

**From:** [Jim Culp](#)  
**To:** [Kitimat Clean Refinery / Raffinerie de Kitimat Clean \(CEAA/ACEE\)](#)  
**Cc:** ["Al Lehmann"](#)  
**Subject:** FW: Reminder: Deadline for Comments-Kitimat Clean Refinery  
**Date:** August 12, 2016 1:43:32 PM  
**Attachments:** [Letter re. Refinery Proposal.docx](#)  
[ATT00007.htm](#)

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To whom it may concern,

I am forwarding you a response to the CEAA guidelines re. the environmental assessment of the Kitimat Clean Refinery Project for my friend Al Lehmann. Both he and I misinterpreted the deadline thinking it was at the end of today Aug.12/16 not yesterday Aug.11/16. His comments pertinent to health impacts are in particular very important, along with all that he said to say re. strengthening the guidelines for must do response from the proponent.

I in turn wanted to say more about fishery values which I intended to do as a follow up to my input yesterday. Very briefly and as concise as I can be it has to be understood that this project will be located in the very heart of fish productivity in the Kitimat River Watershed where arguably the most fish diversity and productive capacity are located in the Cecil Creek to little Wedeen River area and everything in between those bodies of water. There is little doubt that the project if it goes ahead would cause a huge negative impact upon the fisheries of that area. The proponent must show without a shadow of doubt how it carry out its project proposal and not seriously alter that wild fish genetic production capability along with destroying forever or at least a very long time the magical aspect and extent of the recreational fishing area that will be altered by the project.

Thank you for considering Al Lehmann's response and my late comments.

Jim Culp Terrace

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**From:** Al Lehmann [REDACTED]  
**Sent:** August-12-16 11:17 AM  
**To:** Jim Culp  
**Subject:** Re: Reminder: Deadline for Comments-Kitimat Clean Refinery

Jim,

When I tried the link that Margaret sent you, the page churned for a while and then informed me that the page was not available.

I did write the following. Can you forward it to someone who might get it where needed?

Al

[REDACTED]  
Terrace, BC  
[REDACTED]

August 12, 2016

Subject: Proposed Kitimat Valley Refinery

To whom It May Concern:

Yesterday I was informed of further steps being taken to promote the construction of a very large oil refinery in the Kitimat Valley between Terrace and Kitimat. Presumably part of the appeal of this proposal is that it would provide a tidewater exit for Canadian crude oil products, as well as create construction and operational refinery employment for Canadians (the second a feature lacking in other pipeline export plans).

While from a business perspective it might be appealing to “make hay while the sun shines,” that is, to maximize returns on the extensive investment and infrastructure that has developed over the past century for the oil industry while the getting is still good, other imperatives suggest that this development would not ultimately prove beneficial, and that it could actually produce considerable harm.

As a resident of Terrace, my objections might be construed as simply another example of NIMBYism from what BC’s premier has termed the “forces of NO.” In the case of any large-scale industrial development the negative effects (noise, pollution, etc.) are most felt in the vicinity of the development. I, my friends and neighbors, and family are in this vicinity. Thus I have an element of “not in my back yard” to my objections.

For example, I believe it has been suggested that the raw bitumen (or bitumen-like product) is to be delivered by train rather than pipeline. Given the enormous amount of train traffic that would be required for such a venture (over 400,000 bbls per day of planned production, I understand), there would be an equally large increase in noise, traffic delays, and likely derailments (there have already been several derailments in the area of the local bridge that would be used for this traffic).

If this rail traffic were to be carrying diluted bitumen, is there not a real danger of fire in the even of derailment or collision? If the raw material were to be denser and more solid material from the oil sands, where would the sandy, sludgy waste product be disposed of once the valuable hydrocarbons were extracted?

A second local objection is based on the well-known and understood relationship between the presence of oil refineries and the increased incidence of certain cancers, notably non-Hodgkins Lymphoma (See <http://www.medicaldaily.com/high-cancer-rates-areas-near-refineries-and-industrial-plants-why-benzene-getting-environment-248121>, <http://www.jomb.org/uploadfile/2013/0412/20130412054124492.pdf>, and [http://en.hesperian.org/hhg/A\\_Community\\_Guide\\_to\\_Environmental\\_Health:Oil\\_Causes](http://en.hesperian.org/hhg/A_Community_Guide_to_Environmental_Health:Oil_Causes)

\_Serious\_Health\_Problems). One of the frequent pollutants from refineries is benzene, for which the American Petroleum Institute admitted that “the only absolutely safe concentration of benzene is zero.” We live here in an airshed already contaminated by SO<sub>2</sub> from Kitimat’s aluminum smelter, and only recently the BC government permitted the company involved to *increase* its emissions. Continuing to add other chemical pollutants to the region’s air cannot be advisable.

From a wildlife perspective, the vast number of tankers that will be required to export the proposed refinery’s huge output will almost inevitably result in a wreck or two. Engine noise will drive the whales away. Contamination of coastal waters may further damage fisheries for salmon and other species, both on the ocean and inland. The refinery itself would be a blight within one of the last great coastal rainforests, further pressuring wildlife that are finding fewer and fewer places on earth to retreat to.

Of course, the unacknowledged elephant in the room is our continuing neglect of climate change in much more than pious pronouncements of our concern and (eventual, it appears) commitment to action. Investing billions of dollars into further infrastructure that is killing the planet’s ability to support long-term human civilization is utter folly. It’s wonderful, our human capacity for admitting dangers requiring societal change for their amelioration, trumpeting our high-minded goals for addressing these difficulties to high fives all around, and then our continuing on the path we have always trod. CO<sub>2</sub> levels have breached the 400 ppm mark, probably never to retreat, yet governments take seriously the idea of building more technology that will simply add to the threat. It’s akin to the man with liver cirrhosis saying, “I know I should stop drinking--maybe tomorrow. Meanwhile I’ll split a quart with you.” It’s a kind of madness.

Few people with any understanding of biological, medical, and other scientific processes (aside from some chemical engineers and those who mistakenly imagine economics to be a science) would believe that a responsible government department or agency would actually take seriously this refinery proposal. Yet here we are.

On so many levels this project is a threat to life, both globally and locally. I urge you to reject it.

Sincerely,

Al Lehmann