



24959 ALOUETTE ROAD, MAPLE RIDGE, BC V4R 1R8

Tel: 604.467.6401 Fax: 604.467.6478

arms@alouetteriver.org

www.alouetteriver.org

---

31 May 2022

Ted White  
Director and Comptroller of Water Rights  
Province of British Columbia Water Management Branch

Chris O'Riley  
President & CEO  
BC Hydro

Gentlemen,

Following countless urgent and important requests from several BC Hydro staff and consultants for the Alouette River Management Society (ARMS) to meet, provide input, provide comment, evaluate various and sundry projects, and processes it is as if time has stopped. Neither agency has had the courtesy or respect to reach out and communicate to ARMS and others what is happening, or not, on the Alouette and Stave watersheds. What little information we have been able to obtain has come from third parties, but we have no way to determine its veracity. For a small non-profit organization of a few staff and mainly volunteers this is very stressful and frustrating.

We are aware that there are discussions and/or negotiations underway between the Federal and Provincial governments and the First Nations whose traditional and unceded territories include the Alouette and Stave watersheds.

We are also cognizant and fully respectful that the negotiations are between the parties and are to a large degree confidential.

However, is it too much to expect someone of authority from either BC Hydro or the Comptroller of Water Rights Office to explain that the negotiations are underway and out of respect for the First Nations the other activities are being suspended pending further developments? And even a suggestion of how long the delay may be. We are especially interested and concerned whether the long standing environmental and social issues are being included in the negotiations.

A related issue is what is happening with the existing, but long expired, operating approvals such as the Water Use Plan, water license and the DFO issued HADD. Especially since these were some of the driving forces behind the stated urgency for ARMS to respond to many of the requests from BC Hydro.

As one of the leading groups that has consistently represented the ecological interests of the Alouette watershed for many decades we are rightly concerned that the negotiations, which we understand will likely involve more than the long-term ecological health of the watershed and the critically necessary actions that BC Hydro should be compelled to act upon immediately, will be completed without properly addressing those issues. And quite possibly foreclose any opportunities to require BC Hydro to take the necessary actions to reverse and remedy the devastating impacts that have been allowed to continue for over a century.

ARMS is fully respectful and supportive of the First Nations finally having their voices heard and their grievances addressed. ARMS, however, is primarily focused on the long-term health and well-being of the river, the watershed and all the creatures that depend on it to survive.

ARMS objectives for the watershed include, but are not limited to:

1. All parties acknowledge and respect that the Alouette and Stave watersheds are within their unceded territories. Therefore, all decisions must involve the respective First Nation(s);
2. Provide year round upstream and downstream fish passage around the Alouette dam that is suitable to all native resident and anadromous species that currently and historically utilize the Alouette River;
3. As part of #2 or separately provide the capacity to provide much higher downstream flows from the Alouette Reservoir. The existing Low-Level Outlet (LLO) is incapable of providing adequate or proper flows nor does it have the operating capability to vary the flows or water temperatures to replicate natural annual flow variations. The current LLO located under the dam is subject to failure in the event of a sizeable earthquake which would cut off any life-giving river flows. The current LLO also lacks an alarm system if it fails;
4. Eliminate the entrainment of fish and minimize the entrainment of other aquatic life and nutrients through the diversion structure between the Alouette and Stave reservoirs. Some 94% of the annual inflows into the Alouette watershed are being diverted to generate electricity in the Stave River generating stations. The impact of this inter-basin transfer of such a high percentage of the inflows in an ultra-oligotrophic watershed is extra critical for the species trying to survive downstream of the tunnel intake;
5. The watershed being managed on a fully functioning ecosystem basis. In particular, the remnant sections of riparian habitat downstream of the Alouette Dam be preserved and protected to allow the lower watershed to function somewhat normally. This will require the participation of other agencies including the cities of Maple Ridge and Pitt Meadows, Metro Vancouver and more. This may also require purchasing, or similar measures, some properties to secure them as they form a critical component of the ecosystem;
6. Engage in a comprehensive program to refresh and revitalize the riverine and riparian habitats downstream of the Alouette Dam. The loss of the natural flow events in the river have resulted in the continued degradation of the river and watershed for all aquatic and terrestrial life. Human intervention is now necessary to somewhat replicate the natural processes;
7. The dam and diversion facilities be upgraded and maintained to handle current earthquake and flood rating standards that includes the projections related to climate change;
8. BC Hydro upgrades and maintains its flood information and advisory system for the residents and other watershed users downstream of the Alouette Dam. The flood events of November 2021 demonstrated that the current system is inadequate and unsafe and that the City of Maple Ridge lacks the staffing capability and expertise to properly execute this role. It is not the City's responsibility; that lies totally with BC Hydro. People's lives are at risk;
9. Ensure all future infrastructure developments (e.g., the planned river crossing at 240th Street in Maple Ridge are designed and built to protect the ecological integrity and functionality of the watershed; and
10. Educate, inform, and engage the current and future generations of the importance of protecting one of the life sustaining resources on the planet.

BC Hydro and its predecessor companies have earned hundreds of millions of dollars from the waters of the Alouette watershed. The province has earned millions in taxes and fees from these waters. Residents of the Lower Mainland and beyond have consumed the electricity for nearly a century. The river and the watershed, especially the salmon populations, have paid a very high price. However, virtually nothing has

been invested in mitigating and compensating the impacts. It is time for all those who have benefitted to repay the debt to the watershed.

The river and watershed's consistent voice has been ARMS. In all honesty the success of the relentless and tireless efforts of the ARMS volunteers and others has been to provide life support to the river and the fish. The river and watershed are under continuous threat and attack from countless fronts but none as great as the construction of the hydroelectric facilities and the diversion of virtually all of the water. It requires a concerted and concentrated effort to preserve, protect and enhance what remains. Every day that passes is one less day to save the river and the watershed.

The ongoing negotiations are an opportunity for the parties involved to initiate significant and substantial change in how this watershed is viewed and treated. ARMS is asking that in our absence from the process your agencies ensure the health and well-being of the Alouette River, and watershed is protected for the life forms that depend on it to survive and for future generations of humanity. It is your moral and fiduciary duty to do so.

With all due respect, if fish passage had been provided for all species at the last WUP where would the fish populations be today? And if passage was in place for the previous 100 years? Instead, we continue to be burdened with endless committees, processes, studies in what seems to have become an effort to provide the illusion of solving the problems. The truck and trap program for Sockeye, while appreciated, falls far short of ARMS call for providing upstream and downstream passage for all species. This situation has become even more frustrating by the current hiatus and the failure of either BC Hydro or the Comptroller's Office to communicate with ARMS and others who are trying to protect the watershed.

May we suggest that you peek over the border to observe and learn from our American colleagues of what can be accomplished when we change our approach? To start, accept and embrace that in their rush to produce the valuable commodity of electricity that they caused serious and significant environmental and social damage. We have inherited both the many benefits of the electricity and the responsibility to produce that electricity in a socially and environmentally responsible manner. That responsibility now rests with you. With the right commitment much of the social and environmental damage can be reversed.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Ken Stewart', written over a light blue rectangular background.

Ken Stewart  
President  
Alouette River Management Society

CC

Katzie First Nation Chief and Council  
Justin Laslo, Leq' a: mel First Nation  
Karen Popoff, BC Hydro  
Joyce Murray, Minister of Fisheries, Oceans, and the Canadian Coast Guard  
Rebecca Reid, DFO Regional Director General, Pacific Region  
John Horgan, Premier

Marc Dalton, MP Pitt Meadows-Maple Ridge

George Heyman, Minister of Environment and Climate Change Strategy

Lisa Beare, MLA Maple Ridge-Pitt Meadows, and Minister for Citizen Services

Bob D'eith, MLA Maple Ridge-Mission

City of Maple Ridge Mayor and Council

City of Pitt Meadows Mayor and Council

Dan Sneep, DFO Fisheries Protection Program

Dr. Marvin Rosenau, BCIT Rivers Institute

Dr. Ken Ashley, BCIT Rivers Institute