

Heritage Resources Management Plan 2021 Annual Report

Site C Clean Energy Project

March 31, 2022

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Impact Assessment Agency of Canada
National Programs
160 Elgin Street, 22nd floor
Ottawa, Ontario K1A 0H3
Attention: Mr. Nicolas Courville

Dear Mr. Nicolas Courville:

RE: Site C Clean Energy Project – Heritage Resources Management Plan 2019 Annual Report (for the period January 1 to December 31, 2021)

I am writing to provide you with an annual update on BC Hydro's Heritage Resources Management Plan (HRMP) for 2021. This seventh update is being submitted in accordance with Condition 15.6 of the Site C Project's Decision Statement, issued to BC Hydro on October 14, 2014 (and revised on November 14, 2014), as well as with reporting required outlined in the HRMP.

Per Condition 15.6 of the Decision Statement:

The Proponent shall implement the plan and provide to the Agency an analysis and summary of the implementation of the [Heritage Resources Management 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.

This plan also provides an update on Condition 62 of the Environmental Assessment Certificate, which requires that BC Hydro "protect and preserve heritage resources by implementing measures as detailed in a Heritage Resources Management Plan." In addition, per Condition 9 of the HRMP, BC Hydro has committed to preparing and submitting an annual report to the BC Archaeology Branch, the Environmental Assessment Office (EAO), Indigenous groups including the Métis Nation British Columbia.

The HRMP was developed by BC Hydro, in consultation with Reservoir Area Indigenous groups and the Métis Nation British Columbia, to avoid, minimize or manage impacts to local archaeological and heritage resources. The draft HRMP was submitted to the Archaeology Branch of FLNR, Indigenous groups, and Métis Nation British Columbia on October 17, 2014. The final HRMP was submitted to EAO, the Archaeology Branch of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development, Indigenous groups and Métis Nation British Columbia on June 5, 2015.

In response to a direction from the British Columbia Environmental Assessment Office, the HRMP was also updated and submitted to regulators, the Archaeology Branch and Indigenous groups and the Métis Nation British Columbia on November 19, 2018.

Revision 3 of the HRMP is available on the Site C Project website at:
<https://www.sitecproject.com/sites/default/files/Heritage Resources Management Plan 0.pdf>

Heritage Resource Work in 2021

The heritage resources program for the Site C Project is a multi-year integrated study comprising assessments of palaeontological, archaeological and historical resources. The 2021 heritage program level of effort was reduced compared to that in previous years, largely due to reaching the milestone of completing archaeological inventory and impact assessment of the project area in 2020.

The palaeontological resources investigation and mitigation program was completed previously in 2019. In 2021, five palaeontological chance finds were reported which required follow up analysis.

The archaeological program entered its 12th year in 2021. Pre-construction archaeological impact assessments focused on new locations that required archaeological or heritage consideration. Systematic data recovery work was limited this year largely due avoidance of archaeological sites through project redesign. Project components with archaeological work included proposed aggregate and shoreline enhancement areas, and Middle and Western Reservoir components. In addition, heritage support was provided for Indigenous burial management and project construction.

Future assessment will continue to focus on project design changes. Our 2021 field season resulted in the following work:

- 13 new archaeological sites recorded
- 7 previously recorded sites revisited
- 1 site with systematic data recovery undertaken
- 14 sites with post ground disturbance inspections by the Heritage Specialist
- 13 sites with compliance support, concurrent monitoring, or inspection by the Heritage Specialist

Additional information regarding palaeontological, archaeological and historical resource works during 2021 are provided in the reports cited below.

- 2021 Annual Report for *Heritage Conservation Act Permits* 2016-0235 and 2019-0213 (Inspection and Alteration Permits)
- 2021 Annual Report for *Heritage Conservation Act Permit* 2019-0218 (Inspection Permit)
- 2021 Palaeontological Resources Chance Find Summary

These reports include details of work completed, analysis of results, inspections, incidents, and chance finds as applicable, learnings, and conclusions and recommendations. Please note that the annual reports for the *Heritage Conservation Act* are prepared in accordance with *Heritage Conservation Act* permits required for the works.

Status of Compliance

Attached to this letter is a table that lists the Conditions of the Environmental Assessment Certificate and Decision Statement 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).

Please do not hesitate to contact me if you have any questions or comments.

Best regards,



Doris Zibauer, MA, RPCA
Heritage Program Lead
Site C Clean Energy Project

2021 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.

No.	Condition	Implementation Status	Reference to Plan	Description
ENVIRONMENTAL ASSESSMENT CERTIFICATE EAC #14-02				
EAC 62	The EAC Holder must protect and preserve heritage resources by implementing measures as detailed in a Heritage Resources Management Plan.	Ongoing	Heritage Resources Management Plan (HRMP)	The Heritage Resources Management Plan is available on the Project website at: Heritage Resources Management Plan 0.pdf (sitecproject.com) . Following instruction from the EAO, the HRMP was updated to Revision 3 and submitted to regulators on November 19, 2018. Annual reports for field work completed in 2021 under these permits and for palaeontological resources will be submitted to regulatory agencies by March 31, 2022.
EAC 62	The Heritage Resources Management Plan must be developed by a QEP.	Completed	Section 10.0 Qualified Professionals	Section 10.0 of the HRMP lists the QEPs who prepared the plan.
EAC 62	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.	Ongoing	Section 4.0 Engagement with Aboriginal Groups	This is addressed in the final HRMP. Implementation of this requirement has included: <ul style="list-style-type: none"> • The opportunity for Indigenous groups to comment on Sections 12.2 and 12.4 (formerly Sections 14 and 12) heritage permits, permit amendments, and reports in accordance with the Heritage Conservation Act where the Indigenous groups is listed in the permit, • Offers to present heritage work results to Indigenous groups and, • Providing archaeological crew field assistant employment opportunities for Indigenous people.

No.	Condition	Implementation Status	Reference to Plan	Description
EAC 62	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.	Ongoing	Section 4.0 Engagement with Aboriginal Groups	This is addressed in the final HRMP Implementation of this requirement has included: <ul style="list-style-type: none"> • In accordance with the Heritage Conservation Act, Indigenous groups that may be affected by a permitting decision and who are listed in the permit, are provided a review period of between 15 and 30 days and an opportunity for comment, and • Providing archaeological crew field assistant employment opportunities for Indigenous people. • BC Hydro continues to work with Indigenous groups to implement appropriate burial management solutions.
EAC 62	The EAC Holder must provide the draft Heritage Resources Management Plan to Archaeology Branch of FLNR and Aboriginal Groups for review a minimum of 90 days prior to the commencement of construction.	Completed	Section 2.4 Consultation	The draft HRMP was submitted to the Archaeology Branch of FLNR and Indigenous groups on October 17, 2014.

No.	Condition	Implementation Status	Reference to Plan	Description
EAC 62	The Heritage Resources Management Plan must include Archaeological Impact Management and Heritage Resources Monitoring and Follow-Up Programs.	Ongoing	Section 6.0 Heritage Resources Impact Management Section 8.0 Heritage Monitoring and Follow-up Program	Section 6 of the HRMP describes Heritage Resources Impact Management. Management measures implemented to date have included: <ul style="list-style-type: none"> • Inclusion of heritage requirements in contractor EPPs, as applicable to the scope of work covered by the EPP, • Undertaking archaeological work for the Heritage Resources Impact Assessment in accordance with the terms and conditions of Heritage Conservation Act Section 12.2 (Inspection/Investigation) permits, and • Undertaking any land-altering work in accordance with Section 12.4 Heritage Conservation Act (Alteration) permit.
EAC 62	The field and reporting portions of each program will be of a scope, duration and frequency prescribed by the BC Heritage Conservation Act permits.	Ongoing	Section 6.0 Heritage Resources Impact Management	This is addressed by the <i>Heritage Conservation Act</i> permits and their associated Annual Reports. Annual reports for field work completed in 2021 under these permits, and for palaeontological resources, will be submitted to regulatory agencies on March 31, 2022.
EAC 62	The Archaeology Impact Management Program must be developed by a QEP qualified to hold Section 14 Heritage Inspection and Investigation Permits.	Completed	Section 10.0 Qualified Professionals	Section 10.0 of the HRMP lists the QEPs who prepared the plan.

No.	Condition	Implementation Status	Reference to Plan	Description
EAC 62	The Heritage Resources Monitoring and Follow-Up Program must include at least the following: Monitor reservoir erosion during occurrences of exposure to assess the impacts on existing or newly identified protected archaeological sites and other heritage resources	Initial Planning	Section 8.0 Heritage Monitoring and Follow-Up Program	BC Hydro acknowledges and understands this condition. Specific details of the Heritage Resources Monitoring and Follow-Up Program will be finalized before reservoir filling in fall 2023. Post-inundation site visits will start in snow-free conditions the following year.
EAC 62	Implement mitigation measures, systematic data recovery or emergency salvage operations in accordance with the Heritage Resources Management Plan.	Initial Planning	Section 6.0 Heritage Resources Impact Management	BC Hydro acknowledges and understands this condition.
EAC 62	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.	Initial Planning	Section 8.0 Heritage Monitoring and Follow-Up Program	BC Hydro acknowledges and understands this condition.

No.	Condition	Implementation Status	Reference to Plan	Description
EAC 62	Establish a reporting structure for reporting to Aboriginal Groups and the Archaeology Branch beginning 180 days following the commencement of operations.	Initial Planning	Section 9.0 Reporting	BC Hydro acknowledges and understands this condition.
EAC 62	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.	Completed	Section 2.4 Consultation	The final HRMP was submitted to EAO, the Archaeology Branch of FLNR, and Indigenous groups on June 5, 2015. Revision 3 of the final HRMP was submitted to EAO, the Archaeological Branch of FLNR, and Indigenous groups on November 19, 2018.
EAC 62	The EAC Holder must develop, implement and adhere to the final Heritage Resources Management Plan, and any amendments, to the satisfaction of EAO.	Ongoing	Heritage Resources Management Plan	Implementation of the HRMP is detailed in the annual reports for field work completed in 2021 under these permits and for palaeontological resources and will be submitted to regulatory agencies by March 31, 2022.
EAC 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.	Ongoing	Section 7.0 Compensation-in-Kind	BC Hydro acknowledges and understands this condition. BC Hydro is funding local accredited facilities in close proximity to the Project to curate and display the recovered archaeological resources. No funding was provided in the current reporting period; a portion of the total funding was provided in previous reporting periods.

No.	Condition	Implementation Status	Reference to Plan	Description
EAC 64	These funds must be provided only to facilities that agree to work with interested Aboriginal Groups on the display and curation of those artefacts.	Ongoing	Section 7.0 Compensation-in-Kind	BC Hydro acknowledges and understands this condition. BC Hydro is funding local accredited facilities in close proximity to the Project to curate and display the recovered archaeological resources.
FEDERAL DECISION STATEMENT				
FDS 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.	Ongoing	Section 6.0 Heritage Resources Impact Management	<p>The Heritage Resources Management Plan, and Annual Reports are available on the Site C website at: Environmental & Socio-Economic Plans & Reports Site C (sitecproject.com)</p> <ul style="list-style-type: none"> • Section 4 of the HRMP details BC Hydro's engagement with Indigenous groups and the management of impacts to local archaeological and heritage resources. • Section 5.2 of the HRMP describes how BC Hydro is working with Indigenous groups to complete ground-truthing exercises to identify culturally important areas in the project activity zone. • Section 6 of the HRMP describes BC Hydro's Heritage Resource Impact Management through Work Planning, Heritage Conservation Act Permits, and Mitigation Measures. • BC Hydro continues to implement the heritage program to ensure all project related activities, including construction, remain in compliance with
FDS 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.	Ongoing	Section 2.3 Consultation Section 4.0 Engagement with Aboriginal Groups	
FDS 15.3	The plan shall include:			

No.	Condition	Implementation Status	Reference to Plan	Description
	15.3.1 procedures to continue inventories and ground truthing of potential physical and cultural heritage resources to determine the need and applicability of mitigation measures;	Ongoing	Section 4.0 Engagement with Aboriginal Groups Section 5.2 Additional Baseline Inventory	<p>the Heritage Conservation Act (HCA) and meet the FDS Condition Statement 15.</p> <ul style="list-style-type: none"> • This includes ongoing impact assessment and mitigation of heritage resources and working with Reservoir Area Indigenous groups to facilitate opportunities for ground truthing of potential physical and cultural heritage resources. • The following procedures will commence at start of operations: <ul style="list-style-type: none"> ○ Monitoring of reservoir erosion ○ Monitoring downstream shoreline erosion
	15.3.2. 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;	Ongoing	Section 6.0 Heritage Resources Impact Management	
	15.3.3. 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	Ongoing	Section 8.0 Heritage Monitoring and Follow-up Program	

No.	Condition	Implementation Status	Reference to Plan	Description
	15.3.4. 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.	Ongoing	Section 8.0 Heritage Monitoring and Follow-Up Program	
FDS 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.	Complete	Section 2.3 Consultation	The draft Heritage Resources Management Plan was submitted to regulators, Reservoir Area Indigenous groups and Métis Nation British Columbia on October 7, 2014.
FDS 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.	Complete	Section 2.4 Consultation	The final Heritage Resources Management Plan was submitted to regulators, Reservoir Area Indigenous groups and Métis Nation British Columbia on June 5, 2015. Following instruction from the EAO, the HRMP was updated to Revision 3 and submitted to regulators on November 19, 2018.

No.	Condition	Implementation Status	Reference to Plan	Description
FDS 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.	Ongoing	Section 9.0 Reporting	<p>Status of implementation of the Heritage Resources Management Plan is described in the latest annual report submitted to regulators on March 31, 2021.</p> <p>The next annual report will be submitted by March 31, 2022.</p> <p>Annual Reports are available on the Site C website at: Environmental & Socio-Economic Plans & Reports Site C (sitecproject.com)</p>