Dear Commission members,

You have been charged with providing answers as to the financial cost of stopping, suspending, or completing the Site C project. This submission asks you to estimate the value of the loss of the Peace River valley if the project proceeds and the value to the local First Nations of the undoubted further infringement of their Treaty 8 rights, and to include these costs in your final analysis.

The drainages of the Peace River and its tributaries the Finlay and Parsnip rivers lie within the area of Treaty 8, as do all the lands in BC lying east of the spine of the Rocky Mountains. For those familiar with the history and development of this area it is clearly apparent there have been significant infringements in BC alone, some on a grand scale, of the rights envisaged in Treaty 8.

Let me list the major projects and their impacts:

- The WAC Bennett dam flooded the productive floodplains of most of the Finlay and Parsnip rivers, with enormous loss of wildlife, and contaminated the fish in the reservoir with mercury.
- The Peace Canyon dam followed but with a much smaller impact.
- The extension of the BC Railway to Fort St John brought industrial forestry and a pulp mill at Mackenzie, resulting in massive changes to the natural environment. This impact was increased by the extension of the railway to Fort Nelson and the location of a sawmill there.
- The Northeast Coal project brought further penetration by a railway and highways into the area, the town of Tumbler Ridge, and coal mines.
- The oil and gas industry has made a great impact on the landscape with the clearing for seismic lines, construction of roads, drill pads, and pipelines. This has now been compounded by the requirements for fracking, including enormous volumes of water, storage reservoirs, and yet more clearing.

It still astounds me that all this has happened without recognition by the province of the infringement of the Treaty 8 rights of the First Nations of the region. I
believe that, in the spirit of reconciliation, the time has come to recognize those losses, and I ask that the Commission determine a value to be placed on the further incremental loss of such treaty rights if Site C is to proceed. There is a significant value there as the continued strong objection of the local First Nations to the project has shown.

You will have visited the Peace River valley, so are therefore aware that the drive from Hudson Hope to Fort St John is to experience a landscape that is unique in the northeast. The valley is a productive oasis as compared to the bench lands on either side. The importance of the valley for natural resources, such as wildlife, birds and fish, as well as agriculture cannot be overstated. In addition the valley provides an incredibly aesthetic background for those that live there. There are other incised river valleys north of the Peace, but none can compare to the scale of the Peace River valley and the resources it supports. As such I believe that the valley as a whole should not be valued purely in terms of its economic loss to humans, such as the loss of productive agricultural land, but in terms of the loss of the value of all the resources lost by flooding, representing the value it provides to the region, in other words the value of the reduction in natural capital.

I have lived and worked in BC as an engineer since 1965 in close association with BC Hydro projects, having been part of the survey team to locate the Arrow Dam, been responsible for the design of two structures for the Mica Dam, managed post impoundment impact assessment studies of the Mica and Arrow reservoirs, and been responsible for the environmental input to the location of several 500kV and 230kV transmission lines. On retirement I was a public representative on BC Hydro’s Coastal Fish and Wildlife Compensation Program from 2005 to 2015.

In addition I am familiar with the Peace River country and northeast BC having completed several assignments in the region including: environmental input to the 250kV transmission line from WAC Bennett dam to Tumbler Ridge; review of a potential coal mine in Carbon Creek; study of 500kV transmission line routes from proposed Liard River dams to central BC; and management of environmental studies for the railway, highways, and town site required for the Northeast Coal project.
I believe this experience qualifies me to present these requests to you. Despite my long association with BC Hydro and a full understanding of the benefits of hydro power, I believe this project should not proceed as it is too costly and its impacts are too high, given the level of impacts of existing BC Hydro projects on the Peace River.