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Parliament Buildings
Victoria, British Columbia
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Dear Premier Horgan and members of cabinet,

We write to you today on behalf of the nearly 30,000 people who support the work of Sierra Club BC.

With the final report of the Site C megadam review by the B.C. Utilities Commission (BCUC) due in mere days, your cabinet faces the decision whether to proceed with, suspend, or cancel this controversial project. With its limited scope and expedited timelines, the BCUC's review is a poor substitute for the full review to which Site C should have been subject before it was approved in the first place.

The Joint Review Panel's environmental assessment of Site C found that justification for the dam would require both an unambiguous need for the power and analyses showing its financial costs to be sufficiently attractive as to make tolerable the bearing of substantial environmental, social, and other costs.

Doubts regarding the adequacy of the evidence and the analysis of the BCUC review raise critical questions regarding the determination of financial costs and whether there is need for the power.

In this context, we commend your government for stating clearly that cabinet would weigh considerations outside the scope of the BCUC review before making a decision. It is the view of Sierra Club BC that these factors incontrovertibly tip the balance in favour of cancelling the project outright:

Jobs

- Greater job creation opportunities exist through demand-side management and by deploying an appropriate mix of smaller-scale renewable power sources, which could be commissioned to better match potential changes in B.C.'s power demands as they occur. Both approaches have the benefit of spreading jobs benefits more evenly on a geographic and temporal basis, avoiding the boom and bust cycle that inevitably comes with extremely large capital projects.

Treaty Rights

- Proceeding with Site C would violate the treaty rights of Treaty 8 First Nations and would put your government at odds with its commitment to the United Nations Declaration on the Rights of Indigenous Peoples. More than 330 documented archaeological sites would be inundated by flooding, and land currently used for hunting fishing and medicinal purposes would be lost forever.ⁱ

Food Security

- The farmland that would be flooded by the Site C reservoir would seriously harm B.C.'s future food security, which is increasingly imperilled by the mounting impacts of climate change. Approximately 70 per cent of B.C.'s fruits and vegetables are imported from California, a source that may literally dry up due to worsening and persistent droughts. Significant portions of Fraser Valley farmland is at risk of flooding due to sea level rise. In this context, your government must be proactive in ensuring B.C.'s food security is not compromised. The Site C dam would flood 3,816 hectares of prime farmland that could grow fruits and vegetables sufficient for a million British Columbians, such is the agricultural potential of the Peace River Valley.ⁱⁱ

Environmental Impacts

- Site C would cause numerous adverse environmental impacts, including mercury poisoning of fish; downstream impacts on the Peace-Athabasca Delta (the largest freshwater delta in the world); and adverse effects on many species of fish, birds, bats, vertebrates, and plants, as well as sensitive ecosystems. The cumulative environmental impacts of the petroleum/natural gas and forestry industries in the region would be exacerbated by the Site C dam.

Greenhouse Gas Emissions

- Contrary to B.C. Hydro's claims, Site C would not deliver power with lower greenhouse gas emissions than other renewable sources of energy. To call Site C the "cleanest" power option, as many of its proponents have done, is simply false. In large part, this is because of methane emissions from the reservoir—which would be front-end loaded in the early years of Site C's lifecycle, making it even more problematic in the fight against climate change.ⁱⁱⁱ

Alternatives Exist

- British Columbians would be much better served by a more ambitious and expanded version of the Power BC initiative that was announced before your government assumed power. Cancelling the Site C dam and building upon the ideas in Power BC would offer your government an opportunity to position B.C. as an environmental and climate leader, accelerate the transition to a post-carbon economy, and provide the kind of good, well-paying jobs we need for the future.

While the issues at the heart of the BCUC review are critical, the limitations placed upon the BCUC by virtue of the review's expedited timelines means that the evidence has likely not received the required level of scrutiny. Throughout the history of the Site C proposal, B.C.

Hydro has failed to demonstrate the need for the power. Will BCUC be able to produce a trustworthy analysis, given the constraints?

The multiple adverse impacts of this proposed dam demand serious consideration, regardless of the outcome of the BCUC review. Cabinet's decision on this matter will determine whether your government is genuine about respecting treaty rights and supporting British Columbians with good green jobs that don't undermine the environment we all depend on.

Sierra Club BC believes cabinet has no choice but to conclude that the adverse effects of proceeding with Site C are far too great. We urge your government to cancel this outrageously expensive, environmentally destructive and socially disastrous project.

Sincerely,



Caitlyn Vernon
Campaigns Director



Galen Armstrong
Peace Valley Campaigner

ⁱ Canadian Environmental Assessment Agency, *EIS Technical Appendix: Heritage Resource Assessment Report* Volume 4, Appendix C.

www.ceaa-acee.gc.ca/050/document-eng.cfm?document=85328

ⁱⁱ Wendy Holm, "Site C land definitely has agricultural potential." <http://www.timescolonist.com/opinion/op-ed/comment-site-c-land-definitely-has-agricultural-potential-1.23072408>

ⁱⁱⁱ UBC Program on Water Governance, *Comparative Analysis of Greenhouse Gas Emissions of Site C Versus Alternatives*. <https://sitecstatement.files.wordpress.com/2016/07/1-site-c-comparative-ghg-analysis-report-final2.pdf>