

From: [Jim Culp](#)
To: [Kitimat Clean Refinery / Raffinerie de Kitimat Clean \(CEAA/ACEE\)](#)
Subject: Kitimat Clean Oil Refinery proposal
Date: August 11, 2016 7:06:46 PM
Attachments: [Kitimat Clean Oil Refinery proposal.docx](#)

To whom it may concern,

See attached letter.

Jim Culp Terrace BC

August 11,2016

Canadian Environmental Assessment Agency

Kitimat Clean Refinery Project

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To whom it may concern,

I am shocked that this project proposal has gone so far as to be considered for environmental assessment by your agency.

The idea of building an oil refinery in Canada or in BC to refine the Alberta tar sands bitumen is a good idea because it creates jobs for Canadians and provides for greater control of this natural resource for Canadian consumption along with the amount that is exported to other countries.

Has any Agency/Department within the Federal Government or the BC Provincial Government through its Ministries and Agencies looks seriously at the feasibility of this gigantic project being built before this costly assessment takes place?

Transport by CN Rail-

The transport of bitumen in a semi-solid state by rail sounds fine and reasonable compared to moving liquid petroleum via rail or by pipeline. The problem is that the existing rail infrastructure now in place (which should be included in the environmental assessment) is not capable with the existing system to deliver the product and not cause unacceptable amounts of noise, rail alignment changes and derail issues.

All the rail movement on to the Kitimat line would have to be shunted from one direction to another maybe on constant basis within the urban area of Terrace, where previous derailments have taken place. This is double line location with a sharp turn is where other product shipments and Via Rail compete every day for the use of the track.

The noise and disruption along the line in the recreational fishing area along the upper Lakelse River portion of the line to the refinery site would be very disappointing to many anglers who fish in a semi-wilderness area.

The two level crossings in a part of Thornhill provides access for residents from that community, residents from the Kitselas First Nation Reserve, plus traffic from rural residential areas, other industry and tourism/recreational users and are the only way in and out of the area.

The length of the rail trains shipping bitumen is assumed would be very long, slow moving shipments possibly a nightmare for those who would have to cross the tracks at those two crossings that are very close together. There are no alternative routes out of the area.

The Forest Resource of the Kitimat River Valley

The Kitimat River valley is one of the most productive timbered river valleys along the BC coast and may be now in all of British Columbia having a larger forest land base than the Fraser Valley the largest coastal valley that is now covered by urban development.

The size of the area where the refinery would be located is absolutely huge, more than 1000 hectares and would take out a huge chunk of the valleys forestry productivity which is unacceptable. The Wedeen Industrial site was an ill conceived site in the late 1970's and remains so until this day, particularly when Kitimat proper has a very large industrial area that somewhere within its boundaries could conceivably provide an alternative location for the refinery.

The forest loss for the Forest Industry needs to be analyzed from a future perspective when the trees reach a mature size that can be then logged through a carefully managed perpetual rotation, forever. The timber loss is not a onetime loss but an ongoing loss of a renewable resource where once there was a forest of spruce, cedar and hemlock and other species of trees, some that were 1000 or more years old, compared with the refining of a non-renewable resource that will reach the end of its productive capacity in 50 years or less.

Of course such a large forest area has various values which may be comparable to tree harvesting particularly the forest covers ability to absorb carbon dioxide and in a world where forests are being destroyed for all kinds of development from agriculture, various industries and

urban development as the world's population increases at an ever increasing pace. The Guidelines for the EIS have spelled out need for a very rigorous identification, protection, and mitigation requirements associated with the loss of timber requirements/habitat for all forms of wildlife. Those very specific guide lines must remain in place and become a must do for the proponent.

Wildlife, Fish, birds et al

Same as for forests, the guidelines for all wildlife must remain very stringent and become a must do in place of the guidelines and cover almost every eventuality that the proponent must undertake.

I carried out a number of job creation projects under various Federal and Provincial job creation projects in the Kitimat valley in the early 1980's and mid 1990's all to do with small stream fish habitats that were damaged by industrial logging. The work showed that there were many small streams in the mid-to lower valley and all were and are very productive anadromous fish tributaries that support sometimes fish spawning and rearing or one or the other. There is a myriad of small streams some fed by groundwater the others by surface water. They are all extremely important for the overall well being of the health of the Kitimat River Watershed ecology.

Tourism and recreational values and angling

Again the guidelines must become a must do for the proponent. The Kitimat River is very valuable tourism river with a huge number of anglers converging on the watershed every year to catch the fish bounty that is available.

A refinery will mar the landscape and do nothing that is good for tourism or recreational angling. The river is gorgeous and very productive with all salmon species (including steelhead), dolly varden char, cutthroat trout and whitefish which are all native to the river and its tributaries. The Kitimat River supports a large population of cutthroat trout some of the biggest in size and many spawn and rear in the small tributaries.

Marine clays

The Kitimat valley has marine clays as common mix of the substrate in the valley which can be very problematical if disturbed because it is so difficult to control once disturbance takes place. Heavy clay silt loads are an enemy for angling if turbidity is extreme and it is no friend for fish if constantly weeps heavy concentrations into small streams. It is critical that the substrate be identified and the proponent explain very carefully how they will deal with it should it be a problem.

Human Health and Green house gas emissions

Obviously there is nothing more important human health and I am particularly concerned about the prevailing westerly wind moving the accumulation of chemicals in the air from the Rio Tinto Alcan Smelter, a future LNG plant in Kitimat, the oil refinery and increased emissions from the many locomotives moving bitumen to the oil refinery. All the assurances and comforting words from Governments and industry do not instill confidence in me that all is going to be okay.

I grew up in Coquitlam about 12 km. from the Imperial Oil IOCO refinery that was small in comparison to the giant Kitimat Clean refinery being proposed. We would often smell the emissions from loco when a prevailing wind blew up Burrard inlet and at times there were light coatings on the windshields of our vehicles that smudged when we tried to clean them off.

To this day we know nothing about health impacts from that refinery because people died younger in 1950's and 1960's from heart disease and we did not know anything about the various cancers people ended up with or respiratory ailments which were not proven to be associated with the refinery emissions. We did talk about those things but that was as far as it went.

I am concerned more about impacts upon my children and grandchildren than my wife and I. The guidelines appear to touch base with my concerns now it is a matter to again make sure they are requirements in the EIS.

More and more people including our family are becoming very concerned with climate change which is real and more noticeable every day around the world. The refining will in all likelihood increase British Columbia's green house gas emissions. We are very concerned over that possibility, therefore in the strongest way possible the proponent must not hide anything and show British Columbians that the refinery will be a very low emitter of carbon dioxide.

I will stop there and will be watching to see how the process plays out and determine at that time if the refinery makes sense or not. At this time we do think that it does.

Yours Sincerely

Jim Culp