

Dawson Creek Water Supply System Project - Issues Tracking Table for Early Engagement					
ID #	Topic	Comment/Issue Date	Comment Organization	Application/Document (include section/subsection)	Participant Issue, Description or Comment
1	Continued water provision to residents	06-Oct-25	PRRD	Letter from PRRD to EAO	<p>From Leonard Hiebert, Director Electoral Area D: On behalf of the 50 residents within Electoral Area D who are using a line connected to the current water source used by the city of Dawson Creek.</p> <p>This water is essential to the residents' livelihoods and must be maintained to ensure a reliable and sustainable source, shifting the burden of finding and funding alternative infrastructure onto residents is unreasonable.</p> <p>I am requesting that the provision of this water continue should this alternative water source be approved.</p>
2	Emergency water conservation	23-Oct-25	BC Energy Regulator		<p>Would like to understand what the City has done regarding emergency conservation responses. Anecdotally, it appears to have been quite light on enforcement of residents skirting the rules and continuing to do restricted activities (washing cars, watering lawns, etc.) outside of bylaw hours/during the evening.As of October 22, 2025 the City is still only in Stage 3 Water Conservations, Bulk water sales for non-potable use in commercial or industrial processes still permitted. Current bulk water restrictions only for hydraulic fracturing operations. If City is so concerned, why are restrictions not at Stage 4?</p>
3	Industrial water sales	23-Oct-25	BC Energy Regulator		<p>Fully support the proposal to secure the Peace River as a long-term source for the City. Not in support of augmenting their daily withdrawal volume by more than double and more than 4X annual allocation to facilitate industry water sales.There is minimal rationale provided supporting such a massive increase in water demand.</p> <p>- Using water scarcity as leverage to expedite process for financial gain.</p> <p>- If the real concern was ensuring faster access to a more secure community water source, the City should consider decreasing instantaneous withdrawal and annual allocation request to below Environmental Assessment triggers – See detailed comment below. Focus should be on securing reliable long-term source for the community use and invest in expanding reclaimed water facility for sale to industry.</p> <p>- With increasing frequency and severity of drought conditions, the focus should not be on increasing availability of freshwater to industry, but instead making reclaimed and recycled water more available.</p> <p>- Statement “Economies of scale and watershed stewardship by managing and supplying water to multiple users via a shared regional system” fails to address the reality that water scarcity and drought severity affect systems large and small and making freshwater more readily available for use by industry will negatively impact investment on recycled water technology, which will further contribute to high freshwater demand and decreased watershed stewardship.</p>
4	Project size and purpose	23-Oct-25	BC Energy Regulator		<p>This entire process of Environmental Assessment could be avoided and expedited if the City decreased their applied for withdrawal rate and annual volume. Reducing their requested groundwater withdrawal rate below the 0.075 m3/s threshold and augmenting it with river diversions to a combined withdrawal of 0.23 m3/s would more than double the annual allocation from what is currently licensed. Provide water security for decades to come with significantly less demand on the Peace system. Significantly lower the cost of design, construction, and operation through smaller required pumps and pipeline diameter. Lower reliance on industry. Still provide opportunity for licensed water sales of surplus water.</p>
5	Economic benefits and water stewardship	23-Oct-25	BC Energy Regulator		<p>Project stands to potentially provide a financial benefit to only one community through water sales with a minimal benefit to the Province through initial application and water rental fees. Greater long-term financial benefit to Province through continuation of water licensing to individual industry applicants.</p> <p>Better water stewardship by BCER through more scrutiny and continued assessment of water availability and ecological impact through this method of industry water access.</p> <p>Further aided through required industry water withdrawal volume reporting to BCER.</p>
6	Water treatment facility capacity	23-Oct-25	BC Energy Regulator		<p>Current Water Treatment Plan capable of treating 14,500 m3/day (5.3 million m3/yr) will this be upgraded to handle more?Note that without WTP upgrades, City could increase annual withdrawals by 1.97 million m3 and withdrawals as low as 20,000 m3/day.</p>

7	Total demand for water	23-Oct-25	BC Energy Regulator		<p>Require clarity on total demand for groundwater wells and river diversions.</p> <p>Average initial flow of 0.115 m3/s would be ~3.6 million m3/yr based on 24 hr. pumping.</p> <p>Peak design flow of 0.463 would be 14.6 million m3/yr based on 24 pumping.</p> <p>Surface water diversion reported at 14.6 million m3/yr.</p> <p>Indicates City plans to divert at maximum rate.</p> <p>What would pumping withdrawal schedule be?</p> <p>Is a 24-hr pumping schedule realistic?</p> <p>No provided withdrawal thresholds (i.e.. No withdrawal when flow of Peaces is approaching or at minimum of Site C licensed discharge.</p>
8	Size of pipe	23-Oct-25	BC Energy Regulator		Require rationale on proposed size of pipeline, is 36 inch really required?
9	Water storage calculation	23-Oct-25	BC Energy Regulator		Report says 200 days of storage, however with 1.8 million m3 of cumulative storage and average use of 6000 m3/day gives 300 days of storage.
10	Water withdrawal calculation	23-Oct-25	BC Energy Regulator		<p>Increased withdrawal request does not compute based on minimal population growth of the City (~1.2%) and decrease of Pouce Coupe (-3.8%) and the greater Electoral Area D population (-19%) from 2016 – 2021.</p> <p>By comparison, the City of Fort St John has a population nearly twice the size (21,465; 2021 Census) with population growth of 5.9% from 2016 – 2021 has newly amended water licenses in 2025 (C503515 & C503516) authorized for a maximum combined withdrawal of 6.6 million m3/yr (maximum of 5.5 million m3/year from the Peace River).</p>
11	Reliance on oil and gas industry	23-Oct-25	BC Energy Regulator		<p>This project assumes that industry will want to help pay for the cost of construction as well as the assumption that industry will want to purchase it from the City in the future. Industry unlikely to commit to additional cost of trucking or additional pipeline for water transfer when they are increasingly securing their own long-term licenses at their strategic points of need.</p> <p>Oil and gas industry is very dynamic and wants to source water as close to their point of use as possible. Assumes long-term commitment of industry for a specific area. Large reliance on industry to make it financially feasible and is a large financial risk for the City.</p>
12	Traffic and agriculture	23-Oct-25	BC Energy Regulator		Many unintended consequences such as increased trucks on the road and/or more pipelines crossing the region to distribute from tie in points to industry points of use. Demonstrated impacts on this as a concern from local residents dealing with increased traffic on local roads, as well as reduced productivity of agricultural fields due to pipeline disturbance and loss of soil structure.
13	Current water license on Kiskatinaw	23-Oct-25	BC Energy Regulator		If this project is permitted, will the City relinquish their water license and cease withdrawals in the Kiskatinaw to facilitate recovery of that system?
14	Project Benefits	23-Oct-25	BC Energy Regulator		<p>What are the potential benefits to residents to have industry water sales?</p> <p>Who really stands to benefit from this project?</p> <p>Can residents count on decreased taxes, expanded bus service, better library and public resource infrastructure access for young families and at risk populations?</p> <p>How much of this application is driven by need for the community and how much of this is driven by potential financial benefit?</p>
15	Baseline Hydrology	23-Oct-25	BC Energy Regulator		Baseline hydrology review of the Peace River does not account for it being a regulated system with three large hydroelectric dams upstream of the point of diversion and the impacts that these have had on the natural hydrology and ecosystem of the broader Mackenzie River Delta
16	Monitoring and mitigations for watercourse crossings	23-Oct-25	BC Energy Regulator		Ensure Detailed Project Description includes fulsome summary for site specific monitoring and associated mitigations for all watercourse crossings during construction as well as a post construction monitoring plan.
17	Water regulator (WLRS/BCER)	23-Oct-25	BC Energy Regulator		Statement “WLRS would be the agency for permitting if more than 51% of the volume is utilized through City.” Fail to see how this would be possible based on the currently licence amount from the Kiskatinaw (3.3 million m3/yr) vs the requested amount of 14.5 million m3/year. This assumes that City use will increase by more than double. This would realistically be the opposite, with up to 75% or more of the licenced volume contributing to licenced water sales. With proposed sales to industry being heavily weighted on the oil and gas industry, would be prudent to have the BCER involved to ensure proper and transparent withdrawal reporting.

18	Groundwater Feasibility Assessment	23-Oct-25	BC Energy Regulator		Groundwater Feasibility Assessment states only “...that there is a moderate probability of developing a groundwater source capable of supplying the requested water demand...”Does not provide information on potential drawdown impacts to proximal wells caused by a high-capacity withdrawal. Provides additional note that other regional large capacity wells require regular redevelopment to maintain capacity and thus a higher cost of operation and maintenance compared to other low-capacity wells.
19	Treaty 8 engagement	23-Oct-25	BC Energy Regulator		Interested to get clarity on what was provided to Nations that have provided “Support based on the proposed Project description, point of diversion, proposed withdrawals, and anticipated Project benefits to industry...” Specifically information on proposed water withdrawals and plans to sell majority to industry. DRFN, WMFN, and SFN often state their opposition to freshwater being used for hydraulic fracturing, nor private water sales to industry, so I question what information was shared, how it was shared, and to whom within the Nations. In follow-up with some Nations: HRFN: support the water for community use but oppose the proposed water sales and shared they are working directly with the EAO. DRFN: Concern expressed by lands staff and shared they are reaching to EAO regarding this.WMFN: Concern expressed by lands staff, no official response at time of TAC deadline.
20	Engagement with Landowners	23-Oct-25	BC Energy Regulator		Minimal discussion in Engagement Plan of whether potentially affected landowners have been or will be fully briefed on the potential impacts to their land and peaceful enjoyment by this project through increased traffic and additional development of water conveyance pipelines.
21	Engagement with BC Energy Regulator	23-Oct-25	BC Energy Regulator		Regarding the Engagement Plan, the BCER is not included in Table 6, where it was briefly engaged in late 2024.As City plans to have water sales to O&G industry, BCER should be engaged more directly in these discussions as the project evolves.
22	Genaral comment on Engagement Plan	23-Oct-25	BC Energy Regulator		In general, this engagement plan appears to be lacking in depth and does not fully outline the potential impacts associated with the project through large freshwater withdrawals for industry water sales.Heavily publicized through the lens of community risk due to water scarcity and downplays what appears to be the primary goal of becoming the largest industry water user and seller in the region, which is problematic.
23	Archaeological and Heritage Resources	29-Oct-25	MOF - Archaeology Branch	Initial Project Description	Acknowledging that requirements to conduct archaeological assessments and possibly obtain alteration permits in accordance with the <i>Heritage Conservation Act</i> are properly identified. Recommend that Heritage Inspection Permit application is submitted as soon as possible to avoid schedule delays.

24	Water Volume	29-Oct-25	WLRS - Water Resource	IPD	<p>The key concern for WLRS is that there is no rationale for the volume of water sought by the city. Based on the Sept 2025 Water Scarcity Report for Dawson Creek, the City of Dawson Creek (CDC) currently diverts about 2M m3/year of water from the Kiskatinaw River under conditional water licence C133995. The IPD states that the current population of the CDC is 15,000 and that the city grew by an average of 1.2% from 2016-2021. During this period, the population of the Village of Pouce Coupe, where CDC also supplies water, declined by 3.8%, and the greater Electoral Area D population declined by 19%.</p> <p>The WSA requires that beneficial use (defined in the WSA) be made of water authorized under a water licence. Typically, licence holders have 3 years to make beneficial use of water. However, for large infrastructure investments for water supply we will often authorize the volume of water needed to supply estimated buildout over 10-25 years, providing the water is available from the proposed source. The IPD and the water licence application that WLRS received is for the diversion of up to 14.6M m3/year. According to the volume of water reported to water revenue for billing purposes, the CDC used 2,409,772 m3 of water in 2024 (inconsistent with the Water Scarcity report). If we use this volume and apply a growth rate of 1.2% every 5 years for 25 years, the water demand would increase to approximately 2,559,000 m3/year. Their water treatment plant also only has capacity to treat up to 5.3M m3/year.</p> <p>Based on the water licence application received by WLRS, CDC intends to supply water to their residents as well as sell water to third parties. No information has been provided on the potential market for over 10M m3/year of water and how this water would be distributed. Water cannot legally be taken across any BC borders in containers larger than 20L. There are socio-economic considerations and concerns related to the proposed sale of water. The volume that would be for sale may be up to 11M m3/year and licensing it to CDC it gives them the ability to decide who they sell it to and what to charge for the water. If this water si be sold to the oil and gas sector, rather than the industry acquiring an authorization through the BCER, the annual volume of water sold will need to be reported to the BCER. The water licenced to CDC would no longer be available for the Province to licence to any other entity. Unless the CDC can demonstrate a market for this water and that it is more sustainable to supply water through their infrastructure rather than third parties obtaining their own water licence at the location where they need it, it is not advisable to permit such a significant volume for water sales by one entity.</p>
25	Environmental Impacts	29-Oct-25	WLRS - Water Resource	IPD	<p>The IPD states that there are 11 wetland crossings and 16 watercourse crossings in the proposed project location/corridor. WLRS needs more information on the nature of the proposed crossings and the values of these wetlands and watercourses to determine if there are potential environmental impacts. The cumulative impacts of all 27 stream crossings should be considered rather than the impacts of each individual crossing. Offsetting may be required depending on the nature of the crossings and the potential impacts.</p> <p>The ongoing drought is impacting flow in all stream systems, not just the Kiskatinaw River. While flows in the Peace River are relatively high compared to smaller systems in the region, flows have been much lower than the mean annual discharge stated in the IPD. BC Hydro has only just started operating the Site C generating station and are still in the testing phase. The Site C water licence requires a minimum flow release of 390 m3/s. To determine water availability in the Peace River, engagement with BC Hydro is required to understand how they will operate Site C and how the ongoing drought impacts flows in significant tributaries (such as the Pine River). The Environmental Flow needs of the Peace River must be considered in this application.</p>
26	Other Licensees and Landowners	29-Oct-25	WLRS - Water Resource	IPD	<p>There are other significant water licences at, and downstream of, the proposed point of diversion on the Peace River including: the District of Taylor, the Peace River Regional District, and over 20 industrial licences. Impacts to these licensees must be considered in the water licence decision under the WSA. Although BC Hydro's Site C licence is upstream of the proposed project, they are required to maintain a minimum flow in the Peace River. BC Hydro will need to be engaged on this project to understand how it may impact their ability to meet the terms and conditions of their water licences and Water Use Plan.</p> <p>The majority of the project area is privately owned land. Under the WSA, all landowners whose land will be physically impacted by the project must be notified of the application. Compensation to landowners may be required for access and disturbance.</p>

27	General	29-Oct-25	WLRS - Water Resource	IPD	Overall, the IPD provides enough information to understand the need for a more reliable water supply as well as the concept for the proposed project. However, there is insufficient information at this time to determine if mitigation measures could effectively minimize or avoid environmental, economic, social, cultural or health impacts to the point where they are not significant.
28	General	29-Oct-25	WLRS - Water Resource	IPD - Executive Summary	Why both groundwater and surface water? If HC it's the same water. Are the wells true wells or infiltration galleries?
29	General	29-Oct-25	WLRS - Water Resource	IPD - Executive Summary	The report should state upfront what volume of water the City is asking for, not have it buried further in.
30	General	29-Oct-25	WLRS - Water Resource	IPD - Project Overview/Location	What are the impacts to ALR?
31	General	29-Oct-25	WLRS - Water Resource	IPD - Project Overview/Location	The adjacent and existing corridors should be shown in figure 1.
32	General	29-Oct-25	WLRS - Water Resource	IPD - Purpose and Rationale	Is the 19.88 m3/s the annual daily average flow or a comparable daily flow?
33	General	29-Oct-25	WLRS - Water Resource	IPD - Purpose and Rationale	Calculations should also include the instantaneous demand relative to low flow or BC Hydro required release from Site C.
34	General	29-Oct-25	WLRS - Water Resource	IPD - Existing Infrastructure/Source	Are there numbers or estimates to quantify volumes?
35	General	29-Oct-25	WLRS - Water Resource	IPD - Existing Infrastructure/Water Treatment Plant	Are there plans to expand the treatment facility? Is treatment bypassed for sale of non-potable water?
36	General	29-Oct-25	WLRS - Water Resource	IPD - Water system projects and upgrades	Include a map that shows the system and associated reservoirs/dams
37	General	29-Oct-25	WLRS - Water Resource	IPD	Storage capacities vary in the IPD. Is it 2.5 million m ³ or 1,836,255 m ³ 2,146,255 36255 m ³ ?
38	General	29-Oct-25	WLRS - Water Resource	IPD - Water system projects and upgrades	Reclaimed water - How much was is reused?
39	General	29-Oct-25	WLRS - Water Resource	IPD - Project Description	Why GW as well as SW? Need to consider if GW is hydraulically connected. Wells will need to be constructed and tested before impacts and water availability can be assessed.
40	General	29-Oct-25	WLRS - Water Resource	IPD - Project components - Water intake system	Need clarity - are these infiltration galleries or groundwater wells? What is the reason for wells? Is it for water quality purposes? Need advice from health on whether or not this changes treatment requirements.
41	General	29-Oct-25	WLRS - Water Resource	Project components - Access	The Proponent will need permission to access the Project Study Corridor.
42	General	29-Oct-25	WLRS - Water Resource	Early Works - Surveying	Has access already been provided?
43	General	29-Oct-25	WLRS - Water Resource	Early works - Access	Need to decide internally if pipeline construction would be authorized under a water licence or if it would require S.11 applications for stream crossings.
44	General	29-Oct-25	WLRS - Water Resource	Early works - Access	Is a Crown Land Application required?
45	General	29-Oct-25	WLRS - Water Resource	Watercourse Crossings	Depending on the route, and water crossing, can HDD be used at other locations?
46	General	29-Oct-25	WLRS - Water Resource	Alternative Means of Carrying Out the Project	Current use is just over 6,000 m3/day. Why is the assumed demand 40,000 m3/day?
47	General	29-Oct-25	WLRS - Water Resource	Potential Drawbacks - conservation	Pricing has shown to be the most effective water conservation measure. Water conservation measures should continue to be implemented.

48	General	29-Oct-25	WLRS - Water Resource	Fish and Fish Habitat	Environmental flow needs of Peace River need to be evaluated. The Peace is also impacted by drought and flows are currently lower than normal. There are existing licensees on the Peace and BC Hydro has an instream flow requirement that they must meet.
49	General	29-Oct-25	WLRS - Water Resource	Hydrology	BC Hydro controls the releases to the Peace. This is not a natural river system. Site C has recently come on line and is still in the testing phase. River flows down stream of Site C will change with Site C online.
50	General	29-Oct-25	WLRS - Water Resource	Hydrology	Is this allocation at the proposed POD? Are there downstream diversions that should be considered as well?
51	General	29-Oct-25	WLRS - Water Resource	Vegetation and Ecosystems	Does land need to be removed from the ALR?
52	General	29-Oct-25	WLRS - Water Resource	Socio-Economic Conditions	The population growth rate should be informing the volume of water in the water licence application.
53	Air Quality	05-Nov-25	ENV	IPD	Section 7.1 - Atmospheric emissions: Construction emissions may also include burning of land clearing debris. Please include this in the application, unless there will be no open burning.
54	General	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p. i	Key factors for local governments to plan effectively for future needs and strengthen community resilience were identified as outcomes for this project.
55	Discharge rates	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.ii	From the annual discharge reduction of 0.06% to 0.03%, will the new system = reduce the amount of water used by the city?
56	General	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.14 - 3.2.1	It sounds like City of Dawson Creek as well as surrounding rural residents would benefit from this new water infrastructure system.
57	General	07-Nov-25	Ministry of Housing and Municipal Affairs	Engagement Plan August 15, 2025 p. i	"The Project is expected to provide regional benefits, including providing improved water access for agriculture, fire protection, and industrial operations". What is the scope of 'regional'? Which communities will receive the previously stated benefits from the improved water access?
58	Workforce	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description	Will workers for building this new water system be sourced from neighbouring communities?
59	Community engagement	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.26	Noticed the City sought input from the community to identify what residents viewed as the preferred water supply option from a supplied list of options.
60	Community engagement	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.27	Will the water conservation methods received through community feedback inform ongoing water supply usage to respond/forecast response to ongoing drought conditions?
61	Socio Economics	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.57	Will there be any cost or benefit to the communities that the proposed water pipeline goes through?
62	General	07-Nov-25	Ministry of Housing and Municipal Affairs	Initial Project Description p.57	What if there is a pipeline rupture, who is responsible for repairing it any any surrounding damage?

63	Engagement	13-Nov-25	Ministry of Housing and Municipal Affairs	Engagement Plan August 15, 2025 p. 13	It looks like there is a variety of engagement methods to communicate and gather feedback from the public.
64		13-Nov-25	Ministry of Agriculture and Food	Initial Project Description, page 53	Based on the initial map, as well as mentioned on page 53 (and 68) this project will significantly overlap with ALR lands. The range of agricultural capability is noted as ranging from a 2-5. Prime agricultural lands are classified from 1-4, meaning the majority of the land this project overlaps with is prime agricultural land. Mitigation measures on the agricultural landbase should be focused and expanded upon and there may even be the possibility of benefit to agriculture through this project. For example improved access to livestock water or the implementation of irrigation infrastructure. It might be worthwhile for the proponent to keep an eye on the Ministry of Agriculture and Food's Agriculture Water Infrastructure Program Stream 2 (Community Projects) as a possible funding opportunity to expand agriculture water infrastructure in the region through this pipeline (https://iafbc.ca/agriculture-water-infrastructure-program/stream-2/)
65		13-Nov-25	Ministry of Agriculture and Food	Initial project Description, page 61	The chart lists the Ministry of Agriculture and Food as the authority for the Agricultural Land Commission Act, however it should be noted that an application would be sent not to the Ministry but to the Agricultural Land Commission
66		13-Nov-25	Ministry of Agriculture and Food	Engagement Plan, page 30	The chart on page 30 lists Agricultural Operators within the Peace Valley who will be reached out to once the project footprint is further refined. The Ministry would recommend engaging not only with specific producers but with prominent agricultural associations (the BC Grain Producers Association, the Peace River Forage Association of BC, the Peace Region Forage Seed Association, the South Peace Stockmen and North Peace Cattlemen) in the region as early on as possible. This project as listed will be located over 50% on agricultural land. The agricultural community should be engaged as early on as possible.
67		13-Nov-25	Ministry of Agriculture and Food	General	The Ministry has shared a standardized guidance document with recommendations for projects undergoing an EA.

68	Proposed Waterline to Supply the City of Dawson Creek	14-Nov-25	Ministry of Transportation & Transit		<p>The Ministry of Transportation and Transit (MoTT) has reviewed the preliminary information regarding the proposed Dawson Creek Water Supply System Project, a water diversion and groundwater extraction initiative. The project includes the installation of four to six groundwater extraction wells along the south side of the Peace River near Taylor, British Columbia, a river intake pipe, associated pumping stations, and a water transmission pipeline approximately 52 kilometers in length extending from the Peace River to the City of Dawson Creek.</p> <p>Any work proposed within or next to a MoTT public road right-of-way must first receive permitting and approval from the Ministry, in accordance with the requirements outlined under Highway Use Permits – Province of British Columbia. This requirement applies to, but is not limited to, any proposed use of MoTT public road rights-of-way such as pipeline crossings, roadway construction or upgrades within road allowances (constructed or unconstructed), roads shown on Crown Grants, surveyed or unsurveyed roads, and any proposed access to MoTT roadways associated with the project.</p> <p>MoTT would like to highlight several important conditions and restrictions that apply to this type of work:</p> <p>**The Ministry does not support the storage of equipment within highway rights-of-way, gravel reserves, tenures, or quarries, nor the establishment of temporary workspaces in these areas.</p> <p>**Pipelines crossing a public road right-of-way must be installed at a 90-degree angle.</p> <p>**Pipelines running parallel to or within highway rights-of-way, gravel reserves, tenures, or quarries are not supported. Similarly, pipelines located parallel to a highway but outside of the right-of-way must not encroach into the required 4.5-metre property line setback.</p> <p>During the design phase, care should be taken to ensure that large vehicles, such as B-Trains, can maneuver safely within the parcel if required for installation, as MoTT generally supports only one access point per lot. Proposed access locations should be situated at least 170 meters from bends or intersections to maintain adequate sightlines and safe decision-making distances for the travelling public. The Ministry strongly encourages proponents to locate the pipeline at least 30 meters from the edge of the MoTT right-of-way wherever possible. Care should be taken to ensure that the minimum depth of cover requirements is met, as the Peace Region is prone to erosion.</p> <p>Additionally, the Ministry recommends that the proponent engage a qualified archaeologist early in the route planning process for permanent pipeline requests. An Archaeological Overview Assessment (AOA), Archaeological Impact Assessment (AIA), and/or Site Alteration Permit (SAP) may be required to address potential impacts to recorded archaeological sites and cultural materials. Should the Development Services Team determine that consultation is required during the review process, an AIA may also be necessary to respond to First Nation concerns or requests for information.</p> <p>MoTT also strongly encourages the submission of any pre-engagement records, Nation feedback, Letters of Support related to the water license applications, and any other relevant consultation documentation with the permit application package to support the Ministry’s review.</p> <p>The proponent is encouraged to contact MoTT as early as possible to discuss the proposal, particularly if any of the above-noted conditions may be affected. Please be aware that the MoTT Development Services Department reserves the right require design modifications, or initiate consultation internally and externally during the permit review process.</p> <p>We appreciate the City’s coordination on this matter and look forward to continued collaboration to ensure the safe and effective development of infrastructure in the region. Should you have any questions or require further clarification, please contact Pearl Canaday at pearl.canaday@gov.bc.ca or by phone at 250-795-3139.</p>
----	---	-----------	--------------------------------------	--	---

69		14-Nov-25	WLRS	3.2.3/Appendix B	While the water treatment facility is described, there is no explicit mention of the water content differences between the Peace and the Kiskatinaw Rivers. Can the treatment plant actually treat this new water source? Volume is discussed but not content. Appendix B, page 7 indicates that water quality has not been assessed. The Peace River contains manganese and in places it exceeds the health limits. The Kiskatinaw does not contain amounts that would have to be treated. Does the DC water treatment facility have the ability to deal with this if this is the case, or should an expanded or new treatment facility be being considered in this exemption request as well?
70		14-Nov-25	WLRS	4.3.1	It is mentioned that timber will be salvaged and non-merchantable timber is burnt, given away or mulched. Are small mammal piles being considered near good habitat to create connectivity? Who benefits from the sale of the merchantable timber (if profitable)?
71		14-Nov-25	WLRS	8.2	It should be noted that a desktop review for vegetation and ecosystems is not sufficient for most species at risk in the NE region. Much is not known or mapped (or submitted to the provincial repositories). For example, the presence of Upland Sandpiper is likely a lot higher along the proposed route than the desktop review of listed occurrences would indicate.
72				8.2.2	Concerned about the feedback loop here given this statement, "Project-specific surveys will be undertaken as needed to inform construction planning and to obtain permits and approvals required for construction." If an exemption is granted, who determines the "as-needed" scope?
73		14-Nov-25	WLRS	general	In the case of exemption request, it would be good to see the other pathways considered (like one straight north which would be shorter distance). Some reasons such as slope/grade, don't make a lot of sense, as this route has to deal with the Kiskatinaw river valley in addition to a few others. This feels a little like, "trust me, I'm right".
74		14-Nov-25	WLRS	general/Appendix B	As stated in Appendix B, the amount of water being applied for, significantly exceeds the city's needs and that the additional water is intended for industrial use. Thus, the cumulative effects of the pipeline should be considered. Will the access to water increase activity along the corridor? This could have implications to wildlife, wildlife habitat and vegetation communities beyond what is presented in this initial project description
75	Groundwater	16-Oct-25	Halfway River First Nation		WATER QUANTITY: Many communities, agricultural operations, and industrial users—including oil and gas—draw water from the Peace River, both upstream and downstream of the proposed intake. The proposed extraction represents a substantial volume of water. What will this project mean for overall water availability in the Peace River and the broader region? Who has priority during low flow conditions? How will BC Hydro, with its three dams on the Peace, be involved? If flows are low, will additional water be released?
76	Groundwater	16-Oct-25	Halfway River First Nation		WATER QUANTITY: A mechanism should exist to shut off industrial water sales during ecological concerns or drought. Priority should be given to potable water for the city and residents. HRFN requests the project consider an Environmental Flow Needs (EFN) threshold to curtail extraction if permitted withdrawal volumes exceed environmental flow needs. Industrial and commercial withdrawals should be curtailed before domestic use. Current monitoring tools (e.g., Northeast Water Tool) do not provide real-time data; better monitoring is needed
77	Economics	16-Oct-25	Halfway River First Nation		How will this impact city users and water price and availability when industrial users, such as oil and gas, can pay higher prices and potentially drive costs up? What is the overall potential impact on water availability and pricing for all users in the region? Setting a precedent where water becomes a long-term revenue source for the city is unacceptable and could encourage other municipalities to do the same. Halfway Lands Office supports water use for the city's municipal water needs but does not support selling water to industrial users as a commodity to fund infrastructure, especially in perpetuity.
78	Groundwater	16-Oct-25	Halfway River First Nation		WATER QUANTITY: If an alternative is found, does the City revoke its existing Kiskatinaw water licence?
79	Groundwater	16-Oct-25	Halfway River First Nation		ALTERNATIVE OPTIONS: What alternative funding options have been explored by the city apart from industrial water sales? For example, funding from other levels of government, grants or the city's own source revenue. What assessment has been done of alternative water sources (e.g., the Pine River) that may be closer, more cost-effective, and not reliant on industrial water sales?

80	Groundwater	16-Oct-25	Halfway River First Nation		<p>WATER QUALITY: The proposed intake is downstream of major industrial activities that may impact drinking water quality: BC Hydro dams (contributing to methylmercury), major mining projects (contributing to selenium), petroleum and natural gas extraction and processing (contributing to hydrocarbons)</p> <p>Water treatment plans need clarity: Will water be treated only at the city, or also at filling stations for intermediate or end users?</p> <p>Using untreated water could harm human health and the ecosystem.</p> <p>The project should include a baseline assessment identifying potential contaminants and ongoing water quality testing. Will there be additional water treatment if contaminants of concern are detected?</p>
81	Fish and Aquatic Resources	16-Oct-25	Halfway River First Nation		<p>Intact riparian corridors are important to HRFN for supporting Treaty 8 Rights.</p> <p>Wherever practicable, riparian areas should be avoided or fully restored.</p>
82	Fish and Aquatic Resources	16-Oct-25	Halfway River First Nation		<p>The Kiskatinaw River has existing contamination issues, primarily from cattle waste and occasional dead animals.</p> <p>The proponent should provide more information on the current state of the river and how it reached this condition.</p> <p>Restoration and rehabilitation of the Kiskatinaw River should be prioritized rather than simply abandoned. It could serve as a backup water source and is an important ecosystem that requires care.</p> <p>Monitoring of Kiskatinaw River flow is insufficient and needs improvement.</p>
83	General Comment	16-Oct-25	Halfway River First Nation		Any new project must ensure careful planning and learn from previous impacts to rivers like Kiskatinaw. Without proper planning there is a risk of repeating the same issues at the new river source.
84	General Comment	16-Oct-25	McLeod Lake Indian Band		Noted that the proponent had not previously met with them to discuss the project and expressed a desire to do so now.
85	Archaeological and Heritage Resources	16-Oct-25	McLeod Lake Indian Band		Highlighted the need for an archaeological baseline assessment of the area.
86	Biophysical Factors and Ecosystem Function	16-Oct-25	McLeod Lake Indian Band		Raised cumulative effects as a significant concern. Requested a meeting with the proponent to review the project in relation to the cumulative effects tool, specifically the disturbance calculator.
87	Groundwater	16-Oct-25	McLeod Lake Indian Band		Raised concerns about industrial water sales to oil and gas, including the potential for high water use and impacts on treaty rights.
88	Construction and operation schedule	02-Oct-25	Saulteau First Nations		Saulteau First Nations requested additional detail on project timelines and phases, noting that the IPD provides only high-level information.
89	General Comment	10-Nov-25	Saulteau First Nations		Saulteau First Nations emphasized the river's significance and requested information on how the overall water balance among all users (current and future) is being considered. We asked how this relates to the region's overall water use and to what extent the City's water crisis is influenced by drought, population growth, and industrial demand.
90	Archaeological and Heritage Resources	10-Nov-25	Saulteau First Nations		Saulteau First Nations asked whether an archaeological assessment will be completed for the project area.
91	Groundwater - water end use	10-Nov-25	Saulteau First Nations		Saulteau First Nations requested clarification from the City of Dawson Creek on how water is managed and disposed of after use.
92	General Comment	10-Nov-25	Saulteau First Nations		Saulteau First Nations have a sacred relationship with water. The death of a river, or the disrespectful use of a river, is akin to the death of a relative or disrespect of an Elder. Our Treaty rights and cultural responsibility require us to protect and respect all water.
93	General Comment	10-Nov-25	Saulteau First Nations		We understand the Peace River is over allocated with water licenses even without adding the Dawson Creek new withdrawals. We are concerned about upstream impacts on water levels and water availability.
94	General Comment	10-Nov-25	Saulteau First Nations		The water balance of the region is a key factor in understanding the effects being created that will have generational impact.
95	Treaty rights and responsibilities	10-Nov-25	Saulteau First Nations		In Section 11.2, the IPD states "The Project Study Corridor is not located within the areas for enhanced management and restoration that have been identified by Saulteau First Nations within the Consensus Document (Saulteau First Nations 2023)." This statement is misleading and suggests Saulteau First Nations have no stewardship interests or responsibilities in the project area. This statement must be edited or enhanced in a future DPD to reflect that Saulteau First Nations has Treaty rights and responsibilities outside of the enhanced management areas identified in the 2023 letter agreement.

96	Regional water allocation	10-Nov-25	Saulteau First Nations		The IPD states that some of the water allocation in the water licence is intended for a doubling of the Dawson Creek population. However, the IPD also notes a stagnant or declining population in the region. “The City grew by an average of 1.2% from 2016 to 2021, whereas the Village of Pouce Coupe’s population declined by 3.8% and the greater Electoral Area D population declined by 19% during that same period (Statistics Canada 2023). During this same time period, the provincial population has increased by an average of 7.6% (Statistics Canada 2023). The reason for the stagnant or declining population in the Northeast is likely due to a combination of factors, including an aging population, an out-migration of working-age individuals, limited immigration, and economic factors (BC Stats 2025, Northern Development 2022).” We are concerned about the First in Time, First in Right (FIT FIR) approach BC takes to water allocations, and the implications a significant over allocation in the license would have to the health of our territory and the ability to exercise Treaty rights.
97	IPD and Engagement Plan	10-Nov-25	Saulteau First Nations		There is no specific plan for engagement with Saulteau First Nations described in the Engagement Plan submitted to BC with the IPD. Saulteau First Nations considers this Engagement Plan deficient. Furthermore, the Engagement Plan says that “The submission of this EP and the IPD formally communicates this intent [for an EA exemption] and provides an opportunity for interested parties to offer feedback.” And then goes on to say “At the time of writing, no feedback regarding the intent to seek exemption had been received.” We hope that the Crown can see that no feedback on the exemption is irrelevant given that the EP and IPD is the first written communication of an application for Exemption. Saulteau First Nations has not and does not have enough information about the Project and its effects to make a consensus decision regarding this exemption.