

August 28, 2017

Dear Commissioners Morton, Keilty, Mason and Cote,

I am writing to address the questions before the BC Utilities Commission as a citizen, academic, and director of the Northern BC Public Interest Research Group who has been following the issues surrounding the Site C dam for some time now. As a professor in First Nations Studies, I focus on the impacts of dams and other large-scale development on Indigenous communities, particularly, on harvesters whose food systems and intangible cultural heritage is significantly affected, if not destroyed, with these projects.

As someone who has examined damage from hydroelectric development in Manitoba for numerous years already, and who has participated as an intervener with the Clean Environment Commission of Manitoba, *it is the Northern BC Public Interest Research Group's position that the Site-C project should not be built.*

With great respect to the partners who are proponents of this project, and to BC Hydro itself, the damage that hydro development will do to this “breadbasket of BC”, as past experience has clearly shown in numerous other areas and in Indigenous communities, the effects have been devastating. To name a few, communities such as Tse Keh Nay and Cheslatta in BC as well as Makeso Sakahican Inninuwak, Pimicikamak, Nelson House, and Tataskeweyask in Manitoba have all seen irrevocable damage done to their communities, their people, their way of life, and their homelands. I have personally seen the extent of this damage and I recommend that you look at *Green Green Water*, a documentary outlining the damage that hydroelectric development has had on Indigenous communities. Indigenous narratives tell us that damage resulting from hydro development to the land and First Nations communities, has significantly contributed, if not caused, an increase in alcohol consumption, unemployment, violence, suicide, a loss of food sovereignty, and hopelessness to deal with all the impacts (Please see: Hydrojustice.org; *Strangers Devour the Land* (1996); [Green Green Water](#) (1996); [Cheslatta looking to stop the floods](#); [Kipekiswaywinan, FLCN Environment Evaluation Report](#) to name a few).

All these effects come at a great cost.

Therefore, as per the previous BCUC assessment report for Site C (1983), it is pertinent that the BCUC hold public hearings to hear all concerns regarding the dam: “the B.C. Utilities Commission [is directed] to hold public hearings at that time to assist it in making these determinations (p. 24)”. To further ensure credibility, cross-examination of BC Hydro should be permitted, especially in regards to the economics and job promises associated with Site C.

Please consider the recommendations below on your five questions:

1. Is the project is on time and within budget?

According to BC Hydro website, the project is significantly delayed. Only 2 out of 8 milestones have been reached (source: Quarterly Progress Report No. 7 <https://www.sitecproject.com/sites/default/files/quarterly-progress-report-no7-f2017-q4-januarymarch.PDF>, p. 30). BC Hydro is only 25% complete for its Spring 2017 deadline. In my experience, such large-scale projects almost always surpass their assumed budget, largely due to the numerous other projects that make up the combination of the dam. At this point, BC Hydro is still searching for

contracts, is still evicting families, and is still dealing with local First Nations, and recently has come across a burial site. Not only do found remains need to be properly dealt with (as per Heritage Conservation Act Sec 12 & 13), which will take more time and money, but also BC Hydro must still deal with the opposition of First Nations and non-Indigenous communities to this development, in general. Although BC Hydro is not transparent with the financing associated with Site-C, these delays will continue to add costs to the project and this early stage of development, it is impossible for BC Hydro to continue Site C dam within budget.

Already, the cost of the dam rose from \$7.9billion (in 2003) to \$8.3 billion (in 2015) to a \$8.8 billion (in 2017) so that “so that the full contingency could be maintained”. (Source: <https://www.sitecproject.com/faq>). This estimate is, in many cases, without all the other projects that are needed to complete the Site-C dam: transmission lines, converter stations, ground stations, access roads, logging, parking, power stations, ground electrode sites, excavation sites, rock quarries, deposit sites, burrow deposits, construction camp sites, corridors, start-up camp sites, quarry stock piles, equipment holding sites, pipelines, lagoons, transfer stations, generating stations, etc. All these, will significantly increase the cost of Site-C.

2. What is the cost to ratepayers of suspending the project?

The media reports that a 1-year delay of Site C dam would cost \$630 million. Each year that the project is delayed, will cost significantly more, especially since the future of the project is undetermined. Termination of project is the right choice.

However, the challenge here is to assess this factor into your examination of the project. Delaying the project may also prove to be an opportunity to hold BC hydro responsible and accountable to the region, and to British Columbians.

If the project is to be suspended, Northern BC Public Interest Research Group proposes a number of recommendations:

1). A complete cumulative regional socio-environmental and economic assessment should be made before further hydro-development projects are built in the Peace region/Northern British Columbia.

Currently, BC Hydro views each project as independent from all other projects. No current project has been examined in relation to previous projects on the region, and baseline [data] always begins from the current state of the environment (ecological and sociological). It is assumed by BC Hydro that the Site-C project will not impact areas outside the project area. It is also stated in Volumes 1 and 2 of the EIS document that regionally certain species are not threatened by hydro development because they are typically “common and secure in other parts of BC and beyond” (Source: CEAA). The problematic nature of multi-scale evaluation is immensely risky when we consider the worth of the biodiversity of northern BC.

Similarly, despite legal advancements in Aboriginal and environmental law, climate of involvement and ‘consultations’ with First Nations indicated that history and past experience with hydro development still weighs heavily on the minds, and in some instances lives, of its members. This relationship has not improved and many First Nations ‘consulted’ by Hydro, do not think current practices are appropriate either. Short timelines, ‘death by volumes of information’, culturally insensitive consultants, are all still the face that First Nations and local non-Indigenous communities see.

There continues to be silence in public discourse about the extent of damage hydro-development creates. Local peoples bear almost all the burden of hydro infrastructure on their landscapes and peoples, and it is pertinent to examine all the effects all development has made to northern BC over the past 60 years before any more projects are built. Finally, BC Hydro is still deaf to the narratives of opposition by local voices, and the Commission can be the ear that these First Nations and communities need.

The cost of this knowledge for taxpayers is worth knowing prior to Site-C.

2) An independent and multi-stakeholder committee should be established to conduct relevant environmental and socio-economic research that is at arms-length from Hydro. This is needed before Site-C is given the go-ahead, if at all. This body should have a balance between First Nations, local communities and Hydro members but would also ideally involve participation by some of the intervenor/public interest groups and academics. This committee and the research that it supported should also be funded directly by Hydro, perhaps at \$200,000 per year for the first 10 years of the project and the last 10 years (through to the decommissioning phase). This committee should support a wide diversity of relevant research that is prioritized through annual competitions by the committee. Some of this independent research might be basic in nature, some of it cross-cultural in approach, and some of it advocacy based, but it would all be accountable to all local First Nations, communities, the public/public interest groups, and Hydro.

The cost of this knowledge for taxpayers is worth knowing prior to Site-C.

3). A thorough study examining the economic benefits of the region as is.

An eco-system and cultural heritage assessment should be conducted by organization(s) independent from BC Hydro. The ecosystem assessment (often conducted by the International Institute for Sustainable Development [IISD]) should be carried out to measure the benefits provided by natural landscapes, including an economic analysis of how much money the Peace Valley pumps into British Columbia. Ecological benefits of fishing, camping, trapping and from the overall value of the rivers should be made. Likewise, benefits of the fresh air that the region provides, of the amount of food local farmers bring to BC, of the natural resources that are gathered and upon which British Columbians depend on for sustenance. To illustrate, such a study was conducted in an area of Manitoba where a certain area of the boreal forest generated \$35 million/year from fishing for both residents and non-residents, \$32 million/year from water purification, and in addition to the actual services used directly, the natural assets such as carbon sources from forest and peat lands have an estimated value of \$2.7-\$17.5 billion. (Source: https://www.iisd.org/pdf/2008/ecosystem_valuation.pdf). More benefits can be estimated when human and public expenditures are added.

Such a study should be done to determine the economic losses of the damaged ecology. The boreal forest on the east side of Lake Winnipeg is worth approximately CDN \$120-130 million a year (IISD 2008:2), and in his study of the Peace Valley farmlands and ecosystems, Damien Gillis estimates that \$7.9 billion to \$8.6 billion a year” in perpetuity can be obtained (<http://commonsensecanadian.ca/peace-valleyfarmland-ecosystems-worth-8-billion-year-study/>). British Columbians should also know the economic benefits of the entire Peace Region before the decision to destroy this wealth is approved. British Columbians should also acknowledge the economic benefits of the entire Peace Region so that it is not destroyed.

The cost of this knowledge for taxpayers is worth knowing prior to Site-C.

4) It is important for the BC Utilities Commission to have access to all available and pertinent information about a project, therefore, space for public hearings and cross-examination by interveners/participants as well as funding should be allocated to any First Nation, grassroots groups/voices, and public interest groups on a given project. A BCUC hearing could be that space.

There are significant issues with the current Environmental Assessment process, and well as with the way large-scale projects are carried out. Most of the people affected – tragically – by these policies and practices are local people, Indigenous and non. The proponent has ample time to think of new projects and conduct studies; citizens shouldering the brunt of these large-scale projects are left with the aftereffects, with little time to manage. They also have very little time to voice their concerns and opposition. There are those who are under the threat of expropriation and those whose livelihoods and ways of life may be flooded. These British Columbians should be given the space to share their opposition to Site-C.

The cost of this knowledge for taxpayers is worth knowing prior to Site-C. The cost of acknowledging narratives of opposition to Site C by means of terminating the project, is worth taxpayers' money.

3. What is the cost to ratepayers of terminating the project?

Terminating the project far outweighs all the costs associated with building the project. While the initial cost of terminating the project may seem high, this is only so if the ecological, economic, and social values are ignored. While areas and communities living within them all over the world are being destroyed, we, British Columbians, have the opportunity to save the last remaining “breadbasket” of BC. The worth of this natural capital can be translated to the public by instituting a policy of energy conservation and by providing them with examples of regions that have already been destroyed by hydro-development. Perhaps these are lessons to be learned today so our children can thank us tomorrow.

The benefits of terminating the dam outweigh its costs, economically, environmentally, culturally and morally.

The cost of terminating Site-C is worth it.

4. What portfolio of generating projects and DSM initiatives could provide similar benefits?

The best method to begin with, is energy conservation. Simple things like automatic turn-of light switches, powering down due to inactivity (especially city buildings at night), being conscious of own energy use. Changing public discourse and creating a cultural shift would help us, as British Columbians, to eliminate the assumption that energy is endless and that hydro-development is ‘clean and green’. There are numerous technical solutions that are explored and possibilities that can serve the need for alternatives, and we recommend that the Commissioners provide space in the form of public hearings to voice all initiatives.

5. What are the expected peak capacity demands and energy demands?

We cannot rely too much on BC Hydro’s forecasts. Certainly, as the proponent of Site C, the company is in business to forecast higher energy demands. As discussed above, not only is an independent and multi-stakeholder committee needed to balance out studies conducted by BC Hydro, but also the

proponents do not take into account current and future conservation methods.

Dams like the Site C are not clean or green. No animal or local community member stands on the sidelines and applauds as explosives blow holes in the ground and their homelands are flooded.

As a province, we need to create incentives, such as rebates in hydro fees, when low energy consumption is reached. We need to focus more on increasing our energy conservation efforts and less on destroying spaces that we need for air, water and renewable resources. Destruction of a valley that brings the sustenance of life through food, air, clean water, wildlife and even aesthetics – and replacing it with electricity, is an irresponsible, immoral and economically unsound choice. Undoubtedly, the need for electricity in today's time cannot be denied, but citizens are not asked to not use electricity – just to do their part at conserving it. It is important to re-evaluate the worth we place on using hydro-power at the cost of our natural resources. This is not the time for a Site C; it is a time for citizen responsibility.

Finally:

With great respect to BC Hydro and any supporters, it is the position of Northern BC Public Interest Research Group that the Site C project should not be built.

The damage that hydro-development will do, as past experience has clearly shown, will far outweigh the meagre benefits –if any- that it may provide to Northern BC communities.

This dam should be terminated – or, at the very least delayed until a comprehensive cumulative environmental assessment of Northern BC can be completed. Should discussions of ANY development in that region ever begin in the future, a comprehensive social assessment must be done, in which communities are talked to together and in which different models of agreements, consultations, including the Peace of the Braves and including revenue sharing, are presented as options. That is, a global, cumulative, comprehensive discussion is needed that looks at different models of generating energy, and of best practices around the world in sustainability- and that comes up with a better way.

Terminating this project is the smart thing to do for the future of BC.

Anything less means that we are continuing a pattern that has proven to be socially and ecologically devastating to Indigenous and non-Indigenous peoples in Northern British Columbia – and Canada in general. Anything less may lead to another shameful legacy towards leaders of British Columbia and BC Hydro by the people who will grow up in the shadow of the decision that will be made by you, the Commissioners, today.

Terminating this project is the right thing to do.

Thank you for the time.

Respectfully,

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Traditional Territory of the Lheidli T'enneh

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