



November 22 2013

To: Canadian Environmental Assessment Agency
Via email: SiteCReview@ceaa-acee.gc.ca
BC Environmental Assessment Office,
Via email: brian.murphy@gov.bc.ca

Re: BC Nature comments on proposed Site C Dam

BC Nature (the Federation of BC Naturalists), which represents around 5,000 naturalists in the province of British Columbia, is deeply concerned about the proposed Site C dam on the Peace River. We have not had the resources to participate fully in the CEEA hearings that are ending shortly, but wish to have our concerns recorded and taken into account when the Province decides whether or not to proceed with the Project. As a naturalists' organization, our concerns relate to the predicted impact Site C will have on the ecosystems, including agricultural land, and vulnerable species that would be affected by the dam.

Environmental Impacts of Site C

If the Site C dam is built, it will impact 57,000 acres of land, including 17,000 acres of boreal forest and 16,000 acres of farmland. The ten kilometers of the upper Peace River valley that would be lost under the lake behind the proposed dam is a deep steep-sided valley carved through deep layers of glacial silts. The banks of the impoundment can be expected to slough continually, as the banks of the WAC Bennett dam upstream have been doing for the past 47 years since the construction of that dam. About 6,500 acres of the land to be flooded is classified as Class 1 and 2 agricultural land, which it would be short-sighted in the extreme for British Columbia, a mountainous province with little agricultural land, to sacrifice to industrial development.

Wetlands along the Peace provide valuable habitat for both nesting and migratory waterfowl. One such wetland, Watson Slough, provides prime breeding habitat for at least five listed bird species (American Bittern, Yellow Rail, Olive-sided Flycatcher, Nelson's Sparrow, and Le Conte's Sparrow). Watson Slough is right beside Highway 29 about 50km northeast of Hudson's Hope. Its location adjacent to the highway provides the public with a unique opportunity to learn about these fragile wetland ecosystems and the possibility of seeing and/or hearing some of B.C.'s rarest breeding bird species.

There are extensive areas of critical ungulate wintering habitat along the south-facing banks of the Peace River and its major tributaries. Mule and white-tailed deer are quite common. The Peace River valley also provides habitat for several red and blue-listed mammal species such as grizzly bear, fisher and Northern *Myotis* bats.

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Rising mercury levels from the inundation of vegetation behind the dam will also threaten aquatic organisms, including migratory Arctic grayling in the Moberly River; migratory bull trout in the Halfway river; and mountain whitefish in the Peace River.

Conclusions

BC Nature cannot support BC Hydro's proposal to build the Site C dam on the Peace River. The environmental cost is too high, as is the cost to BC taxpayers. According to BC Hydro¹ the estimated cost of building Site C has been rising steadily since the beginning of the century and as of November 2012 stood at \$7.9 billion – a very high cost that will be borne by B.C. tax payers.

At one time energy conservation was an important priority for BC Hydro, but the conclusion is inescapable that this is no longer the case. Its website states that "B.C.'s lowest cost resource option continues to be energy conservation and efficiency", yet at the same time it continues to promote Site C. In our view, BC Hydro must do more to encourage industry to conserve energy, and to educate the public on the importance of energy conservation and how to go about it. Future generations will be grateful.

Yours truly,



John Neville
President
BC Nature (Federation of BC Naturalists)

¹ See Site C Clean Energy Project, Vol. 1, Appendix F, Part 1, November 2012
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