



January 28, 2021

Nancy Pepper
Community and Social Mitigation Manager
BC Hydro – Site C Clean Energy Project

Via email: Nancy.Pepper@bchydro.com

Dear Nancy Pepper:

Re: Environmental Assessment Certificate (EAC) #E14-02: Schedule A (Project Description) – Hauling Material by Truck from 85th Avenue Industrial Lands to the Site C Project Dam Site Area

I am writing you on behalf of the Regional District to advise you that we will be fully participating in the BC Environmental Assessment Office (BCEAO) process once this application is filed. During the BCEAO process we will be providing ongoing input and a detailed and comprehensive submission respecting the application. We will also take steps to ensure all residents are fully engaged and have sufficient time to provide meaningful feedback.

This truck hauling application represents a complex and fundamental change to the project that could well have significant adverse impacts on the Regional District and its residents. Hauling materials by truck will impact numerous valued components, including but not limited to transportation, greenhouse gas emissions, human health, wildlife resources, vegetation and ecological communities, local government revenue, labour market, regional economic development, agriculture, minerals and aggregate, outdoor recreation and tourism, navigation, visual resources, population and demographics, housing, community infrastructure and services, and current use of lands and resources for traditional purposes (including the application of the *B.C. Declaration on the Rights of Indigenous Peoples Act*).

In the meantime, we wish to highlight aspects of the January 4th draft application that we believe need much more attention and supporting detail in any submission to the BCEAO.

No Analysis of Alternatives to Truck Hauling – The draft application does not include supporting verifiable expert analysis and evaluation of any other options for the transportation of glacial till from the 85th Avenue Industrial Lands to the Site C Project Dam Site Area, the provision of that till by any other means, or other alternatives. Examples of other options not considered including stockpiling of till to avoid the need for hauling in the event of conveyor service interruption, or sourcing glacial till from another location. In the absence of such analysis of options, it is difficult not to conclude that the sole focus of BC Hydro is to minimize cost.

Minimal Analysis of Risk and Duration of Breakdown of Conveyor System – The draft application includes a short table that sets out the cause, duration, frequency and probability of truck hauling. There is no supporting verifiable expert description, analysis and evaluation of:

diverse. vast. abundant.

PLEASE REPLY TO:

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- a) **The causes of conveyor belt down time** – For example, analysis of the engineering specifications of the conveyor equipment with reference to other similar applications in BC and around the world to provide a science based explanation for the scope, number and nature of tasks involved in routine maintenance and dealing with unplanned breaks.
- b) **Duration of down time** – For example, analysis of past performance of the conveyor equipment with reference to other similar applications in BC and around the world to provide a science based explanation for the duration ranges set out in the table.
- c) **Frequency of down time** – Examples in the table range from daily to per season. This is a very imprecise breakdown given the differential impacts on residents. And as noted earlier, there is no supporting analysis of alternatives - if there is going to be 4 hours of down time per day, then what are the options to stockpile glacial till so there is no need to haul by truck.
- d) **Probability** – Given the impact on the Region and residents, using terms such as certain, likely, unlikely, and very unlikely are imprecise in the extreme. There should be detailed statistical analysis to support precise probability estimates with an accompanying full discussion of descriptive statistics.

Additional Supporting Studies

As part of the EAC #E14-02 draft amendment package, the following supporting studies were included for the one option (truck hauling from 85th Ave. on public roads) considered – traffic impact assessment, human health / air quality / noise assessment, greenhouse gas assessment, indigenous groups and rights. As noted above, the Regional District requests that the effects and necessary mitigative and monitoring measures be assessed for a much broader range of valued components, and that these assessments be conducted for a full suite of options in addition to the 85th Ave. truck hauling option considered thus far.

Please contact me if you have any questions.

Yours truly,



Brad Sperling,
PRRD Board Chair

c: Kimberly.Walters@gov.bc.ca