



# CRESCENT SPUR-LOOS COMMUNITY ASSOCIATION

General Delivery, Crescent Spur, British Columbia, Canada V0J 3E0

30 June 2009

Darlene Clark  
Integrated Land Management Bureau  
#200-1488 4th Avenue  
Prince George, BC V2L 4Y2

Re: Morkill River Independent Power Plant Proposal, File Nos. 7408964 and 7408965

Emailed To: Darlene.Clark@gov.bc.ca

Dear Madam:

The following is the Crescent Spur-Loos Community Association's (CSLCA) submission to Front Counter's call for input on Robson Valley Power Corporation's (RVPC) Morkill Expansion Project. We live in the two communities closest to the planned development by the RVPC. In fact, to access the Morkill Valley you must drive directly through our communities and past our homes. We thus represent the citizens who will be directly impacted by this development. We also submit to you under separate cover a petition opposed to the RVPC project with more information, representing us and 40,000 other people on another document.

RVPC's Morkill Management Plan proposal is a blueprint for the destruction of Morkill Falls and the impact of this loss will be significant. It will:

- negatively affect our local sustainable ecotourism economies;
- disrupt our communities' well being and peace of mind;
- contribute to the extermination of endangered species; and
- contribute to the destruction of our globally unique Rainforest wilderness and rare biodiversity.

The CSLCA finds that RVPC's Morkill Management Plan document is riddled with exaggerations, missing information, self-serving statements, and falsities, of which we document in the following pages.

It is important that government understands our communities' history with the applicant to fully comprehend our absolute disapproval of this application. RVPC's president (Mr. Roger Blagborne) proposed his Ptarmigan Creek Power Inc. Plant as a boon to Robson Valley residents some 25 years ago. He then alleged the Ptarmigan Creek Power Project was the solution to power outages in Robson Valley and government approved his application on those grounds. However, today we find he has instead supplied us with power only a few times in 25 years. Today in its Morkill Management Plan proposal, RVPC is again repeating those same promises it has never carried out. We find today after we attended RVPC's open house, we studied the history of Mr. Blagborne's Ptarmigan Creek power facility, and after we have thoroughly reviewed RVPC's Morkill Management Plan that we are convinced that once again,

there is no intent to provide any benefit to local communities. Any additional power required for the Robson Valley can be provided by the IPPs currently under development on the Holmes/Beaver River tributaries.

We urge that government must not let RVPC override our local communities' well-being with disparaging statements about local residents. Government represents the public and the public depends upon government to look after their well-being by doing the right thing. We no longer have a democracy when government makes a decision in favour of a corporation like RVPC over the greater public good.

The decision-making process in issuing water licenses, land tenures or otherwise approving IPP applications needs to be open, independent and credible. The IPP decision-making process should not be fettered by the higher level provincial government energy policy, as communities like ours have invested a significant amount of time, energy and trust in land use planning processes over many years under the clear expectation that these would be honoured by government.

#### GENERAL PROBLEMS WE HAVE WITH RVPC'S PROPOSAL AND THE IPP REVIEW PROCESS BY GOVERNMENT

1. Local and regional sustainable tourism economies will suffer significant loss and people's livelihoods will be affected. Crescent Spur and Loos residents have been planning for an increased sustainable ecotourism economy and existing tourism businesses will be seriously affected by the RVPC proposal. The Morkill Falls is at the heart of the Morkill Valley, which has extremely high wildlife, wilderness, and biodiversity values. The ecotourism dollars that help sustain our communities' economies are extremely critical, so that the loss of the Morkill Falls will severely compromise our local economy.

2. The quality of life of Crescent Spur and Loos residents, business owners, and visitors will be diminished by noisy construction activities, locked gates, the eyesore of the 50 kilometres of power lines, and by an ugly power plant at a destination tourism and recreation site that has been used for years by many people. The RVPC proposed project is a source of significant anxiety in the communities of Crescent Spur and Loos, for many others who use the area for recreational activities, and for those who spent many years of their lives in government planning processes to conserve the area for its wilderness and biodiversity values.

3. BC Hydro data show that there is no shortage of power in the province. Staff from BC Hydro has informed us that it cannot determine where power goes once it is on the BC Hydro grid--IPP's go on the grid like a cup of water goes into a river. The infrequent power outages in Robson Valley are mostly weather related and these will continue with or without destruction of Morkill Falls. Power outages are never caused by a shortage of power in Robson Valley, and this proposal will not provide anything that existing power supplies cannot meet. The electrical generation and money from the Morkill proposal will not benefit British Columbians, Crescent Spur, Loos, or Robson Valley, contrary to the RVPC Management Plan, but we will lose our sustainable economies if the RVPC proposal is accepted by government.

4. The fundamental rights of Crescent Spur and Loos residents - to self-determination, safety, security and influence over our own home ground and our sustainable economy - are threatened by the RVPC proposal. There is nothing but detriment to our communities from this proposed project. If the government were to grant private rights to Morkill Falls - up until now a much cherished public and

community asset – to the RVPC, it would forever limit the potential of our communities' sustainable tourism industry and our property values. The low quality rubber dam proposed that has failed in icy waters is not safe and puts the safety of our families', visitors, clients, and Morkill Valley recreationists and tourists at risk. The dam also puts our properties at risk and therefore the proposal should not be allowed to go forward.

5. Our government cannot claim to be working for us, the sustainability of communities, or for the other creatures that share our province by accepting this proposal. We residents of BC are forced to spend our time doing what government should be doing to protect our well-being. We can only weep and ask, why, for whom does government work? Why would government consider placing the value of our land and our precious water so low that RVPC does not have to pay what a "normal" business would pay for degrading and using them for their own self-gain at the exclusion and huge loss to our communities? As Mr. Blagborne said at his open house *"there will be no long-term jobs or power for local communities,"* only long-term profits for him at our expense.

6. Crescent Spur and Loos residents as well as visitors, tourists, and wilderness recreationists are very concerned about how RVPC will impact the appearance of Morkill Falls. An incredible waterfall has potential to have increased use as a tourism destination, albeit today it is already widely visited. The Morkill Falls should be preserved in the natural state for the broader public interest, as several land use plans written by ALL Robson Valley stakeholders have clearly demarcated. The Morkill Falls was designated an official Special Site Recreation Area Map Notation in the Robson Valley LRMP Process by ALL Robson Valley stakeholders because of the high recreation, tourism, and public values. It is "morally right" that Morkill Falls remain preserved in the natural state.

7. Crescent Spur and Loos residents have rights as property and business owners to current and future economic survival. We must not to be driven-out of business or lose future economic opportunities based on the whims of somebody living 100's of kilometres outside our communities, who merely wants to be rich at our expense.

8. Our local communities do not want the Morkill Valley to become another snowmobiling destination, especially since we have seen this occurring all around us. This valley should be managed for other values. The year round snowplowing of the Morkill FSR will open the Morkill Valley up to hundreds of snowmobiles who will introduce an element that will compromise our communities, the wildlife, and ecotourism values of the valley.

9. Fisheries, First Nations, and Safety concerns have not been met.

#### SPECIFIC ISSUES THE CSLCA HAS WITH THE RVPC MORKILL MANAGEMENT PLAN.

The following RVPC Open House statements and review of RVPC's Morkill Management Plan proposal clearly demonstrate the inconsistencies and incorrect statements that RVPC has told us and written in their Morkill Management Plan to gain acceptance from government for their intrusive, destructive, and dangerous Morkill Power Project.

#### RVPC'S AUGUST 2008 OPEN HOUSE STATEMENTS, AS THEY CONTRADICT THE RVPC MANAGEMENT PLAN

Mr. Blagborne made the responses below during his open house to the many concerns voiced about his:

- 50 kilometre transmission line;
- accompanying logging;
- riparian zone destruction;
- Morkill falls viewing economies;

- new access for hunters, poachers, snowmobiles, ATVs;
- destruction of wilderness values and our communities' sustainable wilderness tourism economy; and
- his proposal's impact on our community's 20-year vehicle road hunting closure on the Morkill Forest Service Road:

#### 1. VIEWING:

##### Proponent's Open House Comment:

*"Your ability to view the Morkill falls will not be affected. You will still have full access to the viewing area and the falls will look the same except you may see a small piece of pipe."*

##### Proponent's Management Plan:

The RVPC Morkill Management Plan proposes to dry up the falls and completely destroy the falls viewing site that MOF spent tax dollars to construct.

#### 2. Proponent's Open House Comment:

*"Let me make this perfectly clear, the power generated from the Morkill falls will NOT go to you or anyone else in Robson Valley and it will NOT generate jobs for your community."*

##### Proponent's Management Plan:

The RVPC Management Plan proposes ALL the power for Robson Valley even though we do not need the power.

#### 3. COST TO THE PUBLIC AND WILDERNESS VALUES:

Mr. Blagborne's response to the many concerns voiced about the value of building a hydroelectric plant at the expense of the most impressive waterfalls for hundreds of kilometres around, world-class wilderness values, rare and endangered species, high biodiversity, salmon and bull trout spawning and rearing grounds, and local sustainable community economies that depend upon the falls:

##### Proponent's Open House Comment:

*"It does not matter if you are in favour of our proposed project or not, there is a strong push from government to approve all Independent Power Producer's and anyone that applies for one gets approved. No one gets rejected."*

#### 4. NOTICE OF PUBLIC MEETING LETTER ,10 JULY 2008, PAGE 90 OF THE RVPC MANAGEMENT PLAN

Mr. Blagborne wrote the following in his 10 July 2008 Notice of Public Meeting. Many of these statements are contradicted throughout the RVPC Management Plan without ANY explanation and we find fault with others: *"The falls area will not be impacted in any way...the plant is located above the upper limits of salmon habitat...none of the works will be visible from the falls or bridge area...the Morkill Forest Road is radio controlled and therefore any motor vehicle attempting to access the falls area must communicate by radio...travel on this road is not recommended."*

5. The following statements in the RVPC Management Plan (pages 1 and 2) are directly opposite to all of the statements made by Blagborne in his open house: *"To better meet the needs of the Robson Valley*

*and to increase stability RVPC intends to build...across the Morkill Falls...This would enable the generation profile to be reversed with the highest output in winter and the lowest during freshet, while maintaining the same high quality, reliable power services, voltage and VAR control...profiled to meet the winter and stand alone security needs of the Robson Valley which are not currently being met...it can "black start" Robson Valley during transmission line failures"*

#### CSLCA'S RESPONSE

Throughout RVPC's Morkill Management Plan proposal the project is portrayed as a winter energy producer for Robson Valley. However, Blagborne stated very clearly at his open house: *"there will be no local power or jobs created by our Morkill River project...all power generated will be sent south."*

The RVPC wants everyone to believe there is a crisis, *"winter and stand alone security needs of the Robson Valley which are not currently being met,"* and that they are going to solve it. The facts are that the RVPC's proposal will create many crises (outlined below), and we do not need the power they propose whatsoever—even if they were really intending to produce power for us. Critically, the data the RVPC shows for the Mwh that will be produced in winter are OPPOSITE to what their text says in the same document (see details below).

#### 6. RVPC Morkill Management Plan page 1

*"This would enable the generation profile, to be reversed with the highest output in winter and the lowest during freshet, while maintaining the same high quality, reliable power services, Voltage and VAR control..."*

#### CSLCA'S RESPONSE

RVPC's Energy Source Data section (e) on page 53: Computed additional generation available at Morkill... shows exactly the opposite of the RVPC statement above. The paragraph: *"We therefore propose the following profile of generation,"* shows January, February, and March with 1795, 1308, 1705 Mwh, respectively. However, we find that the April–December data there show ALL more Mwh (2500–4017) than winter. The RVPC data here show the lowest output of the generation profile in the winter months, opposite to the RVPC statement above from page 1 and elsewhere throughout the RVPC Morkill Management Plan. This is the FOREMOST CRITICAL FLAW in the RVPC Morkill Management Plan proposal since the ENTIRE document claims RVPC will produce MORE Mwh in winter, EXACTLY THE OPPOSITE of their data shown on page 53 in the SAME document. This fact alone completely nullifies the major claims in the RVPC Morkill Management Plan.

#### 7. RVPC's statements pages 2–3 c; Identified Concerns

*"RVPC has studied the Morkill Falls area over the past 15 years in all states of seasonal flow, and we have identified four issues we feel are important."*

#### Fish Habitat

*"It is our desire to use all of the stream flow available...during...winter.... We therefore have designed a plant with the diversion weir immediately above the falls, and the tailrace as close to the base of the falls as is possible."*

## CSLCA'S RESPONSE

RVPC's plans are to dry up the Morkill Falls and riverbed beneath the falls for a kilometre between the falls and their proposed powerhouse. This will destroy critical rearing habitat for Chinook salmon, blue-listed bull trout, and many other fish species that depend upon that stretch of river for rearing of young fish in nests at the exact time RVPC plans to de-water the riverbed. It will also destroy fish habitat downstream for several kilometres since normal water flow and normal fish habitat will not immediately occur when re-watering is forced out of RVPC's pipe.

Robson Valley is the last place left throughout the Rocky Mountains where grizzly bears are known to still feed on ocean going salmon. The magnificent Morkill Falls raceway starting at the base of the falls and flowing for over a kilometre is the exact location where this rare salmon-grizzly phenomenon occurs. The salmon-grizzly phenomenon is observed by many tourists, some that pay people in our communities to be guided there for viewing. De-watering this portion of the Morkill River will destroy all the nests of eggs and hatching fish that were left by Chinook Salmon each previous fall and will destroy critical spawning and rearing habitat for blue-listed bull trout and many other fish species. The salmon-grizzly relationship alone makes the Morkill Falls one of the most important tourism sites in the entire region, and the money generated from tourism on the Morkill River far exceeds RVPC's contribution to our local economy.

8. RVPC's Statements page 3, 3; Public Recreation Site;

*"The Morkill River has quite a number of areas along it set aside by the Forest Service for use in public recreation. None of them, however, have been developed. Use of the Morkill site has been infrequent and for the most part is used for viewing the falls...is very dangerous...slippery...reached by only the most determined climber...RVPC is exploring alternatives with the authorities to providing alternative safe access to view the falls. The intake, penstock, power house and tail race would not be visible from the actual area currently be used"* (for viewing).

## CSLCA'S RESPONSE

Hundreds of inexperienced tourists view the falls every year from the site developed by MOF that RVPC plans to destroy—all the quotes above from RVPC's Morkill Management Plan are not correct. The Morkill River has quite a number of areas along it set aside for use in public recreation because the wilderness tourism values in the Morkill Valley are very high. All Robson Valley stakeholders identified the highly valued recreation areas in many government-planning processes (LRMP, LRUP, Caribou Habitat, Old Growth Management Areas, sustainable alternative economic activity processes, etc.). Morkill Falls is officially designated as a Special Feature Recreation Map Reserve in the Robson Valley LRMP because of its high tourism and recreational value. RVPC is trying to give the impression that tourism use of the Morkill is infrequent but this is false. Businesses in our communities will lose tens-of-thousands of tourism dollars should the RVPC Management Plan proposal be accepted. RVPC's statement that the base of the falls can be reached by only the most determined climber is false. Several movies, many photographs, and several books have been written at the falls, all by people standing exactly where RVPC claims *"only the most determined climber"* will go.

9. The RVPC claim that *"the intake, penstock, power house, and tail race would not be visible from the current viewing area"* is false. Page 14-15 of RVPC's proposal instead clearly shows RVPC plans to

entirely transform the current MOF Morkill Falls viewing area into a very large 120 meter long and 20 meter wide head pond that will run from upstream of their proposed dam, down to their intake structure where the penstock begins. Thus, their diagram shows the opposite of what they write in the same document. The major water diversion and extensive development proposed will completely cover and destroy the current Morkill falls viewing area that MOF developed with tax dollars for tourism use. Hundreds of people annually use the exact area that RVPC claims nobody uses and our communities make income bringing them to the exact spot that RVPC plans to destroy.

10. RVPC's Statements pages 3-4; Ungulate Winter Range;

*"A large portion of the project is located within designated "Ungulate Winter Range. We have studied this subject extensively and have found that Caribou actually winter...nowhere near the proposed project."*

#### CSLCA'S RESPONSE

The area of the RVPC power plant and much of the power line has been designated "ungulate range" by government biologists, many scientists, and many members of the public during numerous public review processes, where it was determined that the Morkill watershed is critical to ungulates for their survival after many years of research and study. Mr. Blagborne seems to be claiming he is more knowledgeable than government, biologists, and the public who provided real data to designate the area as ungulate range in these processes. Scientists know that the Morkill Watershed is the only watershed in Canada where three federally-provincially recognized endangered or threatened woodland caribou subpopulations have their last stronghold. The Caribou depend on the unique habitat that is proposed to be cut down for the 50 km of power lines in the RVPC Management Plan. Instead, the Management Plan falsely claims that no caribou were present for 15 years, opposing much scientific data to the contrary, too voluminous to post here.

The RVPC proposes to use their incorrect "data" to log legislated, endangered Mountain Caribou Reserves and to make permanent roads within 2 km of others where it is illegal to make permanent roads under FRPA. Additionally, several Spatial Old Growth Management Areas designed to protect caribou, ungulate range, tourism values, and the world's only Inland Temperate Rainforest that are also legislated for no logging or roads are not mentioned anywhere in the RVPC Management Plan, yet are planned for obliteration by the proponent's power plant, power lines, and accompanying road development.

11. RVPC's statements pages 3-4; Ungulate Winter Range;

*"The risk to Caribou survival is human activity (primarily snowmobilers) giving predators easy access to run down animals on top of the snow. This is a public access issue and RVPC is willing to be part of the solution".*

#### CSLCA'S RESPONSE

RVPC will be the cause of the exact public access problem they propose to fix by providing access to snowmobiles. RVPC will further drive an endangered species towards extinction by PROVIDING the very access they claim they are "willing to be part of the solution." Scientists know that the Morkill watershed is the last stand for three federally-provincially recognised endangered or threatened woodland caribou

sub-populations—the only such watershed in all of Canada. RVPC's 50 kilometres of power lines will create the exact conditions for which snowmobilers are looking. Prince George MOF Regional Ecologist Dr. Dale Seip, MOE Biologist Glen Watts, and UNBC Professor Dr. Chris Johnson documented the negative impact of snowmobiles on this endangered species in their report: Displacement of Mountain Caribou from Winter Habitat by Snowmobiles 2006, 21 pages. Their findings prove that the RVPC will cause local extinction of the Morkill Caribou by providing snowmobilers new access to critical Caribou range. Caribou run from snowmobiles and stay away for weeks after they are disturbed, causing them severe energy problems in winter that leads to their death. Thus, the CSLCA is opposed to snowmobile access in the Morkill. Heavy snowmobile use in the Morkill headwater Renshaw Creek and neighbouring Kakwa Provincial Park, and snowmobilers' vociferous demands pose a distinct threat to the endangered Caribou living in this wilderness area. The winter snowplowing of the Morkill FSR will enable and encourage snowmobilers from far and wide to access the valley. There is nothing that RVPC can do to stop this. The RVPC plan claims to be part of a solution when in fact they will only be the exact cause of this problem.

This issue was extensively discussed at RVPC's August 2008 open house. Mr. Blagborne acknowledged being very aware of the problems that his proposed transmission line would create, whereas he dismisses attendee's concerns as being *"very unpleasantly vociferous against any development what so ever"* in his RVPC Morkill Management Plan proposal.

12. RVPC's statements page 3, d; Access Roads Power Line.

*"No new access roads are required, Brushing and removal of danger trees out to the right of way boundary is required along with some moderate clearing in a short section between Morkill River crossing and the POB Road."*

#### CSLCA'S RESPONSE

RVPC's Morkill Management Plan proposal section Power Line Engineering Specifications on page 66, appendix #5, says the opposite of their statement above from page 3 in the same document. Page 66, 3.3 Access Roads 3.31 says: *"Access road construction may be required as a part of the work."*

13. CSLCA'S GENERAL RESPONSE TO RVPC'S DISCUSSION OF THEIR PROPOSED ROAD CONSTRUCTION:

RVPC states they will build their power line along the existing Morkill Forest Service Road (FSR), whereas we find this is impossible. There were numerous problems and space was severely limited between the Morkill River and the steep slopes running along the river when the Morkill FSR was constructed. The result was that much of the road was constructed within a critical riparian zone that today would be illegal. We thus find that RVPC will have to construct much of their power line away from the Morkill FSR because there is no room to put power lines along the Morkill FSR. Thus, the RVPC proposal would require extensive logging through legally protected forest.

14. RVPC's statements page 3, d; Access Roads Power Line.

RVPC claims *"Brushing and removal of danger trees out to the right of way is required along with some moderate clearing in a short section between the Morkill river crossing and the POB road."*



## CSLCA'S RESPONSE

We find that RVPC is attempting to have “free reign” over their power line route to log as much timber as they can for 50 kilometres. At RVPC's August 2008 open house, Mr. Blagborne made many comments about the “*outstanding timber*” existing in the Morkill Valley. He said his relative is a Registered Professional Forester and they identified many areas of “*outstanding timber.*” Mr. Blagborne went on to say that, there are many forest industry workers out of work in McBride and that cutting the timber would be beneficial to them. Everyone present agreed the timber was there because of government planning processes that our communities attended over the last decades and that we wanted the protected forest reserves to remain. The RVPC Morkill Management Plan proposal, however, ignores our and government’s sustainability efforts, as the RVPC plans to log off legislated Spatial Old Growth Management Areas and to make roads inside and within 2 kilometres of Endangered Mountain Caribou Reserves, all illegal activities under FRPA (U-7-003 GAR rat amend 20 Fe 09).

15. RVPC's statements, page 65, Power Line Engineering Specifications.

Page 65 says: “*Note. The following specifications are Standard Engineering Practice, however, the line has not been actually staked by our engineer and may require change should unanticipated geological conditions arise.*”

## CSLCA'S RESPONSE

Construction of 50 kilometres of power lines is a major construction project. The fact that RVPC has not studied their proposed power line while the project proposal is being reviewed for acceptance by government demonstrates that something is drastically wrong with the IPP review system. This point alone should be reason enough for government to reject RVPC’s current Morkill Management Plan proposal.

16. RVPC's statements page 3 d; Access Roads, Power House, Penstock, and Tailrace.

“*Access to the powerhouse area will require a road to be built from Morkill Forest Service Road, 1200 meters to the Power House location. The road would be mostly hewn out of solid rock...*”

## CSLCA'S RESPONSE

Mr. Blagborne continually downplays the amount of logging required to carry out his Morkill proposal throughout his application. Page 15 of RVPC’s Morkill Management Plan proposal shows the powerhouse location. No matter how the proposed powerhouse location is accessed from the Morkill FSR, the route will go through solid, undisturbed forest, and much of it is legislated for no logging under FRPA as Spatial Old Growth Management Areas.

Many people throughout Robson Valley spent years of their lives attending government–planning processes about the Morkill watershed. The Morkill Falls was identified as having exceptional values at all these processes and all stakeholders of Robson Valley agreed there must be no logging in the falls area. The Morkill Falls was designated an official Special Site Recreation Area Map Notation in the Robson Valley LRMP Process by all stakeholders because of the high recreation, tourism, and public values. Now RVPC wants government to throw away results obtained from the decades of hard work by those stakeholders who heavily invested their time, energy, and resources. Government should honour its past commitments at land use planning exercises and advise the applicant that these issues are

“show stoppers” as outlined on page 59 of the Ministry of Agriculture and Lands’ publication “Independent Power Production in BC: an Inter-agency Guidebook for Proponents.”

17. RVPC's statements page 7 d; Biological Information

*"The Morkill expansion and the interconnecting power line is located in a remote area along radio controlled logging roads, and is infrequently visited for recreational purposes. The area seems primarily to be used for logging, guiding, trapping, and heli tours. Almost all of the lands impacted by this application have been previously disturbed by logging activities, Triton Environmental has yet to complete a final report."*

CSLCA'S RESPONSE

This is not biological information and these statements are false. Several businesses in our communities have made tens of thousands of dollars showing clients the exact locations RVPC's Morkill Management Plan proposal falsely claims are *"infrequently visited for recreational purposes."* Additionally, almost none of the lands impacted by the RVPC Morkill Management Plan proposal application have been previously disturbed by logging activities. Finally, how can ANYBODY comment on RVPC's Biological Information Report that RVPC writes has yet to be completed in the RVPC Morkill Management Plan? Again, how can Front Counter/ILMB advertise this Plan without the necessary documents referred to in the plan?

18. RVPC's statements Page 7 e; Affected Water Users

*"None Known"*

CSLCA'S RESPONSE

RVPC claims they have studied the Morkill area for over 15 years. Why don't they know the answer to this critical question? In fact, the Morkill River appears in the paddling guidebook: "Canoeing and Kayaking BC's Central Interior." Kayakers and recreational canoeists regularly paddle stretches both above and below the Morkill falls.

19. RVPC's statements Page 7 Issues Governing Design Power Line, a; design concept

*"RVPC intends to construct a standard, 52 kilometer...power line...The route chosen is intended to cause a minimum of disturbance during construction or maintenance and therefore runs along existing forest roads."*

CSLCA'S RESPONSE

During construction of the existing Morkill FSR many problems were encountered because of the narrowness of available land existing to put a road between the Morkill River and steep slopes. There is no question that RVPC will have to extensively log protected areas along their proposed power lines to erect the poles. Please see above the CSLCA's RESPONSE TO RVPC's STATEMENTS page 3, d; Access Roads Power Line.

20. RVPC's statements page 8 b; Land Impacts

*"The route runs along existing, remote forest roads, and requires the brush and debris within the allowance be cleared and the ground profiled to allow mowing rather than herbicide use."*

#### CSLCA'S RESPONSE

RVPC tries to paint a rosy picture of low impact on the Morkill Valley because they are not going to use herbicides when in fact the following RVPC Morkill Management Plan proposal statements contradict their statements above in the same document:

RVPC proposal, page 68 Clearing Methods and Equipment

2.2.3 *"When specified in the right-of-way construction units, stumps left in place **MUST** be treated with a heavy application of an appropriate herbicide approved by the engineer. Chemical treatment of the stumps **MUST** occur as soon as possible after cutting. The chemical treatment **MUST** be sufficient to saturate the entire above ground surface of the stump and cause a small amount to run down the sides and collect at the base to penetrate below the ground line into the roots. Any stumps showing resurgent growth prior to completion of line construction **MUST** be treated to kill all such growth."*

21. RVPC's statements page 8 b; Land Impacts

*"Most of the route has been clear-cut."*

#### CSLCA'S RESPONSE

This statement is false.

22. RVPC's statements page 8 b; Land Impacts

*"Other than rebrushing the right of way there are no adverse environmental impacts foreseen."*

#### CSLCA'S RESPONSE

How is all the herbicide RVPC plans to put on the road along the river going to be kept from running-off into the river?

23. RVPC's statements page 8 d; Aquatic Impacts

*"Minimal; Will be included with fisheries reports."*

#### CSLCA'S RESPONSE

The fisheries report in the RVPC Morkill Management Plan proposal does not address this issue contrary to the RVPC statement above.

24. RVPC's statements page 8 e. Fish and Wildlife Habitat Impact.

*"Included on Biologist Report."*

#### CSLCA'S RESPONSE

The few hours Triton spent in the Morkill falls area was not enough time whatsoever to accurately comment on this RVPC major construction job.

25. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 54

*"This brief report was prepared to document the findings of the one-day field investigation..."*

#### CSLCA'S RESPONSE

One day is insufficient to make accurate comments on this major construction project.

#### 26. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 54

*"Spawning habitat was difficult to assess as the river is quite turbid, but extensive gravel bars were not noted."*

#### CSLCA'S RESPONSE

Extensive gravel bars are not needed for spawning habitat as our 20 years of observing spawning by hundreds of fish beneath the falls attest.

#### 27. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 54

*"The river margin was sampled...but no fish were captured in 285 seconds of electro fishing."*

#### CSLCA'S RESPONSE

How can anybody think that trying to find fish for less than 5 minutes is sufficient to assess fish use affected by this major development? The backed up water will extend for several kilometres up river—5 minutes and old reports do not prove there are no fish.

#### 28. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 55

*"Historically, Chinook salmon have been recorded spawning up to the base of the falls. However, these sources don't indicate if Chinook spawning was actually observed at the falls, Chinook salmon were observed at the falls, or if the falls are at the upper limit of Chinook access within the system."*

#### CSLCA'S RESPONSE

Triton does not say who their sources of information are—why not? We found 5 articles on the Internet with a 1 minute search that explain answers to every part of Triton's quote above. Many scientists, local residents, recreationists, and others have all observed Chinook salmon and bull trout spawning and rearing at the base of the falls for 20 years, and Mr. Blagborne was told this many times at his open house. The latest ILMB (MSRM) text on this subject from Thibeault, Nesbit, and Spears 2006, Robson Valley-North (former Robson Valley Forest District) Sustainable Resource Management Plan Biodiversity Chapter Background Report, 46 pages is: "The Morkill River system is highly rated for fisheries values. Chinook salmon and fresh water fish species are present in the main Morkill River up to a barrier at Morkill Falls. The river above the Morkill Falls contributes to ensuring stream temperatures and food sources are favourable for the downstream fisheries..." (page 33). It appears that Triton has not talked to any of the right people or done an adequate literature search yet tries to make biological conclusions based on a complete lack of information.

#### 29. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 55

*"Fish sampling was conducted downstream of the falls on Sept 3<sup>rd</sup>, 2008...(for)...1485 electrofishing seconds."*

#### CSLCA'S RESPONSE

One day in the field electro-fishing for 5 minutes upstream and 25 minutes downstream is insufficient to assess fish use affected by this major development.

#### 30. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 55

*"Rearing habitat quality was good, as large boulders and eddies provide abundant cover. The river has sufficient depth to provide over wintering habitat in the vicinity, though higher quality over wintering habitat is available at other locations downstream (e.g., at the confluence of Forget-me-not Creek)."*

#### CSLCA'S RESPONSE

Forget-me-not Creek is 3 kilometres downstream from Morkill Falls. We see Triton is double-talking on the one hand finding conditions suitable for fish rearing at the Morkill Falls, while on the other hand downplaying that suitability at the proposed project site by saying there is better fish rearing habitat downstream, all with NO EVIDENCE. There is not a word in the biological report of what will happen downstream when water gushes out of RVPC's pipe. However, we know that much of the riverbed will be de-watered for several kilometres downstream; exactly where the Triton report found salmon and claims this habitat is good for many fish species.

#### 31. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 55

*"Spawning habitat was difficult to access due to the turbid water conditions, but is not SUSPECTED to be of high quality...Because spawning habitat is LIKELY of poor quality, Chinook spawning is not SUSPECTED to occur within the reach immediately downstream of the falls."*

#### CSLCA'S RESPONSE

It is clear from the language used in Triton's report that the investigation and assessment effort made to date is woefully inadequate and cannot be relied upon as the basis for any decisions by government to allow this project to proceed. We have watched salmon and bull trout spawning beneath Morkill Falls for 20 years, and are convinced that a more thorough and scientific study will confirm this.

#### 32. TRITON ENVIRONMENTAL CONSULTANTS REPORT pages 55-56

*"Additional fish sampling was conducted along the right margin of the Morkill River immediately upstream of the confluence of Forgetmenot Creek."*

#### CSLCA'S RESPONSE

We are concerned that focusing on the confluence of the Morkill River and Forget-me-not Creek suggests an attempt to convince decision-makers that the quality of fish habitat from Forget-me-not Creek upstream to the base of the Morkill Falls is very poor, and Chinook salmon do not spawn, use, or have any need for this portion of the Morkill River. However, as noted above, we have watched salmon and bull trout spawning beneath Morkill Falls for 20 years.

#### 33. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 55-56

page 55: *"Spawning habitat was difficult to assess due to the turbid water conditions, but is not suspected to be of high quality".*

page 56: *"A more in-depth study of the habitat in the vicinity of the falls would be required to more conclusively demonstrate the poor quality of the spawning habitat at this location...Consideration may need to be given to a Chinook smolt outmigration study...As with chinook salmon, the quality of the below the falls appears to be of marginal quality for spawning, however bull trout are able to use smaller patches of gravels. The habitats below the falls were judged to have good rearing habitat quality for bull trout".*

#### CSLCA'S RESPONSE

Triton asks for more in-depth study because they know their study is insufficient, yet they still try to say spawning habitat is poor. Triton uses the words *"suspected," "appears,"* and *"judged"* because their assessment is insufficient. The report implies that spawning habitat is more important than rearing habitat but we know both habitats are critical to fish. Triton's study even found rearing habitat of a blue-listed species beneath the falls planned by RVPC to be dried up, and therefore the question about spawning habitat is much less relevant than is suggested. We dispute any suggestion that that salmon do not spawn in the location planned for de-watering. However, the rest of the Triton data demonstrate that rearing habitat will definitely be destroyed beneath the falls and for several kilometres downstream.

#### 34. TRITON ENVIRONMENTAL CONSULTANTS REPORT page 59

*"Morkill Falls are in a recreation reserve and permission to develop within the reserve would need to be obtained from the appropriate agencies...Identification of fish habitat quality and spawner use, and permission to operate within the recreation reserve are likely to be the most significant obstacles to permit this project."*

#### CSLCA'S RESPONSE

These are significant obstacles but Triton is mistaken to think they are the only significant obstacles.

#### 35. TRITON ENVIRONMENTAL CONSULTANTS REPORT Page 59

Neil Foord, B.Sc., R.P.Bio.

#### CSLCA'S RESPONSE

A few hours of field study to evaluate the feasibility of this major construction job is unacceptable. People with Ph.D.'s and 20 years experience working in the Morkill watershed told RVPC many, many facts opposite to Triton's report, and opposite to other text of the RVPC Morkill Management Plan.

#### 36. RVPC PROPOSAL POWER LINE ENGINEERING SPECIFICATIONS Page 67 Section 3.6, f.

*"Power lines are to be cleared in winter or by hand."*

#### CSLCA'S RESPONSE

Opposite to the RVPC Morkill Management Plan proposal statement above, page 88 of appendix #6 *"development/construction schedule"* says exactly the opposite in the same document *"power line construction will be carried out in June 2011."* It is impossible for us to imagine that RVPC will clear 50 kilometres of power line by hand.

37. RVPC PROPOSAL POWER LINE ENGINEERING SPECIFICATIONS Page 67 Section 3.6, g.

*"The Walker, POB, and Morkill forest roads are radio controlled industrial roads...all vehicles shall have radios...complete blockages shall be arranged to suit active forestry contractors."*

#### CSLCA'S RESPONSE

These quotes are false. The Walker, POB, and Morkill Forest Service Roads have had very limited industrial forestry activity or radio controlled traffic for a decade. RVPC was told this yet still attempts to block the Morkill FSR from the many that use it for sustainable economies, recreation, tourism, and to view the outstanding Morkill Falls. Mr. Blagborne wants to carry out his destructive activities without scrutiny by falsely claiming a lack of recreational and tourism use in the Morkill watershed.

38. RVPC' statements Page 88 Morkill Expansion Project–Development Schedule

*"Since the Ptarmigan 2 plant was finished RVPC has been studying the Morkill Falls area with a view to developing winter energy."*

#### CSLCA'S RESPONSE

Throughout RVPC's proposal they constantly give the false impression their main purpose is to develop winter energy for Robson Valley.

39. RVPC's statements page 89 Public and First Nations Involvement

*"RVPC has been planning and working towards this application for some years. During this time we have spoken with many Robson Valley residents and have received a great deal of encouragement, support, and suggestions."*

#### CSLCA'S RESPONSE

Residents in the communities most affected by RVPC's proposal (Loos and Crescent Spur) had no idea this project was being considered until one of RVPC's employees dropped off notices at our local post office in August 2008. RVPC did not even pay any postage to ensure these notices were delivered to residents yet falsely claims in the RVPC Morkill Management Plan proposal they hand-delivered them to all residents. RVPC used a hit-or-miss delivery method, leaving a few notices, not enough for every resident, on the post office counter for those who happened to noticed it. The notice had no directions to the location of the meeting but the notice claimed signs for directions to the meeting would be posted. However, no signs were posted, and when Mr. Blagborne and his company's secretary were told people could not find the meeting place they would not place any signs for directions, causing many to miss the meeting, even though his written notice said directions would be posted (page 90).

40. RVPC's statements Page 89

*"We feel this development must be in the best interest of all."*

#### CSLCA'S RESPONSE

The fact that our communities have to take the time to write this response after already expressing to Mr. Blagborne our many concerns and reasons for rejecting his RVPC Morkill Management Plan proposal, should indicate to government that our communities certainly do not consider this proposal to be in the

best interests of the people who live here. Government should reject these proposals from being advanced to further stages in the permitting process.

41. RVPC's statements Page 89

*"On 16 August 2008 we held an open house at our Ptarmigan operation to display and discuss with local residents (Dome Creek, Loos, Crescent Spur) our plans and options, and to invite input...Almost all were notified by hand and those who were unable to attend were spoken to personally...We did receive positive comments from those who chose to respond to us at the time...The reaction of those who attended was mixed, and we felt the results were generally positive, but not completely representative of the community."*

CSLCA'S RESPONSE—We dispute Mr. Blagborne's description of his open house notification process. We have found NOBODY in Crescent Spur or Loos to date that was *"notified by hand."* Residents in these communities were notified by a hit-or-miss approach with notices (not enough copies for all residents), being left at the local post office by a RVPC employee without postage being paid. Mr. Blagborne's statement that *"those who were unable to attend were spoken to personally"* is false. Contrary to Mr. Blagborne's quote above, we have not found a single resident of Crescent Spur or Loos who was unable to attend RVPC's August 2008 Open House that was contacted by Mr. Blagborne to date. Please see the attached petition letter signed by nearly all residents from the communities of Crescent Spur and Loos documenting Mr. Blagborne's mistaken interpretations of *"positive comments,"* and documenting that his comments are definitely *"not representative of the community."* The petition letter attached was featured on the front page of the Prince George Citizen on 28 April 2008, several weeks BEFORE Front Counter/ILMB posted the RVPC proposal with many quotes directly opposite to that article.

42. RVPC Morkill Management Plan page 11 Safety Aspects: *"There are absolutely no Downstream Consequences from dam failure..."*

CSLCA'S RESPONSE--We adamantly disagree. This RVPC Morkill Management Plan proposes a dam design that the manufacturer admits on pages 36-39 has failed in icy waters several times in the same Management Plan. This problematic dam is being proposed for one of the most frozen rivers in North America. However, the above serious contradiction is the ONLY RVPC safety explanation for community residents living downstream from the proposed dam site, and for our business clients, riverside recreationists, and tourists who will all be flooded out and perhaps killed when the icy waters cause the storage pond to rush down river.

Sincerely,

*Julie Zammuto*

Julie Zammuto

Secretary