



Jim Abram, Director
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Re: Crown Land File: 3020-20/2412171

Tracking Number: 100269298

Upper Jewakwa River and Upper Heakamie River Hydroelectric Project

June 28, 2019

Dear Premier Horgan,

As Director for Strathcona Regional District, Area C, I have received a referral for the above- mentioned application submitted to Front Counter BC on December 10, 2018 for tenure on a tract of land in the Bute Inlet area for the purposes of an investigative license for a hydroelectric power project. I have been asked to comment on it by July 15, 2019.

I would like to ask, first of all, that the comment period deadline be extended to allow time for a more comprehensive response to this file.

The application has been made by Mirzeydin Ilhanli, listed as a permanent resident of New York City but named as the contact for a B.C. numbered company, with an office in Vancouver. (see below)

<https://twitter.com/ilhanlienerji?lang=en>

<http://site371434.webydo.com/home-1.html>

[Under Canadian law, numbered companies do not have the same rights as individuals, including the right to apply for crown tenure.] The agent for the applicant is one Josh

Friedman of Sigma Engineering Ltd., a subsidiary of an international engineering firm listed on the Toronto Stock Exchange.

Perhaps the applicant and his agent are unaware of the history of water licensing and hydroelectric power projects in this area. Ten years ago when this jurisdiction, SRD Area C, was faced with an uncannily similar project by Plutonic Power (later to become Alterra Power Corp.), the Area C community as well as many other concerned individuals, groups, companies and local First Nations, rallied in overwhelming numbers to demand a full panel environmental review by a federally appointed board. The proposal at that time went to standing room only information sessions and public hearings and the proposal was, in the end, soundly rejected. BC Hydro announced that the power generated by this project was not required, and further, was directed to not purchase any more of this type of power as it was simply too expensive.

Things have not changed much since then when in the January 16th, 2009 edition of the Discovery Islander, Ray Grigg (one of my constituents) wrote for Sierra Quadra:

“Arthur Caldicott, an independent environmental researcher, gave a public presentation at the Quadra Island Community Centre on December 6th, 2008, to help Islanders understand the complex issue of run-of-river power development in British Columbia. Caldicott notes several key environmental concerns:

Developments of this kind and scale are unprecedented in BC. With no science based, over-arching policy in place as guidance the BC government and the IPPs are working together on a site-by-site basis to make each project economically viable. This is a risky strategy that invites compromises and mistakes.

No studies have been conducted on the downstream effects of such water diversion.

These projects are industrial-scale invasions in wilderness areas with no measured impact on ecotourism values or on natural ecologies - the transmission lines themselves will be huge scars on pristine mountains, and the disposal of huge volumes of tunnel rock is problematic.

Projects of less than 50 megawatts do not need environmental reviews. Consequently, the impact of individual projects or the cumulative impact of many such projects is undetermined.

Bill 30, recently passed by the BC Liberal government, removes the right of local municipalities to stop such developments, even if these projects impair the natural assets that are valuable to any municipality – Bill 30 was probably the government's response to Squamish's vehement objections to an IPP development on its beloved Ashlu River, a favourite tourist attraction and world-class kayaking site. As for

profitability, Caldicott estimates that these run-of-river projects will be very lucrative for private developers. This prospect has probably enticed General Electric to buy a 50 % share in Plutonic Power. And profits should rise even further when the purchasing arrangements with BC Hydro expire and the assets and rights are assumed by the developer. Because of such advantages to corporations, many British Columbians believe that these projects should be undertaken by the province's publicly owned utility, BC Hydro, so that profits and assets remain in the public rather than the private domain.”

As is the case now, there was no need for this power in British Columbia, even before Site C was a reality. There was also no market south of the border. California being the only potential customer, refused to purchase this energy which would have been produced only after massive industrialization of the unspoiled natural wilderness of Bute Inlet. The law requiring California to purchase electrical power from only truly green sources is still in place today.

At the end of the previous public hearing process, in the spring of 2011, West Coast Environmental Law issued a press release including assurances by the Federal government of the day.

“Although the current Review Panel has been disbanded, the Canadian Environmental Assessment Agency issued a statement confirming the Minister of Environment will appoint a new Panel, should the Bute project proceed at a later date.”

“We’re happy that Minister Kent has done the right thing and made sure that if this massive hydro project comes back, it will get the strongest possible environmental assessment available under the law,” said Josh Paterson, Staff Lawyer at West Coast Environmental Law, which assisted the Friends of Bute Inlet in advocating for the federal review panel to be maintained. “This project has huge potential impacts and its wider, cumulative effects on the whole region need to be studied.”

<https://www.wcel.org/media-release/bute-inlet-hydro-project-have-public-hearings-if-project-revived-says-ottawa>

Ten years on we know that science’s predictions for climate change were greatly underestimated. It is widely accepted that what we are facing today is indeed a climate emergency. In our region we have been experiencing drought conditions for the past 5 to 6 years. Average rainfall and snowpack in the Coast Range and on Vancouver Island is far below normal. Melting glaciers are receding at a far greater rate than ever before in recorded history. Water resources are being taxed like never before. We are seeing

western red cedars, shore pine, and other tree and plant species dying in alarming numbers along this coast.

Native salmon species, particularly our valuable chinook, are in peril. Low water flows in streams and rivers, and low autumn rainfall are making it all but impossible for returning salmon to reach their upstream spawning grounds in the rivers of Bute Inlet as well as the rest of the B.C. coast. Not only does this affect populations of salmon, it also affects predator species and the associated web of life that depends on strong salmon returns for survival.

The lucrative commercial, recreational and sports fishing industry, important for many jobs and businesses in Area C, has been seriously impacted by fishery closures this year. At a time when the federal Department of Fisheries and Oceans is putting very large amounts of public resources into salmon restoration and enhancement, it defies reason to enable more habitat destruction by allowing this type of industrial water diversion infrastructure to take place.

With respect to the current water crisis being experienced in the area, it seems completely and almost dangerously counter-productive to even consider granting a water license and tenure to what amounts to an un-named, offshore entity for any purpose whatsoever, let alone one that will result in on-going, large-scale industrialization of the 4800 (approx.) hectare tract of land in the upper reaches of the Jewakwa and Heakamie rivers, part of the Homathko River watershed.

The fact that the application is for a tract of land just under the 5000 hectares and 50 MW limits that would trigger a full panel environmental review requiring further scrutiny squeaks of disrespect for the people of this District who gathered together in large numbers, spending valuable time and energy protecting the wilderness of their beloved Bute Inlet just ten years ago. (the application is for just under the trigger points)

Geographically, the area in question is one of steep and unstable slopes, a rugged and difficult terrain with a repeated history of huge and devastating landslides as the following links show.

<https://www.sfu.ca/~jclague/dams.htm>

“During the winter of 2011/2012, a massive landslide occurred on the Homathko below the Tiedemann/Mosely confluence, creating a debris field that dammed the river, catastrophically and permanently altering the majority of the notable whitewater... While the gradient is now lost as the river flows over the debris from the avalanche... the whitewater heart of the Homathko, no longer and will never again exist. It is hard to relate the scale of this incredible geological event without seeing it in person.”

(Check out the photos near the bottom of the following link where a slide came down in the Homathko Canyon and created a dam in the Homathko River.)

<http://liquidlore.com/bc/homathko/>

If the investigative license is allowed to move forward and infrastructure is built, there will be on-going problems with slides and washouts. This was the experience of the Toba-Montrose hydroelectric project in nearby Toba Inlet. Repeated problems with rocks and boulders wrecking pen stock and extreme wear and tear on turbines by heavy glacial silt have been costly and ongoing.

Extreme industrial activity and the effects of stability issues related to construction of infrastructure would take its toll on wildlife in the area. Mountain goats and sheep, as well as grizzly bear, are extremely sensitive to such disturbances and will not tolerate this sort of activity. This would prove to be a problem with wildlife viewing activities that border the area in question. A number of local resorts, guide-outfitters and tour operators, including those of First Nations whose territory is in question (who so far have not been referred in this proposal) employ large numbers of local people, directly and indirectly, in a multi-million dollar “soft” industry that is reliant on the wilderness of Bute Inlet remaining intact and undisturbed.

The Strathcona Regional District is currently engaged in the creation of its new Integrated Community Sustainability Plan. The appetite for this sort of project in the Bute Inlet and area wilderness is less than ever before. This type of industrial activity on such a large scale is absolutely not in keeping with the community’s vision for the future of the Bute Inlet area, nor is it compatible with successful enterprise currently taking place in the Bute Inlet watershed area.

The proposal by Plutonic Power (later known as Alterra Corp.) a decade ago, is still being promoted on industry websites. It seems that the current applicant has simply changed the title of this proposal to include two of Plutonic’s original 17 run-of-river projects making the proposal appear smaller and more benign than it actually is.

“The proposed Bute Inlet Hydroelectric Project includes 17 run-of-river hydroelectric facilities located on tributaries of the Homathko, Southgate, and Orford Rivers, in the Coast Mountains of British Columbia. Combined, these projects constitute about 1,100 MW of renewable energy, with 200 km of 230 kV and 250 km of 500 kV transmission line and interconnecting substations, new access roads, bridges and barge landing facilities, construction camps, and air strips.”

<https://www.knightpiesold.com/en/projects/bute-inlet-hydroelectric-project/>

In 2009 the NDP, then in opposition to Gordon Campbell's provincial Liberal government, made it known in a letter to a local constituent, where they stood on this type of development in the region:

“The BC NDP's position is very clear. We want a moratorium on independent power projects until there is an overall assessment of their impact. The privatisation of our power generation, combined with the loss of control over our rivers, will undermine all of our futures. BC remains a net exporter of power and while we know we need to develop alternative energy sources, selling off BC's rivers for years to come is not the way. Nor is the likely devastation caused in pristine areas to build the transmission lines. No one should be lulled into thinking that these mega, private power projects are green or in the best interests of the people of BC.”

It would be interesting to know what the current NDP government would have to say about this sort of development proposal today, a decade into the future with our precious water resources on the line. I expect they would not be in favour of this proposal, and that they would also expect a full panel review, as promised by the Federal government nearly ten years ago, complete with public hearings and community and First Nations involvement in the process.

Finally, it has come to light that the proponent has, within the past year, been advertising on the LinkedIn website, attempting to recruit retired staff or ministers from the Departments of the Environment and Energy to act as consultants for this proposed project. It is unknown if he was successful, but just the idea of such a thing is completely reprehensible, suggesting further disrespect for our democratic system.

<https://ca.linkedin.com/jobs/view/environmental-consultant-at-ilhanli-power-generation-co-808195285>

<https://ca.linkedin.com/jobs/view/consultant-at-ilhanli-power-generation-co-863560791>

This application, under review for the past six months now, at the expense of the provincial taxpayer, is tying up government resources as well as government staff, burdening the already overloaded system with a proposal that is very unlikely to proceed or succeed in the long run. In fact, it should not have been accepted in the first place by Front Counter BC staff.

I look forward to your reply and an outright denial of this application in the area that I represent.

Respectfully,



Jim Abram

Director

Discovery Islands-Mainland Inlets

Strathcona Regional District

Cc:

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The Honorable Doug Donaldson - doug.donaldson.mla@leg.bc.ca

The Honorable Claire Trevena - claire.trevena.mla@leg.bc.ca

Media

The views expressed in this letter are those of the director and do not necessarily reflect those of the corporation or the full board of directors.