



PEACE RIVER REGIONAL DISTRICT

February 3, 2021

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Project Assessment Director
BC Environmental Assessment Office
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PO Box 9426 Stn Prov Govt
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Via email: Kimberly.Walters@gov.bc.ca

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

On behalf of the Peace River Regional District (PRRD), thank you for meeting with our staff and consulting team on January 15th to provide us with a more thorough understanding of the process for assessing proposed amendments to Environmental Assessment Certificates. During this call it was noted that the PRRD would like to participate fully at many points in the proposed amendment process. The purpose of this letter is to provide further elaboration in that regard.

As a starting point, we acknowledge that the PRRD received the draft EAC #E14-02 amendment package on January 5th, 2021. This package invited the PRRD to comment on the draft amendment by January 29th, 2021. Given the proposed fundamental change to the Site C dam construction process – hauling of 85th Ave. glacial till construction material for some period versus continuous use of the conveyor system – along with the potential magnitude of this change and scope with respect to effects on many valued components identified through the Environmental Impact Statement, the PRRD was unable to fully respond by January 29th. We have provided some initial comments to BC Hydro in our January 28th letter to Nancy Pepper, a copy of which has been provided to you.

The PRRD believes that the proposed 85th Ave. hauling proposed amendment is of sufficient complexity to warrant the highest level of consideration set out in the 'Environmental Assessment Certificate and Exemption Order Amendment Policy'. Moreover, we wish to ensure that the process is paced to allow for meaningful input, research and analysis and full and fair consideration of all input received. Making allowance for the complex and fundamental nature of the amendment request, as well as application of the *Declaration on the Rights of Indigenous Peoples Act*, we anticipate that a determination by the BC Environmental Assessment Office on this application is at least a year away.

diverse. vast. abundant.

PLEASE REPLY TO:

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Our review of Table 1: Complexity Characteristics and Corresponding Information Requirements in that Policy reveals a range of characteristics of the 85th Ave. hauling proposal – material change to process, likely effects on valued components, complex engagement requirements, and potential for both public comment periods and formation of community advisory committee. These characteristics place the 85th Ave. hauling proposal squarely into the ‘Complex’ category.

With respect to process, we would also like to respectfully offer the following suggestions:

- Technical Advisory Committee – we understand that the EAO can appoint specialized expertise to this Committee. The PRRD feels that this expertise would be very beneficial in addressing various concerns which were noted in our response to BC Hydro’s draft amendment application package. These include identification of options to truck hauling in the event of conveyor service interruption, analysis of risk and duration of breakdown of the conveyor system, and review of effects of options (including truck hauling) on certain valued components (for example, transportation and human health). The PRRD also wishes to add representatives to this Committee, and will provide our nominees following their appointment by the Board. We would appreciate receiving a current list of the members of the Technical Advisory Committee.
- Community Advisory Committee – the PRRD believes that there is sufficient interest in this proposed amendment to warrant the establishment of a Community Advisory Committee. This Committee should include among its members representatives from the PRRD Board, with our nominees forthcoming. We attach copies of representative correspondence from community members already received which illustrate the depth of interest and concern regarding this forthcoming amendment.
- Public engagement process – the PRRD envisions three Environmental Assessment Office-led points of public engagement. These would include engagement efforts such as online sessions during the following steps in the overall amendment assessment process:
 - Step 2 (Assessment Procedures and Supplementary Materials Development, Fee Determination and Engagement)
 - Step 3 (Submission of Supplementary Materials and Review of Application and Supplementary Materials)
 - Step 4 (Amendment Assessment Report and Decision).

The proposed amendment to allow hauling of 85th Ave. construction material to the Site C dam construction location is an issue of high importance to the Regional District and our residents. We appreciate you taking our comments into consideration when establishing the proposed amendment assessment process.

We also look forward to working with your office as that process evolves.

Yours truly,

A handwritten signature in black ink, appearing to read 'Brad Sperling', written in a cursive style.

Brad Sperling,
PRRD Board Chair

c: BC Hydro- Nancy Pepper, Community and Social Mitigation Manager

c: PRRD Board and PRRD website

Attachments: Correspondence from PRRD Residents Regarding Proposed 85th Ave. Hauling
Amendment