

From: [Neil Thompson](#)
To: [Commission Secretary BCUC:EX](#)
Subject: Review of Site C
Date: Saturday, August 19, 2017 9:56:34 PM

Dear Commissioners,

The following has also been forwarded to our prime minister:

Subject: A case of Wilful Moral Blindness at Site C

I have become very concerned that we have no enforceable setback regulation between proposed heavy industry emissions and our community airports. I am also requesting the BC Hydro's consultant's work be subjected to written endorsement by the professionals working in the aviation industry.

HISTORY

Over many years the encroachment of industrial emissions into our Air Traffic Control Zone has increased the disruptions, costs, risks, and the environmental footprint in our aviation community. The cumulative impact of the emissions have also increased the unreliability of our aviation weather forecasts which are important in selection of an alternate airport when flight planning from other airfields in bad weather conditions.

In our case, the provincial Environmental Assessment Office and the provincial Ministry of Environment and the provincial Ministry of Transportation claim no expertise in aviation weather matters, relying on expertise at the Federal level at the Ministry of Environment, NavCanada, and Ministry of Transport who appear very reluctant to speak up in matters they wish to consider provincial. To make matters worse, the environmental assessment processes do not invite participation of, or endorsement of Environmental Impact Statements by, the professionals who are our air traffic controllers, airline pilots, and aviation weather forecasters.

The result has been that our Environmental Assessment Boards and Joint Review Panels have had very little opportunity to perform truly informed assessments on many proposals.

Consequently:

1. The nearby sawmill acquired permit after permit to increase wood harvesting and emissions. They were also successful in acquiring extension after extension before finally shutting down their beehive burner just west of our airfield.
2. The refinery at Taylor acquired permit after permit to increase their production and their emissions.
3. The propane plant at Taylor acquired permit after permit to increase their production and their emissions.

4. The asphalt plants acquired permits to increase their dusts and emissions.
5. The wood pellet plant acquired permits to emit new dusts and emissions.
6. The pulp mill at Taylor acquired permits to increase their wood harvest and their emissions.
7. The largest OSB mill in North America acquired permits to build right in the center of our air traffic control zone and emit at least 1900 metric tonnes of water vapour per day. They have since received permits to increase production and add MDI resins to the formaldehyde in their emissions. MDI reacts to copper and aluminum which is commonly used for manufacturing airfield lighting and aircraft. On at least three occasions they even allowed spontaneous combustion fires to develop, sending smoke and sparks drifting across our airfield.
8. Until very recently, our Oil and Gas Commission has witnessed a steady increase in nearby flaring emissions.

It should come as no surprise that none of the polluters above have seriously investigated or proposed mitigation to their aviation neighbours or the air travelling public. They appear to prefer to not understand that the textbook behaviour of an air mass can be dramatically affected by industrial emissions.

FUTURE

More impacts are yet to come.

While the climatological records clearly trace the increases in low cloud, mists, fogs, and airframe icing since the construction of the WAC Bennet dam in the late 60s, our Hydro has now begun construction of a new dam 7 km SW of our city which is immediately upwind of our air traffic control zone.

The plan includes:

- a. New dusts from a large conveyor and rock hauling.
- b. New smoke from the burning of at least 1 million cubic meters of wood debris.
- c. New moisture from a new reservoir which is unlikely to stay frozen in winter because of fluctuating water levels and climate change.
- d. New moisture from turbine heat added to the downstream river which is unlikely to ever freeze over again.

ENVIRONMENTAL ASSESSMENT OF FUTURE

While the Environmental Impact Statements presented by Hydro skilfully try to convince CEAA, the Joint Review Panel and the public that impacts to aviation weather will be restricted to within 1 km of the new reservoir, I can find no professional within the aviation community who believes that is even a possibility let alone a likely outcome of the project.

We note that the modelling presented by Hydro's consultants completely omitted an assessment of:

1. Visibilities of 6 miles which are a World Meteorological Organization standard important for forecasting and aviation fuel management decisions.
2. Visibilities of 3 miles which is an ICAO and a CARS minimum standard for visual flight rules operations.
3. Visibilities of 1 ½ miles which is minimums for 3 of our runways and the back course for our Instrument Landing system as dictated by wind direction.
4. Visibilities of 1, ¾, and 5/8 mile which are critical to some aircraft.
5. Cloud heights of 1000 feet which is VFR minimums.
6. Cloud heights of 500 feet which is minimums for circling within the zone.
7. Cloud heights of 200 feet which is the Instrument Landing decision height.
8. Airframe icing implications.

Neither Environment Canada nor Transport Canada chastised the consultants for these omissions although EC did point out some modelling errors. Both ministries then went on to spend most of their 20 minute allotment on fish habitat and the Water Navigation Act respectively. While those are important topics, the superficial assessments dedicated to aviation weather implications must surely constitute a dereliction of duty only enabled by an absence of the enforceable regulations requested herein.

At the end of that day of Joint Review Panel hearings, Hydro's VP attempted to further mislead the panel and the public by saying they had arrived at the decision to only model visibility of ½ mile after a meeting at the airport with Transport Canada's Senior Air Specialist.

In truth:

1. Transport Canada have no Senior Air Specialist. The representative at that meeting was an Airways Regulations Inspector who accumulated flying hours in the United Emirates and is unlikely to have ever flown an IFR approach for a scheduled carrier into our airport in winter conditions.
2. The Airport Manager in-training had come to us with a background in banking.
3. The assistant Airport Manager in-training had come to us with a background of

janitorial contracting.

Clearly better expertise was required that day, and their decision should have been subject to endorsement by our air traffic controllers, our airline pilots, and our aviation weather forecasters who are the professionals. It was not. And no mitigation is being considered.

CONCLUSION

As a retired flyer, I have seen many examples of really bad land use planning near other airports. My suggestion is a 6 mile set back based on some years as a weatherman.

Federal introduction of enforceable set back regulations would not only help the aviation sector with less disruption, cost, risk, and unreliable forecasts, it would help Canada to get in step with the Climate Leadership Plan and the Paris Agreement through significant fuel and glycol consumption reductions.

For confirmation that banks of low cloud, mists, and fogs are increasingly present near our airports please refer to records contained in climatological data and satellite views. Possibly Commander Hadfield would agree to the use of over 40,000 photographs in this matter.

But more importantly, this letter is to request that no further Federal permits be issued to Site C unless the EIS omissions outlined above are properly modelled and endorsed by the true professionals, also outlined, who have current responsibilities in our air traffic control zone.

Respectfully,

G.N. Thompson

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