



Reference: 370938

February 9, 2021

SENT VIA EMAIL

Brad Sperling
Board Chair
Peace River Regional District
Box 810, 1981 Alaska Ave
Dawson Creek, BC V1G 4H8
Prrd.dc@prrd.bc.ca

Dear Chair Sperling:

Thank you for your letter dated February 3, 2021, regarding the Environmental Assessment Certificate (EAC) #E14-02: Schedule A (Project Description) – Hauling Materials from 85th Ave Industrial Lands to the Site C Project (Site C) Dam Site Area. The Environmental Assessment Office (EAO) acknowledges the Peace River Regional District's (PRRD) concerns regarding the draft EAC Amendment Application from the BC Hydro and Power Authority (BC Hydro) regarding potential truck hauling from 85th Avenue Industrial Lands and the desire for PRRD to participate in the EAC amendment process.

This letter is to advise you that the EAO has not received a formal application for an amendment to EAC #E14-02 on this subject to date. Once an application is submitted, the EAO will review the materials to determine the type of amendment (i.e., simple, typical, complex as outlined in Table 1 of the amendment assessment guidance) and establish the amendment assessment procedures which will guide the assessment process. As you are likely aware and have reviewed, information on the EAO's amendment assessment process can be found [here](#).

With respect to your specific suggestions regarding the amendment assessment process:

- If a formal amendment application is received by the EAO from BC Hydro, as with previous amendment application processes, PRRD will be invited to

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participate on a Technical Advisory Committee (TAC) (previously referred to as an 'Advisory Working Group') to review the amendment application once it is submitted. The Site C TAC is comprised of potentially affected Indigenous nations, municipalities (including the PRRD), and relevant provincial and federal agencies.

- Upon receipt of any amendment application, the EAO will assess the request and will determine the appropriate level of community involvement, which may include a Community Advisory Committee, public comment period(s), and/or virtual engagement sessions. Given the nature of this potential amendment and the public interest to date, the EAO anticipates undertaking a public engagement process as part of the amendment assessment.

The EAO endeavours to undertake thorough, fair and transparent reviews of all amendment requests received. Amendment applications, comments from TAC members and the responses provided by certificate holders, and the EAO's decision materials are all made publicly available on our [website](#).

Thank you again for taking the time to advise the EAO of PRRD's concerns and desire to participate in an amendment assessment process. If you have any questions or require further information, I can be reached by telephone at 778-698-4761 or by email at Sarah.Duggan@gov.bc.ca.

Yours truly,

Sarah Duggan
Project Assessment Director

cc: Kimberly Walters, Executive Project Director, Environmental Assessment Office
Kimberly.Walters@gov.bc.ca

Stasia Ferbey, Project Assessment Officer, Environmental Assessment Office
Stasia.Ferbey@gov.bc.ca

Nancy Pepper, Community and Social Mitigation Manager, BC Hydro
Nancy.Pepper@bchydro.com



PEACE RIVER REGIONAL DISTRICT

February 3, 2021

Kimberly Walters
Project Assessment Director
BC Environmental Assessment Office
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PO Box 9426 Stn Prov Govt
Victoria, BC V8W 9V1

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.

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PLEASE REPLY TO:

☒ Box 810, 1981 Alaska Ave, Dawson Creek, BC V1G 4H8 Tel: (250) 784-3200 or (800) 670-7773 Fax: (250) 784-3201 Email: prrd.dc@prrd.bc.ca
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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,

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