



**WILDERNESS
COMMITTEE**

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Re: Site C Terms of Reference

I am writing on behalf of the Wilderness Committee, Canada's largest membership based environmental preservation organization. The Wilderness Committee represents over 65,000 members and supporters all over Canada. We are very concerned about the environmental impact of the impending Site C Dam project, which would build a mega-dam on the Peace River just outside of Fort. St John, BC.

This is the third time the government of British Columbia has tried to build the Site C Dam. Both previous times resulted in very large levels of public concern, and the project was turned down. And, we believe that the project should be turned down this time as well.

In the meantime, it is imperative that this project be subjected to the highest level of scrutiny. We believe that a rigorous environmental assessment process is required that includes opportunity for meaningful public comment and that respects indigenous rights and title.

We oppose the Site C project going forward at all. However, so long as the environmental assessment process is going forward, we are pleased that it is a joint panel review (JPR), but would like to make sure that adequate time is given to fully assess the impacts, and to ensure meaningful consultation with First Nations and the public. The current timeline for the assessment rushes opportunities for comment, and presents serious challenges for organization seeking to apply for participant funding.

Despite many requests for staged funding from non-profits and the Treaty 8 First Nations, CEEA is moving forward with a single envelop of funding for the entire process. This forces interveners to budget for the entire process and determine priority issues without seeing the EIS. The Wilderness Committee supports the call for phased funding stages throughout the process.

Furthermore, the amount of money allocated for participant funding is inadequate. The Site C Dam is an 8 billion dollar public infrastructure project, but yet the proponent is only putting \$140,000 on the table for groups to participant in the process. For comparison, the Embridge Northern Gateway funding envelope had \$600,000 available, and the Bute Inlet Hydroelectric project had \$200,000 available. The public interest and environmental consequences of the proposed dam deserve more funding.

In terms of the factors to be considered in the assessment, we would like to emphasize the large scale cumulative impacts associated with this project.

The electricity from Site C will power, with heavily subsidized electricity, a wave of environmentally and economically unsustainable industrial development through northern BC, including transmission lines, oil and gas development and mining. Without regional planning, the subsidized energy provided by Site C will fuel reckless and uneconomic development all over northern BC, which will further impact critical caribou habitat and further fragment ecosystems. Similar to the Lower Churchill power project, this project needs a full sustainability assessment within the JPR process.

The 8 billion dollar price tag associated with Site C will have a huge impact on every resident and industrial user of electricity in the province, especially as a result of selling power to the mining and gas industries at half the cost of production. Without the proper oversight, which used to be provided by the watchdog organization known as the BC Utilities Commission, the assessment process will not look into the larger issues of the impact that building Site C will have on most ratepayers who will have to make up the cost of subsidizing the mining and gas industries. We feel like the cost to Hydro rates needs to be a factor considered under the economic impacts of the project.

The Wilderness Committee stands with the Treaty 8 First Nations, who have significant concerns about the effect the dam will have on their culture, their land and their traditional food sources. Over 33 First Nations have signed a joint declaration in opposition to this project. We would advocate for ensuring that the people appointed to the panel are approved by First Nations.

Yours Sincerely

Tria Donaldson | Pacific Coast Campaigner

Wilderness Committee