

June 14, 2021

BC Environmental Assessment Office  
2nd Floor, 836 Yates Street  
P.O. Box 9426 Stn Prov Govt  
Victoria, BC V8W 9V1  
Attention: Elenore Arend  
Associate Deputy Minister and Chief Executive Assessment Officer

Dear Elenore Arend:

**Re: Request to Amend Environmental Assessment Certificate (EAC) #E14-02, Schedule B Condition #40, regarding change of location for boat launch/day use area from Cache Creek to Halfway River**

## **1. INTRODUCTION**

The purpose of this letter is to seek an amendment to Condition #40 of Schedule B, Environmental Assessment Certificate (EAC) #E14-02, for the Site C Clean Energy Project (the Project). This condition requires that BC Hydro establish “three new boat launch/day use sites, complete with parking, picnic areas and toilets, at Cache Creek, Lynx Creek and Hudson’s Hope Shoreline, and accessible via Highway 29.” The overall intent of this condition is to mitigate for the Project’s effects on navigation, river/reservoir access points and recreational areas along the Peace River, specifically replacing the existing public boat launches at Halfway River, Lynx Creek and Hudson’s Hope that will be inundated by the Site C Reservoir.

As required by EAC Condition #40, the initial plan for the establishment of these boat launch/day use sites is described in BC Hydro’s Outdoor Recreation Mitigation Plan, submitted to local governments, regulatory agencies, Saulteau, West Moberly, Halfway River, Doig River, Blueberry River, Prophet River First Nations, and McLeod Lake Indian Band in January 2017. Following the submission of the Outdoor Recreation Mitigation Plan, BC Hydro and its design engineering teams undertook more detailed evaluations of location options and respective designs for the three required boat launch/day use sites (hereafter referred to as “boat launch sites”). During this evaluation, BC Hydro found that all potential locations near Cache Creek were either not viable or not readily achievable due to geotechnical, environmental, archaeological, property, and/or heritage considerations.

As an alternative, BC Hydro has identified a viable boat launch location on the reservoir shoreline east of the Halfway River, near the existing Halfway River boat launch. Establishing a boat launch at this location would facilitate boating and recreational access in the eastern portion of the Site C reservoir and mitigate the loss of access provided by the existing Halfway River boat launch. Therefore, pursuant to section 32(1) of the *Environmental Assessment Act*, BC Hydro is requesting that EAC Condition #40 be amended to reflect that one of three required boat launches be constructed at Halfway River instead of Cache Creek.

Figures 1 and 2 in Appendix A show the location of the proposed boat launch. Information in this letter is provided in accordance with section 32 of the *Environmental Assessment Act* and section 7(4) of the EAC. This letter and attached appendices describe:

- The difference between the current requirements of EAC Condition #40 and BC Hydro's proposed amendment
- The impact of the proposed amendment to relevant valued components described in the Project's Environmental Impact Statement (EIS)
- The impact of the proposed amendment on Indigenous Nations and rights, in accordance with Section 25 of the *Environmental Assessment Act*
- Indigenous Nation consultation on BC Hydro's proposed boat launch/day use site at Halfway River
- Stakeholder group consultation on BC Hydro's proposed boat launch/day use site at Halfway River
- Government approvals related to the boat launch construction

This submission also includes proposed updates to the Outdoor Mitigation Recreation plan to reflect the proposed Halfway River boat launch location.

## **2. BOAT LAUNCH SITE SELECTION**

### Site Selection Process

After issuance of the EAC, BC Hydro began to evaluate potential locations to satisfy the requirement in EAC Condition #40 to establish a boat launch at Cache Creek. As described in the Outdoor Recreation Mitigation Plan, locations were assessed against the following criteria:

- Public safety; including consideration of preliminary reservoir impact lines (which identify erosion, landslide, and landslide-generated wave areas that are considered a potential public safety risk)
- Safe access from Highway 29; with consideration of visibility, turning lanes, and appropriate grade to enable safe access for trucks and boat trailers (for approval by BC Ministry of Transportation and Infrastructure)
- Site capability to accommodate an access road, boat launch, parking area and day use facilities
- Proximity to original boat launch site location, and to population centres
- Avoidance of environmentally sensitive areas
- Boating accessibility to the reservoir for reservoir levels expected during the peak recreation season, with consideration of the minimum licenced reservoir elevation
- Overall site development and maintenance costs, and,
- Potential for third party recreation facility development potential on adjacent lands, such as RV parks, campgrounds or marinas

Based on initial evaluations and input from Indigenous Nations, two sites, "Cache Creek East" and "Cache Creek South" were evaluated but not selected respectively due to (a) poor highway access and (b) proximity to, and potential impacts, on cultural resources and heritage resources. In 2018, BC Hydro expanded its search for viable locations and completed technical evaluations of potential locations at "Watson Spring" and "Silver Spring". The location at Silver Spring was subsequently eliminated as an option due to its long and steep access from Highway 29 and potential issues with debris accumulation at the boat launch ramp impacting safety.

In 2020, BC Hydro identified a potential boat launch location on the reservoir shoreline east of the Halfway River – the “Halfway River East” boat launch. This location was identified after BC Hydro acquired the land as part of the Highway 29 realignment works (previously, other locations along the shore of the future reservoir near Halfway River had been viewed as unfavourable due to geotechnical conditions). BC Hydro also identified a new option for Cache Creek – “Cache Creek 2020”, located to the north of the Cache Creek South location. The Halfway River East, Cache Creek 2020 and Watson Spring locations were subsequently reviewed through a Structured Decision Making” (SDM) process to arrive at a final boat launch location. The SDM process entailed further detailed evaluation of each location against key criteria, including:

- Indigenous and cultural interests
- Permitting and regulatory requirements
- Environmental impacts
- Social impacts
- Archaeological and Heritage Impacts
- Properties impacts
- Safety considerations
- Construction cost
- Operations cost

A summary of SDM key findings for each boat launch location is provided below.

### SDM Findings

#### **1) Halfway River East**

The SDM process identified the Halfway River East site as the preferred boat launch location, given its proximity to the existing Halfway River boat launch and effective mitigation of loss of access, its location on BC Hydro land (and avoidance of private and crown land), good access from Highway 29, low impacts to vegetation, low risk for ARD-ML issues, and overall low construction and operating costs. While this location is in and adjacent to an archaeological site, BC Hydro would implement mitigation measures required by the EAC, *Heritage Conservation Act* (HCA) permits, Heritage Resources Management Plan and the Construction Environmental Management Plan (CEMP) to manage impacts.

In addition, BC Hydro has worked closely with Halfway River First Nation to develop mitigation in response to concerns regarding this site’s potential impacts on cultural and traditional uses – namely, concerns about a potential increase of hunters using boats to access the Tsaa Nuna Conservancy, located approximately 48 km from the current Peace and Halfway River confluence. The Tsaa Nuna Conservancy was established on February 12, 2021. Indigenous Nations have identified this area as part of a key wildlife migration route from the Peace River. On June 8, 2021, BC Hydro formally committed to Halfway River First Nation to work with the Province and provide funding for a Conservation Officer position within the Ministry of Forests, Lands, Natural resource Operations and Rural Development to patrol the area in and around the Site C Project for a period of five years. Please refer to Section 7, Indigenous Nations Consultation/Engagement, for additional information.

## 2) Cache Creek 2020

The SDM identified several disadvantages associated with the Cache Creek 2020 location, mostly notably its proximity to a high concentration of Indigenous cultural resources and highly valued sites, including recorded and potential burial sites and a sweat lodge. This location would also require the acquisition of private land and would have higher construction and operating costs associated with the management of Acid-Rock Drainage and Metal Leachate (ADR-ML). In addition, this location would have greater impacts on vegetation and wildlife habitat relative to the Halfway River location.

## 3) Watson Spring

Similar to the Cache Creek 2020 location, the Watson Spring location would have high construction and operations costs due to its sloped access terrain, a high-water table, and ADR-ML issues. In addition, Indigenous Nations have identified this location as highly valuable and utilized ungulate habitat and part of an important wildlife corridor based on their camera data collection and analysis. Indigenous Nations have further indicated that Peaceview Pit Island, located adjacent to Watson Spring, is expected to be part of a significant wildlife corridor after reservoir filling.

Additional information on BC Hydro's consultation with Halfway River First Nation and other Indigenous Nations is provided in Section 7 below.

## 3. PROPOSED MODIFICATIONS TO EAC SCHEDULE B

Table 1 shows the requested amendments to EAC Schedule B Conditions #40. The full text of the condition #40 is provided in Appendix B.

**Table 1. EAC Schedule B Conditions #40a versus BC Hydro Proposed Condition #40**

<b>Schedule B Condition</b>	<b>EAC Schedule B Condition (Extract)</b>	<b>Proposed Revision to EAC Schedule B Condition (Extract)</b>
40	<p>The EAC Holder must finalize and implement the Outdoor Recreation Mitigation Plan to mitigate changes in recreational opportunities and loss of existing recreational areas resulting from the Project.</p> <p>The Outdoor Recreation Mitigation Plan must be developed by a QEP.</p> <p>The Outdoor Recreation Mitigation Plan must include at least the following to ...</p>	<p>The EAC Holder must finalize and implement the Outdoor Recreation Mitigation Plan to mitigate changes in recreational opportunities and loss of existing recreational areas resulting from the Project.</p> <p>The Outdoor Recreation Mitigation Plan must be developed by a QEP.</p> <p>The Outdoor Recreation Mitigation Plan must include at least the following to ...</p>

Schedule B Condition	EAC Schedule B Condition (Extract)	Proposed Revision to EAC Schedule B Condition (Extract)
	<ul style="list-style-type: none"> <li>Establish three new boat launch/day use sites, complete with parking, picnic areas and toilets, at Cache Creek, Lynx Creek and Hudson's Hope Shoreline, and accessible via Highway 29.</li> </ul>	<ul style="list-style-type: none"> <li>Establish three new boat launch/day use sites, complete with parking, picnic areas and toilets, at <b>Halfway River</b>, Lynx Creek and Hudson's Hope Shoreline, and accessible via Highway 29.</li> </ul>

#### 4. ASSESSMENT OF EIS VALUED COMPONENTS

For this EAC amendment request, the proposed Halfway River East boat launch location was compared to the Cache Creek 2020 location. Table 2 provides an overview of BC Hydro's consideration of how the valued components described in the EIS interact with the proposed boat launch location. As shown in the table, the following valued components were reviewed as having interactions with the proposed boat launch location: fish and fish habitat, vegetation and ecological communities, wildlife resources, current use of lands and resources for traditional purposes, agriculture, forestry, greenhouse gases, harvest of fish and wildlife resource, outdoor recreation and tourism, navigation, visual resources, and heritage resources.

**Table 2. EIS Valued Components Interactions with Proposed Relocation of Boat Launch**

Valued Component	Interaction Identified (Y/N)	Description
Fish and Fish Habitat	Y	Please see assessment below.
Vegetation and Ecological Communities	Y	Please see assessment below.
Wildlife Resources	Y	Please see assessment below.
Greenhouse Gases	Y	Please see assessment below.
Local Government Revenue	N	The EIS assessment of local government revenue considers local government expenditures on programs and services, local government revenues from property taxes, grants in lieu of payments, sales of services, transfers or other income. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the local government revenue valued component.
Labour Market	N	The potential effects of the Project on the labour market considered the Project's need for labour relative to the expected availability and types of skills of the persons in the local area; the indirect project employment calculated through modelling; and a comparison of the Project labour requirements against the baseline and forecast local labour supply and

Valued Component	Interaction Identified (Y/N)	Description
		demand by skill category where the data are available. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the labour market valued component.
Regional Economic Development	N	Project effects on regional economic development were assessed in the EIS by considering potential effects of the Project on regional business and contracting opportunities, capabilities and capacity in consideration of regional business, and contracting characteristics. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with this valued component.
Current Use of Lands and Resources for Traditional Purposes	Y	Please see assessment below.
Agriculture	Y	Please see assessment below.
Forestry	Y	Please see assessment below.
Oil, Gas and Energy	N	The EIS assessment of oil, gas and energy considers changes in land and resource use for tenured oil, gas, and energy activities, operations and facilities, and changes in access for oil and gas industry activities. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the oil, gas and energy valued component.
Minerals and Aggregates	N	The EIS assessment of minerals and aggregates considers changes to land use, resource use, and access, the Project's use of local aggregate for construction activities, and any new or improved access to aggregate sources created by the Project. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the oil, gas and energy valued component.
Harvest of Fish and Wildlife	Y	Please see assessment below.
Outdoor Recreation and Tourism	Y	Please see assessment below.
Navigation	Y	Please see assessment below.
Visual Resources	Y	Please see assessment below.
Population & Demographics	N	The EIS assessment of population & demographics considers the assessment of the Project demand for labour, workforce accommodation plans, current and forecasted population, demographics, and household size and characteristics. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the population & demographics valued component.

Valued Component	Interaction Identified (Y/N)	Description
Housing	N	The EIS assessment of housing considers the change in demand for housing. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the housing valued component.
Community Infrastructure and Services	N	The EIS assessment of community infrastructure and services considers changes in the demand for, or the provision of, community, emergency, education and health, and social services, and specific displacement of, or effects to, infrastructure, such as sewer and water systems. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the community infrastructure and services valued component.
Transportation	N	The EIS assessment of transportation considers potential change in local road traffic volumes, change in road safety during construction due to increases in traffic volumes, and upgrades to roads, and change in road safety during operations. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the transportation valued component.
Heritage Resources	Y	Please see assessment below.
Human Health	N	The EIS assessment of human health considers potential change in potable and recreational water quality, ambient air quality, noise and vibration, electric and magnetic fields, and country foods (methylmercury in fish). The proposed relocation of the boat launch from Cache Creek to Halfway River East does not interact with the human health valued component.

Outlined below is a summary of the assessment undertaken for each valued component found to have an interaction with the proposed boat launch relocation.

#### Fish and Fish Habitat

As with the Cache Creek 2020 boat launch, the proposed Halfway River East boat launch location does not overlap with any watercourses and would be constructed prior to reservoir filling. In addition, operation of the boat launch is not expected to change the angling pressure on fisheries resources, as the relocation will not result in a change to the type of vessel being accommodated or the length of boater visit. The Halfway River East boat launch is not expected to cause any additional effects on fish and fish habitat relative to the Cache Creek 2020 location.

#### Vegetation and Ecological Communities

The Cache Creek 2020 location would impact a combination of cultivated field and regenerating white spruce and aspen forest. In contrast, the Halfway River East boat launch location would affect cultivated

field, but no natural ecological communities. Overall, the Halfway River East location is expected to have a lesser impact on vegetation and ecological communities than Cache Creek 2020.

#### Wildlife Resources

The Cache Creek 2020 location would impact some regenerating white spruce and aspen forest. In addition, because Cache Creek 2020 is located within a natural ecological community, this location is expected to result in greater impacts to wildlife habitat and greater disturbance and displacement of wildlife relative to the Halfway River East location. The construction of a boat launch at Halfway River would affect cultivated field, but no natural wildlife habitat.

Please refer to the assessment of Current Use of Lands and Resources for Traditional Purposes regarding Indigenous Nations concerns regarding the use of the Halfway River boat launch.

#### Greenhouse Gases

The potential effects of the Project on greenhouse gases during the environmental assessment considered the net change in greenhouse gas (GHG) emissions from the construction and operations of the Project, including emissions associated with construction activities, land use change and clearing to form the reservoir. The proposed relocation of the boat launch from Cache Creek to Halfway River East does not change the nature of the activity associated with boat launch construction or operation and therefore is not anticipated to affect the EIS assessment of greenhouse gases.

#### Current Use of Lands and Resources for Traditional Purposes

Significant concerns have been raised by Indigenous Nations regarding the Cache Creek 2020 location due to its proximity to areas of high cultural significance, including a registered burial site, a potential burial location, and a sweat lodge. For context, similar concerns resulted in BC Hydro obtaining an EAC amendment to change the route of Highway 29 at Cache Creek east to reduce the potential for impacts to cultural resources.

Halfway River First Nation has expressed concern that the proposed Halfway River East boat launch location may result in an increase of hunters using boats to access the Tsaa Nuna Conservancy, thereby impacting their ability to continue to protect and use the land and resources in the Conservancy for cultural and traditional purposes. BC Hydro has worked with the Halfway River First Nation to mitigate the potential effects of the Halfway River East boat launch. Further details on the concerns and mitigation are noted in Section 7 below (Indigenous Nation Consultation/Engagement).

#### Agriculture

The Cache Creek 2020 is located almost entirely within the Agricultural Land Reserve. The Halfway East boat launch is located east of the existing Halfway River boat launch and is situated in the corner of a field adjacent to the new Highway 29 alignment. The conceptual design for Halfway East has a footprint of 0.98ha within the Agricultural Land Reserve (ALR), where 0.77ha is currently cultivated field. The boat launch footprint would also sever approximately 1.01 ha of ALR land between the parking area/access road and Highway 29.



### Forestry

The EIS assessment of forestry considers changes in land use, resource use, access and activities related to industrial forest use, and changes in land use that affect Crown forest management. The Cache Creek 2020 location would affect approximately 2.8 ha of forested land. The proposed Halfway River East will not affect forested land as the site is cultivated.

### Harvest of Fish and Wildlife Resources

Because relocating the Cache Creek 2020 boat launch site to Halfway River East is not expected to worsen effects on fish and fish habitat, vegetation and ecological communities, and wildlife resources, it is not expected to cause any additional effects on the harvest of fish and wildlife resources.

Please refer to the assessment of Current Use of Lands and Resources for Traditional Purposes regarding Indigenous Nations concerns regarding the use of the Halfway River East boat launch.

### Outdoor Recreation and Tourism

The intent of EAC Condition #40 is to provide mitigation for changes to recreational opportunities and loss of recreational access caused by the inundation of three existing boat launches, including an existing boat launch at the Halfway River. Establishing a new boat launch on the eastern shoreline of the reservoir near Halfway River is expected to achieve the intent of EAC Condition #40 by mitigating the loss of the existing boat launch at Halfway River.

### Navigation

The existing boat launch is located at the Halfway River. The construction of a boat launch at either Cache Creek 2020 or Halfway River East will facilitate similar access to the reservoir and therefore have the same effect on navigation.

### Visual Resources

The EIS assessment of visual resources considers visibility of Project components from selected sites, viewpoints, or predicted scenic values. Both the Cache Creek and proposed Halfway River Boat Launch would be on the reservoir and would have the same visual effect.

### Heritage Resources

The Cache Creek 2020 location overlaps with HbRh-16, a Site C Class I archaeological site, 16.4 ha in total area. The overlap encompasses 0.93 ha or about 5.7 % of the area of the site. Given the nature of the finds from this site, HbRh-16 likely represents a large and long-term and/or recurrently occupied basecamp at the confluence of Cache Creek and Peace River.

Less than 250 m from the Cache Creek 2020 location, within the boundary of archaeological site HbRh-16 and of high cultural significance is a potential burial site, as discussed under Current Use of Lands and Resources for Traditional Purposes. In addition, a portion of the Cache Creek 2020 boat launch location that

has not been archaeologically investigated would require archaeological assessment and excavation under a *Heritage Conservation Act* investigation permit, as well as ground disturbing works conducted under a *Heritage Conservation Act* alteration permit.<sup>1</sup>

The Halfway River East location overlaps with HbRi-33, a Site C Class I archaeological site, 101.7 ha in total area. The proposed boat launch site encompasses 1.09 ha or about 1% of the area of the site. HbRi-33 is on a well-defined intermediate fluvial terrace at the nexus of the Halfway and Peace Rivers. Given the artifacts recovered and spatial patterns observed at HbRi-33, it is likely that a series of distinct occupations over time are reflected in which site function varied, including but not limited to a recurrently occupied seasonal base camp, stone tool manufacturing location, and/or temporary camps.

The Halfway River East location portion of the archaeological site is outside of the area assessed in the EIS. Prior to construction at Halfway River East, archaeological assessment and if required excavation will be conducted within the boat launch area under a *Heritage Conservation Act* investigation permit. Ground disturbing works associated with construction will be managed under the terms of a *Heritage Conservation Act* alteration permit.

## 5. RELATED ENVIRONMENTAL MITIGATION PLAN UPDATES

If accepted by EAO, BC Hydro's proposed amendment to Condition #40 will require revisions to the Outdoor Recreation Mitigation Plan, as shown in Table 2. In accordance with Condition #40, the proposed revisions will be provided to the agencies, communities and Indigenous Nations for review on completion of the EAC amendment process: Environmental Assessment Office, Ministry of Forests, Lands, Natural Resource Operations and Rural Development, Peace River Regional District, City of Fort St. John, District of Hudson's Hope and Saulneau, West Moberly, Halfway River, Doig River, Blueberry River and Prophet River First Nations, and McLeod Lake Indian Band.

**Table 2. Outdoor Recreation Mitigation Plan – Current Text versus Proposed Text**

Plan Reference	Current Text (Extract from January 27, 2017 Plan)	Proposed Revision to Text
Section 2.2.2 New Boat Launch and Day Use Sites	<p>"... The Outdoor Recreation Infrastructure Mitigation map included in Appendix B, Figure 1 identifies the proposed boat launch sites including:</p> <ul style="list-style-type: none"> <li>• Cache Creek Recreation Site – This location will replace the current Halfway River public boat launch area near the confluence with the Peace River. The new recreation site, including</li> </ul>	<p>"... The Outdoor Recreation Infrastructure Mitigation map included in Appendix B, Figure 1 (<b>revised</b>), identifies the proposed boat launch sites including:</p> <ul style="list-style-type: none"> <li>• Halfway River East Recreation Site – This location will replace the current Halfway River public boat launch area near the confluence with the Peace River. The new recreation site, including a trailer boat</li> </ul>

<sup>1</sup>All archaeological reports are shared with Indigenous Nations as soon as they are completed. Reports are available at the following extranet site for Indigenous Nations:

[https://extranet.bchydro.com/sites/t8\\_info/Heritage\\_Reports/Forms/All.aspx](https://extranet.bchydro.com/sites/t8_info/Heritage_Reports/Forms/All.aspx)

Plan Reference	Current Text (Extract from January 27, 2017 Plan)	Proposed Revision to Text
	a trailer boat launch, will be on the new reservoir shoreline west of Cache Creek ..."	launch, will be on the new reservoir shoreline <b>east of Halfway River ..."</b>
Section 2.2.2 New Boat Launch and Day Use Sites -- Consultation	BC Hydro consulted with regulators, including Transport Canada (Navigable Waters Protection Program), and regional and local governments (PRRD, City of Fort St. John, District of Hudson's Hope, and District of Chetwynd) about the proposed BC Hydro-managed recreation site locations in February 2012. BC Hydro further consulted with the public on these three proposed sites during the spring 2012 Project Definition Consultation on Outdoor Recreation. Refer to Section 9.1 Public Information Distribution and Consultation in Volume 1 Section 9 Information Distribution and Consultation for more information regarding the scope of BC Hydro's Project Definition Consultation. BC Hydro will provide information to regulators, Aboriginal groups and recreational stakeholders on the final locations for each recreation site.	BC Hydro consulted with regulators, including Transport Canada (Navigable Waters Protection Program), and regional and local governments (PRRD, City of Fort St. John, District of Hudson's Hope, and District of Chetwynd) about the proposed BC Hydro-managed recreation site locations in February 2012. BC Hydro further consulted with the public on these three proposed sites during the spring 2012 Project Definition Consultation on Outdoor Recreation. Refer to Section 9.1 Public Information Distribution and Consultation in Volume 1 Section 9 Information Distribution and Consultation for more information regarding the scope of BC Hydro's Project Definition Consultation.  <b>The locations for the Hudson's Hope Boat Launch and Lynx Creek Boat Launch were identified and agreed upon in the environmental assessment and 2018 respectively. The site for the Halfway River East boat launch replacement was identified and agreed upon after additional consultation with regulators, regional and local government and Indigenous Nations in 2020 and 2021.</b>

## **6. RELATED STUDIES SUBMITTED DURING THE ENVIRONMENTAL ASSESSMENT**

The following EIS sections are relevant to this EAC amendment application:

- Volume 2, Section 12, Fish and Fish Habitat
- Volume 2, Section 13, Vegetation and Ecological Communities
- Volume 2, Section 14, Wildlife Resources
- Volume 3, Section 19, Current Use of Lands and Resources for Traditional Purposes
- Volume 3, Section 20, Agriculture
- Volume 3, Section 24, Harvest of Fish and Wildlife Resources
- Volume 3, Section 25, Outdoor Recreation and Tourism
- Volume 3, Section 26, Navigation
- Volume 4, Section 32, Heritage Resources

## **7. INDIGENOUS NATIONS CONSULTATION/ENGAGEMENT**

BC Hydro has continued to consult with Indigenous Nations on the proposed boat launch locations since the issuance of the EAC. Throughout the SDM process, BC Hydro consulted Indigenous Nations on the three proposed locations by way of letter on May 8, 2020 and during Site C Project Update meetings. When required, subsequent meetings were held with Indigenous Nations to discuss their feedback on the proposed locations.

Based on this feedback, the conclusion of the SDM process, and decision to proceed with the Halfway River boat launch location, BC Hydro sent a draft EAC amendment request to amend EAC Conditions #40 to the following Indigenous Nations on March 25, 2021: Blueberry River First Nation, Dene Tha' First Nation, Doig River First Nation, Duncan's First Nation, Fort Nelson First Nation, Halfway River First Nation, Horse Lake First Nation, McLeod Lake Indian Band, Saulteau First Nations, Prophet River First Nation, West Moberly First Nations, Kelly Lake Métis Settlement Society and Métis Nation British Columbia. BC Hydro requested that Indigenous Nations provide comments by April 23, 2021 and offered to meet to review the draft amendment request. Indigenous Nations were advised that their input will inform the final amendment request.

As described in Section 2 of this request, Halfway River First Nation expressed concern that the proposed Halfway River East boat launch site will result in increased hunting in the Tsaa Nuna Conservancy, impacting First Nations' ability to protect wildlife and use of the Conservancy for cultural and traditional purposes. Based on discussions in the Cultural and Heritage Resources Committee, the Heritage Resources Committee, Environmental Forums, as well as their own research and analysis conducted for their Indigenous Traditional Use Fund project, Halfway River First Nation proposed the hiring of a Conservation Officer on behalf of all First Nations as appropriate mitigation for the proposed Halfway River East boat launch.

On June 8, 2021, BC Hydro formally committed to Halfway River First Nation to work with the Province and provide funding for a Conservation Officer position within the Ministry of Forests, Lands, Natural Resource Operations and Rural Development to patrol the area in and around the Site C Project for a period of five years. BC Hydro and Halfway River First Nation will request that the Conservation Officer position be made

available to interested Treaty 8 Nations, as communicated through the Site C Environmental Forums and other forms of communication. In addition, BC Hydro is also committed to continue working with Halfway River First Nation and other Indigenous Nations to develop mitigation measures associated with the construction and operation of the Project.

Please refer to Appendix C for a letter from Halfway River First Nation, dated May 10, 2021, regarding their support for the Halfway River East boat launch relocation, provided BC Hydro's establishment and funding of a Conservation Officer position and commitment to develop mitigation measures associated with the construction and operation of Site C.

## **8. IMPACT OF PROPOSED AMENDMENT ON INDIGENOUS NATIONS AND RIGHTS**

As required by Section 25 of the *Environmental Assessment Act*, BC Hydro has assessed the effects of the proposed amendment on Indigenous Nations and rights recognized and affirmed by section 35 of the [Constitution Act, 1982](#).

Consultation with Indigenous Nations respecting potential impacts of the Project on the exercise of asserted or established Aboriginal and treaty rights is ongoing. As described in this amendment request, BC Hydro is committed to implementing mitigation measures to address potential impacts on Indigenous Nations regarding the proposed relocation of the boat launch site to Halfway River East. Given this mitigation, the proposed relocation of the boat launch is not anticipated to result in any additional impacts beyond what was described in the EIS."

## **9. ENVIRONMENTAL ASSESSMENT ACT – OTHER REQUIREMENTS**

Please refer to Appendix D, which describes how the EAC amendment request has addressed the requirements of Section 25 of the *Environmental Assessment Act*.

## **10. STAKEHOLDER GROUP CONSULTATION/ENGAGEMENT**

BC Hydro began engagement with local governments and community stakeholders regarding potential eastern reservoir boat launch locations during the environmental assessment. The Peace Country River Rats is the largest local organized boating group. Potential locations for the boat launch were discussed periodically with group leadership between 2012-2021. On April 22, 2021, the Peace Country River Rats submitted a letter to BC Hydro stating their support for the EAC Amendment, and the establishment of "a new boat launch/day use site, complete with parking, picnic area and toilets, at Halfway River and accessible via Highway 29." The letter is attached as Appendix E.

## **11. GOVERNMENT APPROVALS/ENDORSEMENTS**

The following permits and approvals will be required for construction of the boat launch at Halfway River:

- Agricultural Land Reserve – Request for Non-Farm Use of ALR Land – submitted April 16, 2021
- *Water Sustainability Act* - Conditional Water Licences 132990/132991 – Leave to Commence Construction for Halfway River Boat Launch – to be submitted

- *Canadian Navigable Waters Act* – Approval – to be submitted

## 12. ATTACHMENTS

### Appendix A: Figures

- Figure 1: Overview Proposed Location of Halfway River Boat Launch
- Figure 2: Detail Proposed Location of Halfway River Boat Launch
- Figure 3: Boat Launch Site Selection Options

### Appendix B: Proposed Revisions to EAC Schedule B

- Full text of EAC Conditions #40 and requested amendment

### Appendix C: Letter dated May 10, 2021 from Halfway River First Nation

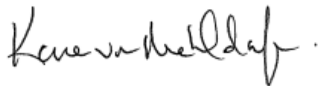
### Appendix D: Section 25 of the *Environmental Assessment Act*: Impact of Proposed Amendment on Indigenous Nations and Rights

### Appendix E: Letter dated April 22, 2021 from Peace Country River Rats

## 13. CLOSURE

I trust this submission provides useful information regarding BC Hydro's request to amend Conditions #40 of EAC #E14-02. We look forward to discussing this request with you further. In the meantime, please don't hesitate to contact me if you have any questions or comments.

Regards,



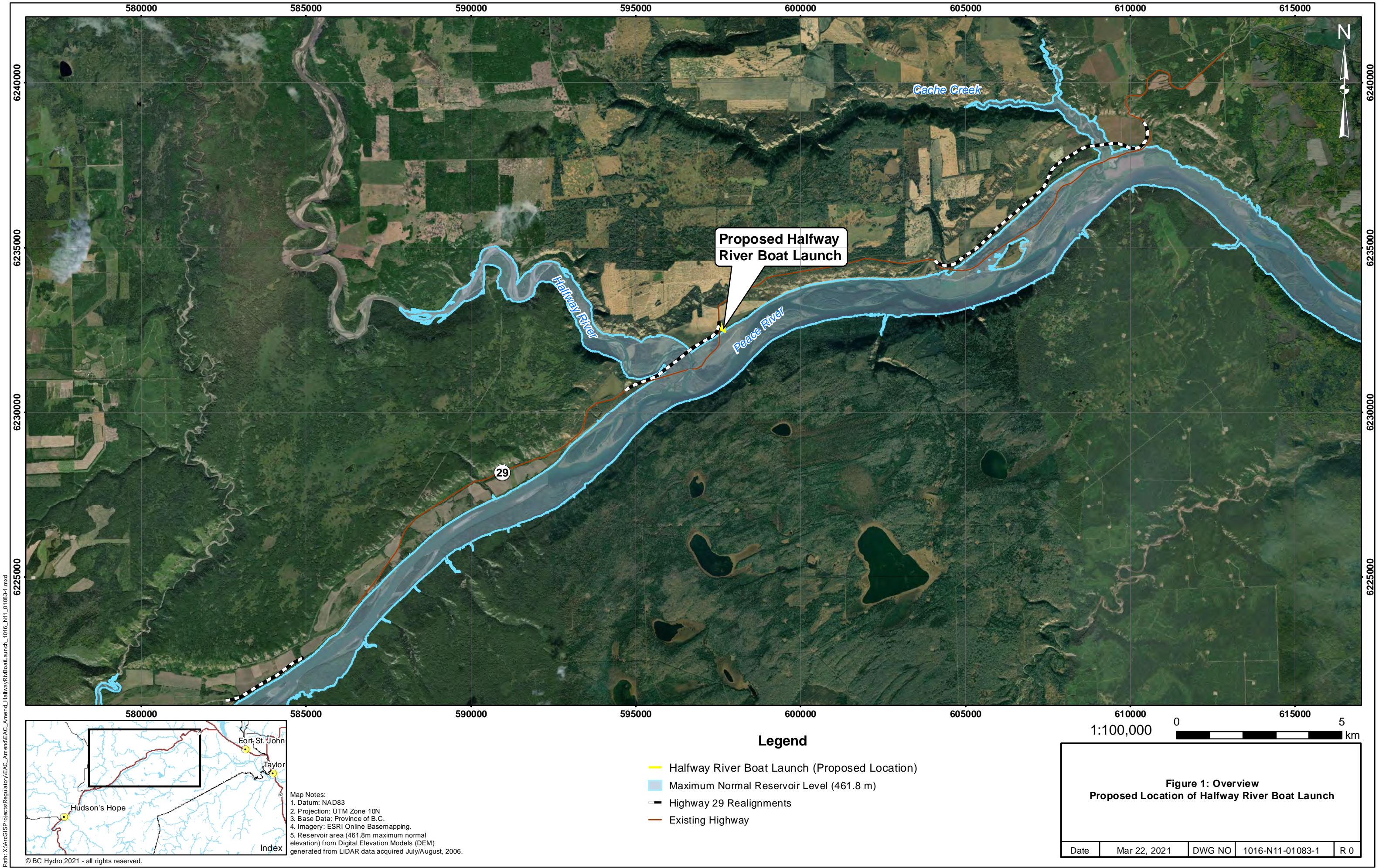
Karen von Muehldorfer  
Regulatory Manager  
Site C Clean Energy Project  
[Karen.vonMuehldorfer@bchydro.com](mailto:Karen.vonMuehldorfer@bchydro.com)

Cc: Shanna Mason, Environment, Permitting and Community Benefits Director, BC Hydro  
Sarah Duggan, Project Assessment Director, Environmental Assessment Office  
Stasia Ferbey, Project Assessment Officer, Environmental Assessment Office

## **APPENDIX A: FIGURES**

- Figure 1: Overview Proposed Location of Halfway River Boat Launch
- Figure 2: Detail Proposed Location of Halfway River Boat Launch
- Figure 3: Boat Launch Site Selection Options









Path: X:\GIS\Projects\Regulatory\EAC\_Amend\_HalfwayRiv\BoatLaunch\_1016\_N11\_01083-2.mxd



Map Notes:  
1. Datum: NAD83  
2. Projection: UTM Zone 10N  
3. Base Data: Province of B.C.  
4. Imagery: ESRI Online Basemapping.  
5. Reservoir area (461.8m maximum normal elevation) from Digital Elevation Models (DEM) generated from LIDAR data acquired July/August, 2006.

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Legend

- Halfway River Boat Launch (Proposed Location)
- Maximum Normal Reservoir Level (461.8 m)
- Highway 29 Realignment - Halfway River
- Existing Highway

1:15,000

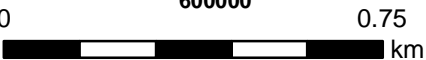
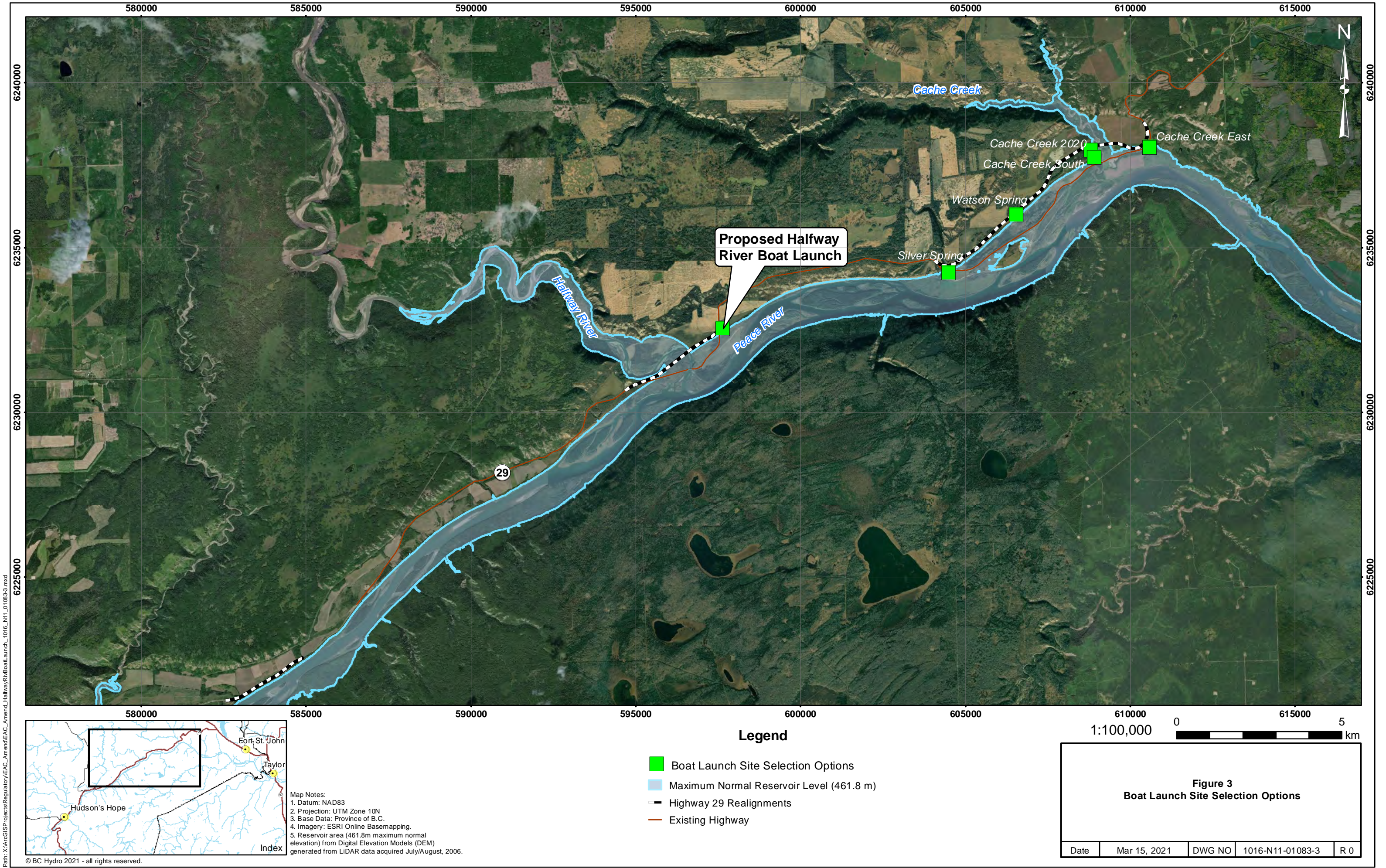


Figure 2: Detail  
Proposed Location of Halfway River Boat Launch

Date	Mar 5, 2021	DWG NO	1016-N11-01083-2	R 0
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## **APPENDIX B: PROPOSED REVISION TO EAC CONDITION #40**

## EAC Condition #40 – Current Text versus Proposed Revised Text

EAC Schedule B Condition #40	Proposed Revision to EAC Schedule B Condition #40 (proposed revision in bold)
<p>The EAC Holder must finalize and implement the Outdoor Recreation Mitigation Plan to mitigate changes in recreational opportunities and loss of existing recreational areas resulting from the Project.</p> <p>The Outdoor Recreation Mitigation Plan must be developed by a QEP.</p> <p>The Outdoor Recreation Mitigation Plan must include at least the following to:</p> <ul style="list-style-type: none"> <li>• Provide technical information to support outdoor recreation providers in adapting to new shoreline conditions.</li> <li>• Establish three new boat launch/day use sites, complete with parking, picnic areas and toilets, at Cache Creek, Lynx Creek and Hudson's Hope Shoreline, and accessible via Highway 29.</li> <li>• Establish at least one public viewpoint at the Site C dam site.</li> <li>• Provide approximately \$150,000 to the District of Hudson Hope for the enhancement of Alwin Holland Park, or other community shoreline recreation areas.</li> <li>• Provide approximately \$200,000 for a Community Recreation Site Fund of which \$50,000 is for recreational sites on the south bank to support development of new shoreline recreation areas within the Peace River and its tributaries to the Alberta border.</li> <li>• Outline an approach to governance and allocation of funds from the Community Recreation Site Fund</li> </ul> <p>Fund the development of a BC Peace River/Site C Reservoir Navigation and Recreation Opportunities Plan</p> <p>The EAC Holder must provide this draft Outdoor Recreation Mitigation Plan to FLNR, Peace River Regional District, City of Fort St. John, District of Hudson's Hope and Saulteau, West Moberly, Halfway River, Doig River, Blueberry River and Prophet River First Nations, and McLeod Lake Indian Band for review within 12 months after the commencement of construction.</p>	<p>The EAC Holder must finalize and implement the Outdoor Recreation Mitigation Plan to mitigate changes in recreational opportunities and loss of existing recreational areas resulting from the Project.</p> <p>The Outdoor Recreation Mitigation Plan must be developed by a QEP.</p> <p>The Outdoor Recreation Mitigation Plan must include at least the following to:</p> <ul style="list-style-type: none"> <li>• Provide technical information to support outdoor recreation providers in adapting to new shoreline conditions.</li> <li>• Establish three new boat launch/day use sites, complete with parking, picnic areas and toilets, at <b>Halfway River</b>, Lynx Creek and Hudson's Hope Shoreline, and accessible via Highway 29.</li> <li>• Establish at least one public viewpoint at the Site C dam site.</li> <li>• Provide approximately \$150,000 to the District of Hudson Hope for the enhancement of Alwin Holland Park, or other community shoreline recreation areas.</li> <li>• Provide approximately \$200,000 for a Community Recreation Site Fund of which \$50,000 is for recreational sites on the south bank to support development of new shoreline recreation areas within the Peace River and its tributaries to the Alberta border.</li> <li>• Outline an approach to governance and allocation of funds from the Community Recreation Site Fund</li> </ul> <p>Fund the development of a BC Peace River/Site C Reservoir Navigation and Recreation Opportunities Plan</p> <p>The EAC Holder must provide this draft Outdoor Recreation Mitigation Plan to FLNR, Peace River Regional District, City of Fort St. John, District of Hudson's Hope and Saulteau, West Moberly, Halfway River, Doig River, Blueberry River and Prophet River First Nations, and McLeod Lake Indian Band for review within 12 months after the commencement of construction.</p>

EAC Schedule B Condition #40	Proposed Revision to EAC Schedule B Condition #40 (proposed revision in bold)
<p>The EAC Holder must file the final Outdoor Recreation Mitigation Plan with EAO, FLNR, Peace River Regional District, City of Fort St. John, District of Hudson's Hope and Saulteau, West Moberly, Halfway River, Doig River, Blueberry River and Prophet River First Nations, and McLeod Lake Indian Band within 18 months after the commencement of construction.</p> <p>The EAC Holder must develop, implement and adhere to the final Outdoor Recreation Mitigation Plan, and any amendments, to the satisfaction of EAO.</p>	<p>The EAC Holder must file the final Outdoor Recreation Mitigation Plan with EAO, FLNR, Peace River Regional District, City of Fort St. John, District of Hudson's Hope and Saulteau, West Moberly, Halfway River, Doig River, Blueberry River and Prophet River First Nations, and McLeod Lake Indian Band within 18 months after the commencement of construction.</p> <p>The EAC Holder must develop, implement and adhere to the final Outdoor Recreation Mitigation Plan, and any amendments, to the satisfaction of EAO.</p>

**Appendix C: Letter dated May 10, 2021 from Halfway River First Nation**

# Halfway River First Nation

Box 59 Wonowon BC V0C 2N0 Phone (250) 772-5058 Fax (250) 772-5200

May 10, 2021

Via Email: [Alicia.Christie@bchydro.com](mailto:Alicia.Christie@bchydro.com)

BC Hydro Community Consultation Office  
9948 100th Ave  
Fort St. John, BC  
V1J 1Y5

Attention: Alicia Christie, Relationship Lead, Indigenous Relations

Dear Alicia:

***Re: proposed Site C boat launch***

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We write with respect to BC Hydro's proposed Site C boat launch on the Halfway River (the "Halfway Boat Launch").

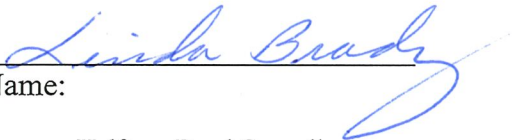
Halfway River First Nation agrees to support the Halfway Boat Launch, provided that BC Hydro establishes and funds a Conservation Officer position to patrol the Site C reservoir during the operation of the Site C Dam and continues to work with the Halfway River First Nation and other affected Nations to develop mitigation measures associated with the construction and operation of the Site C Project.

Please contact Lands Manager Roslyn Notseta if you would like to discuss this matter further.

Yours Truly,

HALFWAY RIVER FIRST NATION

Per:

  
Name:

cc. Halfway Band Council  
Roslyn Notseta; Halfway River First Nation  
Tim Watson; Devlin Gailus Barristers & Solicitors

**Appendix D: Section 25 of the *Environmental Assessment Act*: Impact of Proposed Amendment on Indigenous Nations and Rights**



## Schedule 25 Environmental Assessment Act

BC Hydro is submitting a request to amend Schedule B, Condition #40 of EAC #E14-02 for the Site C Clean Energy Project (the Project), to reflect that one of three required boat launches required by the condition be constructed at Halfway River instead of Cache Creek.

Overall, the requested amendment is not anticipated to result in any changes to the matters outlined in Section 25 of the EAA as follows:

- a) positive and negative direct and indirect effects of the reviewable project, including environmental, economic, social, cultural and health effects and adverse cumulative effects
  - Please refer to BC Hydro's EAC Amendment Request, which indicates that constructing a boat launch at Halfway River instead of Cache Creek will fulfill the intention of Condition #40, which is to mitigate for the Project's effects on navigation, river/reservoir access points and recreational areas along the Peace River.
  - The following valued components were reviewed and are described in the amendment request as they were assessed as interacting with the proposed amendment: fish and fish habitat, vegetation and ecological communities, wildlife resources, current use of lands and resources for traditional purposes, agriculture, forestry, greenhouse gases, harvest of fish and wildlife resource, outdoor recreation and tourism, navigation, visual resources, and heritage resources.
- b) risks and uncertainties associated with those effects, including the results of any interaction between effects
  - Please refer to BC Hydro's EAC Amendment Request which includes a description of the assessment of effects on valued components for the proposed amendment.
- c) risks of malfunctions or accidents
  - The proposed amendment is not anticipated to result in increased risks to malfunctions or accidents compared to the current requirement of EAC Condition #40.
- d) disproportionate effects on distinct human populations, including populations identified by gender
  - The proposed amendment is not anticipated to have disproportionate effects on distinct human populations, including populations identified by gender.
- e) effects on biophysical factors that support ecosystem function
  - Please refer to BC Hydro's EAC Amendment Request, which compares potential effects of the Cache Creek boat launch location to the Halfway River boat launch location.
  - The EAC Amendment request also indicates that Halfway River First Nation has expressed

concern that the proposed Halfway River boat launch location may result in an increase of hunters using boats to access the Tsaa Nuna Conservancy, thereby impacting their ability to continue to protect and use the land and resources in the Conservancy for cultural and traditional purposes. BC Hydro is working with the Halfway River First Nation to mitigate the potential effects of the Halfway River boat launch.

f) effects on current and future generations

- The proposed amendment is not anticipated to have an effect on current and future generations. However, as described in the EAC Amendment request, Halfway River First Nation has expressed concern that the proposed Halfway River boat launch location may result in an increase of hunters using boats to access the Tsaa Nuna Conservancy, thereby impacting their ability to continue to protect and use the land and resources in the Conservancy for cultural and traditional purposes. BC Hydro is working with Halfway River First Nation to mitigate the potential effects of the Halfway River boat launch.

g) consistency with any land-use plan of the government or an Indigenous nation if the plan is relevant to the assessment and to any assessment conducted under section 35 or 73.

- The proposed amendment is consistent with land use planning and is being consulted on with Indigenous groups.

h) greenhouse gas emissions, including the potential effects on the province being able to meet its targets under the *Greenhouse Gas Reduction Targets Act*

- The proposed relocation of the boat launch from Cache Creek to Halfway River East does not change the nature of the activity associated with boat launch construction or operation and therefore is not anticipated to affect the EIS assessment of greenhouse gases, or have any effect on the province being able to meet its targets under the Greenhouse Gas Reduction Targets Act.

i) alternative means of carrying out the project that are technically and economically feasible, including through the use of the best available technologies, and the potential effects, risks and uncertainties of those alternatives

- Please refer to BC Hydro's EAC Amendment Request which describes the decision-making process for arriving at the Halfway River boat launch as a viable location for meeting the intent of Condition #40.

j) potential changes to the reviewable project that may be caused by the environment

- The environment is not expected to cause changes to the boat launch proposed in this amendment application.

**Appendix E: Letter dated April 22, 2021 from Peace Country River Rats**



**BC PEACE COUNTRY RIVER RATS**

PO Box 1, Downtown  
Fort St. John, BC V1J 6W7  
April 22nd, 2021

Dear BC Hydro:

Care of: Ben Rauscher,

With the continuation of construction of the Site C Dam and the flooding of the Peace Valley nearing, the BC Peace Country River Rats would like to ensure that there will be a boat launch constructed at the Halfway River. This is an extremely common boat launch for many river users. Also, the possibility of people making their own trail down to the river to gain the access that they are used to having causing erosion and potential disaster for garbage and debris is a very real concern.

On behalf of the BC Peace Country River Rats, I am writing in support of BC Hydro's request to the Environmental Assessment Office (EAO) to amend Condition #40 of Schedule B, Environmental Assessment Certificate (EAC #14-02). We are in support of BC Hydro establishing a new boat launch/day use site, complete with parking, picnic area and toilets, at Halfway River and accessible via Highway 29.

Thank you,

Jason Palfy  
President  
BC Peace Country River Rats  
250-262-1290