

July 5, 2016

Canadian Environmental Assessment Agency
National Programs
160 Elgin Street, 22nd floor
Ottawa, Ontario K1A 0H3
Attention: Ms. Magali Francoeur and Mr. Michel K. Vitou

Dear Ms. Francoeur and Mr Vitou:

RE: Site C Clean Energy Project – 2015 Heritage Resources Management Plan Annual Report

Construction of the Site C Clean Energy Project commenced on July 27, 2015. This first Heritage Resources Management Plan (HRMP) annual report was prepared in accordance with Condition 15.6 of the Decision Statement which states:

The Proponent shall implement the plan and provide to the Agency an analysis and summary of the implementation of the plan, as well as any amendments made to the plan in response to the results, on an annual basis during construction and for the first five years of operation, unless otherwise indicated.

BC Hydro completed heritage work regarding palaeontological, archaeological and historical resources in the past year in accordance with the HRMP. The work completed is described in two reports: one that discusses archaeological and protected historical resources, and the other that discusses palaeontological resources. Lastly, attached is a table that provides a summary of compliance with HRMP conditions.

In accordance with the HRMP and Heritage Conservation Act permits, BC Hydro completed archaeological and historical impact management from July 27 to December 31, 2015 as described in the following report:

Annual Report - HCA Permits 2014-0203, 2014-0274 & 2015-0193 Site C Clean Energy Project - Archaeological Program Year 5 (2014) and Year 6 (2015) Summary Report submitted April 21, 2016 to the Archaeology Branch of Ministry Forests, Lands and Natural Resource Operations.

When referenced again, the report will be called Annual Report - HCA Permits.

The Annual Report – HCA Permits includes archaeological and protected historical resources. Please note that the Annual Report – HCA Permits includes a summary of work completed and findings from both 2014 and 2015. While the work completed in 2014 predates the Federal Decision Statement, the report includes multiple years of work as agreed to with the BC Archaeology Branch. The report includes final reports related to permit 2014-0203 that is now closed for work that also predates the Federal Decision Statement.

Archaeological and protected historical resources in B.C. are regulated under the Heritage Conservation Act. Work was performed in compliance with the following permits:

1. Heritage Conservation Act Inspection Permit 2014-0274 with approval issued Sep. 29, 2014.
2. Heritage Conservation Act Site Alteration Permit 2015-0193 with approval issued July 15, 2015.
3. Heritage Conservation Act Site Alteration Permit 2015-0193 Amendment 001 with approval issued March 31, 2016.

The three letters of approval for the Heritage Conservation Act permits (items 1, 2 and 3) can be found at the following link:

<https://extranet.bchydro.com/sites/SiteC/Transfer/Plans/CEAA/Annual%20Reports/HRMP>

As per the HRMP, archaeological impact management involves work that includes:

- Archaeological inventory and impact assessments of areas with high potential for archaeological resources
- Systematic data recovery from selected protected archaeological sites
- Inspections of protected archaeological sites post ground disturbance

These three forms of archaeological work are described in the Annual Report – HCA Permits.

The Annual Report – HCA Permits report provides details of work completed, the analysis of the results, incidents, learnings particularly with regards to inspections which were undertaken for the first time in 2015, and conclusions and recommendations. The report includes an Executive Summary that can be found on pages viii-x. The full report (item 4) can be found at the following link:

<https://extranet.bchydro.com/sites/SiteC/Transfer/Plans/CEAA/Annual%20Reports/HRMP>

BC Hydro completed palaeontological work in 2015 and in March 2016 in accordance with the HRMP and the *Canadian Environmental Assessment Act, 2012*, which requires that any structure, site or thing that is of paleontological significance be taken into consideration. There is no provincial regulation regarding palaeontological resources. The following reports describe work completed in 2015 and March 2016 regarding palaeontological resources:

1. Annual Report - Site C Clean Energy Project: Palaeontological Resources Field Work Summary for Year 6 (2015) submitted June 8, 2016 to the Ministry of Forests, Lands and Natural Resource Operations and to the Royal BC Museum.
2. Chance Find 001 Palaeo Sample Analysis 17MAY_16 submitted to the Ministry of Forests, Lands and Natural Resource Operations and to the Royal BC Museum.

When referenced again, the annual report will be called 2015 Annual Report: Palaeontological Resources.

The 2015 Annual Report: Palaeontological Resources summarizes palaeontological field work completed in 2015 (Year 6) and focuses on two areas recommended for mitigation through Preservation-by-Record prior to site preparation (ie, clearing, grubbing, and road improvements). A brief summary can be found on page 1 of the report. The chance find report summarizes palaeontological field work performed in response to the chance find of equid (horse) skeletal elements that occurred during construction preparation activities.

The 2015 Annual Report: Palaeontological Resources and the Site C Chance Find 001 Palaeo Sample Analysis report (items 5 and 6) can be found at the following link:

<https://extranet.bchydro.com/sites/SiteC/Transfer/Plans/CEAA/Annual%20Reports/HRMP>

Attachment 1 to this letter provides a table that lists the Commitments or Conditions of the Environmental Assessment Certificate (EAC) and Federal Decision Statement (FDS) that relate to mitigation of heritage resources indicating the following:

- Reference to the section of the Heritage Resource Management Plan where the condition/ commitment mitigation requirements are described;
- The status of the condition and associated deliverables / actions (e.g. Not Started, Ongoing, Complete); and
- Reference to applicable deliverables / evidence that document compliance if applicable (e.g. for ongoing or completed commitments).

The table reflects the table found in Section 2 of the HRMP submitted to the CEAA on June 5, 2015 with additional columns added as described above.

Please do not hesitate to contact me at 604-695-5234, or bettina.sander@bchydro.com, if you have any questions or comments.

Best regards,



Bettina Sander
Regulatory Manager
Site C Clean Energy Project

2015 HRMP Condition Compliance Summary

The purpose of the Heritage Resources Management Plan is to describe the measures that will be used to mitigate the adverse effects of the Project on heritage resources. The Plan has been developed in accordance with the conditions of the Environmental Assessment Certificate (EAC) and federal Decision Statement (FDS), as indicated in the table below.

Condition	Condition	Plan Reference	Status	Evidence / Deliverables
EAC Condition 62	The EAC Holder must protect and preserve heritage resources by implementing measures as detailed in a Heritage Resources Management Plan.	Heritage Resources Management Plan		
	The Heritage Resources Management Plan must be developed by a QEP.	Section 10.0 Qualified Professionals	Complete June 5, 2015	Heritage Resources Management Plan
	The Heritage Resources Management Plan must specify a process for the engagement of Aboriginal Groups in planning and follow-up/monitoring activities related to heritage resources as the Project proceeds. In particular, the Plan must incorporate a process for continued collaboration with Aboriginal Groups on ground-truthing for the identification of any burial sites that the Project may disturb.	Section 4.0 Engagement with Aboriginal Groups	Complete June 5, 2015	Heritage Resources Management Plan
	The Heritage Resources Management Plan must include Archaeological Impact Management and Heritage Resources Monitoring and Follow-Up Programs. The field and reporting portions of each program will be of a scope, duration and frequency prescribed by the BC Heritage Conservation Act	Section 8.0 Heritage Monitoring and Follow-Up Program Section 6.0 Heritage Resources Impact Management	Complete June 5, 2015 Ongoing	Heritage Resources Management Plan Annual Report – HCA Permits

Condition	Condition	Plan Reference	Status	Evidence / Deliverables
	permits. The Archaeology Impact Management Program must be developed by a QEP qualified to hold Section 14 Heritage Inspection and Investigation Permits.	Section 10.0 Qualified Professionals	Complete June 5, 2015	Heritage Resources Management Plan
	The Heritage Resources Monitoring and Follow-Up Program must include at least the following:			
	<ul style="list-style-type: none"> Monitor reservoir erosion during occurrences of exposure to assess the impacts on existing or newly identified protected archaeological sites and other heritage resources 	Section 8.0 Heritage Monitoring and Follow-Up Program	Not started	Will commence upon occurrence of reservoir exposure
	<ul style="list-style-type: none"> Implement mitigation measures, systematic data recovery or emergency salvage operations in accordance with the Heritage Resources Management Plan. 	Section 6.0 Heritage Resources Impact Management	Ongoing	<ul style="list-style-type: none"> Annual Report – HCA Permits 2015 Annual Report: Palaeontological Resources Chance Find 001
	<ul style="list-style-type: none"> Conduct the monitoring of shoreline erosion downstream (for approximately 2 km) as part of chance-find procedures to determine if physical heritage resources are affected by the Project. The EAC Holder must undertake this monitoring for any spills from the Project reservoir for a period of two years following the commencement of reservoir filling and commissioning. 	Section 8.0 Heritage Monitoring and Follow-Up Program	Not started	Will be conducted following commencement of reservoir filling and commissioning
	<ul style="list-style-type: none"> Establish a reporting structure for reporting to Aboriginal Groups and the Archaeology Branch beginning 180 days following the commencement of operations. 	Section 9.0 Reporting	Not started	Will begin 180 days following the commencement of operations

Condition	Condition	Plan Reference	Status	Evidence / Deliverables
	<ul style="list-style-type: none"> The EAC Holder must file the final Heritage Resources Management Plan with EAO, Archaeology Branch and Aboriginal Groups a minimum of 30 days prior to commencement of construction. 	Section 2.3 Consultation	Complete June 5, 2015	Heritage Resources Management Plan
	<ul style="list-style-type: none"> The EAC Holder must develop, implement and adhere to the final Heritage Resources Management Plan, and any amendments, to the satisfaction of EAO. 	Section 2.3 Consultation	Ongoing	2015 Heritage Resources Management Plan Annual Report
EAC Condition 64	The EAC Holder must provide a total of \$100,000 to local accredited facilities in close proximity to the Project, prior to the start of operations, to curate and display the recovered resources and the funding is not to be used for buildings to house them. These funds must be provided only to facilities that agree to work with interested Aboriginal Groups on the display and curation of those artefacts.	Section 7.0 Compensation- in-Kind	Not started	To take place in Year 5 of construction phase
FDS Condition 15.1	The Proponent shall ensure that the Designated Project is constructed and operated in a manner that avoids, minimizes or manages impacts to local archaeological and heritage resources.	Section 6.0 Heritage Resources Impact Management	Ongoing	<ul style="list-style-type: none"> Annual Report – HCA Permits 2015 Annual Report: Palaeontological Resources Chance Find 001
FDS Condition 15.2	The Proponent shall develop, in consultation with Reservoir Area Aboriginal groups and the Métis Nation British Columbia, a plan to avoid, minimize or manage impacts to local archaeological and heritage resources.	Section 2.3 Consultation Section 4.0 Engagement with Aboriginal Groups	Complete June 5, 2015	Heritage Resources Management Plan

Condition	Condition	Plan Reference	Status	Evidence / Deliverables
FDS Condition 15.3	The plan shall include:			
FDS Condition 15.3.1	<ul style="list-style-type: none"> procedures to continue inventories and ground truthing of potential physical and cultural heritage resources to determine the need and applicability of mitigation measures; 	<p>Section 4.0 Engagement with Aboriginal Groups</p> <p>Section 5.2 Additional Baseline Inventory</p>	<p>Ongoing</p> <p>Not started</p>	<p>See section 3. Ground Truthing, Aboriginal Plant Use Mitigation Plan (submitted July 5, 2016)</p> <p>Any additional inventory work will be completed in accordance with the Heritage Conservation Act Inspection Permit 2014-0274 extension</p>
FDS Condition 15.3.2	<ul style="list-style-type: none"> measures to address the effects of the Designated Project on the physical and cultural heritage and to structures, sites or things that that have been identified as being of historical, archaeological, paleontological or architectural significance by local stakeholders, relevant organizations, Reservoir Area Aboriginal groups and the Métis Nation British Columbia; 	Section 6.0 Heritage Resources Impact Management	Ongoing	<ul style="list-style-type: none"> Annual Report – HCA Permits 2015 Annual Report: Palaeontological Resources Chance Find 001
FDS Condition 15.3.3	<ul style="list-style-type: none"> procedures to monitor reservoir erosion during occurrences of low reservoir levels, to investigate any potentially new-found sites and to carry out emergency salvage procedures during construction and operation; and 	Section 8.0 Heritage Monitoring and Follow-Up Program	Not started	Will commence upon occurrence of reservoir exposure
FDS Condition 15.3.4	<ul style="list-style-type: none"> procedures to monitor shoreline erosion downstream of the Site C dam for up to 2.5 kilometres during the first two years of operation to determine if physical heritage 	Section 8.0 Heritage Monitoring and Follow-Up Program	Not started	Will be conducted following commencement of reservoir filling and commissioning

Condition	Condition	Plan Reference	Status	Evidence / Deliverables
	resources are affected.			
FDS Condition 15.4	The Proponent shall submit to the Agency, Reservoir Area Aboriginal groups and the Métis Nation British Columbia a draft copy of the plan for review 90 days prior to initiating construction.	Section 2.3 Consultation	Complete June 5, 2015	Heritage Resources Management Plan
FDS Condition 15.5	The Proponent shall submit to the Agency the final plan a minimum of 30 days prior to initiating construction. When submitting the final plan, the Proponent shall provide to the Agency, an analysis that demonstrates how it has appropriately considered the input, views or information received from Reservoir Area Aboriginal groups and the Métis Nation British Columbia.	Section 2.3 Consultation	Complete June 5, 2015	Heritage Resources Management Plan
FDS Condition 15.6	The Proponent shall implement the plan and provide to the Agency an analysis and summary of the implementation of the plan, as well as any amendments made to the plan in response to the results, on an annual basis during construction and for the first five years of operation, unless otherwise indicated.	Section 9.0 Reporting	Ongoing	2015 Heritage Resources Management Plan Annual Report