

March 29, 2018

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

Dear Mr. Courville and Mr. Vitou:

RE: Site C Clean Energy Project – 2017 Heritage Resources Management Plan Annual Report

Construction of the Site C Clean Energy Project commenced on July 27, 2015. This third 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 three reports: two that discuss archaeological and protected historical resources, and the third 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 primarily April through October, 2017. This work is described in the following two reports:

Annual Report - HCA Permits 2014-0274 & 2015-0193 Golder - Site C Clean Energy Project - Archaeological Program Year 8 (2017) Summary Report Annual Report - HCA Permits 2014-0274 & 2015-0193

Annual Report – HCA Permit 2016-0235 Ecofor – Site C Clean Energy Project – Systematic Data Recovery Annual Summary Report (2017) - Heritage Investigation Permit 2016-0235

When referenced again, the reports will be called Annual Report - HCA Permits Golder and Annual Report – HCA Permit Ecofor.

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

Permit	Issued	Expiry	Amendments	Reporting Requirements	Due	Last Submitted
Heritage - Inspection Permit 2014-0274	July 15, 2015	Dec. 31, 2023	001: July 15, 2015 002: Feb. 3, 2016 003: Jun. 20, 2017	Annual Permit Report to Archaeology Branch	March 31, 2017	March 31, 2017*
				Final Permit Report to Archaeology Branch	December 31, 2023	Not started
Heritage - Site Alteration Permit 2015-0193	July 15, 2015	Dec. 31, 2023	001: Mar. 31, 2016 002: Nov. 18, 2016 003: Jan. 27, 2017 004: Aug. 2, 2017 005: Aug. 8, 2017 006: Oct. 17, 2017 007: Dec. 27, 2017 008: Mar. 8, 2018	Annual Permit Report to Archaeology Branch	March 31, 2017	March 31, 2017*
				Final Permit Report to Archaeology Branch	December 31, 2023	Not started
Heritage - Investigation Permit 2016-0235	August 4, 2016	March 31, 2020	001: May 9, 2017	Annual Permit Report (Ecofor to Arch Branch)	March 31, 2017	March 27, 2017**
				Final Permit Report to Archaeology Branch	March 31, 2020	Not started

* Annual Report - HCA Permits 2014-0274 & 2015-0193 Golder - Site C Clean Energy Project - Archaeological Program Year 8 (2017) Summary Report *submitted March 31, 2017 to the Archaeology Branch, Ministry of Forests, Lands and Natural Resource Operations.*

** Annual Report – HCA Permit 2016-0235 Ecofor - Site C Clean Energy Project – Systematic Data Recovery Annual Summary Report (2017) *submitted March 27, 2017 to the Archaeology Branch, Ministry of Forests, Lands and Natural Resource Operations.*

The following permit amendments for the Heritage Conservation Act permits obtained in the past year are listed below and can be found at the link provided:

<https://www.sitecproject.com/document-library/permits-and-authorizations>

1. HCA Inspection Permit 2014-0274 Permit Amendment 003.
2. HCA Site Alteration Permit 2015-0193 Permit Amendment 004 – 008.
3. HCA Investigation Permit 2016-0235 Permit Amendment 001.

As per the HRMP, heritage resources management includes:

- Archaeological inventory and impact assessments of areas with high potential for archaeological resources
- Systematic data recovery of selected protected archaeological sites
- Inspections of protected archaeological sites post ground disturbance
- Chance find investigations
- Heritage compliance support, concurrent monitoring and inspections, and non-compliance management

These three forms of archaeological work are described in the Annual Report – HCA Permits. The Annual Report – HCA Permits for Golder and Ecofor provide details of work completed, the analysis of the results, incidents as applicable, chance finds as applicable, learnings, and conclusions and recommendations. Both reports include an Executive Summary.

The full reports can be found at the following link:

<https://extranet.bchydro.com/sites/SiteC/Transfer/CEAA/Annual Reports/Annual Reports for 2017/Annual Report - HRMP 2017-20180329>

BC Hydro completed palaeontological work in 2017 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 report describes work completed in 2017 regarding palaeontological resources.

When referenced again, the annual report will be called **2017 Annual Report:**

Palaeontological Resources. Please note that this report will be submitted upon completion by approximately April 30, 2018. Please also note that we will provide the 2016 Annual Report: Palaeontological Resources which will summarize palaeontological field work completed in 2016 (Year 7) focused on areas recommended for mitigation through Preservation-by-Record prior to site preparation (i.e., clearing, grubbing, and road improvements).

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).

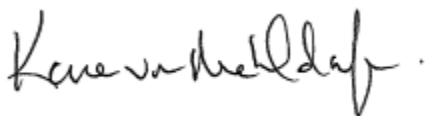
The table reflects the table found in Section 2 of the HRMP submitted to the CEAA on June 5, 2015 with additional columns added as described above.

This year, updates were made to the table including the following:

- The addition of a column titled "Project Phase" in which the EAC or FDS condition applies.
- Separation of EAC conditions by sentence to better show in which project phase the condition applies.
- Correction of the project status for three sentences.

Please do not hesitate to contact me at 604-695-5204, or Karen.vonMuehldorfer@bchydro.com if you have any questions or comments.

Best regards,



Karen von Muehldorfer
Regulatory Manager
Site C Clean Energy Project

2017 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. The table below shows in which phase of the project the HRMP EAC and FDS conditions apply. Where an item is complete or not currently applicable, the table is greyed out.ⁱ

Condition	Condition	Plan Reference	Project Phase ⁱⁱ	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	Prior to start of construction	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	Prior to start of construction	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.	Section 6.0 Heritage Resources Impact Management Section 8.0 Heritage Monitoring and Follow-Up Program	Prior to start of construction	Complete June 5, 2015	Heritage Resources Management Plan
	The field and reporting portions of each program will be of a scope, duration and frequency	Section 6.0 Heritage Resources Impact	All	Ongoing	Heritage Conservation Act permit Annual Reports

Condition	Condition	Plan Reference	Project Phase ⁱⁱ	Status	Evidence / Deliverables
	prescribed by the BC Heritage Conservation Act permits. ⁱⁱⁱ	Management			
	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	Prior to start of construction	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	Post-reservoir filling	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	Post-reservoir filling	Not started ^{iv}	Will commence upon occurrence of reservoir exposure
	<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	Post-reservoir filling	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 	Section 9.0 Reporting	Post-reservoir filling	Not started	Will begin 180 days following the commencement of operations

Condition	Condition	Plan Reference	Project Phase ⁱⁱ	Status	Evidence / Deliverables
	commencement of operations.				
	<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	Prior to start of construction	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	All	Ongoing	EAO Annual Compliance 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	During Construction	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	All	Ongoing	Heritage Conservation Act permit Annual Reports; Ongoing contractor and BC Hydro monitoring program of Environmental Protection Plan compliance
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	Prior to start of construction	Complete June 5, 2015	Heritage Resources Management Plan

Condition	Condition	Plan Reference	Project Phase ⁱⁱ	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; 	Section 4.0 Engagement with Aboriginal Groups Section 5.2 Additional Baseline Inventory	Prior to start of construction	Complete June 5, 2015 ^v	See section 3. Ground Truthing, Aboriginal Plant Use Mitigation Plan as relevant.
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	Prior to start of construction	Complete June 5, 2015 ^{vi}	Heritage Resources Management Plan
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	Post-reservoir filling	Not started	To 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 resources are affected. 	Section 8.0 Heritage Monitoring and Follow-Up Program	Post-reservoir filling	Not started	To be conducted following commencement of reservoir filling and commissioning
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	Section 2.3 Consultation	Prior to start of construction	Complete June 5, 2015	Heritage Resources Management Plan

Condition	Condition	Plan Reference	Project Phase ⁱⁱ	Status	Evidence / Deliverables
	for review 90 days prior to initiating construction.				
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	Prior to start of construction	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	All	Ongoing	Heritage Resources Management Plan Annual Report

ⁱ **All items noted in red font have been added in 2017 and reflect permanent additions to the table.**

ⁱⁱ New column added to better show when the EAC condition applies.

ⁱⁱⁱ This is now a separate line item.

This item was erroneously reported as Complete in a previous version of this table but correctly reported as Ongoing in the EAO Annual Compliance Report. The status has been revised to read Ongoing.

^{iv} This item was erroneously reported as Ongoing in a previous version of this table but correctly reported as Not Started in the EAO Annual Compliance Report. The status has been revised to Not Started as the work will not commence until reservoir exposure.

^v This item was erroneously reported as Ongoing in previous tables. The status has been revised to Complete since the procedures were established and approved in 2015.

^{vi} This item was erroneously reported as Ongoing in previous tables. The status has been revised to Complete since the procedures were established and approved in 2015.