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Sent: November 26, 2013 12:36 AM
To: brian.murphy@gov.bc.ca; SiteC Review / Examen SiteC [CEAA]
Cc: <email address removed>
Subject: Statement on Site C from Friends of Ecological Reserves

Letter of concern and opposition to development of Site C BC Hydro

This letter is for the record from Friends of Ecological Reserves regarding Site C.

We are concerned that an independent watch dog acting on behalf of all British Columbians was removed from oversight of the project. Why was Public Utilities Commission oversight removed with changes in the Clean Energy Act? Since Site C was first proposed over forty years ago it has been rejected twice as too risky and too costly. We believe if an assessment by the BC Utilities Commission were done today it would again reach a similar conclusion. We suspect that the removal of the BC Utilities Commission was because on technical merits the greater public good Site C could provide would again deem it to be a non starter. The current process should be but is not tasked with the bigger picture of energy needs and conservation. There are too many confounding factors in Energy development to look simply at Site C in isolation without this much needed broader context and public dialogue.

We ask that the current process recommend to government to re-instate the Public Utilities Commission as an body to provide oversight role expand the scope and put in context Site C. The re-negotiation of the Columbia River Treaty, numerous Independent Power initiatives and the overall needs of BC and the export potential and domestic and local industrial needs all need to be put into context along with site C and also made known to the citizens of BC.

We need energy but flooding agriculture land and prime habitat is not worth the cost. We cannot create more Class 1 agriculture but we have many more options on creating power. Site C is really on the wrong track. There are significant opportunities in BC for alternate energy, thermal, solar and closer to consumers as well as conservation measures to meet future expected demand. We need to invest in those to meet energy demands not in Site C.

There is also lack of clarity on why BC need Site C? There is fear by many that this project is being considered now because its energy is needed to fuel the oil and gas industry. Accelerating carbon development needs to be questioned as do the long term destructive costs of fracking and the energy-intensive liquefaction of natural gas and the liabilities of long term ground water pollution. Tax payer are being asked to pay the \$8-billion cost for the construction of the dam, which appear as a public subsidize the oil and gas industry.

In addition to destroying thousands of acres of fertile farmland and forest, Site C will cut the Yellowstone to Yukon wildlife corridor in half at its narrowest and most vulnerable point. The Peace River Valley is home to 20 at-risk species, including grizzlies, bull trout and the great horned owl. IT is totally unacceptable to destroy this amount of intact ecosystems when so many cheaper and better

alternatives are available. Open the door to a wiser decision and better future. We have the largest remaining intact ecosystems in North America and this helps destroy yet more of beautiful BC ruining the very thing that set us apart from the rest of NA which has over the last 400 years developed and degraded functioning ecosystems.

More specifically, I have several concerns about the draft Environmental Impact Statement guidelines (EIS).

1) The boundaries of the study area should be set to include most of BC. There are wide-ranging cumulative effects that would be felt throughout B.C. and adjoining provinces and territories. Thorough consideration must be given to the full range of impacts that could result from the dam, including: effects of all past, present and foreseeable activities in the area; severe disruption of wildlife corridors; and, protection of the long term food production potential that could supply produce to northern B.C. and Yukon Territory.

2) The Guidelines do not adequately recognize the unique capabilities and strategic importance of Peace River Valley agriculture. The unique microclimate of the Valley, combined with the soils, make farmland in the area extremely productive. In a time when there are significant concerns about global warming and the need to protect farmland, it doesn't make sense to wash away 7,800 acres of highly productive land.

3) The guiding principles required according to the EA Act are not adequately incorporated into the Draft EIS Guidelines, including: sustainable development; the precautionary principle; incorporation of traditional and local knowledge; and, meaningful public participation.

4) The "Need For" the project should be determined in light of the principle of sustainable development and the needs of local communities and other affected groups. The 'need for' the project is inadequately justified. Presently, the energy from Site C is required to supply Asia with liquid natural gas (LNG). (Vancouver Sun, Feb 15, 2012) China recently discovered that it has the 2nd largest shale gas reserves in the world. Site C won't be complete until 2022 at best. China will be producing its own gas by that time. Additionally, one must consider the need for the project in light of the commitments that BC Hydro has with existing independent power producers. Presently (May 2012), turbines at some Hydro dams are sitting idle. (Vancouver Sun, May 11, 2012).

5) The current draft guidelines are vague about how 'alternatives to' the project are to be assessed. Presently, they don't include cumulative effects, social, heritage, health, or Aboriginal interests and rights considerations - even though these are mandatory areas for assessment. Similarly, consideration and evaluation of alternatives to the project must include the "no project" option, in which the EIS considers different ways to meet the identified needs without having the project go ahead. To ignore the possibility of meeting forecasted demands without Site C is to treat the proposal as a foregone conclusion.

Please conduct a thorough and fair assessment of this project. It is hard to believe that it would not be rejected once more if it were critically reviewed and placed in the broader context of multiple resource

values, cumulative effects and suitable energy alternatives. We need power but not Site C there is are better approaches if you are open to wider input and not simply lead by a few who stand to gain the most by degrading the Peace valley further. This project is not in BC best interests.

Thank you

Mike Fenger

President of Friends of Ecological Reserves