documents.”	
17	4.2.3	“PRPA Land Use Plan recommends that PRPA, the District of Port Edward and the City of Prince Rupert refer to one another on any development applications being considered for approval within 200 metres of a shared border or within 200 metres of the shoreline of Porpoise Harbour.”	The majority of the 15km of shared border between the City of Prince Rupert and PRPA jurisdiction has already been developed to the extent practicable for residential use; the most relevant example of use conflict relates to the construction of new industrial activities in areas that will affect existing residences, rather than the other way around. From the Nation’s understanding, the existing examples of conflict involving residential neighborhoods that were impacted by port development lie just beyond the 200m mark. Given this history of known issues between user groups, the 200m threshold should be expanded to meaningfully serve discussions around mitigating impacts from mixed use along shared boundaries. Additionally, more information about the framework for these discussions should be provided in the Plan to allow community members understanding regarding the processes for resolving these conflicts.
18	4.2.4	“PRPA Land Use Plan recommends the establishment of a biannual Regional Planning Meeting to be attended by planning officials from all 10 jurisdictions.”	More information about the proposed framework of these meetings should be included in the plan. Information regarding the scope and structure of these meetings, if a term of Reference be developed And adhered to, , anticipated actionable items as a result and howcoordination by the PRPA is expected to unfold are examples of the information that should be included in order to help the Nation understand the expectations?
19	5.1 Current Port Overview	“In 2020 the most significant activities include:”	It would be helpful to identify the amount of marine, road, and rail shipping associated with the numbers discussed in this section. The ability of community members to transfer TEU or tonnes of dry or liquid bulk into a tangible effects is severely restricted. At a minimum, the

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
			presentation of marine shipping, rail cars and trucks per year would help communities understand their own experience with Port activities.
20	5.2. Future Port Growth & Diversification	"Volumes in the gateway are expected to double by 2030"	Similar to comment number 12 above, estimates in shipping numbers by vessel, rail cars and trucks, would help community members better understand and plan for future Port growth.
21	5.5. Implications for Port Growth	"The demand for new logistics space and transportation infrastructure will also drive demand for land in neighbouring jurisdictions."	This section indicates that the Port anticipates growth to occur both within and outside lands under PRPA jurisdiction, however the section makes no reference to the ability of the Port to safely handle the associated shipping. With projects like the reference Pembina Watson Island project, this section should identify the implications for the growth of marine traffic within the Prince Rupert Harbour area.
22	6.1.2 Highway Connections	"Trans Canada Highway 16 is the highway into Prince Rupert. Highway 16 extends through all four western provinces and connects Prince Rupert to both the Canadian Highway Network and the American Inter-State Network. Provincially, Highway 16 provides connections to Terrace (145 km), Prince George (720 km) and part of the route to Vancouver as well as all communities in between. Highway 16 is maintained by the BC Ministry of Transportation and Infrastructure"	This section should include reference to the rail crossing at Mile 28, as it is a major pinch point between the only roadway in and out of Prince Rupert and the gateway rail line. It is important to capture this direct interaction between the two transportation arteries in their characterization within this document.
23	6.1.3 Rail Connections	"Rail connections to Prince Rupert are another key component of the port's transportation network. CN's North American mainline rail	This section should include reference to the rail crossing at Mile 28, as it is a major pinch point between the only roadway in and out of Prince Rupert and the rail line.

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
		network connects Prince Rupert to important destinations across Canada and the Midwest of the United States of America.”	
24	6.2.1 Gateway Rail	“PRPA’s Rail Master Plan is an essential document that drives much of the port’s land use approach and outlines the development of and gateway’s rail networks into the future.”	To our knowledge, Gitxaala Nation has not received a copy of this document for review. As a listed key partner in section 2.1 of this document, and a member of the newly formed rail dialogue group with a number of substantive unresolved rail related concerns, it is important that Gitxaala be engaged in the development and review of this essential document.
	6.2.1 Gateway Rail	<p>“Zanardi Bridge and Causeway Expansion</p> <p>This project will greatly expand the rail capacity to and from all operations within the Port of Prince Rupert. The current Zanardi Bridge is a single-track bridge which acts as a bottleneck for trains entering and exiting the Port on the CN mainline. The project will add a new double-track bridge which will result in three rail crossings. This project also includes expanded rail infrastructure on the Ridley Island causeway and modernization of rail leads into existing Ridley Island terminals. CN’s current construction of the Wilson Siding near Port Edward complements this future expansion.”</p>	It should be noted that despite being listed as a key partner in this document, Gitxaala was not engaged in the Section 82 review of the Zanardi Rapids project until the Nation requested to be sent the publicly available EEE for review. Considering the commitments made to key partners such as Gitxaala, and the stated importance of this project to the function of the Port, this sequence of events deeply concerns the Nation and highlights the need for increased transparency of PRPA as a federal authority and lead regulator in development authorizations.

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
25	7 Future Land Use Directoin	“The Plan provides a framework for land management that honours PRPA’s strategic goals and encourages thoughtful development that limits environmental impact, is integrated into the surrounding community and is a gateway that provides an economic benefit to all Canadians.”	It should be noted that in its current state, this Plan does not provide an effective framework for land management that encourages thoughtful development that limits environmental impacts. This framework should be further developed, in consultation with key players, like Gitxaala Nation before the finalization of this Plan. Further, given it’s heavy reliance on the Environmental Sustainability Plan, until the ESP has been meaningfully developed and updated (also in consultation with key players), the LUP should not be finalized.
26	Objective 1.1.2	“Plan, design and invest in rail, road and marine transportation infrastructure that responds to anticipated growth and diversification in port capacity and capabilities.”	The plan should contain more information regarding the spatial scope of this objective. Specifically, the plan should detail the extend of both the road and rail line covered by PRPA when consider planning, designing and investing in infrastructure improvements?
27	Objective 1.2.3	“Develop a transparent, defined and expedient development approval process that allows for changes to the existing policy framework so that unforeseen development types can be accounted for. “	The plan should contain more details, including how the Port envisions partners, including Gitxaala Nation, will be involved in the development of this process?
28	Objective 2.2	“Acquire lands where necessary or strategic for future developments. “	Please clarify what areas adjacent to, but currently outside of, PRPA jurisdiction that would be considered strategically valuable.
29	Objective 2.4.	“2.4.2. Ensure new project developments on PRPA lands are introduced to relevant First Nations and local governments for review and feedback, over and above existing consultation	Given the federal government’s commitment to both the Truth and Reconciliation Commission Call to Action and the UN Declaration on the Rights of indigenous People, consultation guidelines and best practices currently identify the need for collaboration and consensus seeking processes. This objective should be re-draft to specify that consultation

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
		and public engagement regulations and guidelines.”	with nations will meet or exceed current regulations, guidelines, <i>or agreements</i> .
30	Objective 3.1.	“PRPA’s approach to environmentally sustainable development will avoid, minimize or mitigate impacts (in that order) to the natural environment “	The reduction of environmental impacts from development should be the primary goal, however this section should include another goal to ensure that effectiveness monitoring is included to ensure that the impacts are avoids, minimized or mitigated, and that the port will adaptively manage for any potential impacts.
31	Objective 3.2	“Decrease intensity of energy and Greenhouse Gas emissions per tonne of trade through the gateway. “	the plan should explicitly state if upstream, downstream, and marine shipping and rail emissions will be include in this objective to decrease intensity of energy and GHG emissions per tonne of trade.
32	Objective 3.6	“3.6.3. Support regional environmental remediation, habitat enhancement and protection through direct environmental sustainability programming and community investments. “	This objective highlights the need for a current and effective ESP. Gitxaala maintains the ESP should be revised before the finalization of the LUP. Please see additional comments on the existing ESP.
33	Objective 3.7	“3.7.1. Establish quantified risk goals for marine navigation within PRPA jurisdiction and develop a plan to meet those goals with our port partners. 3.7.2. Encourage the development and adoption of common operations, environmental and emergency	is the plan should be explicit in identifying the potential Port Partners for the purpose of this objective. Specifically if the Nation will be involved in the creation of these goals.

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
		management principles with our port partners.”	
34	Objective 4.4	“4.4.1 Provide clear and transparent methods for communication and engagement to proposed changes to PRPA Land Use Plan.”	This communication and engagement plan should be developed in advance of the finalization of the LUP.
35	7.3.1	“Generally, this land use plan does not attempt to create environmental protection for specific areas, or prescribe project review policies, but rather to identify environmental characteristics that must be considered and addressed within the designated land uses.”	Is this not what the Lelu/Flora Moratorium is? And is this not the main document for that commitment? This statement should be revised or removed.
36	7.3.2 Land Use Designation Descriptions	“Areas designated Habitat Enhancement are designed to protect habitat and sensitive areas. These may be in marine, terrestrial or foreshore environments. Permitted activities in Habitat Enhancement areas are restricted to preservation, enhancement, or restoration of natural areas or the restoration and enhancement of areas impacted by previous development.”	The term ‘habitat enhancement’ seemingly implies areas designated for enhancement or restoration activities (for example, the artificial reefs), however it also includes areas with restricted development (e.g. Flora Banks), which represents habitat conservation rather than ‘enhancement’. The Nation is concerned that future development will identify the area covered by the development moratorium as a form of habitat enhancement and used to compensate for the loss of habitat function in other locations. The plan should clearly outline that this is an area of conservation and not enhancement, especially in section 7.4.2 and 7.4.3
37	7.3.2	Viewscape buffer: This land use designation is intended to apply to areas between residential and	If the intended function of a designated viewshed buffer is to preserve and enhance the quality of life of residents in conflicting land use areas, it would be helpful for the plan to include some form of reference to

Comment ID	Section	Relevant Text	Gitxaala Nation Comment
	Land Use Designation Descriptions	industrial spaces to provide a visual and acoustic buffer between conflicting land uses. Viewscape buffers preserve and enhance the quality of life for adjacent residents, while not impacting the operation of the Port. In addition, the buffer acts as a shoreline buffer of vegetation. Wherever possible, the buffer goal should be 50 metres.	efficacy monitoring, ensuring that visual and acoustic impacts are successfully mitigated.
38		While Lelu Island is subject to the terms of the Flora, Agnew and Horsey Banks industrial development moratorium, the moratorium definition does allow for the potential of services that would enhance the potential of industrial development on Lelu Island.	The Plan should provide clarity regarding the criteria for services that would be allowed under the moratorium, beyond simply enhancing development potential? If it does not preclude development, it is not a true moratorium, but rather a set of potential restrictions that depend on an unknown set of criteria.
39	8.3 Amending the Plan	“Minor Amendments include small changes, edits and revisions to text or figures within the Plan and will not affect the overall policies, procedures or goals presented in the Plan.”	Minor amendments should include notification to the nation so that changes can be tracked and the current plan can be updated in the Nation’s records.

Appendix B: Gitxaala Nation Comments on PRPA 2020 Environmental Sustainability Plan

Comment ID	Section Name	Gitxaala Nation Comment
1	2.0 Guiding Principles	This section does not agree with arguments made in the 2018 provincial court case brought against PRPA regarding the decommissioning and disposal of the toxic Odin Dock that occurred from June 22, 2017- June 27, 2019. As a legal defence to the 4 charges brought against PRPA, it was argued that PRPA had the right to pollute indiscriminately because it does not have to adhere to provincial regulations as a federal authority. Given this admission, it is apparent that one of the declared guiding principles of the Environmental Sustainability Plan, Pollution Prevention, has not been implemented as intended in this document. To remedy this disparity, the ESP document should be revised to include a sufficient level of detail so that it can serve its intended purpose for PRPA.
2	2.0 Guiding Principles	Similar to the above comment, additional court cases brought against PRPA in 2018 highlight how PRPA willfully fails to consider another of the declared guiding principles of the Environmental Sustainability Plan (Preservation of Environmental Integrity). During the Fairview expansion project between Nov. 30, 2014 and Nov 1, 2015, PRPA and their contractors violated 4 of the Projects' environmental conditions resulting in 2 fisheries act violations. PRPA then chose to not stop work or report the issue to DFO, resulting in additional violated ministerial conditions as well as two addition fisheries violations. In total 10 charges were brought against PRPA due to the blatant failure to preserve environmental integrity, despite this being a guiding principle for PRPA. Again, this document should be revised to include a sufficient level of detail so that it can serve its intended purpose for PRPA in a meaningful way.
3	2.0 Guiding Principles	It has been Gitxaala's experience in working with PRPA on a number of environmental reviews during the past 5 years that continuous improvement in terms of improving overall environmental sustainability performance is demonstrably not a priority for PRPA. These experiences are supported by the evidence presented at, and the outcomes reached, in the aforementioned court cases brought against PRPA by both provincial and federal authorities. This document section references a need for a process of regular review and action, with an emphasis on innovation, however Gitxaala's has not found there to be such a process in place, resulting in each subsequent environmental review we have engaged in moving further away from the intent of environmental sustainability. This regular review and action process should be developed beyond the level of detail presented in the current document, ideally with engagement from key partners, such as Gitxaala.
4	3.0 Goals	Again, the goals of this document do not align with decisions and rationale for those decisions made by PRPA since the inception of the ESP. Specifically, the statement that "the requirements of

Comment ID	Section Name	Gitxaala Nation Comment
		all applicable legislation, regulations, standards and integral policies, practices and procedures are met or surpassed". It would be helpful to provide more information on PRPA's interpretation of what applicable legislation etc is.
5	4.0 Strategic Programs and Initiatives	This section states that this plan would be updated regularly however it does not appear to have been updated since it's creation in 2012. Further, the document appears to expire in 2020, like the 2020 Land Use Plan currently in consultation, which leans heavily on the ESP. Again, Gitxaala maintains this ESP document should be redone to include more accurate and relevant information so that the document can serve its intended purposes as both a stand-alone document, and a supporting reference to the Land Use Plan.
6	4.2 Documentation of environmental conditions	This section states that the stewardship recommendations that will be borne of the Environmental Footprint Study will be incorporated into the ESP. It is not apparent what these recommendations are or how they have been integrated. Please clarify.
7	4.3.1 New Project development	There have been considerable regulatory, and internal PRPA changes since this document was made and this section is now out of date and no longer relevant. Again, this document needs to be redone to serve its intended purpose.
8	4.3.1 New Project development	What is the PRPA Environmental Assessment Policy? Please provide a copy to the GEM office for review.
9	4.3.1 New Project development	This section does not reference Section 82 reviews (or Section 67 as they were known at the time this document was created). This is one of the main ways that projects on federal lands are assessed and as such, information about this process should be captured in this section.
10	4.3.3.2 Climate Change and Air Quality	"Over time, PRPA will work with Port tenants and users, as well as the City of Prince Rupert, utilities, government agencies, and other stakeholders, to encourage additional energy conservation and emission reductions." Again, looking back at the 2018 court case regarding illegal burning of toxic materials and the ongoing assertion that it was within PRPAs right to do so, the actions of PRPA do not agree with the commitments made in the ESP. Further, an internal Emissions Management Plan is referenced in this section however it is not clear if that plan was updated to reflect the courts ruling, ensuring that PRPA does not continue to overreach their jurisdictional authority in regard to air emissions.
11	4.3.3.3 Water Quality	More information is needed about what applicable regulatory requirements are for water quality. Does this include provincial regulatory req
12	4.4 Key Enabling Activities	It is not clear how these activities had or have been implemented since the inception of this document. As a stakeholder, Gitxaala Nation, has found engagement, communication, training and integration of environmental stewardship sustainability considerations to be very poor and even

Comment ID	Section Name	Gitxaala Nation Comment
		decreasing in recent years. This section requires more information about how these key enabling activities are to be undertaken and implemented in PRPAs culture and business processes.
13	4.4.1 Communication	Communication is listed as being integral to the success of this ESP. Given the ongoing issues with communication regarding Section 82 reviews within PRPA boundaries, and PRPAs handling of recent environmental sustainability issues, it would seem that PRPA is not committed to ensuring the success of the ESP. Further, it is not clear that the communication plan referenced in this document has been created or implemented. Please clarify.
14	4.4.2 Stakeholder Engagement	Collaboration with all stakeholders is regarded as a key feature of the ESP, however Gitxaala Nation has not been engaged in the development of the document, nor is the document public ally available. Further, when asked about the status of the ESP as referenced in the LUP, PRPA LUP project lead could not confirm the status or nature of the document. This also calls into question commitments made in this section to have all staff be made aware of the ESP content by HR.
15	4.4.4 Environmental Management System	Until this plan has been updated to include more detail on how key initiatives will be implemented, it does not fulfill the function of an EMS. In 2012 it was identified as being a preliminary EMS; what is the state of PRPA's current EMS?
16	5.0 Plan Review	Again, this plan should be developed to include more detail, wherein PRPA will be able to demonstrate to key partners how environmental sustainability is being put into action.
17	6.0 Supporting materials	This section is unfinished and does not include any links to references. It appears to be a placeholder and speaks to the unfinished and ineffective state of the current document.

Attachment 1: MSS technical comments on PRPA's draft land use plan

Comment #	Page #; Section; Current Wording	Recommendations/Questions
1		<u>General Comment:</u> Metlakatla wishes to see a commitment from PRPA that all projects on Port lands will ensure that sewage and wastewater is effectively treated in advance of discharge to the marine environment. An environmental objective on this topic should be included in the LUP document.
2		<u>General Comment:</u> MSS wishes to see increased transparency regarding the management and monitoring regime of the organics disposal site and sediment disposal site on the south east corner of Ridley Island.
3		<u>General comment:</u> PRPA identifies spill response as part of their role several times throughout the LUP document but it is not explicitly defined. Please include a section that identifies and clarifies PRPA's role in spill response.
4		<u>General Comment:</u> There are concerns that PRPA is not planning to use landscape buffers extensively. In Traditional Use Studies, Metlakatla members have raised concern about their sensory experience being impacted while carrying out traditional harvesting activities as a result of noise, viewscape impacts and lighting from industrial activities. PRPA could be implementing landscape buffers not only in between industrial areas and residential areas but also in industrial areas that have water or trail access. Additionally, PRPA should be committing to implement other techniques and management tools to reduce sensory disturbance, for example through direct lighting, reduction of night-time sound disturbance, etc. Please provide a map showing current and future landscape buffers and other tools for sensory disturbance reduction. Metlakatla can provide specific feedback regarding where additional (if any) landscape buffers should be placed prior to development in green spaces.
5		<u>MSS noticed many opportunities for review within this document, and suggests that the LUP be further edited.</u> <u>For example, the term "affects" should be edited to "effects" in several locations within the LUP.</u>
6		<u>MSS requests a commitment from PRPA to provide Metlakatla Governing Council with an overview of the Land Use Plan, and an opportunity to incorporate their feedback.</u>
7	Page 1; Table of Contents	The table of contents' section numbers do not match the section numbers in the chapters in the body of the document.

		The links in the table of contents do not lead the reader to the correct spot in the document.
8	Page 1; Section 2.1; <i>Environmental assessments on federal lands are required for projects that are anticipated to generate adverse environmental effects according to relevant federal environmental legislation.</i>	It is important to identify that Provincial Environmental Assessment legislation is applicable to Port lands and may also be triggered for projects within PRPA boundaries (i.e. Provincial EA is triggered for the Vopak project). Please edit this paragraph to include that information.
9	Page 15; Section 3.2.1; <i>PRPA recognizes that development with required mitigation in this marine area is challenging, and acknowledges there are lingering concerns and uncertainty from local First Nations environmental organizations and the community related to how a development in this area may pose risk to the health and ecology of the Skeena River estuary and its role in supporting healthy salmon populations in the system.</i>	Please consider replacing the word “ <i>lingering</i> ” with “ <i>ongoing</i> ”. MSS recommends deleting the wording “ <i>in the system</i> ”.
10	Page 16; Figure 6	The map is more detailed than necessary. MSS recommends simplifying the map to just its purpose: showing the moratorium area. It is therefore not necessary to show the current and future rail and road area (orange) or the reef area (green). If PRPA determines to keep the rail and reef polygons on the map, the legend should identify that the orange area is both existing rail and road <u>as well as future proposed</u> rail and road; the reefs should be identified in the legend as artificial habitat compensation reefs so as not to be confused with natural reef systems.
11	Page 17; Figure 7	Can PRPA provide more information on the area of the map labelled ‘ <i>undesignated</i> ’? Is the undesignated area contained within the moratorium? If so, this map seems redundant with Figure 6, especially since the Bathymetry is not readable on Figure 7, which seems to be the purpose of the map as per the title.

12	Page 25; Section 3.5	<ul style="list-style-type: none"> • MSS recommends that PRPA provide the definition of cumulative effects in this section. • Metlakatla has had an ongoing Cumulative Effects Program for the past 6 years. Metlakatla is interested in collaboration with PRPA on this initiative. In particular, Metlakatla would like to work closely with PRPA to ensure that the best values are selected to be monitored and to ensure that work is not being duplicated. • Please see attached Metlakatla's Cumulative Effects Program Synopsis to better understand the values that Metlakatla is evaluating and managing and to better understand what work has been done to date by the Nation. • Metlakatla would like to see a commitment from PRPA to include Cumulative Effects assessments in Section 82 environmental reviews where PRPA is the proponent and/or a federal authority.
13	Page 26; Section 3.6	<p>For ongoing Section 82 environmental reviews and past Section 67 reviews, MSS has been disappointed in both the process and level of engagement with Metlakatla's technical staff at early stages of the review.</p> <p>In the past, MSS has requested that PRPA include MSS in the scoping of the valued components and the review of the proposed study design/methodology for valued components. Adjusting these steps in the process to make it more inclusive to address First Nation concerns would make the EEE process more robust and reduce further issues when the environmental applications are being reviewed. PRPA has carried out environmental reviews in the most limiting way that the legislation allows, rather than going a step further to adequately address concerns raised by First Nations. An example of this is the exclusion of cumulative effects in project level assessments.</p> <p>With past EEE review processes, MSS has stressed the need to review draft proposed conditions for each project that is nearing review completion. Metlakatla should have a role in monitoring projects that are either being constructed or operating in their territory. Steps around project conditions review, and roles in ongoing monitoring need to be built into the environmental review process.</p> <p>MSS recommends that PRPA engage in conversations with the Coast Tsimshian to build a consensus-based review process that follows legislation while also resolving the issues identified above.</p>
14	Page 26; Section 3.6	In addition to the comments above, MSS suggests that PRPA uses this section to provide clarification and elaborate on how PRPA actively works to avoid conflicts of interest, and provide increased transparency with respect to process, review, assessment and significant conclusions; when PRPA is both the proponent and the regulator.
15	Page 32; Figure 13	There are numerous concerns with the map:

		<ol style="list-style-type: none"> 1) the rail polygons include <u>existing and proposed rail</u>- this requires clarification on the legend; 2) the Dodge Cove community boundary on Digby Island is not correct; 3) only some parks are identified on the map, others seem to be excluded; 4) the grey area should be identified as 'communities and reserve lands' on the legend
16	Page 33; Figure 14	<p>Is the strategic business plan identified in this figure available for review?</p> <p>Is the rail master plan identified in this figure available for review?</p> <p>If so, please share these documents.</p>
17	Page 34; Figure 15	<p>There are numerous issues with the legend and map that make it confusing, including:</p> <ol style="list-style-type: none"> 1) there are polygons of colour on the map that are not identified in the legend (i.e. pink, darker green, brown, and darker shade of yellow). 2) Dodge Cove boundaries are incorrect. 3) Is Southwest Digby Island zoned as industrial (purple)? Or is it just crown provincial land with no specific designation? 4) Jurisdictions (municipal, provincial, federal) are not well-defined in the map.
18	Page 43; Figure 16	<p>Several issues exist with Figure 16:</p> <ol style="list-style-type: none"> 1) The legend does not correspond with all of the graph colours. 2) Vopak and RRUC are lumped together – it is not clear why. 3) Vopak should not be included in the graph or legend as it is not a yet a project and is only now undergoing environmental review. 4) Container activity (assumed to be blue) is not listed in the legend. 5) The RIPET project should be added to the graph and legend. 6) It is unclear what PRPA means by “other activity- CN rail; Harbour activity and Alaska marine highway” can these be further defined?
19	<p>Page 45; Section 5.4</p> <p><i>A description of the forecasted annual volumes for different commodity types by node and overall total volume. Commentary on the relative importance of different commodity categories and how the proportions have changed over time. Also include commentary on recent and anticipated growth in</i></p>	<p>Suggest deleting the first paragraph under this section (identified in the column to the left).</p>

	<i>train volumes to support logistics activities.</i>	
20	Page 46; Figure 18	It is unclear what PRPA means by “other activity- CN rail; Harbour activity and Alaska marine highway” (yellow in legend). Can these be further defined?
21	Page 51; Figure 22	Please provide more information on the causeway expansion. It is not clear if that is related to the current EEE review underway by CN, or if the causeway expansion includes additional proposed rail and infilling outside of that project.
22	Page 52; <i>CN’s current construction of the Wilson Siding near Port Edward complements this future expansion.</i>	What/Where is the <i>Wilson Siding</i> ? Does PRPA mean to reference the <i>Watson Island</i> siding?
23	Page 53; Section 6.2.3 <i>The primary location for these berths follow the deep water bathymetry on the west side of Ridley Island, but also include potential locations off the southwest of Kaien Island (direct north of Ridley Island) and potential expansion of berths at Fairview.</i>	Please provide more information. For expansion of berths at Fairview, is PRPA referring to Phase 2B that has recently received permitting or additional expansion that we are not currently aware of?
24	Page 54; Figure 23	Recommend using different colour to identify ships and land in this Figure. Lucy Islands are incorrectly named. The island titled “Lucy Isle” is actually Tugwell Island.
25	Page 56; Objective 1.2.3 <i>Develop a transparent, defined and expedient development approval process that allows for changes to the existing policy framework so that unforeseen development types can be accounted for.</i>	In addition to transparent and expedient, the process needs to be robust. Please see comments provided above (see comment 13) that relate to environmental review processes.
26	Page 57; Objective 2.4.2. <i>Ensure new project developments on PRPA lands are introduced to relevant First Nations and local governments for</i>	Metlakatla is interested in discussing with PRPA the ways in which engagement can be more transparent and meaningful during environmental review processes.

	<i>review and feedback, over and above existing consultation and public engagement regulations and guidelines.</i>	
27	Page 58; Objective 3.1.1. <i>Ensure all project developments are subject to a transparent review that reflects federal legislation and regulations.</i>	This objective will only ensure PRPA is carrying out what they are legally obliged to. For Section 82s there is much flexibility with the process, PRPA could establish a more meaningful, robust and transparent process if they adopt some suggestions outlined in responses above (see comment 12, 13, 14).
28	Page 58; Objective 3.1.2. <i>Ensure best practices for reducing environmental impacts from development and operational activities are considered and approached collaboratively with PRPA partners on PRPA land.</i>	Metlakatla challenges PRPA and other federal authorities to work closely with Coast Tsimshian to explore innovative mitigation measures that go above and beyond identified best practices during review processes and during the post approval phases of projects.
29	Page 58; Objective 3.3.	Recognizing that port activity has the potential to contribute to the spread of invasive species, PRPA should add an objective relating to invasive species management, and preventing the spread of invasive species.
30	Page 59; Objective 3.4.3 <i>Ensure new monitoring stations are activated as necessary to measure impacts as new tenants and development patterns change.</i>	MSS requests that PRPA go further than this objective. PRPA should be able to increase or change monitoring efforts if the baseline condition of a value is decreasing as a result of port activity. <u>PRPA should also be able to adjust and change or implement new management responses.</u>
31	Page 60	MSS recommends that PRPA include an objective that addresses responding to community complaints related to issues around noise, dust, vibrations and viewscape impacts.
32	Page 69: <i>The Fairview container terminal is expected to begin a primarily</i>	Please provide more details. Which expansion is PRPA referring to? Phase 2B or additional expansion?

	<i>southern expansion in 2021 and has the ability to expand further in the future from a spatial perspective.</i>	
33	Page 70; Figure 25	<p>Feedback on Figure 25:</p> <ol style="list-style-type: none"> 1) Map polygon colours are very similar to each other- it would be beneficial to have different, more contrasting colours for the map polygons. 2) The dark blue lots do not appear to have descriptions in the legend. 3) The map appears to show waterfront recreation areas that are under jurisdiction of the City of Prince Rupert (Cow Bay Marina).
34	<p>Page 77; Table 5- Implementation</p> <ul style="list-style-type: none"> • <i>Establish framework for land use plan referrals with local First Nations and local governments (Section 5.2.2)</i> • <i>Develop development approval process (Section 8.2, Policy 1.2.3)</i> 	<p>Metlakatla looks forward to working collaboratively with PRPA on the framework for land referrals referred to in Table 5.</p> <p>Metlakatla hopes to work collaboratively with PRPA to help define additional steps in the development approval process relating to the environmental review to ensure transparency and rigor.</p>
35	<p>Page 78; Section 8.2</p> <p><i>The Plan will be formally reviewed every five (5) years to assess how PRPA is accomplishing the goals and objectives identified in the Plan and to ensure growth targets and policy direction are still relevant to the operating context of the Port. The performance of new initiatives such as inter-jurisdictional collaboration and non-traditional port land uses</i></p>	<p>All good planning documents have objectives, strategies, and performance measures, which are used to evaluate the implementation phase of the plan.</p> <p>MSS understands that the plan will be reviewed regularly but there is no indication of which parties will participate in the review of the plan or what the performance measures are.</p> <p>Metlakatla requests confirmation of participation in the review committee. The opportunity to provide feedback on performance measures should be provided.</p>

	<i>(Habitat Enhancement, Viewscape Buffer and Waterfront Recreation) should be included in the Annual PRPA Report and discussed at annual board meetings.</i>	
36	Page 80- Appendix A – Engagement Summary	The Appendix is currently blank. Will Metlakatla have a chance to review this prior to finalization?
37		<u>General Comment:</u> MSS understands that PRPA or DP World intends to develop a large parking lot area by Fairview Terminal. There was no notice or map of the area in the LUP. In the next draft iteration, please identify where the parking lot will be located.
38		<u>General Comment:</u> Please provide information with respect to next steps in the process for engagement and advancing the Land Use Plan.
39		<u>General Comment:</u> MSS suggests that the document is edited to specifically acknowledge and recognize Coast Tsimshian’s strength of claim within PRPA boundaries.

KITSUMKALUM



INDIAN BAND

AN ORIGINAL TRIBE OF THE TSIMSHIAN NATION

P.O. BOX 544, TERRACE, BC
CANADA V8G 4B5

TEL: (250) 635-6177

FAX: (250) 635-4622

July 14, 2020

Via EMAIL: KEdiger@rupertport.com

Attention: Krista Ediger
Community Relations Associate
Prince Rupert Port Authority

Dear Krista

Re: Second Draft of PRPA Land Use Plan

Thank you for the phone call on July 2, 2020 regarding the PRPA draft Land Use Plan (LUP). Kitsumkalum has submitted initial comments on June 26th, 2020 which were documented directly within the June 2020 Land Use Plan draft (document) and the accompanying email. This letter is in addition to our previous comments. Some comments might be a repetition of points made directly in the LUP document.

Kitsumkalum would like to see your definitions of “local First Nations”, “relevant First Nations” and “partner First Nations”. These terms are used throughout the document and it is not clear to us what the definitions or differences are. Please clarify, define and then use consistent language throughout the text.

Kitsumkalum is requesting a copy of the PRPA Rail Master Plan.

In section 7.3.1 there should be a ‘general land use policy’ related to archaeological / culturally ‘sensitive’ areas. These ‘policies’ should be elaborated on in separate policy documents, and engagement on their development should occur with Kitsumkalum.

In general, this document is disappointing, bordering on esoteric. Kitsumkalum had expected to see a more informative document that could be used in a constructive way on an operational as well as a strategic level. Realizing that times and markets

are forever changing and somewhat uncertain, this document could lay out confirmed development for the next 5 years, with good maps and then go into options and opportunities for the 5-20 year time span. There are statements scattered in the document that elude to some of the development plans, but the hope would be to have a summary of sorts (minimum 5 year terms) of these plans in some more detail (e.g. Section 5.1, 'Intermodal Trade' states that [Fairview] 'long term expansion plans have identified a site for a new future terminal to be built at the south end of Kaien Island,' and "...there are plans for further expansion of both import and export-related logistics and transloading facilities...."). In section 6 there is some discussion of plans, but again not necessarily cohesive (especially considering some of the listed projects are not PRPA's (e.g. Zanardi Rapids bridge expansion). There are obviously some development plans in mind, why not summarize and present these spatially at each of the 5-year review periods (such as the example in section 8.1, Table 5 Implementation Measures)? It is important to differentiate between PRPA plans and other Proponent or land leasee plans / project, but the LUP should present all the plans / projects that affect / are associated with Port activities.

The plan also makes numerous statements of quantitative or scientific nature throughout which are not backed by data or references.

The PRPA LUP asserts a planned doubling of cargo by 2040. Doubling in-port cargo in 20 years will also double cargo being shipped to and from the port. Kitsumkalum is very concerned about such plans. To help us understand what this is based on, we request to see PRPA's assessment and/or analysis that built the foundation for such a plan. We would like to understand how CNR and Highway 16 will be able to accommodate such increase in cargo and also how a risk analysis of accidents and malfunction has been incorporated. How will the shipping flow and safety be addressed? How have partners like the Pacific Pilotage Authority and Western Canada Marine Response Corporation capacity been consulted as to readiness for doubling of cargo?

Within the context of feedback on general port operations / land use planning, Kitsumkalum would like to note that there is a need for some integrated planning with the to and from Port transportation entities (e.g. CNR, Shipping, etc.) (perhaps in Section 2.11, if phase 2 community engagement incorporates feedback from the draft referral process).

It is unclear how interchangeable the land use designations are (discuss in section 7.3). There should be discussion on the process for changing a land use designation during a plan cycle should the requirement occur. The expectation would be some form of consultation or collaborative process with Kitsumkalum prior to any changes in land designation(s). The process could be more clearly laid out in section 8.3 'Major Amendments'.

The differentiation between the 'industrial' (marine and land) designation and the "lower intensity" designation of 'logistics' and 'marine support' is not clear. More rationale is required, perhaps a threshold of some sort which would place a land use in one category versus the other (e.g. defining the level of intensity of use more clearly so the threshold for designation is apparent).

Kitsumkalum notes the absence of any language that commits PRPA, as a federal government entity mandated to manage and operate Crown land, to the United Nations Declaration on the Rights of Indigenous Peoples. Please add the commitment statement as well as a statement that PRPA plans to work with Kitsumkalum to develop a collaboration plan. This should likely be placed in the primary purpose of the Plan within the context of the 'Goals' (see specifically 'Goal 4').

We are looking forward to engaging with you further on this. We request to be provided another opportunity to comment on the next draft after the current review comments have been incorporated and prior to finalization and submission to the board of directors. Review of a track change document is most appreciated.

Sincerely,



Rina Gemeinhardt
Environment, Lands and Referrals
Kitsumkalum Indian Band
rgemeinhardt@kitsumkalum.com

cc: Don T. Roberts, Sim'oogit Wiidildal, Waap (House of) Łagaax, Chief Councillor
Kitsumkalum Indian Band, drobot@kitsumkalum.com
Alex Bolton/Sm'oogyit Hataxgm Lii Midiik, Waap (House of) Łagaax, Treaty
Negotiations, kalum.treaty@kitsumkalum.com
Steve Roberts, Kitsumkalum Band Manager, sroberts@kitsumkalum.com
Jennifer Hill, BRLaw, Jennifer@brlaw.ca
Mary Ellen Turpel-Lafond, Legal Advisor, metl@woodwardandcompany.com
projects@kitsumkalum.com



CITY OF PRINCE RUPERT

424 - 3rd Avenue West, Prince Rupert, B.C. V8J 1L7
www.princerupert.ca

August 25, 2020

By email to KVeldman@rupertport.com
Original by Canada Post

Ken Veldman, VP Public Affairs & Sustainability
Prince Rupert Port Authority
200-215 Cow Bay Road,
Prince Rupert, B.C. V8J 1A2

Dear Mr. Veldman,

Thank you for sending your draft Land Use Plan (LUP) for review and response. We have reviewed the draft with interest and applaud its attention to environmental matters and First Nation goals and relationships, and we are very encouraged by the projected port growth and development. However, we are concerned with the lack of discussion, content or commitment to critical issues of relationship, authority, mutual goals and partnerships needed between the City and Port Authority (PA).

One central issue is the lack of acknowledgement and understanding of the City's jurisdiction and authority including those PA lands which are within the City's boundaries. We urge the PA to work with us to establish this understanding and amend the draft plan to clearly state the City has land use and other authorities that apply to the PA's lands.

There are several other aspects and parts of the draft land use plan that we have concern with as follows:

- 1.0 The critical role and importance of the City of Prince Rupert to the success of the PA is not discussed. For example, the PA needs the City's infrastructure, residential, and commercial services and an attractive environment to recruit and retain workforce.
- 2.0 In the four Land Use Plan goals, the City of Prince Rupert is not named but simply included as one of the neighbouring "communities". This does not continue the spirit and direction of Vision 2030. We suggest adding a fifth goal that speaks to this directly and follow up goals and actions in the plan—goals and actions that are meaningful and proportional to the challenges faced by Prince Rupert. We suggest this wording:

Goal 5 – In recognition of the critical role the City of Prince Rupert has in the future success of the Port, and in recognition of the City's land use and regulatory authority, the PRPA will work with the City to establish protocols, goals, partnerships and processes that address land use,

business regulation, infrastructure and partnerships in financing community development and infrastructure initiatives.

- 3.0 The LUP should call for the development of a memorandum of understanding for community development and a protocol for review of land use decisions in the port especially in areas close to and in the downtown.
- 4.0 The info-graphic on Page 12 does a good job of reflecting input from a survey. We suggest an additional info-graphic that reflects top priorities, issues and concerns from the City of Prince Rupert . We list these below:

Top Priorities:

- a. Clarifying relative authorities and responsibilities of the City and PA.
- b. Establishing working relationship with the PA in accordance with clarified authorities and responsibilities following open discussions and an informed process.
- c. City infrastructure replacement.
- d. Renewal of downtown.
- e. Provision of community services.
- f. Sustainable land use management.
- g. Creating an environment that attracts and retains workers and their families.

Key Issues/Concerns:

- a. Financing infrastructure and services.
- b. Financing downtown renewal.
- c. Lack of development protocols between the Port and the City.
- d. Need to establish port industry funding/contributions for City infrastructure and renewal.
- e. Need greater waterfront access.
- f. Need involvement in environmental review processes (part of protocol agreement).
- g. Review of the Port's Community Investment Fund with the City of PR to determine levels of contribution and agreed priorities with the City.
- h. Need for explicit analysis in the Impact Assessment Section (Section 3.6) on Municipal Impact, financing and community Development goals.

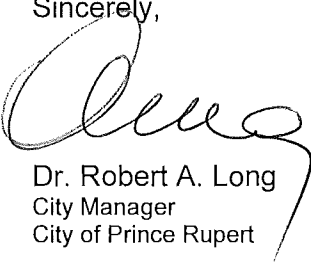
- i. Need for PA to recognize the City's right and authority to establish land use designations, zoning, business regulations and other bylaws within its boundaries including the Port Authority's land.
 - j. Need for Section 4.1 to include the role and authority of the City of Prince Rupert in Land use Planning, Zoning and other bylaws over Port Authority Land. The current draft is silent and ignores important case law on this topic. We suggest a working group between the City and Port to review the legislation and case law to arrive at a fair, full and clear description of this important matter.
 - k. Need for strategic goal to encourage port industries to locate in the downtown as a key driver of downtown renewal.
 - l. Need for City building inspections of any port development in the City given the integration of the properties into the City, the provision of City fire protections services and for the potential disposition of such properties to private interests. In the later case, without city building inspection, the city may not be able to provide services without the assurance of its own inspections.
- 5.0** The LUP states on page 35 "PRPA has approximately 15 kilometres of shared border with the City of Prince Rupert." PRPA lands are located within the City of Prince Rupert. The Port Authority lands do not have borders with the City.
- 6.0** Section 4.2.4 calls for regular meetings with the City. Such meetings are important but not sufficient. We need to develop clear relationship agreements and protocols governing a range of things such as development proposals, community development, financing infrastructure and renewal.
- 7.0** Section 2.4.1 calls to ensure Land Use Plan designations are aligned with existing community Official Community Plans and development plans of adjacent communities. This alignment should also be for future OCP and development plans as well.
- 8.0** Section 2.4.2 calls to ensure new project developments on PRPA lands are introduced to relevant First Nations and local governments for review and feedback, over and above existing consultation and public engagement regulations and guidelines. While feed back is important, it is not sufficient. We need an agreement about approval processes including processes to address disputes.
- 9.0** Objective 4.4 calls to proactively communicate with local communities and partners about updates and changes to land use in PRPA jurisdiction. Communication is necessary but not sufficient. Please see item 6.0 above.
- 10.0** Section 4.4.3 calls to develop policies and procedures related to identifying and quantifying impacts of port development on community values, such as heritage and culture, with the objective of avoiding, mitigating, or compensating for negative impacts from port development. We recommend that Impact Assessments need to be broadened to address municipal services, housing, infrastructure, amenities and financing.
- 11.0** Objective 4.5 speaks to investing in surrounding communities through the Community Investment Fund as a means to share port-related prosperity with local residents. We agree with this but stress the need to add processes for setting appropriate contribution

from the PA and its tenants (e.g., community amenity contributions), and to have protocol and approval process with the City on where and when the investments are made.

- 12.0** Section 7.3.2, Land Use Designation Descriptions, should be amended with a view to working to support and enhance the commercial and office spaces in the down town rather than allowing such uses in other areas of the port lands. This is a key mutual goal that requires explicit policy and action.
- 13.0** Section 8.1, Implementation Measures, should be amended to address jurisdictional issues such as protocol agreements, municipal jurisdiction, building inspections, financial contributions, development approvals requiring municipal approval.

Thank you for the opportunity to review and provide our comments on your draft plan. We are looking forward to establishing mutual goals and a relationship that allows us to pursue our mandates and responsibilities in a mutually beneficial and respectful way.

Sincerely,



Dr. Robert A. Long
City Manager
City of Prince Rupert

August 17, 2020

Prince Rupert Port Authority
200-215 Cow Bay Rd.
Prince Rupert, BC
V8J 1A2

Attention: Ken Veldman, VP Public Affairs and Sustainability

RE: Prince Rupert Port Authority (PRPA) Land Use Plan – NCRD Review Comments

Dear Mr. Veldman,

The North Coast Regional District (NCRD) thanks you for the opportunity to review and provide comment on the Port of Prince Rupert's (PRPA) updated Land Use Plan. We have reviewed the plan in relation to the NCRD's own land use planning frameworks and strategic priorities. This includes our draft Official Community Plan and 2019-2022 Strategic Plan. Our review identifies some small considerations for the PRPA to take prior to finalizing the Land Use Plan and opportunities for future collaboration for strategic objectives that are aligned between the PRPA and the NCRD. This letter provides a summary of our review and comments pertaining to the updated Land Use Plan.

The NCRD's comments regarding the review of the PRPD Land Use Plan are summarized below:

1. The PRPA Land Use Plan generally conforms with the direction set out in the NCRD Official Community Plan

There were no identified major conflicts identified between the land use direction set out in the PRPA Land Use Plan and NCRD lands as set out in our draft Official Community Plan bylaw and related draft Local Area Plans. In the future, as the Port continues to develop, proactive communication with the NCRD can help identify any future potential land use conflicts and potential mitigation measures.

2. Ensure future expansion of the Port of Prince Rupert mitigates impacts on Dodge Cove

The NCRD notes that future priorities for Dodge Cove, as per the draft Local Area Plan for the area, includes tourism and home-based economic development, environmental sustainability and ensuring access to the ocean and marine infrastructure. Future development and expansion

of the Port of Prince Rupert infrastructure, capacities and operations may impact NCRD objectives for Dodge Cove. The NCRD recognizes that a key goal of the PRPA Land Use Plan is to minimize the environmental impacts of operations and collaborate with neighbouring communities. Following through on these goals will be critical in ensuring the future development of Dodge Cove is unimpeded by Port development and operations.

3. The NCRD is satisfied with project-related community engagement efforts

The NCRD would like to comment that the engagement process utilized in the development in the PRPA Land Use Plan was effective at ensuring the NCRD was able to provide input at different stages of the Plan's development. The NCRD would like to see this model of project engagement continued in future Port planning activities to ensure collaboration between parties is maintained in future planning efforts.

4. The NCRD is encouraged to see an emphasis on engaging neighbouring local governments in the future

The NCRD is encouraged to see an emphasis included in multiple sections within the PRPA's Land Use Plan on the need to consult, engage and collaborate with neighbouring communities, including the NCRD, on a range of future Port activities. In particular, the execution of the following implementation measures identified in the Land Use Plan will ensure that a stronger collaborative relationship is fostered in the future between the NCRD and PRPA:

- Establish a regional cumulative effects modelling program;
- Establish framework for land use plan referrals with local First Nations and local governments;
- Establish a Regional Planning Committee; and
- Improve platform for communicating PRPA environment programs and monitoring data.

There is interest for the NCRD to have representation or involvement in this implementation activities.

5. PRPA development approval and referral process

There are two areas within the PRPA Land Use Plan implementation section that may benefit from further dialogue. The NCRD would possibly find it desirable for PRPA to share project development referrals with NCRD in addition to Port Edward and Prince Rupert. Secondly, further discussion on Initiative 6 – Develop a development approval process – may be desirable. Initiative 6 refers to Policy 1.2.3 which reads:

“Develop a transparent, defined and expedient development approval process that allows for changes to the existing policy framework so that unforeseen development types can be accounted for.”

While this policy is intended to provide PRPA with flexibility, it may create situations where insufficient dialogue and consultation with affected communities performed for development proposal that are ‘unforeseen’. Consultation with the NCRD when developing the development approval process could alleviate any potential concerns.

6. Be proactive engaging with neighbouring governments regarding strategy land acquisition

The Land Use Plan’s objective 2.2. “Acquire lands where necessary or strategic for future developments” could be strengthened through the addition of a statement or language reflecting the need to engage neighbouring communities (First Nations and local governments). Future land acquisition may directly or indirectly impact or conflict with NCRD priorities and engagement surrounding land acquisition may prevent those instances. It is noted that other provisions in the Land Use Plan pertaining to engaging surrounding communities may make this suggestion redundant.

7. Opportunities for PRPA to support NCRD environmental projects

The NCRD is encouraged by the Land Use Plan’s Objective 3.6 “PRPA will continue to collaborate on environmental projects”. Specifically, within that objective, the NCRD suggests adding “local governments” to policy 3.6.1 as the sharing of environmental data with local governments could be valuable information to inform decision making at a local level. In addition, the directive to support regional environmental remediation, habitat and enhancement and protection measure (policy 3.6.3.) aligns with the NCRD’s environmental objectives as contained in the NCRD 2019-2022 Strategic Plan, including:

- Establishing an Erosion Prevention Strategy;
- Developing a Renewable Energy Program; and
- Working with partners to establish Regional Water Supply Plan.

These initiatives could be supported by the PRPA in the future, and the NCRD commends the PRPA for including provisions in the Land Use Plan related to supporting local and regional environmental initiatives.

8. Opportunities to coordinate and collaborate on recreation-based initiatives

The NCRD’s 2019-2022 Strategic Plan identifies the development of a “Trails Strategy” as a high priority for the regional district. This is to support economic and tourism development and quality of life objectives for residents and visitors to the NCRD. The PRPA Land Use Plan’s Objective 4.3 “Explore opportunities to enhance waterfront access and recreation” is a welcomed addition to the updated plan and aligns with NCRD priorities. The NCRD would like

to be included as a local community partner with future trail development and planning to ensure NCRD trail development efforts align and compliment a broader regional network.

9. Encourage coordination for future planning of NCRD “Industrial Special Study Areas”.

The NCRD’s draft Official Community Plan includes the designation of “Industrial Special Study Areas”, including one on Digby Island. The intent of these special study areas is to identify lands of special interest to large scale development, specifically related to past proposals for large LNG export facilities. Future development on these lands could include additional port facilities and large employment operations. Future coordination of planning for these lands with the PRPA could ensure mitigation of potential conflict from their development in the future. This could be addressed through existing Land Use Plan directives related to engaging with neighbouring communities.

10. Be proactive engaging with the North Coast Regional District on environmental programs

The NCRD wishes to be engaged and participate in environmental programs relevant to NCRD communities. These programs are instrumental in furthering the PRPA’s understanding of its local environment and in developing monitoring and impact reduction programs designed to maintain a good quality of life for adjacent communities. The NCRD is particularly interested in programs aimed toward monitoring and reducing the impact of light and noise pollution within the region, as growing concern around these pollutions have been expressed by constituents within NCRD communities.

The bullets above summarize the NCRD’s review and comments pertaining to the PRPA Land Use Plan. The NCRD looks forward to discussing these comments with the PRPA at the upcoming planned virtual meeting to be scheduled. For any questions or comments related to this letter and the NCRD’s comments, please feel free to contact Daniel Fish, CAO, at 250-624-2002, ext. 8 or by email at cao@ncrdbc.com.

Sincerely,



Daniel Fish, CAO
North Coast Regional District

Preliminary Comments from District of Port Edward

- **How large is the vegetation/ viewscape barrier on the east side of Ridley Island? How will it look, and how will it be enforced or regulated?**

We don't have an acreage estimate, but the idea is that we would use best efforts to maintain a minimum 50 metre buffer in that area, essentially just leaving the existing environment. This is a direct response to comments we've heard from Port Ed residents regarding the visual aesthetic of the area, and we believe that even with future expansion of the RRUC we can accomplish that. Its not contiguous because there's a small bay that juts inward in the middle of it. In terms of enforcement, it would be accomplished through our own engineering (the most likely activity in close proximity would be rail infrastructure) or through project development agreements/leases with third party proponents.

- **What is the PRPA's stance on the pier / dock in Port Edward that Tenerife was kicked out of? Do you intend to lease this commercially or are you open to a public/recreational use?**

As per our previous conversations, we're open to either at this point. We also think there's potential to use it for habitat compensation, and if we did that we would apply our habitat enhancement zoning and could potentially incorporate that with public/recreational use on the upland.

- **What is the realistic timeframe that you see Lelu Island developing, based on your Master Plan?**

Lelu Island's challenge is access from the upland and access to a traditional berth, so its portfolio of potential uses is smaller. Generally speaking, we think filling potential Ridley capacity is the more likely precursor on the critical path, and if that's the case we're looking at a minimum of 10 years.

- **Port Edward is currently exploring the concept of fully servicing the Highway 599 out to the Highway 16 junction – providing improved land that may be suitable for ancillary businesses associated with the port development.**

- **Also, we are currently proceeding with a water system analysis as we are not covering our costs in our industrial water sales – we greatly support the development of Ridley Island and we want to work to find a solution to this issue.**

- **How do you intend to make your monitoring data more easily accessible to the public?**

Air emissions and noise are currently available in real-time online. We'll be looking at upgrading our website to provide improved ongoing reporting that matches up with testing frequency.

- **On page 71, can you please reflect that Lelu Island is within the District of Port Edward (it currently says Prince Rupert)**

Noted, thanks.

- **The public is using Kinahan Island for recreational purposes and have been historically – has there been any public comments on the intent for industrial use of the island? I'm wondering if because of the significant level of detail of your LUP components if smaller locations like this get lost in the wash so to speak?**

Kinahans have always been denoted as industrial. There's obvious limitations to future industrial development, and until that happens we would expect that ad hoc recreational purposes would continue. There's no plan for limiting access in the interim.

- **How is wildlife management planning incorporated into the development of PRPA lands and adjacent lands supporting port terminals? (Danielle is clarifying with the councilor on this to see if it falls under cumulative effects)**

Individual projects are required to have wildlife management plans in place during construction to mitigate impacts. This may be a topic for consideration under cumulative effect modelling.

Port Edward Notes:

- Question: How does Port Edward fit into Goal 4?
 - PRPA Answer: Port Edward is part of the “surrounding community” in Goal 4
- Question: Raised issues and concerns with Board representative:
 - PRPA Answer: Let the know that falls outside of perimeters of the Land Use Plan, will pass it on to appropriate staff
- Port Edward has concerns around noise and light pollution from development on Ridley, as it 100% impacts residence, and wondering ability to reduce these impacts of pollutions with projects – noted, as it is project specific, will pass along to the appropriate PRPA staff;
- Port Edward concern that Viewscape buffer on Ridley Island is too small and would like to see it larger
 - PRPA answer; noted.
- Port Edward would like to see development occur on Lelu Island, and wondering when that will occur
 - PRPA answer – Lelu is designated for Industrial development in LUP, and potential for development over the next 20 years, there are challenges associated with building on Lelu including no rail or road access, right project will need to come along that has economic benefits after development of the site
- Port Edward mentioned that affects from coal dust is lower than where the monitor station is placed
 - PRPA answer: Noted and will pass on to the right PRPA staff
- Port Edward is wondering about PRPA plans for Tenerife:
 - PRPA answer – four potential options from PRPA prospective includes 1)Fish industry, 2) dock development, 3) Habitat compensation, 4)Recreational. PRPA is looking for feedback from the District
 - Port Edward would like to see recreational development (yet prohibition of tying up boats)
- Port Edward concerns over increase rail traffic, and access to waterfront including the ability of 50+ jobs that need to access that area:
 - PRPA answer: outside of PRPA jurisdiction, willing to look at partnership similar to similar to what was done around rail crossing, PRPA is happy to discuss further with the District
- Port Edward brought to attention that Lelu is part of Port Edward, and draft of LUP it has it under City of PR jurisdiction
 - PRPA answer: noted and will change for final

Andrew Cuthbert

From: Land Use Plan <landuseplan@rupertport.com>
Sent: July 14, 2020 10:54 AM
To: Andrew Cuthbert
Cc: Andrew Baigent
Subject: FW: Land use management plan

■ CAUTION: External Email. ■

Morning Andy,

Here is an email from a community member on the Land Use Plan.

I will respond to her on this.

Thanks,

Krista

KRISTA EDIGER
COMMUNITY RELATIONS ASSOCIATE
OFFICE: 250-627-2581 MOBILE: 250-600-4431

-----Original Message-----

From: Kathleen Larkin <kalarkin@citywest.ca>
Sent: Saturday, July 11, 2020 6:36 PM
To: Land Use Plan <landuseplan@rupertport.com>
Subject: Land use management plan

To the Board of Directors:

With the clearing of brush on Barrett Point comes an exciting opportunity to commemorate Prince Rupert's role during the Second World War. Our city was instrumental in defending the west coast of North America, a role that deserves recognition with a conserved and restored site. Barrett Point is the ideal choice. The largest of the fortifications with gun emplacements, search lights, observation points, and a strategic view of the harbour, its importance in the war effort cannot be underestimated.

I urge you to consider developing Barrett Point into a national site of historic interest. We are quickly losing the structures and living memory of wartime Prince Rupert, and preserving Barrett Point is an opportunity that should not be missed.

Kathleen Larkin

Deputy Librarian, Prince Rupert Library

Vice President, Prince Rupert City & Regional Archives Director, British Columbia Veterans Commemorative Association

kalarkin@citywest.ca

Sent from my iPad

August 9, 2020

Comments: “Second Draft PRPA LAND USE PLAN, April 2020”

I submit my below noted comments, following my review of the 78 page “Second Draft PRPA LAND USE PLAN, April 2020”.

To begin, I extend my congratulations to all of those responsible for the many successes of the Port of Prince Rupert, starting from the early 1900’s with the completion of the Grand Trunk Pacific Railway. It is clearly and primarily due to the tremendous success of the recent conversion of Fairview Terminal from a general cargo/break-bulk facility into a container terminal that is finally resulting in Prince Rupert becoming the great Port City envisioned by Charles Hays. Those from the PRPA that have managed to stick handle the numerous obstacles associated with container terminal development are especially to be congratulated. The employment opportunities and financial benefits, including PRPA’s Community Investment Fund, are of immeasurable value to Prince Rupert residents and to the entire northern region.

My specific comments pertaining to PRPA’s 2020 Land Use Plan are in regards to Quality of Life and making Prince Rupert a more attractive place to ‘live, work and play’.

1. Noise generated from container operations at Fairview Terminal.

There is now and there has been for several years the virtual constant sounding of horns, whistles and sirens resulting from container operations at Fairview Terminal. These disturbances can be heard throughout most of the city and can be heard from within the confines of residents’ homes. With the planned expansion of container operations, these disturbances are likely to get worse and they are thereby a problem that residents deserve to have addressed.

It is to be noted that approvals to convert Fairview Terminal into a container terminal were based upon the commitments, obligations, agreements and promises set out in the 300+ page document “FAIRVIEW TERMINAL CONVERSION PROJECT ENVIRONMENT SCREENING DOCUMENT”, dated January 22, 2006. In this ESD several important statements regarding the generation of noise from container operations were made, as follows:

ESD page 114:

“The RA’s indicated in an email (Mah, 2005b) that a noise management plan should be developed to ensure that noise will not become an issue with this project. The PRPA has committed to developing and implementing a noise management plan and HC has committed to providing technical advice....”

ESD page 158:

“A long-range monitoring program would target events being conducted through the operational phases of the terminal. Monitoring the noise of trains, cranes, vehicles and safety warning sirens will be undertaken to determine if there are any unacceptable noise

effects. If necessary, mitigation measures such as changing the types or frequencies of warning alarms to reduce distance effects can be implemented.”

Clearly, the potential for disturbing noises to be generated from container terminal operations, specifically from “safety warning sirens” and “warning alarms”, was anticipated by those responsible for granting the approval to proceed with container terminal development in Prince Rupert. Equally clearly, it was intended that “noise will not become an issue with this project.” However, in spite of these assurances, commitments, agreements and promises, noise has become a major problem and steps need to be taken, as per the ESD, to eliminate these disturbances. Reasonably and logically, how can the constant sounding of sirens and alarms be an effective safety measure to on-site workers? Further, do workers simply wear ear plugs to drown out from their close proximity the piercing noise from sirens and alarms? Is working in such a noisy environment in itself a health issue to workers?

In the above regards, a sophisticated monitoring program is not needed to address the unacceptable level of noise being generated from Fairview Terminal -- anyone wishing to review this problem only needs to overlook the terminal from various positions within the city to gain an appreciation of the extent of the problem.

2. Access to the Waterfront.

It is acknowledged in the 2020 Draft PRPA LAND USE PLAN that public access to the waterfront has been reduced due to recent port development. Although the PRPA has spent millions to help reduce the negative aspects of limited waterfront access (on projects such as Rushbrook Trail), public access to the waterfront continues to be a huge issue to Prince Rupert residents. The following points help to highlight the full extent of the problem of limited waterfront access to Prince Rupert residents:

- In spite of the city of Prince Rupert being on an island – Kaien Island -- and therefore being surrounded by water, residents have NO convenient access to a beach or to a place where children or adults can ‘dip their toes’ into the ocean or to a place where they can simply have a picnic or light a fire on the edge of the ocean surrounding them.
- Canoeists and kayakers living in Prince Rupert similarly have restricted access to a proper place to launch their watercraft. The preferred site for launching a canoe or kayak is from a sand or gravel beach, neither of which is available to residents. Certainly launching a canoe or kayak at a concrete boat launching site, amidst power boats, or from a wooden/metal marina, is unattractive, awkward, at times hazardous and at times inaccessible. The extent of this problem can be seen from the large number of local vehicles having saddles for carrying canoes or kayaks.
- On June 10, 1972 a huge fire destroyed most of the waterfront facilities along Prince Rupert’s central inner harbour, opposite from CN’s present inner city rail yard. Today, 48 years since this fire, the waterfront where the fire occurred remains unused, fenced off to the public, with the only indication of the former structure being the many creosote pilings that have been cut off close to the gravel surface in the foreshore area. In our community, with no waterfront access to the public, to canoeists or to kayakers, this fenced off area on our central waterfront

offers the only site that would fill the needs of our community to have proper access to the waterfront.

The responsibility for this travesty is unclear. How a site of this significance can remain unused for going on a half century, with the needs to the community so obvious, is difficult to comprehend. Is the problem that CN controls the situation and that as absentee landlords they could care less of the well-being and quality of life of their own employees, let alone the general public, young and old alike. In the history of Prince Rupert, this has to be one of the dark events. Whatever the cause, it is unacceptable and should be one of the top priorities of the PRPA along with its stakeholders, to correct.

This concludes my comments. I thank the PRPA for the opportunity to review your Land Use Plan and to make comment accordingly.

Respectfully

Brian Denton
2134 Graham Ave.
Prince Rupert, BC, V8J 1C8
Email: snow@citytel.net

Andrew Cuthbert

From: Land Use Plan <landuseplan@rupertport.com>
Sent: August 18, 2020 8:56 AM
To: Andrew Cuthbert
Cc: Andrew Baigent; Ken Veldman
Subject: FW: Comments on the Land Use Plan

CAUTION: External Email

Good morning Andy,

Please see below the comments PRPA received from RTI.

Thanks,

Krista



KRISTA EDIGER
COMMUNITY RELATIONS ASSOCIATE
OFFICE: 250-627-2581 MOBILE: 250-600-4431
f t in @ RUPERTPORT.COM

From: Booker, Rob
<rbooker@rti.ca>
Sent: Monday,

August 17, 2020 7:06 PM

To: Land Use Plan <landuseplan@rupertport.com>
Subject: Comments on the Land Use Plan

First and foremost I would like to thank and commend Krista Ediger for reaching out ensuring I have had the opportunity to participate in the land use planning process.

The plan is clearly well thought out.

With regards to potential improvements I would look for the plan to incorporate metrics for its key goals and objectives and have those metrics available to the public.

Federal changes on carbon policy set in motion in late July would suggest the plan needs a clear process to assess emissions impacts not only within on the PRPA's land but the end use of products handled across those lands.

The rapid changes occurring in federal policy with respect to the environment and climate would suggest the land use plan should incorporate a rapid or quick response/use change be available to adjust and modify the plan.

The assignment of PRPA's land for monopoly purposes by tenants should be eliminated.

The PRPA's continued and enhanced partnership with First Nations and the community with respect to land use and economic impacts is well documented, thought out and I am sure will continue to grow.

--

Regards,



ROBERT A. BOOKER
Chief Executive Officer

RIDLEY TERMINALS INC.

PO Bag 8000, Prince Rupert, BC Canada V8J 4H3
Tel: 250.627.3511 Cell: 250.600.0656 Fax: 250.624.2389
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Prince Rupert Port Authority Draft Land Use Plan

Submission by SkeenaWild Conservation Trust

August 17, 2020

SkeenaWild Conservation Trust appreciates the opportunity to provide additional feedback on PRPA's land use planning process and specifically the April 2020 draft plan. In our original submission we requested the following measures to help protect critical marine habitats in the Skeena estuary while enabling port development (further details can be found in our original submission from Dec 2019):

- Permanently protect the area currently under the development moratorium (Flora, Agnew, Horsey Banks and the Foreshore of Lelu Island)
- Minimize development impacts in areas identified by DFO / WWF / PRPA as high value habitat (red) by putting in place stronger protection measures
- Avoid any development atop eelgrass habitats
- Minimize impacts to foreshore by using avoidance wherever possible, and construction techniques with least impacts
- Leave a shoreline buffer of vegetation, 50 meters in width or greater, wherever possible
- Protect water quality by increasing spill response capacity, reducing anchor dragging, and improving protections for dredging

PRPA's draft land use plan fails to adequately address these recommendations.

Permanent protection for Flora, Agnew and Horsey Banks

The draft LUP formalizes a 20-year development moratorium for Flora, Agnew and Horsey Banks, which is a positive step (Figure 1). However, the moratorium is voluntary and there is nothing stating the moratorium cannot be removed by the PRPA after the initial 20 years. Further, The draft LUP outlines that some development (pipelines, undersea cables, weather monitoring, and scientific equipment) may be allowed access under the moratorium (pg. 17). Pipeline development often requires dredging. These are large structures that can alter flow and migration patterns of marine organisms. Such development is not appropriate in this sensitive habitat and would defeat the purpose of the development moratorium. The importance of this area to juvenile salmon and marine life and its unique environmental and geological features and sensitivities requires formalizing permanent protection.

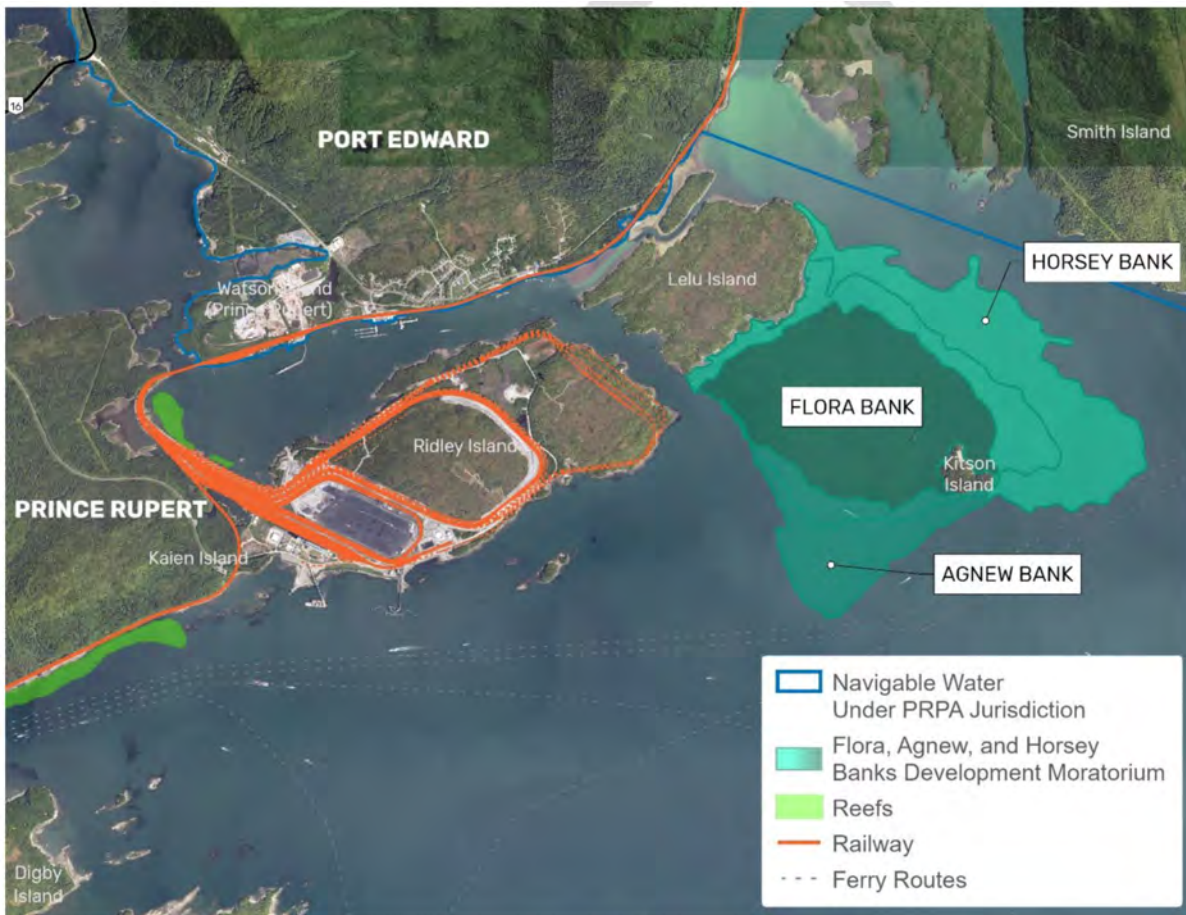


Figure 1. Flora, Agnew and Horsey Bank Development Moratorium

Minimize development impacts to high value habitats

There are no specific measures in the draft LUP that direct avoidance of construction near and overtop of high value habitats (figure 2). The land use plan should state that the foreshore habitats identified as high value (red) by DFO, WWF and the PRPA will be avoided. To avoid development overtop or near these high value habitats the LUP should require:

- Proponents assess multiple / alternative locations and design methods.
- Locations and designs be reviewed by independent technical experts and the results made public.
- Enhanced indigenous and public consultation.

If impacts to these habitats are found to be unavoidable then the proponent should be required to undertake habitat compensation work with details on the probability of effectiveness. The habitat compensation should be of the same type of habitat as that being impacted or destroyed and habitat compensation effectiveness monitoring should be required.

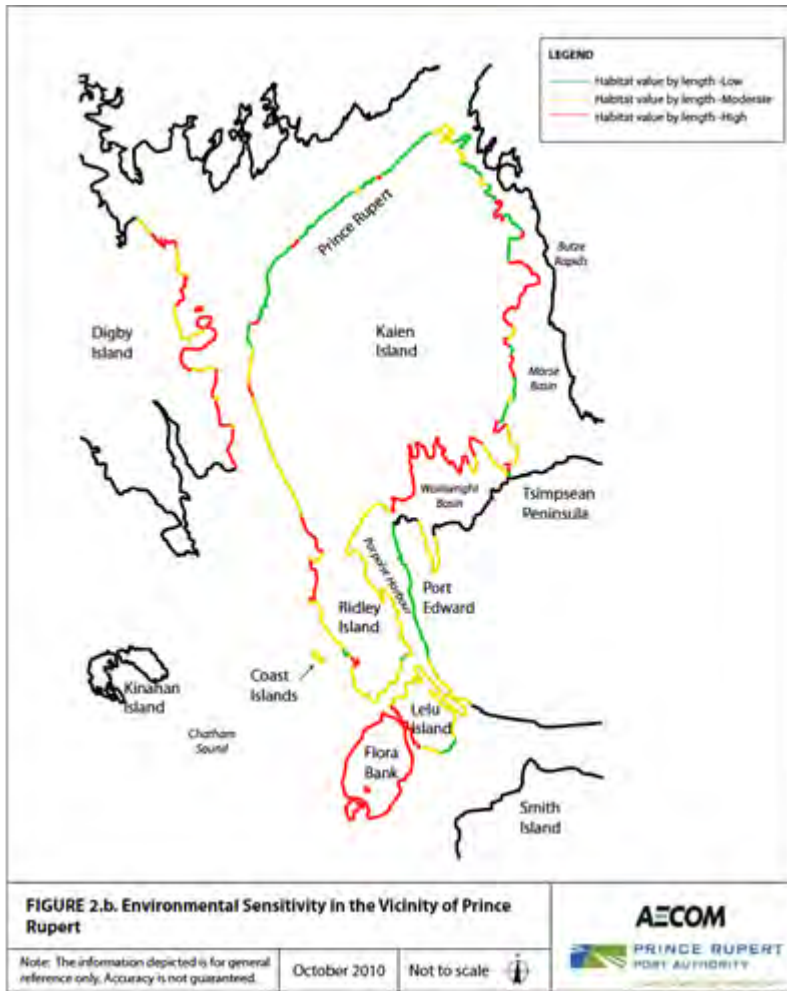


Figure 2. Prince Rupert harbor foreshore classification of various habitat values (red, yellow, & green lines), and proposed development study. Black lines indicate areas not assessed in the 1999 study.

Avoid development overtop of eelgrass habitat

Other than the area currently under the development moratorium, eelgrass habitats receive no protections under the draft LUP. Eelgrass habitats are limited in the region (Figure 3), very important for marine life, and are sensitive to disturbance (Ocean Ecology 2009). The LUP should include protective measures - such as avoidance requirements for all development projects in the vicinity of eelgrass habitat, and outright protection. In essence, *no* infrastructure should be placed overtop of these critical and sensitive habitats. While mitigation of the loss of important habitats is discussed in the draft LUP, such mitigation measures are most often ineffective (Palmer et al. Freshwater Biology 2010; Moore et al, 2015). Therefore, eelgrass habitats must be protected to ensure thriving marine wildlife communities.

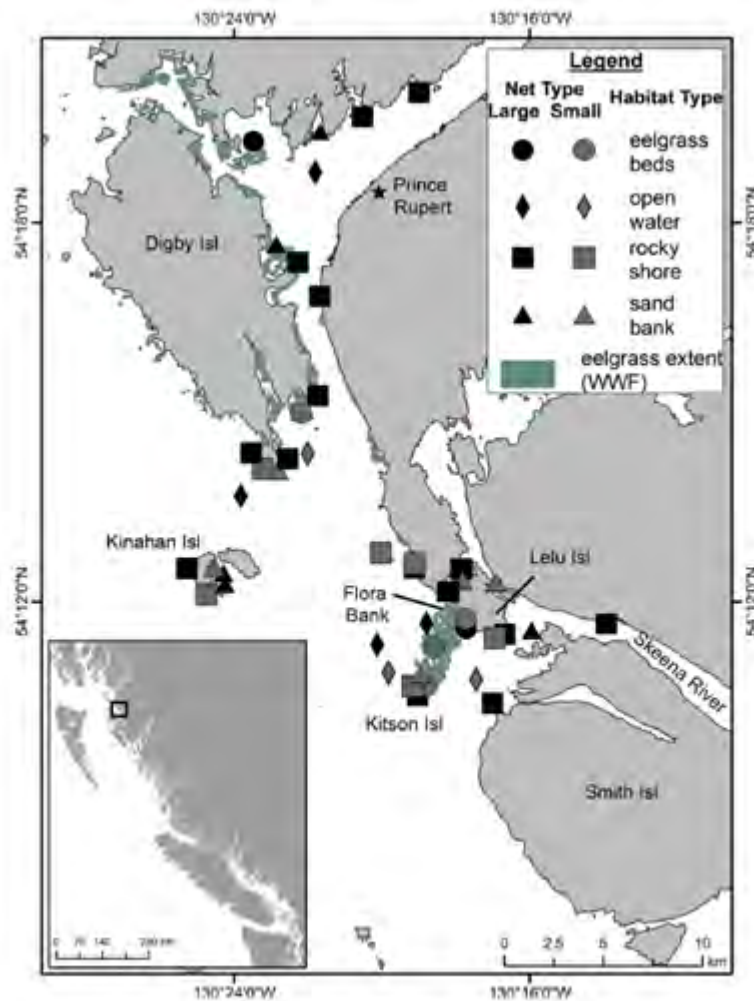


Figure 3. Map of eelgrass habitat across the Skeena River estuary, and sampling locations from various surveys. From: Ambach & Casey, 2011; Forsyth, Borstad, Horniak, & Brown, 1998; Ocean Ecology, 2013; WWF-Canada, 2009.

We are deeply concerned with PRPA's infrastructure development plans that propose to place a future container terminal overtop of the eelgrass and high-value habitat identified by DFO / WWF / PRPA. We recommend that an alternate site be used for future container port expansion given that this eelgrass habitat would likely be destroyed by the development and mitigation is unlikely to be successful. According to the SFU / Lax Kw'alaams Fisheries surveys, juvenile Chinook salmon prefer this specific eelgrass habitat location.

Minimize impacts to foreshore by avoidance and construction with least impacts

Areas classified as moderate and low-value habitat (DFO, WWF, PRPA – see figure 2) are also important for juvenile salmon, marine life, and waterfowl (Sharpe et al 2019). The draft LUP does not contain any protections for shoreline habitats outside of the moratorium area and some visual buffers. The LUP should require avoidance to

foreshore habitats wherever possible, and construction techniques with least impacts where construction is unavoidable. This is especially important considering the large amount of port infrastructure expansion projects and industrial projects underway and planned (figure 4).



Figure 4. Locations of proposed development projects in the Skeena estuary.

Leave a shoreline buffer of vegetation 50 meters in width or greater

The interface between the foreshore and forested areas is important for wildlife, birds, and fish. These areas often contain nesting sites, and resting and hunting areas for birds. Vegetation near the foreshore is also important to juvenile salmon, providing an important source of food. It has been shown that terrestrial insects can provide a substantial portion of young Chinook salmon diet in estuarine environments during all months of the first marine year (Duffy et al. 2010). The draft LUP does not contain any requirements to maintain shoreline buffers except for a few viewscape buffers (i.e. east side of Ridley Island and Lelu Island). The LUP should mandate the retention of a 50-meter width or greater vegetation buffer, wherever possible, adjacent to foreshore habitats. Planned infrastructure should be assessed to try to leave a buffer.



Protect water by improving spill response, reducing anchor dragging, and minimizing dredging

Protecting water quality is essential for the health and vitality of the Skeena estuary. Port expansion has resulted in a significant increase in marine traffic in recent year. Increased shipping results in greater potential for fuel and cargo spills. New petrochemical offloading facilities (e.g., Vopac Pacific Canada, Wolverine Terminals) also pose significant risk of spills. The draft LUP contains no information on how the PRPA will improve spill response capacity. The LUP should contain spill response information and measures for expanding capacity.

Incidents of anchor dragging have been increasing in recent years. (Det Norske Veritas, 2012; TBuck, 2019). While most of these incidents are minor, the risk of groundings, and therefore the risk of fuel and cargo spills are on the rise. We urge the PRPA to take proactive measures to minimize the risk of anchor dragging as outlined in a recent TBuck Suzuki report. Recommendations include; installing mooring buoys, minimizing fuel reserves for onboard bulk carriers and restricting vessels over 50,000 DWT to safe anchorage areas.

http://friendsofwildsalmon.ca/images/uploads/Anchor_Safe_Prince_Rupert_FINAL.pdf

The draft LUP contains no discussion or specific measures of how anchor dragging will be addressed. The LUP should detail measures for minimizing anchor dragging and installing mooring buoys.

Several projects require dredging of marine sediments during the construction of offloading facilities. Dredging can be very harmful to salmon and other marine organisms by suspending large amounts of sediments and altering and destroying important habitat (Dara et al, 2001). Dredging is particularly concerning in areas of the port (Figure 5 – pink area) where sediments contain large amounts of dioxins, furans, PAH's and other harmful chemicals. These toxins were deposited from the Skeena Cellulose pulp mill for over six decades. Significant amounts of these toxins, which are extremely harmful to marine organisms, could be re-suspended during dredging. The draft LUP does not mandate avoiding dredging activities in areas known to contain pulp mill effluent contaminants. The LUP should require dredging be minimized and contaminated sediment be isolated and disposed on proper land based toxic waste sites.

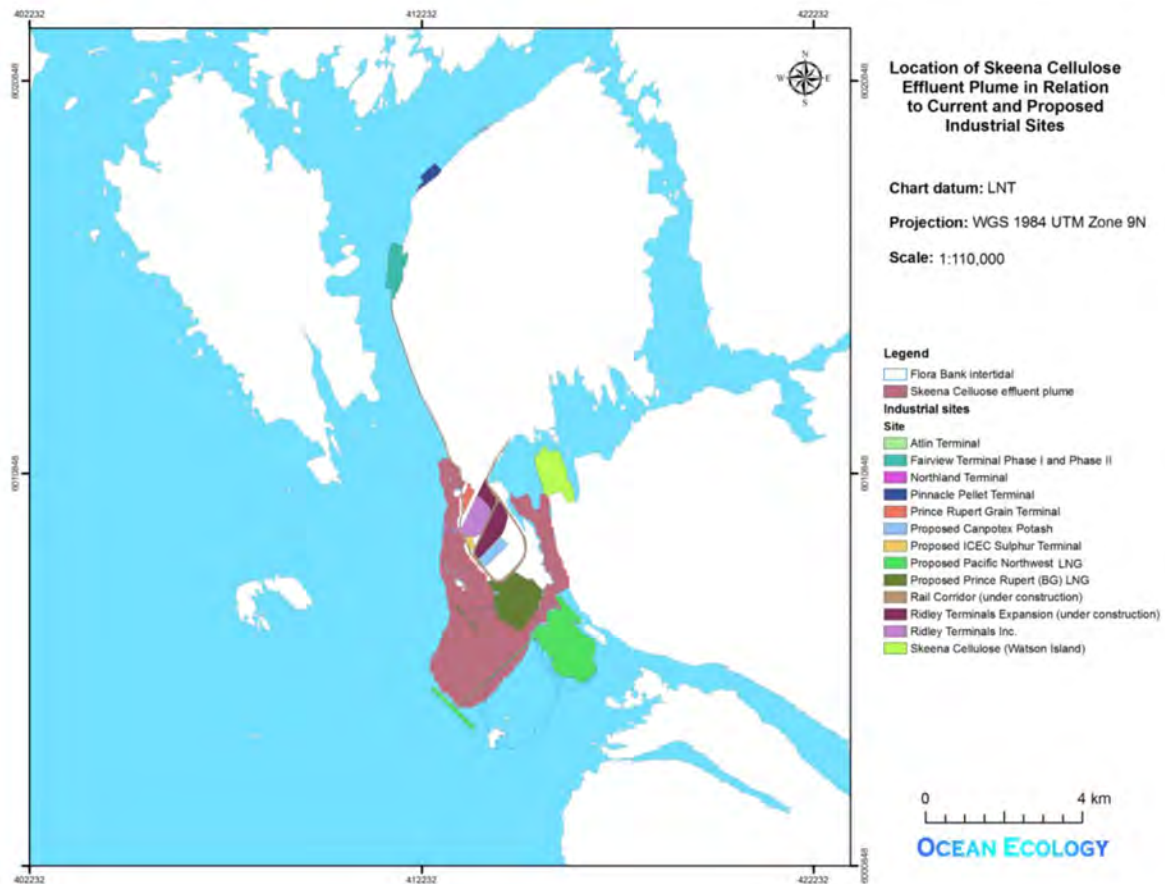


Figure 5. Area identified as having sediments containing significant toxins from Skeena Cellulose effluent. From: Ocean Ecology (2013).

SkeenaWild appreciates the opportunity to provide recommendations to strengthen the environmental components of the PRPA draft LUP. We hope our recommendations are incorporated into the LUP prior to being finalized.

Sincerely,

Greg Knox
 Executive Director
 SkeenaWild Conservation Trust



Literature cited

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Ocean Ecology. 2009. Flora Bank eelgrass survey. Prince Rupert, BC. Available: https://www.oceanecology.ca/publications/Flora_Bank_survey_report.pdf via the internet.

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TBuck Suzuki, 2019. Report: Anchor Safe Prince Rupert – Alarming and Increasing Anchored Incidents in Prince Rupert. http://friendsofwildsalmon.ca/images/uploads/Anchor_Safe_Prince_Rupert_FINAL.pdf

August 13th, 2020

Prince Rupert Port Authority
landuseplan@rupertport.com

Comment on “Draft Land Use Plan Update” (draft Plan)
Section 8.2 Goal 3

Objectives 3.4 and 3.7

3.4

Objective 3.4 “PRPA will continue to monitor and limit pollution from noise, light and airborne emissions.”

We request three changes to encourage accountability by making the objectives more specific with key results to be achieved:

- An additional sentence [underlined below] be added to Objective 3.4

PRPA will continue to monitor and limit pollution from noise, light and airborne emissions. We will meet project specific approval requirements and undertakings as well as environmental regulations and guidelines in a transparent fashion.

- Two additional sentences [underlined below] be added to Objective 3.4.2

Make monitoring data easily accessible to the general public and promptly respond to public feedback and concerns. Historic data, necessary to calculate and compare levels subject to the relevant air quality and noise guidelines, will be publicly available. Current and historic publicly available records will be periodically audited by provincial authorities.

- An additional specific objective [underlined below] be added

3.4.4 PRPA will monitor and record not only average noise levels, but also peak levels, and will include vibration noise levels, as well. PRPA will work with nearby PRPA tenants to ensure personnel responsible for train shunting and hatch lowering are trained and managed to reduce, to zero, the number of times peak noise levels exceed 50 decibels at the Water and Fairview monitoring stations.

3.7

Objective 3.7 “PRPA will establish a reputation as the safest port in North America because of our leadership role in implementing innovative marine navigation practices, procedures and technology.”

We request that:

- The following phrases [underlined] be added to 3.7.1:

Establish quantified risk goals for marine navigation and anchoring within PRPA jurisdiction and Chatham Sound anchorage areas and develop and implement a plan to meet those goals with our port partners.

- A specific clear achievable objective, 3.7.3, [underlined] be added

3.7.3 PRPA will reduce the average annual number of large vessel anchor dragging "risk of grounding" incidents by 50% or more, from the previous ten-year average.

We have chosen to recommend inclusion of the above key results in the PRPA Land Use Plan under Section 8.2 Land Use Objectives and Policy Directions because we think they are achievable. Those listed under 3.4 will greatly reduce the environmental risk to nearby residents' health and well-being from noise and those listed under 3.7 will greatly reduce the risk to the estuary of large oil spills from vessel fuel tanks or large petroleum product spills from cargo holds.

Thank-you in advance for your consideration of these comments.

Submitted by Prince Rupert Environmental Society

For further information contact:

Carol Brown, President, Prince Rupert Environmental Society carolbro@citywest.ca

APPENDIX C COMMUNICATION LOG

Organization	Contact Name	CallNotification Introducing Project	Letter Notification Introducing Project	Phase 1 Meeting	Follow Up	Phase 2 Notification	Follow Up	Phase 2 Draft Invitation for Comments	Follow Up	Phase 2 Meeting	Other Communications
Lax Kw'alaams Band	Mayor John Helin	October 16, 2019	October 22, 2019	October 29, 2019							
Lax Kw'alaams Band	Mayor Gary Reece										31-Jul-20
Lax Kw'alaams Band	Erminio Pucci		October 22, 2019	October 29, 2019							
Lax Kw'alaams Band	Carl Sampson			October 29, 2019							
Lax Kw'alaams Band	Tressa			October 29, 2019							31-Jul-20
Lax Kw'alaams Band	Stephen Conway, CAO					May 12, 2020		May 21, 2020	May 27, 2020		June, 24, 2020, July 10, 2020, July 31, 2020
Metlakatla First Nation	Chief Harold Leighton	October 16, 2019	October 22, 2019								18-Aug-20
Metlakatla First Nation	Steven Lehnert			October 29, 2019		May 12, 2020	May 12, 2020	May 21, 2020	May 27, 2020		24-Jun-20
Metlakatla First Nation	Erin Mutrie						May 12, 2020	May 21, 2020	May 27, 2020		June 24, 2020, July 6, 2020, August 7, 2020, August 18, 2020,
Metlakatla First Nation	William Nelson							May 21, 2020	May 27, 2020		
Metlakatla First Nation	Ross Wilson										18-Aug-20
Kitsumkalum First Nation	Chief Don Roberts		October 22, 2019	December 19, 2020	November 1, 2019, November 22, 2019						June 26, 2020, June 29, 2020, July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Steve Roberts		October 22, 2019		November 1, 2019, December 19, 2019						June 26, 2020, June 29, 2020, July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Rina Gemeinhardt			December 19, 2020	November 1, 2019, November 22, 2019, April 14, 2020, April 15, 2020	May 12, 2020	May 12, 2020	May 21, 2020	May 27, 2020	July 2, 2020, August 10, 2020	June, 24, 2020, June 26, 2020, June 29, 2020, July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Nicole Wallace									July 2, 2020	July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Alex Belton										July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Jennifer Hill										July 14, 2020, August 10, 2020,
Kitsumkalum First Nation	Mary Ellen Turpel- Lafond										July 14, 2020, August 10, 2020,
Kitselas First Nation	Chief Judy Gerow		October 22, 2019		November 6, 2019, November 12, 2019, December 2, 2019, December 9, 2019, December 19, 2019, January 7, 2020						
Kitselas First Nation	Chris Apps		October 22, 2019	January 13, 2020	November 6, 2019, November 12, 2019, December 2, 2019, December 9, 2019, December 19, 2019, January 7, 2020	May 12, 2020		May 21, 2020	May 27, 2020		24-Jun-20

Organization	Contact Name	CallNotification Introducing Project	Letter Notification Introducing Project	Phase 1 Meeting	Follow Up	Phase 2 Notification	Follow Up	Phase 2 Draft Invitation for Comments	Follow Up	Phase 2 Meeting	Other Communications
Kitselas First Nation	Sachiko Ouchi		October 22, 2019	January 13, 2020	November 6, 2019, November 12, 2019, December 2, 2019, December 9, 2019, December 19, 2019, January 7, 2020			May 21, 2020	May 27, 2020	June 12, 2020	June 2, 2020, June 24, 2020, June 26, 2020
Kitselas First Nation	John Balogh		October 22, 2019	January 13, 2020	November 6, 2019, November 12, 2019, December 2, 2019, December 9, 2019, December 19, 2019, January 7, 2020						24-Jun-20
Kitselas First Nation	Cedar Welsh										24-Jun-20
Gitaxaala Nation	Chief Linda Innes,		October 22, 2019								19-Aug-20
Gitaxaala Nation	M. Robinson		October 22, 2019								
Gitaxaala Nation	G. Odfreyinnes		October 22, 2019								
Gitaxaala Nation	James Herbert		October 22, 2019		22-Nov-19	May 12, 2020	May 12, 2020	May 21, 2020	May 27, 2020	August 6, 2020	May 28, 2020, June 16, 2020, June 24, 2020, July 10, 2020, July 14, 2020, August 19, 2020
Gitaxaala Nation	Samantha Wagner									August 6, 2020	19-Aug-20
Gitaxaala Nation	James Witzke									August 6, 2020	
Gitga’at Nation	Chief Arnold Clifton		October 22, 2019								
Gitga’at Nation	Paul Patterson					May 12, 2020	May 14, 2020	May 21, 2020	May 27, 2020		June, 24, 2020, July 10, 2020
Gitga’at Nation	General Email				22-Nov-19						
Gitga’at Nation	Kyle Clifton										15-Jul-20
City of Prince Rupert	Robert Long		October 22, 2019			May 12, 2020		May 21, 2020	May 27, 2020		June 24, 2020,July 10, 2020,July 31,2020, August 25, 2020, August 27, 2020
City of Prince Rupert	Brianna Bunko		October 22, 2019	October 28, 2020	2020-10-22						10-Jul-20
City of Prince Rupert	Mayor and Council		October 22, 2019					May 21, 2020			
City of Prince Rupert	Carinne Bomben										31-Jul-20
City of Prince Rupert	Rosa Miller										25-Aug-20
District of Port Edward	Danielle Wilson, CAO		October 21, 2019	October 28, 2020	22-Oct-19	May 12, 2020		May 21, 2020	May 27, 2020	July 7, 2020	May 28, 2020, June 2, 2020, June 4, 2020, June 15, 2020, June 24 2020, Jun 26, 2020, June 29, 2020, July 10, 2020
District of Port Edward	Mayor and Council		October 21, 2019							July 7, 2020	
District of Port Edward	Polly Pereira									July 7, 2020	Jun 26, 2020, June 29, 2020, July 7 2020, July 10, 2020
North Coast Regional District	Daniel Fish CAO		October 22, 2019			May 12, 2020		May 21, 2020	May 27, 2020	July 14, 2020	

Organization	Contact Name	CallNotification Introducing Project	Letter Notification Introducing Project	Phase 1 Meeting	Follow Up	Phase 2 Notification	Follow Up	Phase 2 Draft Invitation for Comments	Follow Up	Phase 2 Meeting	Other Communications
North Coast Regional District	Board of Directors							May 21, 2020			
Canadian National Railway (including Aquatrain)			October 22, 2019			May 12, 2020					
Ridley Island Terminals Inc.			October 22, 2019			May 12, 2020					August 17, 2020
Prince Rupert Grain Ltd.			October 22, 2019			May 12, 2020					
Dubai World			October 22, 2019			May 12, 2020					
Pembina Pipeline Corporation			October 22, 2019			May 12, 2020					
Alta Gas			October 22, 2019			May 12, 2020					
Pinnacle Renewable Resources			October 22, 2019			May 12, 2020					
Bandstra			October 22, 2019			May 12, 2020					
ILWU			October 22, 2019			May 12, 2020					
DP World			October 22, 2019			May 12, 2020					
Kristoff Trucking			October 22, 2019			May 12, 2020					
Quickload			October 22, 2019			May 12, 2020					
SMIT Marine			October 22, 2019			May 12, 2020					
Western Canadian Marine Response Corporation			October 22, 2019			May 12, 2020					
Gat Leedem Logistics			October 22, 2019			May 12, 2020					
CT Terminals			October 22, 2019			May 12, 2020					
Tidal Coast Terminal Ltd			October 22, 2019			May 12, 2020					
Prince Rupert Chamber of Commerce			October 22, 2019			May 12, 2020					
Wolverine Terminals			October 22, 2019			May 12, 2020					
Ray-Mont Logistics			October 22, 2019			May 12, 2020					
Vopak			October 22, 2019			May 12, 2020					
Suzuki Foundation			October 22, 2019			May 12, 2020					
Skeena Wild			October 22, 2019			May 12, 2020					December 13, 2019, August 17, 2020
Prince Rupert Environmental Society			October 22, 2019			May 12, 2020					August 13, 2020
Ecotrust Canada			October 22, 2019			May 12, 2020					
World Wildlife Fund			October 22, 2019			May 12, 2020					
Department of Fisheries & Oceans			October 22, 2019			May 12, 2020					
Transport Canada			October 22, 2019			May 12, 2020					
Canadian Coast Guard			October 22, 2019			May 12, 2020					
BC Chamber of Shipping			October 22, 2019			May 12, 2020					
BC Coast Pilots			October 22, 2019			May 12, 2020					
Pacific Pilotage Authority			October 22, 2019			May 12, 2020					
BC Ferries			October 22, 2019			May 12, 2020					
Alaska Marine Highway			October 22, 2019			May 12, 2020					
Ministry of Transportation & Infrastructure			October 22, 2019			May 12, 2020					
Jennifer Rice, MLA			October 22, 2019			May 12, 2020					
Skeena Bulkley Valley MP			October 22, 2019			May 12, 2020					