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To: [Pacific Future Energy Refinery / Raffinerie Pacific Énergie Future \(CEAA/ACEE\)](#)
Subject: Comments on Draft Guidelines for Pacific Future Energy Refinery Project
Date: November 7, 2016 6:19:16 PM

I am presenting to you some comments that I feel are somewhat in the Draft EIS.

I have lived in this area since I was a toddler and therefore have 60+ years of local knowledge. I remember when a previous project 'Orenda Pulp Mill' was being assessed for this exact same site and there are the same concerns today as there were back then in the early 1990's except that Climate Change seems to be adding to some of those concerns.

4.7.1 Water Supply, Water Management and Wastewater Streams

4.7.1.1 Water Supply

The proponent states that the preferred source of raw water for the facility is groundwater. Will they be using a baseline of studies from back when the previously noted 'Orenda' did the nine test holes and then compare that data with today's data to compare if the aquifer is refilling at an adequate rate and whether or not they can confirm such data? Aquifers and groundwater* are a big concern right across Canada and a Canadian Groundwater Information Network (GIN) has been developed. Is this particular aquifer at the Dubose Site registered with this group?

From local knowledge and involvement in the Community I am aware of the numbers of water licenses that have been issued for the Kitimat River system 'some of which have changed hands privately' and some of which there appear to be no Industrial process associated with it. I am also aware that the levels of the Kitimat River have been decreasing throughout the year due to lack of snowpack and faster melts of the glaciers that feed this small watershed, presumably due to climate change. In the past we did not have months long periods of low water. I would request a study that would show total use downstream from present and proposed future users of the Kitimat River and her tributaries.

To my knowledge the location that PFEC is planning on putting their pumphouse is above the bigger tributaries such as the above mentioned Wedeene Rivers and Hirsch Creek. At the present time there are no historical water records that can be found for the upper Kitimat as there are no flow rate monitors for that area, therefore no baseline of flow levels.

I have concerns that even lower river levels would create a concern for fish entering the Kitimat River system to spawn as the lower the water levels the warmer the water would become and the past couple of years we have watched the salmon hesitate to enter the river for this reason.

*Natural Resources Canada 3rd National Workshop on Groundwater - 2015 report available - (<http://geoscan.nrcan.gc.ca/>)

4.7.1.3 Wastewater Streams

The proponent PFEC will assess the feasibility of other options such as disposal into the marine environment within the Douglas Channel via a 6" pipe from the Refinery. The discharged water will be mostly saline water with TDSs that may contain traces of other contaminants such as oil/ grease, phenol, sulphides etc.

I find this absolutely unacceptable as Douglas Channel has and is continuing to be polluted from Industry for many decades. Any area where this 6" discharge pipe would have to be located at the head of Douglas Channel is well known locally that there is already a situation where the ability to flush and renew via tides is low just from the nature of the Channel itself. Future discharges into Douglas Channel must be controlled and contaminants cannot be permitted of any kind. There is still areas of eel grass at the mouth of the Kitimat River and adjacent areas where juvenile salmon spend time before heading out to sea. The Kitimat River is and has been for decades a draw for tourism. The former pulp mill had some terrible discharges that tainted the Eulachon to a point where they were completely wiped out and could no longer find their way back to the River to spawn. This cannot be repeated just as the eulachon is trying to re-establish.

5 PROJECT ACTIVITIES

The proponent PFEC has noted that they would do 'Modifications to the existing access road from Highway 37 to the Refinery'

I have concerns that this present access will limit the public who already use that road. My bigger concern is that the present Highway 37 will not be safe given the increased traffic that will use this highway both from Construction and Operations and I would question how this can be taken into consideration and how the Federal and Provincial governments will handle upgrades to the highway to accommodate such an increase. The present highway is very moderate and for the most part just a 2 lane highway. The day to day traffic with 1000 permanent workers and many more subcontract workers going from either Terrace or Kitimat to the plant site could certainly tax the present users of the highway and certainly in the winter create some extremely dangerous situations.

In addition to the increased traffic on our main highway I also have concerns about the increased rail traffic on a rail line that has never seen this amount of traffic before. I understand that this would be a separate issue however given that there is a second refinery proposal "Kitimat Clean" who is planning on double the number of railcars as this project. There is present Industry in Kitimat that relies on this rail line and in fact one of the proposed future projects is planning on shipping volatile materials as a byproduct of their project in the form of 1000 rail cars of condensate per year. This issue needs to be looked at as part of this project.

Concerned Kitimat Lifetime Resident,
Lucy McRae