

Dean, Sharon GCPE:EX

From: Thomas, Vivian P GCPE:EX
Sent: January-31-14 2:50 PM
To: 'provletters@theprovince.com'; 'gclark@theprovince.com'
Subject: Letter from FLNR Minister re: Run of River
Attachments: LTE_The Province_Jan 31.pdf

Hi I've attached a letter from Minister Thomson in response to the Jan 29th article, River power projects get failing grade.

I understand Dan Fumano is away until the end of February, otherwise I would also follow-up with him on this particular section in his article:

"As of this month, there were two new projects in operation, but still a total of 18 of 24 with unsatisfactory operating procedures, according to an email to The Province from a ministry spokesman." We never said there were 18 projects with unsatisfactory operating procedures. All projects were approved to the standards of the day. There are currently six projects operating to today's standards, and another seven actively being updated.

Fyi, Here's his question and the answer we sent him:

The document from the 2012 workshop shows that at that time, "only 4 of the 22 operating projects in the South Coast region have satisfactory OPPs." How many of those operating projects in the South Coast region have satisfactory OPPs now? I think there are supposed to be 25 operating projects in that region by now? Is that correct?

The requirements for operating procedures have evolved over the past 10 years to better protect the environment. As a result some of the earlier projects have OPPRs which need adjusting to meet current standards. Government is in the process of updating those OPPRs as much as possible. At the moment there are 24 projects in the South Coast Region in operation of which six have an OPPR which is satisfactory, and seven are in the process of doing so in the near future. Another seven projects are under construction and will need a satisfactory OPPR before they can start operating in the upcoming years.

Cheers,

Vivian Thomas
Communications Director
Ministry of Forests, Lands and Natural Resource Operations
Tel: 250 356-2475 cell: 250 213-2972
Vivian.Thomas@gov.bc.ca

LETTER TO THE EDITOR

Jan. 31, 2014

The Editor
The Province
c/o provletters@theprovince.com

Dear Editor:

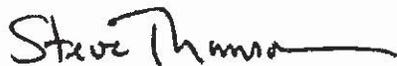
I disagree with the assertions in Jan. 29th article, "River power projects get failing grade."

Both the ministry and run-of-river project operators are committed to continuous improvement in best practices. This is evidenced by the fact that seven projects are currently updating their operating practices and procedures and the fact that Clean Energy BC commissioned the Pacific Salmon Foundation report released today. The report confirms that most projects have no impact on salmon. The data the Pacific Salmon Foundation analyzed was monitoring data that operators are required to provide to government.

Run of river projects are an environmentally friendly source of power and generate about 20 per cent of BC Hydro's electricity supply. It's estimated that 12 of the projects currently under construction will produce \$2.6 billion in capital expenditures over the construction period and support 2,100 direct jobs.

The Pacific Salmon Foundation report also provides a good baseline and recommendations that both government and industry will be evaluating so we can continue to improve our practices.

Sincerely yours,



Steve Thomson
Minister of Forests, Lands and Natural Resource Operations
250 356-2475

Clarke, Brennan GCPE:EX

From: Anderson, Keith FLNR:EX
Sent: January-30-14 1:09 PM
To: Clarke, Brennan GCPE:EX; Hicks, Alan FLNR:EX; Hartley, Brenda FLNR:EX
Cc: Rosenboom, Remko FLNR:EX
Subject: RE: South Coast Region IPPs with OPPRs

No problem.

Just wanted to make sure we did not make a correction that was not correct...

k,

From: Clarke, Brennan GCPE:EX
Sent: Thursday, January 30, 2014 12:51 PM
To: Anderson, Keith FLNR:EX; Hicks, Alan FLNR:EX; Hartley, Brenda FLNR:EX
Cc: Rosenboom, Remko FLNR:EX
Subject: South Coast Region IPPs with OPPRs

Remko says the numbers that have been in the media are correct, 6 of 24 with satisfactory OPPRs, ergo no need to correct. He says the 19 referred to below is not accurate and reminded me that we had one more go-round on that topic just prior to sending the response.

Sorry for the confusion. It's fine as is.

B.

From: Hicks, Alan FLNR:EX
Sent: January-30-14 9:56 AM
To: Clarke, Brennan GCPE:EX; Anderson, Keith FLNR:EX
Subject: RE: South Coast Region IPPs with OPPRs

These were the latest numbers sent to Brennan from south coast. The Province article was definitely in contraction of this.

I will send you an earlier email that provided a different summary in a moment

From: Clarke, Brennan GCPE:EX
Sent: Tuesday, December 31, 2013 2:52 PM
To: Anderson, Keith FLNR:EX
Cc: Hicks, Alan FLNR:EX
Subject: RE: South Coast Region IPPs with OPPRs

Great.

No response from reporter still so we can wait a couple of days, but that certainly makes things easier thanks to both of you I'm outta here happy new year.

From: Anderson, Keith FLNR:EX
Sent: December-31-13 2:50 PM

To: Clarke, Brennan GCPE:EX
Subject: FW: South Coast Region IPPs with OPPRs

Aman checked and based on what he can find:

There are currently 19 operating CEPs with satisfactory OPPRs in South Coast Region (13 until March 2012 per the Charlene's April 4, 2012 presentation plus six more as of today).

Keith

Clarke, Brennan GCPE:EX

From: Anderson, Keith FLNR:EX
Sent: January-30-14 11:42 AM
To: Clarke, Brennan GCPE:EX
Subject: RE: IPP numbers not right

Ok

From: Clarke, Brennan GCPE:EX
Sent: Thursday, January 30, 2014 11:40 AM
To: Anderson, Keith FLNR:EX
Subject: IPP numbers not right

Hi Keith,

Full disclosure I may have screwed up the delivery of those IPP numbers, we are preparing to set the record straight but wanted a 2 minute gut check with you, can you call?

B.

Brennan Clarke
Public Affairs Officer
Ministry of Forests, Lands and Natural Resource Operations
Office: 250 953 4200
Cell: 778 679-3252
Fax: 250 387-8684
Brennan.Clarke@gov.bc.ca

Clarke, Brennan GCPE:EX

From: Fumano, Dan (The Province) <dfumano@theprovince.com>
Sent: January-14-14 8:20 AM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

Thank you for looking into this and getting back to me.

Best regards,
Dan

DAN FUMANO

Reporter

The Province | theprovince.com

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Vancouver, B.C. V6C 3N3

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The information contained in this email is strictly confidential, and is only intended for the party to whom it is addressed. Any other use, dissemination, distribution, disclosure or copying is prohibited. If you have received this email in error please so inform by reply email. Thank you.

From: Clarke, Brennan GCPE:EX [<mailto:Brennan.Clarke@gov.bc.ca>]
Sent: Monday, January 13, 2014 2:31 PM
To: Fumano, Dan (The Province)
Subject: Media Request: The Province, IPP compliance

Hi Dan,

Here's the IPPs on the South Coast that currently have satisfactory operating procedures.

Ashlu
Fitzsimmons
Furry Creek
Upper Mamquam
Upper Clowhorn

Lower Clowhom

As noted, the template for Operating Parameters and Procedures is being revised and, where applicable, some IPPs may need to be revisited to ensure compliance with the revised standards once they are in place.

From: Fumano, Dan (The Province) [mailto:dfumano@theprovince.com]
Sent: Friday, January 10, 2014 1:48 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

I've got a quick follow-up question – you mentioned that six projects in the South Coast region currently have satisfactory OPRs, and seven are in the process of doing so.

Can you let me know which are the six projects with currently satisfactory OPRs?

Thanks,
Dan

DAN FUMANO
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Vancouver, B.C. V6C 3N3
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The Province
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Clarke, Brennan GCPE:EX

From: Thomas, Vivian P GCPE:EX
Sent: January-13-14 2:14 PM
To: Clarke, Brennan GCPE:EX
Cc: Dean, Sharon GCPE:EX; GCPE FLNR Media Requests GCPE:EX; Bethel, Greig MTIC:EX
Subject: RE: Media Request: The Province, IPP compliance

Ok with minor edits.

From: Clarke, Brennan GCPE:EX
Sent: January-13-14 1:37 PM
To: Thomas, Vivian P GCPE:EX
Cc: Dean, Sharon GCPE:EX; GCPE FLNR Media Requests GCPE:EX; Bethel, Greig MTIC:EX
Subject: Media Request: The Province, IPP compliance

Viv,

Remko provided these names this morning and signed off on the wording below.

Want to send.

Hi Dan,

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Lower Clowhom

As noted, the template for Operating Parameters and Procedures is being revised and, where applicable, some IPPs may need to be revisited to ensure compliance with the revised standards once they are in place.

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Thanks,
Dan

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From: Clarke, Brennan GCPE:EX [<mailto:Brennan.Clarke@gov.bc.ca>]
Sent: Tuesday, January 07, 2014 12:28 PM
To: Fumano, Dan (The Province)
Subject: Media Request: The Province, IPP compliance

Hi Dan,

Here's your answers. Thanks for your patience over the holidays.

B.

The document from the 2012 workshop shows that at that time, "only 4 of the 22 operating projects in the South Coast region have satisfactory OPPs." How many of those operating projects in the South Coast region have satisfactory OPPs now? I think there are supposed to be 25 operating projects in that region by now? Is that correct?

The requirements for operating procedures have evolved over the past 10 years to better protect the environment. As a result some of the earlier projects have OPPRs which need adjusting to meet current standards. Government is in the process of updating those OPPRs as much as possible. At the moment there are 24 projects in the South Coast Region in operation of which six have an OPPR which is satisfactory, and seven are in the process of doing so in the near future. Another seven projects are under construction and will need a satisfactory OPPR before they can start operating in the upcoming years.

What about in the other regions of the province? Do we know the number that have satisfactory OPPs?

There are only seven such projects currently operating outside the South Coast region. Five of these are in the Thompson Okanagan Region and two are in the West Coast Region - all of which have satisfactory operating procedures in place and no recorded fish kills.

How many different projects have had noted fish kills?

Environmental incidents can occur as a result of factors like technical failures, extreme natural circumstances or during the initial commissioning of the facilities. Those incidents are reported to us within 24 hours and technical staff will assess the environmental impact and do appropriate follow-up with the owners of the facilities. Fish kills at the Mamquam and Ashlu projects have been well-documented in media reports. The Upper Stave and Miller Creek projects also reported minor fish kills of less than a dozen fish each.

What is the status of the "Operational Parameters and Procedures Report (OPPR) Template"? Is that in effect yet? If so, what have been the results? If not, is there a timeline?

Ministry staff have been consulting with industry on the template. There is a "draft" template that applicants are being asked to use but it has not been finalized yet as it is still being piloted. The final template will depend on the results of the pilot and further discussion with industry. Both facilities which will start operation soon, as well as existing facilities are being asked to use this template while working on their OPPR.

Have flow ramping guidelines been released and implemented?

We have been consulting with industry on these guidelines. There is a "draft" template of which the principles are implemented in the licensing process. There's no anticipated completion date for the guideline.

Are reports from Independent Environmental Monitors (IEMs) being read and reviewed now? The 2012 document suggested these reports from IEMs were "not being followed up on in post-permitting stage." Is that still the case?

Yes, these reports are being read and reviewed by staff. Where issues arise, compliance and enforcement staff are following up with the clients to resolve the issues.

The workshop document also recommended the use of funds from security deposits to help ensure compliance, with a timeline of March 2013 - is that happening?

This was an idea put forward at the workshop. Upon further investigation it was determined that it is not workable. There are no securities associated with water licences at this time and the securities associated with the *Land Act* tenures can only be used legally to assist the province where it has expended funds for clean-up of a site, or to cover off unpaid rent. They cannot be used as part of a fine or administrative penalty. Any monies received from administrative penalties are put into General Revenue, and are not available to the ministry.

Clarke, Brennan GCPE:EX

From: Rosenboom, Remko FLNR:EX
Sent: January-13-14 12:31 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi,

I only added a few words to reflect the fact that we in most cases cannot require those older plants to meet the new standards, but we will do what we can to get them to do so.

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

Office: 604-586-5629
Fax: 604-586-4444
Email: remko.rosenboom@gov.bc.ca
Website: <http://www.env.gov.bc.ca/wsd/>
Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 13, 2014 12:29 PM
To: Rosenboom, Remko FLNR:EX
Subject: Media Request: The Province, IPP compliance

Hi Remko What about something like this?

Hi Dan,

Here's the IPPs on the South Coast that currently have satisfactory operating procedures.

Aslu
Fitzsimmons
Furry
Upper Mamquam
Upper Clowhom
Lower Clowhom

As noted, the template for Operating Parameters and Procedures is being revised and once the new standards are in place, some IPPs may need to be revisited to ensure compliance with the revised standards to the extend possible.

From: Rosenboom, Remko FLNR:EX
Sent: January-13-14 12:04 PM
To: Clarke, Brennan GCPE:EX
Cc: Davles, James W FLNR:EX; Ullah, Aman FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

There you go. I'll give you a call with some clarification.

Remko

Sufficient

Aslu

Fitzsimmons

Furry

Upper Mamquam

Upper Clowhom

Lower Clowhom

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

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Website: <http://www.env.gov.bc.ca/wsd/>

Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 13, 2014 12:00 PM
To: Rosenboom, Remko FLNR:EX
Subject: Media Request: The Province, IPP compliance

Hi Remko, are you back yet....?

From: Clarke, Brennan GCPE:EX
Sent: January-10-14 2:33 PM
To: Rosenboom, Remko FLNR:EX
Cc: GCPE FLNR Media Requests GCPE:EX; Thomas, Vivian P GCPE:EX; Dean, Sharon GCPE:EX; Davles, James W FLNR:EX; Anderson, Keith FLNR:EX
Subject: Media Request: The Province, IPP compliance

Hi Remko,

Do you or Jim have the names and locations of the six project referred to below?

He's not filing today.

Clarke, Brennan GCPE:EX

From: Fumano, Dan (The Province) <dfumano@theprovince.com>
Sent: January-10-14 2:00 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

Thanks for looking into it for us. Nope, not filing today, so I have some time. Won't be filing earlier than Monday or Tuesday.

Thanks -- and have a good weekend.
Cheers,
Dan

DAN FUMANO
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From: Clarke, Brennan GCPE:EX [<mailto:Brennan.Clarke@gov.bc.ca>]
Sent: Friday, January 10, 2014 1:58 PM
To: Fumano, Dan (The Province)
Subject: Media Request: The Province, IPP compliance

Hi Dan,

Have sent this request to the compliance guru, his status light shows as not in right now, could be out in the field.. Are you filing today?

B.

From: Fumano, Dan (The Province) [mailto:dfumano@theprovince.com]
Sent: Friday, January 10, 2014 1:48 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

I've got a quick follow-up question – you mentioned that six projects in the South Coast region currently have satisfactory OPRs, and seven are in the process of doing so.

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Dan

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From: Clarke, Brennan GCPE:EX [mailto:Brennan.Clarke@gov.bc.ca]
Sent: Tuesday, January 07, 2014 12:28 PM
To: Fumano, Dan (The Province)
Subject: Media Request: The Province, IPP compliance

Hi Dan,

Here's your answers, Thanks for your patience over the holidays.

B.

The document from the 2012 workshop shows that at that time, "only 4 of the 22 operating projects in the South Coast region have satisfactory OPPs." How many of those operating projects in the South Coast region have satisfactory OPPs now? I think there are supposed to be 25 operating projects in that region by now? Is that correct?

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What about in the other regions of the province? Do we know the number that have satisfactory OPPs?

There are only seven such projects currently operating outside the South Coast region. Five of these are in the Thompson Okanagan Region and two are in the West Coast Region - all of which have satisfactory operating procedures in place and no recorded fish kills.

How many different projects have had noted fish kills?

Environmental incidents can occur as a result of factors like technical failures, extreme natural circumstances or during the initial commissioning of the facilities. Those incidents are reported to us within 24 hours and technical staff will assess the environmental impact and do appropriate follow-up with the owners of the facilities. Fish kills at the Mamquam and Ashlu projects have been well-documented in media reports. The Upper Stave and Miller Creek projects also reported minor fish kills of less than a dozen fish each.

What is the status of the "Operational Parameters and Procedures Report (OPPR) Template"? Is that in effect yet? If so, what have been the results? If not, is there a timeline?

Ministry staff have been consulting with industry on the template. There is a "draft" template that applicants are being asked to use but it has not been finalized yet as it is still being piloted. The final template will depend on the results of the pilot and further discussion with industry. Both facilities which will start operation soon, as well as existing facilities are being asked to use this template while working on their OPPR.

Have flow ramping guidelines been released and implemented?

We have been consulting with industry on these guidelines. There is a "draft" template of which the principles are implemented in the licensing process. There's no anticipated completion date for the guideline.

Are reports from Independent Environmental Monitors (IEMs) being read and reviewed now? The 2012 document suggested these reports from IEMs were "not being followed up on in post permitting stage." Is that still the case?

Yes, these reports are being read and reviewed by staff. Where issues arise, compliance and enforcement staff are following up with the clients to resolve the issues.

The workshop document also recommended the use of funds from security deposits to help ensure compliance, with a timeline of March 2013 - is that happening?

This was an idea put forward at the workshop. Upon further investigation it was determined that it is not workable. There are no securities associated with water licences at this time and the securities associated with the *Land Act* tenures can only be used legally to assist the province where it has expended funds for clean-up of a site, or to cover off unpaid rent. They cannot be used as part of a fine or administrative penalty. Any monies received from administrative penalties are put into General Revenue, and are not available to the ministry.

Wenham, Logan GCPE:EX

From: Clarke, Brennan GCPE:EX
Sent: January-30-14 9:59 AM
To: Wenham, Logan GCPE:EX
Cc: Thomas, Vivian P GCPE:EX
Subject: Media Request: The Province, IPP compliance

Also this

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 12:42 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi,

The Upper stave info is included in the Report by Charlene which came out last year (ie. 6 fish killed). Miller Creek is unknown. I do have to dig for those numbers if they are really needed.

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

Office: 604-586-5629
Fax: 604-586-4444
Email: remko.rosenboom@gov.bc.ca
Website: <http://www.env.gov.bc.ca/wsd/>
Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 6, 2014 12:37 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Do we have numbers for Upper Stave and Miller Creek?

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 12:36 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

The relevant information on the more significant environmental incidents with fish killed are:

- Miller Creek - headpond dewatering - 2007
- Ashlu Creek - ramping - 2010, 2011, 2012, 2013

- Lower Mamquam - ramping - 2008, 2010,- fish sucked into intake -2012
- Upper Stave - ramping - 2010

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

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Website: <http://www.env.gov.bc.ca/wsd/>
Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 6, 2014 12:13 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Remko,

Ya probably does need some basic details about the other two fish kills, at least for the sake of our own edification.

That's the only outstanding point before this goes for approvals.

B.

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 10:27 AM
To: Clarke, Brennan GCPE:EX
Cc: GCPE FLNR Media Requests GCPE:EX; Drysdale, Alec M FLNR:EX; Davies, James W FLNR:EX; Babakalff, Scott C FLNR:EX; Johnsrude, Allan N FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

I checked the numbers on the OPPR's and corrected them. Please find the correct numbers and some more context below.

Please let me know if this is sufficient?

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

Office: 604-586-5629
Fax: 604-586-4444
Email: remko.rosenboom@gov.bc.ca

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There are only seven such projects currently operating outside the South Coast region. Five of these are in the Thompson Okanagan Region, all of which have satisfactory operating procedures in place and no recorded fish kills. The other two are in the West Coast region.

How many different projects have had noted fish kills?

Environmental incidents can occur as a result of factors like technical failures, extreme natural circumstances or during the initial commissioning of the facilities. Those incidents are reported to us within 24 hours and technical staff will assess the environmental impact and do appropriate follow-up with the owners of the facilities. Most of these environmental incidents are minor in nature and do not result in the killing of fish or other environmental damage. In the small number of instances where fish were killed (e.g. Mamquam and Ashlu) monitors found no long-term impact on the fish population on those rivers or the ecosystem as a whole. (note: I have two other more significant examples, would you like to list them as well?)

What is the status of the "Operational Parameters and Procedures Report (OPPR) Template"? Is that in effect yet? If so, what have been the results? If not, is there a timeline?

We have been consulting with industry on these, there is a "draft" template that applicants are being asked to use but it has not been finalized yet and there's no anticipated completion date. Both facilities which will start operation soon, as well as existing facilities are being asked to use this template while working on their OPPR.

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We have been consulting with industry on these, there is a "draft" template of which the principles are implemented in the licensing process. There's no anticipated completion date for the guideline.

Are reports from Independent Environmental Monitors (IEMs) being read and reviewed now? The 2012 document suggested these reports from IEMs were "not being followed up on in post permitting stage." Is that still the case?

Yes, these reports are being read and reviewed by staff. Where issues arise, non-compliance and enforcement staff are following up with the clients to resolve the issues.

The workshop document also recommended the use of funds from security deposits to help ensure compliance, with a timeline of March 2013 – Is that happening?

This is not a workable idea because there are no securities associated with water licences at this time and the securities associated with the *Land Act* tenures can only be seized to assist the province where it has expended funds for clean-up of a site, or to cover off unpaid rent. They cannot be seized as part of a fine or administrative penalty. Any monies received from administrative penalties are put into General Revenue, and are not available to the ministry .

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To: Wenham, Logan GCPE:EX
Cc: Thomas, Vivian P GCPE:EX
Subject: FW: Media Request: The Province, IPP compliance

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 12:51 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

A quick search of the digital files on Miller gave me a indication of 9 dead fish on Miller, So also rather minor.

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

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Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 6, 2014 12:45 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

But if the number is anything like half a dozen or whatever, then it probably doesn't matter. I don't really think six fish killed at Upper Stave is worth mentioning, I would call that minor. Is Miller Creek roughly in the same ballpark?

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 12:42 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi,

The Upper stave info is included in the Report by Charlene which came out last year (ie. 6 fish killed).
Miller Creek is unknown. I do have to dig for those numbers if they are really needed.

Thanks,
Remko

Section Head Water Allocations, South Coast Region
Ministry of Forests, Lands and Natural Resource Operations

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From: Clarke, Brennan GCPE:EX
Sent: Monday, January 6, 2014 12:37 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Do we have numbers for Upper Stave and Miller Creek?

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 12:36 PM
To: Clarke, Brennan GCPE:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

The relevant information on the more significant environmental incidents with fish killed are:

- Miller Creek -headpond dewatering - 2007
- Ashlu Creek - ramping - 2010, 2011, 2012, 2013
- Lower Mamquam - ramping - 2008, 2010,- fish sucked into intake -2012
- Upper Stave - ramping - 2010

Thanks,
Remko

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Our Vision: Economic prosperity and environmental sustainability

From: Clarke, Brennan GCPE:EX
Sent: Monday, January 6, 2014 12:13 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Remko,

Ya probably does need some basic details about the other two fish kills, at least for the sake of our own edification.

That's the only outstanding point before this goes for approvals.

B.

From: Rosenboom, Remko FLNR:EX
Sent: January-06-14 10:27 AM
To: Clarke, Brennan GCPE:EX
Cc: GCPE FLNR Media Requests GCPE:EX; Drysdale, Alec M FLNR:EX; Davies, James W FLNR:EX; Babakalff, Scott C FLNR:EX; Johnsrude, Allan N FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Brennan,

I checked the numbers on the OPPR's and corrected them. Please find the correct numbers and some more context below.

Please let me know if this is sufficient?

Thanks,
Remko

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Our Vision: Economic prosperity and environmental sustainability

The document from the 2012 workshop shows that at that time, "only 4 of the 22 operating projects in the South Coast region have satisfactory OPPs." How many of those operating projects in the South Coast region have satisfactory OPPs now? I think there are supposed to be 25 operating projects in that region by now? Is that correct?

The requirements for operating procedures have evolved over the past 10 years to better protect the environment. As a result projects some of the earlier projects have OPPR's which need adjusting to meet current standards. Government is in the process of updating those OPPRs as much as possible. At the moment there are 24 projects in the South Coast region in operation of which six have an OPPR which is satisfactory, and seven are in the process of doing so in the near future. Another seven projects are under construction and will need a satisfactory OPPR before they can start operating in the upcoming years.

What about in the other regions of the province? Do we know the number that have satisfactory OPPs?

There are only seven such projects currently operating outside the South Coast region. Five of these are in the Thompson Okanagan Region, all of which have satisfactory operating procedures in place and no recorded fish kills. The other two are in the West Coast region.

How many different projects have had noted fish kills?

Environmental incidents can occur as a result of factors like technical failures, extreme natural circumstances or during the initial commissioning of the facilities. Those incidents are reported to us within 24 hours and technical staff will assess the environmental impact and do appropriate follow-up with the owners of the facilities. Most of these environmental incidents are minor in nature and do not result in the killing of fish or other environmental damage. In the small number of instances where fish were killed (e.g. Mamquam and Ashlu) monitors found no long-term impact on the fish population on those rivers or the ecosystem as a whole. (note: I have two other more significant examples, would you like to list them as well?)

What is the status of the "Operational Parameters and Procedures Report (OPPR) Template"? Is that in effect yet? If so, what have been the results? If not, is there a timeline?

We have been consulting with industry on these, there is a "draft" template that applicants are being asked to use but it has not been finalized yet and there's no anticipated completion date. Both facilities which will start operation soon, as well as existing facilities are being asked to use this template while working on their OPPR.

Have flow ramping guidelines been released and implemented?

We have been consulting with industry on these, there is a "draft" template of which the principles are implemented in the licensing process. There's no anticipated completion date for the guideline.

Are reports from Independent Environmental Monitors (IEMs) being read and reviewed now? The 2012 document suggested these reports from IEMs were "not being followed up on in post permitting stage." Is that still the case?

Yes, these reports are being read and reviewed by staff. Where issues arise, non-compliance and enforcement staff are following up with the clients to resolve the issues.

The workshop document also recommended the use of funds from security deposits to help ensure compliance, with a timeline of March 2013 – Is that happening?

This is not a workable idea because there are no securities associated with water licences at this time and the securities associated with the *Land Act* tenures can only be seized to assist the province where it has expended funds for clean-up of a site, or to cover off unpaid rent. They cannot be seized as part of a fine or administrative penalty. Any monies received from administrative penalties are put into General Revenue, and are not available to the ministry.