



24959 ALOUETTE ROAD, MAPLE RIDGE, BC V4R 1R8

Tel: 604.467.6401 Fax: 604.467.6478

arms@alouetteriver.org

www.alouetteriver.org

31 March 2021

Debra Lamash  
Community Relations Coordinator  
BC Hydro

### **Re: Alouette-Stave-Ruskin Water Use Plan Order Review (WUPOR)**

The Alouette River Management Society (ARMS) provided its position to BC Hydro (BCH) in a letter dated August 6, 2019, which we have attached for your convenience. We note that BCH has not provided any substantive information in the February 11, 2021 notification, nor has BCH formally responded to ARMS' issues and concerns regarding the WUPOR raised previously. We chose not to comment on the synthesis report for the reasons explained. In the following we highlight our continued priorities and position related to BC Hydro's treatment of the Alouette River watershed system.

ARMS also observes that by obtaining approval for the remaining diversion water license, the WUPOR process and the Alouette Reservoir HADD (BCH # 2010-WUP-ALU01 / PATH # 09-HPAC-PA6-00037 – Authorization for works or undertakings causing the harmful alteration, disruption or destruction of fish habitat and destruction of fish), BCH will have uncontested approval to operate with little or no regard for future of the salmonids struggling to survive.

ARMS objective for the Alouette River watershed is:

To restore, recover and protect the Alouette River Watershed ecosystem to return it to as close to a naturally functioning ecosystem as possible.

This will be achieved by:

1. Managing the watershed as a sustainable, wholistic ecosystem.
2. Restoring, to the extent possible, a natural hydrograph to the watershed which will support the restoration of the historic fishery, by:
  - i) Eliminating the diversion of water from the Alouette watershed into the Stave watershed during the periods of the year when the outmigration of any of the salmonid species naturally occurs; and

- ii) Restoring permanent natural upstream migration past the Alouette Dam by building a fish ladder.
3. Recognizing, formally, and managing the resident Sockeye in the Alouette Reservoir in accordance with their natural anadromous cycle.
4. Recovering and restoring the runs of all five species of salmon, steelhead, and sea-run cutthroat trout by using natural means. A hatchery or other artificial measures would only be utilized as a last resort, short-term action.
5. Protecting and restoring the watershed, including the riverine section from the Pitt River to the Alouette Dam from further degradation from urban development, pollution, uncontrolled damaging recreational activities, etc.

ARMS strongly believes the WUPOR needs to be a formal, in-person process, like the original WUP processes. Following are some of the reasons for doing so:

6. The Alouette WUP process was last completed in 2009 some twelve years ago. There have been significant changes within the watershed that will not be addressed by a simple review of the Monitoring Program Synthesis Report. For instance, certain studies in the report consider the salmonids in the reservoir are Kokanee whereas it has been determined they are Sockeye.
7. The diversion and use of the water from Alouette Reservoir have changed in that Alouette Generating Station has now been out of service for some 13 years, and BCH has publicly stated that there are no plans to refurbish or replace the station. Therefore, that portion of the historically licensed water diversion is no longer being used as it was approved or intended. ARMS is aware of BCH's application to renew the water license.
8. BCH has recently, finally, after some 25 years of being asked, committed to conduct a study to determine the amount of fish entrainment through the adit Tunnel. While the cause of the entrainment can conveniently be attributed to the original construction impacts associated with the tunnel and related facilities, this to ARMS is an artificial decision to keep the impact from being addressed as an operational issue. ARMS contends that operating regime can be modified to eliminate or largely minimize the diversion during the critical out-migration of Sockeye and other salmonid species. This can be done while also managing the risk of flooding downstream of the Alouette Dam.
9. ARMS believes, that despite a continuing effort by BCH to drag out the Fish Passage Feasibility process, there is ample evidence in support of BCH building a proper fish ladder to provide year-round flows that would enable all fish species to move more normally within the watershed and re-establish more natural behaviour patterns. Fish passage, like entrainment, was sidelined during the Water Use Planning (WUP) process at the convenience of BCH and Comptroller of Water Rights to complete the WUP process within the timeframe stipulated by the Government of the day. These decisions were made for convenience while sacrificing the concept of managing the

Alouette and all the other 22 watersheds where BCH operates on an ecosystem basis. There is no need or basis to continue this misguided approach.

ARMS also adamantly disagrees with combining the Alouette and the Stave/Ruskin WUP processes. While it is true the water that is diverted from the Alouette Reservoir constitutes a substantial portion of the power generated at the Stave Falls and Ruskin generating stations the environmental and social aspects of the two watersheds are separate. For one, the two watersheds fall within the traditional, unceded territory of two separate First Nations. The Alouette watershed is within Katzie territory and the Stave watershed within the Kwantlen claimed territory. This alone is reason not to adopt the 'one size fits all'. The two First Nations have different objectives for the watersheds. Artificially smushing them into a 'one size fits all' is disrespectful and continues the colonial approach of engaging with the First Nations.

Another is the difference in the current and potential use of the watershed by the fish, in particular the salmon. The only portion of Stave River historically used by salmon was from the Fraser River to the Stave Falls which formed an impassable barrier to upstream migration. Principally chum and coho used the short, but incredibly important, reach of river. The Alouette River on the other hand was used by all five salmon species, steelhead, and sea-run cutthroat trout in addition to resident species. The Alouette Dam cut off access over 90 years ago. It can be easily re-instated with the construction of a permanent fish ladder.

The potential for recovery of the salmonid species in the Alouette is unlimited. Inextricably tying the Alouette operations to the money producing plants situated on the Stave River will be a death knell for the fish. Decisions will consistently sacrifice the fish and other species in the Alouette to optimize power production from the two Stave River plants and if the need arises to protect the two salmon species in the lower Stave River DFO would support and encourage this trade-off.

ARMS has repeatedly requested BCH to treat the watershed as a wholistic entity. The intentional use of silos is an obvious strategy by BCH to overwhelm, frustrate and exhaust anyone who is concerned or interested in how BCH uses and impacts the public resources it uses to generate electricity. In the past few months' BCH has contacted ARMS seeking involvement with the WUPOR; the water license renewal; the HADD renewal; the seismic upgrades on the adit tunnel; the planned seismic upgrades on the Alouette Dam; in addition to ARMS ongoing involvement with other BCH programs.

Every one of these involves, in some manner, the operation and management of the water in the Alouette River watershed. But BCH treats them as totally isolated events. Many of the people on the teams ARMS interacts with are different and often know little, if anything, about the other activities. This is an archaic and regressive approach to dealing with the myriad issues. It also prevents taking advantage of opportunities to address problems in an efficient, wholistic, and cost-effective manner. Just one example is the planned project to upgrade the adit tunnel facilities to meet seismic requirements. This is an obvious, and cost effective, time to end the entrainment of fish from the Alouette Reservoir and plunging them to their unavoidable death. This travesty has been occurring for over 90 years. BCH formally acknowledged the situation during the Stave Falls Generating Station (SFGS) replacement in the 1980's. They were forced into paying for a fertilization program in the Alouette Reservoir by the Province. But it is a band-aid rather than a solution. However, now with an opportunity

to solve the problem the project team headed by the Director of Dam Safety is outright refusing to even consider the issue, and in the process questioning whether ARMS cares about dam safety issues.

During the WUP process the participants were required to initially identify operational changes that could achieve the desired environmental or social outcome. They were also required to consider what were called 'Physical Works' to achieve the same outcome at a lower cost. Or in some circumstances a combination of operational changes and physical works. Despite the artificial separation of issues like fish passage as described above, BCH embraced more wholistic approach to find solutions. However, since the WUP Program was finished, and Water License Requirements Program was conducted to implement the 350+ projects and studies BCH has steadily regressed back to its fortress-like operating mode. Largely to the detriment of the environment and social interests in the watershed and unnecessary increase in the cost of electricity.

ARMS again respectfully requests BCH and the CWRO to immediately end the regressive and divisive approach to managing public resources in the generation of electricity. Instead re-embrace the inclusive, transparent, forward-looking, information-based, cooperative approach of the Water Use Planning process that served BCH, the Province, and the many participants so well. We are not suggesting the use of tools like decision analysis or multi-year studies for every decision, but when required it would be appropriate. True, the WUP process took 2 - 3 years on most watersheds but the committees were dealing with decades of issues.

In closing, ARMS notes that this letter covers much more than addressing BCH's request to simply re-engage in the WUPOR. ARMS has stated numerous times, including in this letter, that the myriad BCH activities occurring in the watershed are all linked and thus are best dealt with in a wholistic manner. To summarize ARMS is seeking resolution to:

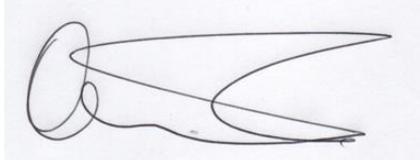
1. Adopting an ecosystem approach to managing the suite of BCH issues in the watershed;
2. Ending the entrainment of fish through the diversion tunnel;
3. Reestablishing the critical permanent upstream migration flows by building a fish ladder around the Alouette Dam;
4. Enhancing the out-migration flows and conditions for all species of salmon
5. Formally acknowledging that the current salmonid species are Sockeye as confirmed by the DNA testing.

In addition to the above BCH is currently working on the seismic upgrade project on the diversion tunnel and is planning for seismic upgrades on the Alouette Dam, completing the WUPOR (including combining the Alouette and Stave WUPS which ARMS vehemently disagrees with), renewing one of the three water licenses, renewing the HADD for the killing of fish being entrained through the diversion tunnel, participating in the Fish Passage Feasibility Framework, ongoing fish and wildlife compensation projects and more.

Several of these undertakings will soon conclude, especially the regulatory issues such as the WUPOR, water license renewal, HADD renewal, which will give BCH a virtual free license to operate as they wish to the potential detriment of the of the fish and ecosystem.

ARMS came into being in the mid-1990's as a community-led effort to save the heavily impacted South Alouette River. Over 25 years of dedicated effort has led to some hard-won improvements in the watershed but far short of what is possible. ARMS recognizes that the window is closing to either convince BCH to begin addressing and managing its impacts properly or to influence the regulators to hold BCH accountable for addressing and managing its impacts. To this end ARMS has chosen to copy our letter more broadly than normal.

On behalf of the Board of Directors,

A handwritten signature in black ink, appearing to read 'Ken Stewart', written over a light blue horizontal line.

Ken Stewart  
President,  
Alouette River Management Society

CC:

Chris O'Riley, BC Hydro CEO

Doug Johnson, BC Hydro Program Manager, Alouette WUPOR

Ted White, Director and Comptroller of Water Rights

Chief Grace Cunningham, Katzie First Nation

Councillor Rick Bailey, Katzie First Nation

Chief Marilyn Gabriel, Kwantlen First Nation

Bernadette Jordan, Honourable Minister for Fisheries and Oceans Canada

Rebecca Reid, DFO Regional Director General (Pacific Region)

Marc Dalton, MP Pitt Meadows-Maple Ridge

Nathan Cullen, Honourable Minister of State for Lands and Natural Resource Operations

Bruce Ralston, Honourable Minister Responsible for BC Hydro (Minister of Energy, Mines and Petroleum Resource)

Lisa Beare, Honourable Minister of Citizens' Services and Deputy House Leader, MLA Pitt Meadows-Maple Ridge

MLA Bob D'Eith, MLA Maple Ridge-Mission

David Morton, BC Utilities Commission, Chair and CEO

ARMS Board of Directors

Reference: "ARMS Response to Alouette WUPOR draft Synthesis report – 6 August 2019