



PEACE RIVER REGIONAL DISTRICT

Office of: **Director, Electoral Area 'B'**

December 21, 2016

Via email: EAreview_participation@canada.ca

Johanne Gelinas, Chair, Expert Panel
Federal Environmental Assessment Processes Review

Dear Ms. Gelinas,

Thank you for the opportunity to submit comments on changes to improve the environmental approval process for projects. I am writing as the elected representative for Electoral Area 'B' of the Peace River Regional District.

I attended the December 5, 2016 meeting in Fort St. John, BC and it quickly became very obvious that there is tremendous frustration with the present system of managing environmental impacts. Most of the presentations were based on our most recent experience over sanctioning the Site C Dam on the Peace River. My comments are as follows:

1. Cumulative impact assessment of the environmental damage to this region has not been undertaken nor is there any mechanism to have that happen.

Solution: One solution might be to assess a region, not just a project. You will never have a clear impact assessment if you assess one project at a time.

2. Economic benefits often override the environmental impacts. Follow the dollar and know that there are very few, if any, projects that are turned down because the dollar becomes the most important.

Solution: Under the environmental assessment, economics should be a very low factor.

3. Navigable waters - The Peace River was our highway. History shows that the Peace was used extensively with Alexander Mackenzie being one of the notable river travelers. The First Nations or indigenous people, fur traders, residents, and clergy all used the Peace River as their highway. Documentation is available that shows the importance of the flowing water of the Peace. An interesting feature of this river is the west to east flow which continues into Alberta and beyond. It crosses boundaries and is therefore a river of importance to other provinces and jurisdictions. We were counting on this being important to the federal government as the governance body for more than one province. The federal government actually failed us in this regard.

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Solution: Waters that cross through multi-jurisdictions should have multi-jurisdictional assessments done.

4. Due to the proposed Site C Dam the Peace River was named the top most endangered river in BC in 2013. There appears to be no importance placed on this or on the adverse impacts to the environment. The islands in the river have always been calving grounds for moose, elk, deer and many other species. Those protected islands would be lost to flooding. A definite environmental impact.

Solution: When doing environmental assessments, take into account the previous processes such as the Land Resource Management Plan (LRMP) which went to great lengths to put a plan in place through local consultation with the focus to allow resources to be extracted while protecting the environment. Subsequent provincial governments have generally ignored the LRMP and have done nothing to ensure that the cumulative impacts of projects are minimized.

5. When projects are proposed and approved, the proponents know full well what criteria they are supposed to operate under. The guidelines are in place. When there are infractions to those operations there is a slight slap on the wrist given, usually occurring long after it happens, with some comment from the company that they take these matters seriously and will do better in the future.

Solution: This needs to be addressed and we need to have a change to the system that acts more quickly with severe consequences to the proponents. If they cannot prevent the infraction, they shouldn't undertake the project. The *Fisheries Act* should have been enough to stop this project (Site C) from proceeding, instead, government chose to change the *Act*, allowing permits to be issued. We will likely lose our Bull Trout which we consider to be our northern salmon. They do not like to be in a still body of water such as the reservoir will be. Their natural environmental habitat is a running stream.

6. Other considerations that I would appreciate being looked at are:

- The Canadian Environmental Assessment Review should engage in a process that allows for cross examination of evidence presented.
- There is a need to recognize that many of the projects that are proposed fall under the impact line that would trigger an assessment which then compounds the cumulative impact aspect.
- Access to funding for those that are impacted by the project need to be enhanced. Allow the opposing forces the opportunity to combine the resources. Fund raising for groups who disagree with a project is very difficult. Especially when you consider that many of the proponents have government funding.
- Last, but maybe the most important change that we should undertake, is that the proponent for a project should not lead the process. The lead should be appointed by an independent body to create the knowledge that this is a transparent process.

Thank you for this opportunity to comment. I look forward to seeing your recommendations.

Yours truly,

A handwritten signature in cursive script that reads "Karen Goodings". The signature is written in black ink and is positioned below the "Yours truly," text.

Karen Goodings,
Director, Electoral Area 'B'
Peace River Regional District