March 4, 2019

Honourable John Horgan,
Via email: Premier of B.C., john.horgan.MLA@leg.bc.ca

Dear Premier Horgan:

**Re: Concerns over the LNG Canada proposals in Kitimat**

BC Nature (the Federation of BC Naturalists) represents 6000 members belonging to more than 50 clubs throughout the province. Our motto is "To Know Nature and Keep It Worth Knowing". We join other organizations such as the Sierra Club, the Canadian Centre for Policy Alternatives, and the Pembina Institute in expressing our grave concerns regarding the LNG Canada project planned for Kitimat.

Our first concern is the impact of this project on global warming. The recent UN Intergovernmental Panel on Climate Change's Special Report on Global Warming makes it very clear that temperatures must not exceed 1.5 °C from pre-industrial levels. The increase to date is estimated at 0.9 °C and likely 3 °C already in parts of the northern latitudes. Experts state categorically that the world must drastically reduce its carbon emissions to avoid catastrophic and runaway climate impacts to all global systems.

Estimates by the Pembina Institute and the Canadian Centre for Policy Alternatives predict far greater carbon emissions from the project than forecast by the B.C. government, ranging from 8.6 to 12 million tonnes. Methane is 30 to 80 times more potent than CO₂ as a greenhouse gas. How then is BC going to meet even its current 2050 emissions target of 13 million tonnes?

Our second concern is the hydraulic fracturing process, including the extensive use of water, the disposal of wastewater, upstream methane emissions, and proven threats to seismic stability. We have learned that many capped gas wells are leaking, adding a further source of methane to the environment. As well, studies of the impacts of fracking indicate possible adverse impacts on human health. In Canada, both Quebec and New Brunswick have declared a moratorium on fracking until they better understand risks to the environment, health, and water. We must also remember that the animals that share our environment face the same risks as humans.

Thirdly, we have concerns about the effects of shipping through a long, island-strewn waterway, increasing the possibility of potentially disastrous accidents. Marine mammals, including humpback whales, congregate annually at the entrance to Douglas Channel and
risk collisions. High winds and treacherous seas in this area are not uncommon. Research conducted by Sandia Laboratories for the U.S. government has demonstrated that the accidental release of LNG from a shipping accident would instantly freeze and asphyxiate all life within a 500 metre radius. In the worst-case scenario, a resulting fire would burn forests and grasslands within a 1.6 km radius. The Society of International Gas Tanker and Terminal Operators (SIGTTO) recommends that LNG not be shipped through long, narrow inland waterways due to the navigational risk. SIGTTO is a voluntary organization that includes oil industry members and it has concerns that LNG be handled and shipped in a safe manner.

We note that a federal comprehensive panel review of this proposed project was conducted in 2006 and that a further provincial environmental assessment was carried out in 2016. Since then we have learned (see our comments in paragraphs 2 and 3) of the dire need to drastically reduce carbon emissions sooner rather than later. The UN Climate Report was made public after your announcement of the LNG Canada project. In light of the information contained therein, we hope that you will do the right thing and cancel this project.

Our final concern is the destruction of wetlands in Kitimat and the restrictions placed by LNG Canada on legitimate wildlife monitoring that volunteers have been doing there for many years. We have heard that there are 400 hectares of land, much of which is salt marshes and mud flats, which will be stripped and alienated at the main LNG project footprint. We are also aware that the LNG Canada offset plan of compensation is now underway in adjacent Minette Bay (also part of the estuary). We understand that two major access roads are now under development for the construction of two saltwater marshes which will be placed on the mud flats. We notice that both the sites of the salt water marshes are situated on prolific mud flats frequented by migrating and over-wintering waterfowl and shorebirds.

BC Nature would like to know the following:
1) Was the extensive Minette Bay data research from the May 2016 Kitimat Estuary bioblitz considered in the company’s mitigation plans?
2) Will the government and company commit to meaningful follow-up monitoring of the overall effects of their plans? If there are unanticipated losses of wetland functions will the government and the company commit to follow-up compensation?
3) Will affected Red- and Blue-listed plant species be transplanted and studied in documented follow-ups?
4) Does any research support the effectiveness of adding copious quantities of alienated gravel to mud-flat habitats?
5) Why can’t LNG Canada plans be adjusted to allow more of the productive mud flats to remain available to migratory and local birds?
6) Will the government and the company commit to a more meaningful consultation process which will consider local knowledge that could avoid problematic environmental decisions?

In conclusion, we reiterate that B.C. Nature is an organization with a strong interest in the preservation of nature. We recognize the importance of a strong economy, but we also believe that without a viable environment, our world, natural and otherwise, will not thrive. We support our province in its efforts to control our carbon emissions. B.C. and Canada need to do their part.

Yours truly,

Alan E. Burger, PhD
President: BC Nature
(Federation of BC Naturalists)

Contact information: Dr. Alan E. Burger, President – BC Nature, aburger@uvic.ca, Phone: 250-378-2468

c.c. The Honourable Catherine McKenna, Minister of the Environment & Climate Change catherine.McKenna@parl.gc.ca
c.c. The Honourable Michelle Mungal, Minister of Energy, Mines & Petroleum Resources michelle.mungal.mla@leg.bc.ca
c.c. The Honourable George Heyman, Minister of the Environment & Climate Change george.heyman.mla@leg.bc.ca
c.c. The Honourable Andrew Weaver, Leader of the B.C. Green Party, andrew.weaver.mla@leg.bc.ca
c.c. LNG Canada info@lngcanada.ca
c.c. Bird Studies Canada- Steven Price- President sprice@birdscanada.org
c.c. Nature Canada info@naturecanada.ca
c.c. Canadian Wildlife Federation info@cwf-fcf.org

References:
https://ipcc.ch/report/sr25/