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August 6, 2019

Doug Johnson
BC Hydro
3100 – 35th Ave
Suite #211
Vernon BC V1T 2T1

Re: Alouette River Management Society response to the Water Use Plan Order Review Process (WUPOR)

Dear Mr. Johnson

Please accept the following position put forward by the Board of Directors of the Alouette River Management Society regarding the proposed WUPOR process.

Synthesis Report Feedback

As one of the participants and drivers of the original Water Use Plan (WUP) initiated in 1996 and as a Consultative Committee member of the 2006 WUP review Panel, the Alouette River Management Society (ARMS) is proud to say that we continue to be an active participant in the collective efforts of citizens and stakeholders residing in the Maple Ridge, Pitt Meadows and Katzie First Nation communities who are working together to ensure the health of the Alouette River watershed is preserved and enhanced.

With rising alarm about depleted salmon stocks, the expectations of the general public for greater environmental stewardship by government and its agencies greatly exceed those held during the previous two A-WUP exercises. Our members and supporters remind us on a regular basis that they are tired of the slow pace of securing unimpeded fish passage and that they continue to support our efforts to improve the Alouette watershed and return all the historical fish species to the Alouette system.

It is for this reason that we are voicing our strong opposition to being relegated to simply providing feedback at Step 13 of the outlined WUP process and will be asking our partners who have supported us in our previous efforts to join us in opposition to anything less than a full review that includes proper consultation with all stakeholders.

As per the background information shared by BC Hydro regarding the existing process it states, *“The Comptroller of Water Rights (the “Comptroller”) may require a WUP as a condition of a new water license, as part of a review of an existing license (e.g., due to an application for a license amendment or for an additional license for the facility), or in response to a perceived water use conflict.”* We believe that due to the Alouette Power Station not being in operation for many years, coupled with the unilateral proposal by BC Hydro to combine the Stave and Alouette WUPs, stakeholders from each watershed need to be brought together.

The 2006 WUP review process highlighted that the review dates for the Stave and the Alouette should be adjusted so that both could be reviewed within the same timeline, but at no time was it contemplated that this would be construed as meaning the two WUPs would be combined. In fact, the understanding of participants that are still involved with ARMS is that if there was to be any conversation regarding such, there would be a committee formed with representatives from both watersheds in order to learn about the intricacies of the two watersheds and potential impacts. However, the level of attention to this was nothing that should have prompted BC Hydro to move forward with such a proposal.

ARMS’ understanding, and most likely that of the original participants in the previous WUP exercises, expected that the parties would be reconvened to evaluate the outcomes of the studies, other learnings, the objectives, the current realities and from that point and then, collectively, make new, if necessary, adjustments to continue seeking the best balance—it is unfathomable that BC Hydro could consider combining the two WUP plans without such.

ARMS will not be commenting on the draft synthesis report in the context of such a limited review process.

Why ARMS believes a full Stakeholder review is required

ARMS believes that the proposed process forces parties that have a vested interest in the WUP into minimalizing their participation and limits the scope of what they can comment on, which betrays the spirit and intent of the collaborative process that was one of the foundations of the WUP process that made it successful in 1996.

The reason the original WUP process worked was the open and interactive interchange and trade-offs that were made as a group with all parties present and engaged. All parties had equal access to the data and information and were able to discuss and be engaged in making trade-offs and recommendations. There was the opportunity for all parties to propose different operating scenarios, have them consistently analyzed and the results provided to all parties to understand, debate, challenge and finally reach an agreement, albeit with incomplete information.

One of the most important aspects of the WUP process was the opportunity for people with differing interests and objectives to listen and learn from others and come to appreciate their points of view. The WUP outcomes were always compromises to achieve the ‘best balance’ of all interests.

The proposed review process does not allow for any of the learning to be considered in the holistic format or for the interested parties to engage in discussion, learning and making trade-offs that reflect not only the watershed specific learning but the changing world and knowledge we have today.

With the process that is presently before us, it appears that BC Hydro, the Comptroller of Water Rights and the senior agencies have reverted to their old ways of operating that lead to the demand for the original process—seeking nominal input independently from interested parties on a plan that has already been determined behind the closed doors of BC Hydro and senior agencies.

ARMS believes today is a new era and BC Hydro must address public demand for a holistic approach to managing the watershed

While the operating changes that occurred from the original WUP have improved conditions, the state of the river and its watershed in 1996 was so negative that any improvements would have been considered a gain. However, today is a different era and the public is expecting far more from BC Hydro, the Water Comptroller and senior agencies whose job is to ensure the public's interests and will is met.

BC Hydro extensively and consistently referred to Water Use Planning as Adaptive Management. Adaptive Management is an ongoing process of identifying and implementing actions, monitoring, tweaking and adjusting (or abandoning) on an ongoing basis.

However, what we are experiencing is a 'One and Done,' which appears to be in the effort of cost cutting, as the other agencies involved in the original process—DFO, Water Comptroller, Provincial agencies—may be challenged to spend the time and money on the WUP, thus leaving the community Stakeholders also out of the equation and full decision-making in the hands of BC Hydro.

ARMS has consistently voiced our concern with the multi-faceted approach to managing the environmental issues: WUP, Fish Passage Feasibility Framework, Entrainment, Fish & Wildlife Compensation, etc., that is an inefficient way to manage a watershed and presents a bureaucratic nightmare for a small organization like ARMS having to respond and adhere to in order to sustain funding to do work that has been abandoned by all levels of government.

Since its inception, ARMS has proposed a comprehensive and coordinated management approach to BC Hydro staff and have advocated for a new approach, which cannot be properly discussed if the present WUP process moves forward.

Why we believe there is evidence the Water Comptroller should trigger a new WUP process

Evidence that provisions within the existing WUP are not meeting the needs of the Alouette River watershed occurred with the recent draw down of the Alouette reservoir that was detrimental to the annual Kokanee/Sockeye smolt out-migration for the Alouette fish (zero Kokanee/Sockeye smolts were captured at the Mud Creek/South Alouette River rotary screw trap, therefore, the outmigration of these smolts did not occur causing an entire year class of Sockeye to be wiped out), but the draw down was seen as a necessary step to protect the Chum redds within the Stave system.

BC Hydro's lack of engagement and consultation left key stakeholders unaware of the pending issue when in fact BC Hydro had many opportunities to reach out to ARMS, Katzie First Nation, the City of Maple Ridge and others who could have offered alternative options. This structure of decision-making is archaic in relation to the expectations the public has for government agencies, such as BC Hydro and an updated WUP should provide a better structure for consultation and co-management of the watershed. BC Hydro has a duty of care for the environment it consistently affects, a duty that has completely failed for the Alouette fish resources in Spring 2019.

The aforementioned incident raises greater concerns with BC Hydro's proposal to combine the Alouette and Stave WUPs without any consultation with all of the stakeholders at one table. There is no way we could ensure a mutually beneficial outcome without all the interested parties discussing it together.

Further reasons that the Water Comptroller should trigger a new Water Use Plan, based on BC Hydro's desire to combine the two WUPs, is that both watersheds have extensive fisheries and recreational programs that are operated by different agencies: (DFO, ENV, BC Parks and BCH) and these water demands could end in conflict like this year has. Additionally, both watersheds have domestic water demands, and the Alouette water is used for the Allco Fish Hatchery and farm irrigation.

Further, the ability of BC Hydro to address existing elevation levels contained within the WUPs for both Stave and Alouette in the face of climate change have never been disclosed or discussed and recent shortcomings in the Alouette that resulted in the loss of the Kokanee/Sockeye smolt out-migration was blamed on on-going climate issues. Without this being addressed, ARMS is not convinced the long-term effects of climate change have been considered within the existing reservoir levels contained within the present WUP.

Conclusions

Although we believe there is enough substance for the Water Comptroller to trigger a new Water Use Plan process, we are simply requesting that BC Hydro engage in a proper WUP review as was done in 2006 with a full roundtable of stakeholders.

ARMS will not be providing feedback on the synthesis report, as we believe any feedback on existing work may be construed as support for the process. However, we agree that the information contained within the synthesis report would, within the review process we request, provide guidance for an improved WUP.

ARMS will be sharing our concerns with the Water Comptroller and our partner groups, requesting that they support our position on this matter.

Thank you for taking the time to read our concerns and proposals.

Respectfully, on behalf of the
ARMS Board of Directors

Per:

A handwritten signature in black ink, appearing to be 'Cheryl Ashlie', written over a light blue horizontal line.

Cheryl Ashlie
President

CC: Mr. Ted White - Director and Comptroller of Water Rights

CC: ARMS Board of Directors