

NRCB APPLICATION NO. 0602

AEUB APPLICATION NO. 1485454

**DUNVEGAN HYDROELECTRIC PROJECT
PROPOSED BY GLACIER POWER LTD.**

**PRE-HEARING SUBMISSION
JANUARY 28, 2008**

SUBMISSION OF



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Represented by:
Bob Cameron, Chairman, South Peace Environment Association
January 28, 2008

Alberta Wilderness Association, Canadian Parks and Wilderness Society – Edmonton Chapter, and South Peace Environment Association make this submission to identify major issues that we are requesting be examined at the Project’s hearing, date and place to be determined. Please include this submission for the record of the pre-hearing as a pre-hearing exhibit.

A. Major Issues to be Examined at the Hearing

We respectfully request that the following ten issues be addressed at the hearing.

ISSUE ONE: Effects on Fish

The application by Glacier Power Ltd. clearly accepts that there will be fish mortality, loss of habitat and reduction in fish movement if the proposed weir is allowed. We are opposed to any development that will impede fish movement, increase mortality and diminish habitat. By the company’s own admission there will be significant adverse effect on the fish population.

ISSUE TWO: Effects on Other Wildlife

Glacier Power’s EIA is clear that valuable shoreline habitat will be lost due to permanent inundation with the creation of the headpond. We find it unacceptable that the Peace River valley, which is a refuge for wildlife from the surrounding human development, should be sacrificed in this way. The claims that upslope habitat will become riparian habitat over time does not address the loss of total habitat or mitigate the damage in the intervening years.

Second, studies on wildlife crossings in winter indicate that considerable cross-river movement on ice occurs. Yet, Glacier Power concludes that “open water below Dunvegan is unlikely to present a barrier” (EIA p. 4- 399). Our concern is the impacts on wildlife crossings up to 80 km downstream of the weir in cold winters when the water will remain unnaturally open due to the weir. The results of wildlife not being able to take advantage of the different habitats on either side of river (being quite different ecologically due to a north versus south exposure) is a serious concern that is not addressed in the EIA.

ISSUE THREE: Slumping

The effects of the Project on slumping remain an outstanding deficiency in the EIA. While the level of water in the head pond will not exceed natural fluctuation levels it is incorrect to assume this means the head pond will not increase slumping. Permanent water at high level will soak in and have a much different effect than seasonal flooding. While slumping is a natural process in the Peace River Valley, the regeneration of these sites is compromised due to the overwhelming availability of weed species to colonize and take over these newer slumps. The negative impacts of this are significant given the current intensive agricultural use of the surrounding uplands, wherein slumps currently seem to be invaded by introduced weedy species rather than following a natural succession to native grassland. Slumping is a major concern that is not adequately addressed by the EIA.

ISSUE FOUR: Cumulative Effects Related to the Bennett Dam

This issue remains an outstanding deficiency in the EIA. The Project will potentially be a significant contributor to negative environmental impacts through its cumulative effects interaction with the Bennett Dam. Glacier Power has not provided adequate information to discuss the incremental effects of its project with the Bennett Dam effects as the baseline. Further, the proposed development of BC Hydro’s Site C is not adequately addressed as “the effects cannot be assessed at the present time.” The EUB/NRCB does not have the information before it that allows clear understanding of the potential significant negative cumulative effects on communities and ecosystems downstream

ISSUE FIVE: Other Cumulative Effects

Cumulative effects including existing development on the Peace River, on-going industrial pollution, global warming and subsequent applications for more weirs continue to be major issues that are not adequately addressed by Glacier Power. Further, the application states that “New borrow pits, the expansion of the Dunvegan Historic Site, and the expansion of transportation and utility corridors have the potential to act cumulatively with Project effects on sedimentation, vegetation, wildlife, and fisheries.”

ISSUE SIX: Aggregate Mining

We are concerned about a rare biotic community in the alluvial fan.

ISSUE SEVEN: Historical and Archeological Importance of Area

In-situ conservation of our historical and archeological heritage is an important resource for understanding our province’s past. Glacier Power’s application identifies four sites that are in conflict with the Project ranging from moderate to high historical importance. They also acknowledge that “site contexts will be destroyed and some of the site’s contents will be lost.” Mitigation suggested by Glacier Power is insufficient to preserve the record of our past in its surrounding context and the removal of artifacts from their context will greatly reduce their value for understanding history.

ISSUE EIGHT: Alternatives to the Project

We believe that possible alternatives to the project have not been fully investigated.

ISSUE NINE: Public Safety

We are concerned with several public safety issues in regards to the Project. Although Glacier Power plans to build a boat lock, any instream obstruction in an otherwise free flowing stream is a matter of public safety and liability and is a significant issue. Second, it is reasonable to expect that people from the surrounding area will visit the Project in order to see the weir. As a responsible company, Glacier Power would have to provide adequate safety measures, increasing the infrastructure in the river valley and impact on local vegetation and wildlife. Thirdly, the potential for human exposure to chemical hazards through various means is not completely investigated. Appendix SIR-G of the Response to Supplemental Information Requests states that groundwater is the source of drinking water in the area, when actually the water intake for the regional water supply is downstream of Dunvegan. Relating to the possibility of the ingestion of harmful chemical through vegetation, Glacier Power has not addressed the issue of the Dunvegan and Bridgeview market gardens in the immediate area. As these issues need further investigation and as a risk assessment has not been completed we ask that these issues be addressed at the hearing.

ISSUE TEN: Transportation

The impacts of the Project on transportation in the area needs to be further investigated. Increased fog and ice fog raise serious safety concerns, as well as concern for the potentially decreased lifespan of the bridge.

B. Location and Timing of Hearing and Accompanying Deadlines

In the matter of timing and location, we will abide by the Board’s decision in these matters.