

June 17, 2011

The Honourable Peter Kent
Minister of Environment
10 Wellington Street, 28th Floor
Gatineau, Quebec, K1A 0H3

Re: CEEA Full Panel Review Request for Proposed Site C Dam on the Peace River in Northeastern British Columbia

Dear Minister Kent,

The Keepers of the Athabasca Watershed Council hereby requests that BC Hydro's proposed Site C Clean Energy Project [Site C dam] on the Peace River in northeastern British Columbia be subject to a full panel federal environmental assessment [EA]. We believe that no other federal and/or provincial process would provide the opportunity to fully and adequately assess the diverse array of issues associated with this project, especially its effects on fish, wildlife, water and aboriginal residents of the Peace-Athabasca Delta area, which lies within the Athabasca River and Lake Basin in Alberta. The Delta is already heavily impacted by the Bennett Dam on the Peace River in British Columbia and is of direct concern to our membership, many of whom are reliant on this region for their livelihood. The proposed Site C dam would likely have further negative impacts on our membership.

The Keepers of the Athabasca are First Nations, Métis, Inuit, environmental groups, and Watershed citizens working together for the protection of water, land and air, and thus for all living things today and tomorrow in the Athabasca River Watershed. Our mission is to unite the peoples of the Athabasca River and Lake Watershed to secure and protect water and watershed lands for ecological, social, cultural and community health and well being.

The Peace-Athabasca Delta is the world's largest boreal freshwater delta and is one of the most important waterfowl nesting and staging areas in North America. A Ramsar Convention Wetland and UNESCO World Heritage Site, it is among the world's most ecologically significant wetlands. Millions of birds come to nest in the delta, including the internationally threatened whooping crane. Traditionally, the delta has been alive with a diversity of life that is dependent on the Peace and Athabasca Rivers to bring in nutrient-rich sediment, which washed over the delta in a flood cycle - the rivers flooded the delta and refilled thousands of wetlands, depositing nutrient rich sediment that created the delta's sprawling flat marshland nature. This marshland is critical to the aboriginal people who have hunted, fished and trapped in the delta region for over 7,000 years. The delta continues to be an important part of their livelihood today and the health of the delta is essential to maintain their lifestyle in the future.

Now, however, the Peace-Athabasca Delta is drying out. The flood events that were essential to the delta's productivity have become rare since the Bennett Dam was built in 1968. Flow regulation on the Peace River, in conjunction with a natural drying trend, has reduced seasonal flooding that is important in maintaining the deltaic ecosystem. Hundreds of thousands of hectares of productive marshes are becoming willow forests which are low in productivity with resulting wildlife populations that are a small fraction of their pre-Bennett Dam numbers. Hundreds of kilometers of formerly navigable channels are now too shallow for boats most of the time. This delta drying trend is being further impacted by massive water withdrawals from the Lower Athabasca River for the oil sands industry.

“Fish population and ecosystem structure and function in the Peace-Athabasca Delta have been investigated by a number of researchers (e.g., Donald 1977, Donald and Kooveman 1974). It is evident that the delta is richly diverse in its species and supports important spawning and rearing habitat for several species of fishes (NRBS 1994, Paul 2009). The perched basins are rich in spring and summer production, when used by juveniles and the forage fish guild. Paul (2009) demonstrated that discharge in the Lower Athabasca River and lake level in Lake Athabasca affect walleye recruitment. It is well documented that the operation of the WC Bennett Dam on the Peace River has shrunk the wetted perimeter on the north side of the Peace Athabasca Delta if not all of the delta” (Boag 2010).

Cumulative impacts from human industrial and other activities on the Peace and the Athabasca Rivers make the care of the delta a complex issue. The Peace-Athabasca Delta is critical to the traditional culture and livelihood rights of the First Nations peoples who occupy the lands surrounding it. The impacts of B.C. Hydro's Bennett Dam have already had devastating and long-term impacts to First Nations, such as the Athabasca Chipewyan First Nation (ICC 1996). Current evidence shows that declining water flows in the Athabasca River are adversely affecting the ability of Mikisew Cree First Nation and Athabasca Chipewyan First Nation members from accessing their traditional hunting and fishing areas and their Indian Reserve Lands, in the Peace-Athabasca Delta (Candler et al. 2010).

Water flow issues in the Peace River are multi-jurisdictional, involving municipal, interprovincial, territorial, federal, and First Nations government levels, as well as having an international scope. To maintain the ecological integrity of the Peace-Athabasca Delta, solutions must involve a coordinated effort of all levels of government and include grass roots input. As mitigation of delta impacts from the Bennett Dam are yet to be resolved it would be a devastating loss to the delta to further impact the Peace River with the construction of the Site C Dam. A full panel federal EA is the process required to adequately consider the environmental impacts of this highly controversial project. We are asking you to ensure that BC Hydro's proposed Site C Dam project and transmission development is subjected to a full panel review under the CEAA.

Sincerely,

Janice Pitman
Coordinator
Keepers of the Athabasca

Roland Woodward
Chair
Keepers of the Athabasca

Julie Burke
Co-Chair
Keepers of the Athabasca

CC:

Minister, Fisheries and Oceans Canada
Canadian Environmental Assessment Agency
Minister, Indian and Northern Affairs Canada
BC Minister, Aboriginal Relations and Reconciliation
BC Minister, Environment
BC Environmental Assessment Office
BC Minister, Forests, Lands and Natural Resource Operations
AB Minister, Environment
AB Minister, Sustainable Resource Development
AB Minister, Aboriginal Relations

Reports Cited:

- Boag, T. D. and Meulen M. Vander and Applied Aquatic Research Ltd. 2010. A Review of Lower Athabasca River Instream Flow Needs and the Phase 2 Water Management Framework-Fishes and Their Habitat. Available on line: http://www.ceaa.gc.ca/050/documents_staticpost/cearref_37519/44815/A12.pdf
- Candler, Craig., Rachel Olson, Steven DeRoy and the Firelight Group Research Cooperative. 2010. As Long as the Rivers Flow: Athabasca River Knowledge, Use and Change. Available on-line: <http://parklandinstitute.ca/downloads/reports/AsLongAsRiversFlow-WEB.pdf>
- ICC [Indian Claims Commission]. 1998. Athabasca Chipewyan First Nation Inquiry W.A.C. Bennett Dam and Damage to Indian Reserve 101 Claim. Available on-line: <http://24583.vws.magma.ca/pdf/ICCP/ICCP10/5-%20Athabasca%20Chipewyan%20Inquiry%20-%20Bennett%20Dam.pdf>