

National Energy Board

Suite 210, 517 Tenth Avenue SW
Calgary, Alberta
T2R 0A8

Attention: Ms. Sheri Young, Secretary of the Board

Re: File OF-Fac-PipeGen-T211 01

Dear Ms. Young,

The Resource Municipalities Coalition (Coalition) believes responsible resource development sustains communities by addressing impacts on ecosystems as well as cumulative impacts to a healthy natural environment and to citizens by ensuring the provision of effective social services that improve quality of life while building a sustainable future.

As referenced in the October 22, 2018 letter, by the National Energy Board (NEB), the project is an approximately 670 kilometer-long, 48-inch diameter natural gas pipeline located within the province of British Columbia (BC). It will connect to a liquified natural gas (LNG) facility located near Kitimat BC from which LNG will be exported to foreign markets. This LNG Terminal, owned by LNG Canada, has been issued a 40-year license to export LNG (License GL-330) by the Board on May 27, 2016. The Board is also aware that on October 1, 2018, LNG Canada made a positive final investment decision (FID) on the construction of the LNG Terminal and on October 2, 2018, TransCanada Coastal GasLink (CGL) announced a positive FID on the Project.

The development of the LNG export facility in Kitimat, BC and the corresponding CGL pipeline will bring sustainable benefits to communities of the province of BC by creating employment opportunities to First Nations and local citizens of the communities along the pipeline route. Modestly, annual revenues of \$20 million are forecasted with respect to property taxes, supporting investment into social services and infrastructure for communities along the pipeline route, represents an example of taxes benefiting Canadians.

As many Canadians enjoy products manufactured in Asia, while failing to understand the negative impacts that come from industrialization of countries like China; were it is believed, 1.6 million deaths a year are attributed to air pollution from the primarily coal-based production processes.

British Columbia's LNG exports to China can help to reduce greenhouse gas emissions (GHG) by as much as 176 million tons annually, making a positive impact on the planet and improving the quality of life for everyone.

The Coalition recognize it is Mr. Sawyer's right to file a jurisdictional challenge with the NEB against the CGL pipeline; yet since the launch of the project in 2012 - over 15,000 consultative sessions with First Nations and communities impacted by construction, which has resulted in 100% support by First Nation communities along the route - after completing an Environmental Assessment Application in 2014 that was approved with 32 conditions to ensure best practices in pipeline construction and operations were maintained, Mr. Sawyer raises a question of jurisdiction on July 30, 2018, which as cited by TransCanada on August 24, 2018, appears to be an "*abuse of process*", as Mr. Sawyer would reasonably have been in possession of the knowledge of the Project in question prior to July 30, 2018.

It is the view of the Coalition that - should the NEB hold a process to fully consider the jurisdictional matter - regardless of perceived similarities, the comparison of the CGL Project to that of the cancelled Prince Rupert Gas Transmission (PRGT) project are not warranted and the CGL Project should not be influenced by any interpretation of challenge or ruling associated to the PRGT project.

It is also the view of the Coalition that any perceived delays, as a result of the NEB holding a process to fully consider jurisdiction, in the construction of the CGL project will have a negative influence on other LNG related projects within BC - Pacific Trails Pipeline (Chevron/Woodside) and Pacific Northern Gas Looping (AltaGas), and erode investor confidence in the regulatory framework of Canada. This is not seen as being in the "public Interest" but rather limiting Canada's economy thus, reducing the quality of life for all Canadians and eroding the opportunity to build a sustainable future for all Canadians.

The Resource Municipalities Coalition encourages the NEB to not allow the proceedings in the matter of Mr. Sawyer's jurisdictional challenge to cause harm to the CGL project, but rather use this opportunity to improve the process by providing positive leadership in future resource development. Recognizing the expertise established by TransCanada in 65 years of experience in the construction and operation of safe and reliable energy infrastructure and their investment in building a sustainable future for all Canadians, is in the public interest.

Sincerely,



Mayor Lori Ackerman
City of Fort St John



Mayor Rob Fraser
District of Taylor



Mayor Don McPherson
District of Tumbler Ridge



Mayor Pat Crook
District of Mackenzie



Executive Director Mike Whalley
Resource Municipalities Coalition

CC: Catie O’Neal - Community Relations, TransCanada
 Kevin Thrasher - Legal Counsel, Coastal GasLink
 Honourable Jody Wilson-Raybould – Attorney General of Canada
 Honourable David Eby - Attorney General of British Columbia