

Dear Commissioners Morton, Cote, Keilty, and Mason,

As a scholar, I focus on the importance of water to the health and well-being of our societies. Water is the baseline upon which all our lives depend. Our cultures need to do a much better job of respecting and valuing water. We can start, for instance, by cancelling the Site C dam because we recognize the worth and need for the Peace River Valley to increase, not decrease, in ecological resilience.

As someone who lives in Vancouver on unceded Coast Salish territories, I use electricity generated by the two previous dams on the Peace River, which flooded and destroyed the homelands of the Tse Keh Nay. As such, I owe a huge debt to the First Nations people of Treaty 8 who have already sacrificed too much. Everyone who uses electricity from BC's grid also owes this debt, whether they realize it or not. This history is attested to in the film *Amazay: A Film About Water* (<https://www.youtube.com/watch?v=pypol54tLxg>, with the ten minutes from 10:53 to 20:30 particularly summing up the devastating impact of the WAC Bennett Dam). The downstream costs of the dams have also been underestimated, and need to be captured in your cost benefit analysis. I urge you to watch *Death of a Delta*, an episode from the *Nature of Things* which records the great losses suffered by the people of Fort Chipewyan due to the WAC Bennett Dam: <https://www.youtube.com/watch?v=6bezgkuK5C8>. This historical context is necessary for you to comprehend the costs that have been inadequately factored into BC's decision-making systems.

Here is my feedback on your five questions:

1. whether the project is on time and within budget;

According to BC Hydro's documents, the project is not on time. Thanks to DeSmog's reporting (see <https://www.desmog.ca/2017/07/13/site-c-dam-late-key-milestones-under-b-c-liberals-report-reveals>), we can see that BC Hydro is late on 6 out of 8 milestones listed in its Quarterly Progress Report No. 7 <https://www.sitecproject.com/sites/default/files/quarterly-progress-report-no7-f2017-q4-january-march.PDF> (page 30). BC Hydro is significantly behind schedule on 75% of the milestones identified for Spring 2017.

Time is money, and these delays will be expensive, making it impossible for the dam to be within budget. This is not surprising, given how megadams notoriously have cost overruns. See for instance, the research done by Alex Budzier, the Fellow in Management Practices at Oxford University's Saïd Business School (referenced at <http://www.cbc.ca/news/canada/new-brunswick/mactaquac-cost-overruns-1.3908868> for instance). How much over budget it is remains anyone's guess, since BC Hydro has not been very transparent about its finances, even though it is a public body. What I can gather is that the project budget was revised from \$6.6 billion in 2010 to \$8.8 billion in 2016. At that rate of increase, we can expect the dam to cost roughly \$11 billion by 2022, as a conservative estimate.

2. the cost to ratepayers of suspending the project;

While it might appear cheaper to suspend the project than to immediately terminate it due to BC Hydro's questionable practice of deferral accounting,¹ there is a substantial cost in terms of both reputation and economic uncertainty that should not be underestimated. These qualitative costs are huge and therefore difficult to measure, but that challenge should not prevent them from being factored into your analysis.

For many years, BC Hydro's passive land acquisition program has stunted agriculture and community development in the Peace River region. Those who've been expropriated and those who live under the threat of expropriation should not shoulder the burden of BC's indecision. They should be able to purchase back the land so that they can get to work on community economic development that strengthens BC's food security and carbon absorbing ecosystems, and this will not be possible if suspension occurs. (<https://www.desmog.ca/2017/08/11/exclusive-bc-hydro-spent-20-million-quietly-buying-land-site-c-dam-was-approved>).

I wrote earlier of the debt I owe the First Nations whose homelands have been destroyed by the dams. Treaty 8 guides us to conduct ourselves with honour, which has been violated by the BC government's unjust and unilateral destruction of their territories. This cost is so immense that it cannot be quantified, spanning many generations of broken relationships that have yet to be repaired or redressed, but it is deeper and greater than any numbers you could put on a page. The cost of living with dishonour and injustice is borne by everyone, who must live with the shame, violence, and mistrust of a government that does not honour its treaties.

3. the cost to ratepayers of terminating the project;

The benefits of terminating the dam far outweigh its costs.

While the initial cost of terminating the dam may seem high, this is only the case if you ignore the benefits and the economic value of the Peace River's ecosystems in perpetuity. It is arguably impossible to quantify what one could call the "natural capital" of the Peace River watershed, given the complexity of this living system, but the David Suzuki Foundation has issued a report to assist people in understanding this immense value (at http://www.davidsuzuki.org/publications/DSF_Peace_natcap_web_July_29%20copy.pdf). This value needs to be recognized and factored in so as to offset the seemingly high cost of terminating the project. The Peace's ecological resilience for both current and future generations is more precious than any number you could put on it.

Some have nonetheless tried to estimate this value; based on the DSF study, Damien Gillis estimates that "Keeping the Peace Valley's farmland and ecosystems intact would be worth **\$7.9 billion to \$8.6 billion a year**" in perpetuity (<http://commonsensecanadian.ca/peace-valley-farmland-ecosystems-worth-8-billion-year-study/>).

¹ "B.C.'s auditor general has noted that Hydro uses deferral accounts to push off costs into future years and give the artificial appearance of annual profitability."
<http://www.timescolonist.com/business/b-c-hydro-debt-puts-credit-rating-at-risk-1.8588424>

4. what portfolio of generating projects and DSM initiatives could provide similar benefits;

As the Program on Water Governance has demonstrated through its analysis, “a fully optimized Alternative Portfolio put forward by BC Hydro” (including wind energy) can provide similar benefits. This research is available online at <https://sitecstatement.files.wordpress.com/2016/07/1-site-c-comparative-ghg-analysis-report-final2.pdf>.

Many commentators have pointed out that a combination of energy conservation (the cheapest energy is the energy you don't use, as someone in the film *Peace Out* states), wind, solar, and geothermal, could provide equivalent energy at lower costs. I would add that climate change (which is really climate destabilization) calls for not only technical solutions, but equally we need cultural shifts that move us away from the assumption of endless growth (also known as cancer) towards a recognition of the earth's limits, and a mass shift in behaviour whereby we consume less more mindfully. In other words, we need to learn to live within the solar budget that the sun provides, to regenerate natural capital instead of destroying it, and to diversify energy generation across different communities rather than relying too heavily on one mega site. Given how rapidly conditions are starting to change, BC should study climate change models *before* making any decision to proceed with a mega dam (see Rebecca Lawton's article at <https://beccalawton.com/storageproblem/>).

Also, the BCUC submission made by John Johnson on Aug 25 proposes a dam in the Lower Mainland that would have First Nations consent and be closer to where the energy consumption is higher. This sounds like a viable option that should be seriously considered.

5. what are expected peak capacity demand and energy demand.

BC Hydro's forecasts of energy demand are notoriously higher than actual use. What is clear is that we need to increase our energy conservation efforts and that Hydro should focus more on this and less on destroying forests that absorb carbon. As stated above, we need to move away from the assumption of endless growth (also known as cancer) towards living within the earth's carrying capacity. Stopping the dam quickly helps us to collectively learn this necessary lesson together and helps to support the kinds of innovation we actually need in this day and age.

I would caution against relying too heavily on inflated forecasts. Muskrat Falls is a clear warning regarding the perils of continuing irresponsibly: <http://www.cbc.ca/news/canada/newfoundland-labrador/stan-marshall-muskrat-falls-update-1.3649540>. Finally, mega dams are not clean or green. As Christopher Pollon points out in *The Peace in Peril*, “Hydro projects bigger than 30 megawatts (MW) do not even qualify as renewable energy under California's current renewable portfolio standard requirement” (see <http://www.energy.ca.gov/renewables/documents/index.html#rps>).

Thank you for your time and attention to this important matter. May the Peace be with you.

Respectfully,
Rita Wong