

Russell, Veronica A ENV:EX

From: Clarke, Brennan GCPE:EX
Sent: Friday, January 10, 2014 2:33 PM
To: Rosenboom, Remko FLNR:EX
Cc: GCPE FLNR Media Requests GCPE:EX; Thomas, Vivian P GCPE:EX; Dean, Sharon GCPE:EX; Davies, 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.

Thanks,

Brennan

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

Reporter

The Province | theprovince.com

Suite 1 – 200 Granville St.

Vancouver, B.C. V6C 3N3

Office: 604.605.2902

Cell: s.22

Fax: 604.605.2759

Email: DFumano@theprovince.com

Twitter: @fumano



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: 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?

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Russell, Veronica A ENV:EX

From: Rosenboom, Remko FLNR:EX
Sent: Monday, January 13, 2014 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: Davies, 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

Office: 604-586-5629
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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
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Cc: GCPE FLNR Media Requests GCPE:EX; Thomas, Vivian P GCPE:EX; Dean, Sharon GCPE:EX; Davies, James W FLNR:EX; Anderson, Keith FLNR:EX
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DAN FUMANO

Reporter

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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?

Russell, Veronica A ENV:EX

From: Ullah, Aman FLNR:EX
Sent: Monday, January 13, 2014 10:33 AM
To: Davies, James W FLNR:EX; Rosenboom, Remko FLNR:EX
Cc: Akhtar, Khaled FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Hi Jim,

Here is the link to this 2012 presentation:

[I:\WSD\04 Water Allocation\03 CEP\CEP Info\Policy & Guidance\DRAFT Menezes 2012 Operational Non-Compliance at IPPs Presentation Final KRedits.pptx](#)

Aman

From: Davies, James W FLNR:EX
Sent: Friday, January 10, 2014 3:10 PM
To: Rosenboom, Remko FLNR:EX; Ullah, Aman FLNR:EX
Cc: Akhtar, Khaled FLNR:EX
Subject: RE: Media Request: The Province, IPP compliance

Remko Rosenboom
Aman Ullah

Do you know where this 2012 Workshop presentation is located in our CEP folders?

I think that document is the basis for the "six project" number, and it may have the names and locations.

Thanks

James Davies, P.Eng.
Regional Hydrologist - Water Allocation
MFLNRO - South Coast Region - Authorizations - Water Allocation
Tel: (604) 586-5637 FAX: (604) 586-4434
email: James.Davies@gov.bc.ca

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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 .

From: s.22
Sent: Tuesday, January 28, 2014 9:37 PM
To: Rosenboom, Remko FLNR:EX; Anderson, Keith FLNR:EX
Subject: <http://www.theprovince.com/technology/Horror+shows+rivers+Wilderness+Committee+gives+handling+river+power+projects/9441418/story.html>

And Narrows Inlet was just approved. Shameful.

‘Horror shows’ on B.C. rivers: Government given an ‘F’ for handling of run-of-river power projects

By Dan Fumano, The Province January 28, 2014

[Comment](#)

4

- [Story](#)
- [Photos \(1 \)](#)



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Please check out and like our Keep Pemberton Wild Facebook page (<https://www.facebook.com/KeepPembertonWild>) to stay informed about environmental issues that impact Pemberton Valley and other areas in British Columbia.

Russell, Veronica A ENV:EX

From: Johnsrude, Allan N FLNR:EX
Sent: Wednesday, January 29, 2014 10:57 AM
To: Rosenboom, Remko FLNR:EX; Anderson, Keith FLNR:EX
Subject: Fwd: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects
Attachments: KM-Waterpower projects_dec2013_final.docx; ATT00001.htm; IN_WaterPower Projects-mamquam_apr17_final.doc; ATT00002.htm; IN_WaterPower Projects-non_compliance_jan16_final.doc; ATT00003.htm

I have lots of info so no need to look. This is what Vivian sent.

Allan from my iPhone

Begin forwarded message:

From: "Thomas, Vivian P GCPE:EX" <Vivian.Thomas@gov.bc.ca>
Date: January 29, 2014 at 10:52:36 AM PST
To: "Johnsrude, Allan N FLNR:EX" <Allan.Johnsrude@gov.bc.ca>
Subject: RE: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

Here's our overall key message sheet (EAO portion is from EAO), and a couple of issues notes from last year related to FOI releases.

I've also pasted below the answers to the reporter's questions earlier this month:

How many different projects have had noted fish kills?

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-----Original Message-----

From: Johnsrude, Allan N FLNR:EX

Sent: January-29-14 10:20 AM

To: Thomas, Vivian P GCPE:EX

Subject: FW: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

Hi Vivian - Are there some update speaking bullets or the like related to this that you have.

So many that we may already have the latest but not sure.

Allan Johnsrude, RPF

A/Director of Resource Authorizations - South Coast Region

Ministry of Natural Resource Operations

Ph. (604) 702-5700

Email: Allan.Johnsrude@gov.bc.ca

-----Original Message-----

From: MacKnight, Heather FLNR:EX

Sent: Wednesday, January 29, 2014 9:42 AM

To: Johnsrude, Allan N FLNR:EX; Haberl, Kevin J FLNR:EX

Subject: FW: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

-----Original Message-----

From: Sutherland, Craig FLNR:EX

Sent: Wednesday, January 29, 2014 9:41 AM

To: MacKnight, Heather FLNR:EX

Cc: Annett, Rory K FLNR:EX; Gelowitz, Christine FLNR:EX; Sheldan, Tim FLNR:EX;

Thomas, Vivian P GCPE:EX; Hadway, Sharon L FLNR:EX
Subject: FW: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

Hi Heather, the MO will want to know the current status of our clean energy program on the coast, particularly in the SC, in preparation for this year's Estimates Debate , and what's new (different) from last the last Estimates Debate. Focus will be on our monitoring program, number of non-compliances, number of fish-kills, and C/E activities. Christine will be contacting you to start updating the existing Estimates Debate note.

Thanks,

Craig Sutherland
Assistant Deputy Minister - Coast Area
Ministry of Forests, Lands and Natural Resource Operations - British Columbia - Canada

-----Original Message-----

From: Thomas, Vivian P GCPE:EX
Sent: January-29-14 9:27 AM
To: Gelowitz, Christine FLNR:EX
Cc: Sutherland, Craig FLNR:EX; Sheldan, Tim FLNR:EX
Subject: RE: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

Yes. It's disappointing. Reporter hardly used any of the info we provided him and instead just goes " with horror shows"

s.13

-----Original Message-----

From: Gelowitz, Christine FLNR:EX
Sent: January-29-14 9:26 AM
To: Thomas, Vivian P GCPE:EX
Cc: Sutherland, Craig FLNR:EX; Sheldan, Tim FLNR:EX
Subject: Province Article: 'Horror shows' on B.C. rivers: Government given an 'F' for handling of run-of-river power projects

Have you seen this?

<http://www.theprovince.com/technology/Horror+shows+rivers+Government+given+handling+river+power+projects/9441418/story.html>

ADVICE TO MINISTER

December 20, 2013 Waterpower Projects – Key Messages

GENERAL:

- Waterpower projects are an environmentally friendly source of power production .
- The ministry applies the best available science in its review and decision-making on proposed projects. Project reviews are comprehensive and consider environmental, social and economic values.
- As well, project proponents must use professional engineers and biologists in the project design, and Independent Environmental Monitors and Independent Engineers while constructing their projects. Ongoing monitoring reports are required during construction and while projects are operating.
- There are about 68 operating waterpower projects in B.C., with 30 in the South Coast Region, although some projects will have multiple facilities involved.
- More than 130 of B.C.'s 200 First Nations are directly benefiting from CEPs through partnership or benefits sharing arrangements.
- The ministry regularly updates its guidelines for these projects to ensure that the best available science has applied. The information guidelines for development are 119 pages long and there's another 216 pages of guidelines that proponents have to follow.
- The vast majority of compliance issues were administrative in nature, i.e. late submissions of required monitoring reports. During construction, an independent monitor and independent engineer are required on site, and are required to submit reports to the province; and are required to report any ramping incidents.
- Most project non-compliances involving fish strandings are during periods with low flows or with the procedures during start up or shut down of projects (known as ramping).
- Ongoing monitoring reports are required before, during and after construction. Ministry staff work closely with project proponents to address any environmental issues that may unexpectedly occur once projects become operational.

FOI RESPONSES:

- Over the past several months, there have been multiple FOI requests on issues relating to the construction, compliance and enforcement of Clean Energy Projects, with well over 10,000 pages of information released to date.
- Together, all of these documents collectively demonstrate that ministry staff continue to actively review and address any environmental issues that may unexpectedly occur during project operations, as well as have internal discussions amongst peers and professionals on how to improve processes.

ENFORCEMENT:

- The Department of Fisheries and Oceans is the lead agency charged with investigating possible violations of the federal Fisheries Act.

ADVICE TO MINISTER

- B.C. uses a combination of approaches. It requires an Independent Environmental Monitor and Independent Engineer on site during construction. Reports must be submitted to the Province.
- B.C. has Compliance and Enforcement staff and Conservation Officer staff who inspect sites. In addition technical staff (engineers and biologists) also inspect.
- In spring of 2011, we enacted the Natural Resource Compliance Act, which allows for the designation of existing compliance staff as natural resource officers and gives them the power to enforce a broader range of legislation that will help in a number of areas, including issues related to water power projects.
- Compliance monitoring and enforcement for projects with an environmental assessment certificate is coordinated through the Environmental Assessment Office with the assistance of Compliance and Enforcement Branch staff and Conservation Officer Service staff depending on the mandate involved.
- The ministry has initiated a number of specific actions to improve compliance of CEPs with their authorizations. These include:
 - Creating the Operational Parameters and Procedures Report (OPPR) Template that details monitoring and reporting requirements by proponents; this document will establish standards across the province.
 - Requesting older facilities with out-of-date or no OPR to adopt one.
 - Participating with industry and the Federal Government in developing draft ramping guidelines.
 - Requiring that monitoring and reporting obligations are finalized and approved before granting of the Leave to Commence Operations.
 - Developing a database and tracking tool for non-compliance issues.
 - Supporting the work of the Pacific Salmon Foundation's independent review of Run-of-River Hydro Projects and their impacts on salmonid species in B.C., including assessing the positive and negative impacts of CEPs on the environment and associated mitigation and compensation works.
 - Working with Clean Energy BC on issues and solutions to improve compliance.

THE ROLE OF THE ENVIRONMENTAL ASSESSMENT OFFICE (EAO)

- New energy facilities – including run-of-river projects – with a production capacity of 50 MW or greater require a provincial environmental assessment before they can be built.
- The Environmental Assessment Office (EAO) has implemented a comprehensive compliance and enforcement program for environmental assessment certified projects. The program addresses compliance management prior to certification (e.g.

ADVICE TO MINISTER

ensuring conditions are drafted in a measurable and enforceable manner) and post-certification (e.g., site and administrative inspections).

- EAO, in collaboration with agency partners, is responsible for compliance of the environmental assessment certificate conditions of the 13 certified run of river projects in BC. Other agencies also have compliance functions related to subsequent permits on these projects.
- EAO, again in collaboration with partner agencies, has inspected or has plans to inspect every run of river project that is operational or under construction.
- Inspections found the projects to be largely compliant with their certificate conditions. Instances of non-compliance have been or are being addressed by the Certificate Holders.

OTHER:

- It's true there have been 635 applications for water power projects, but due to rigorous environmental and technical reviews, less than 11 per cent of all applications ever make it to a decision to approve.
- It takes between \$3 million to \$5 million and 4-6 years of environmental assessment and studies for a proposed project to make it through the province's rigorous requirements. Many of these initial applications are abandoned before they come to fruition.

ADVICE TO MINISTER

CONFIDENTIAL ISSUES NOTE

**Ministry of Forests, Lands and Natural
Resource Operations**

Date: Apr. 17, 2013

Minister Responsible: Hon. Steve Thomson

Not Responsive

ADVICE AND RECOMMENDED RESPONSE:

- The documents demonstrate that ministry staff work closely with project proponents to address any environmental issues that may unexpectedly occur during project operations as well as have internal discussions amongst peers and professionals on how to improve on processes.
- Waterpower projects are an environmentally friendly source of power production.
- The ministry applies the best available science in its review and decision-making on proposed projects. Project reviews are comprehensive and consider environmental, social and economic values.
- As well, project proponents must use professional engineers and biologists in the project design, and Independent Environmental Monitors and Independent Engineers while constructing their projects. Ongoing monitoring reports are required during construction and while projects are operating.

KEY FACTS REGARDING THE ISSUE:

Approximately 220 pages of information relating to ramping incidents at the Lower Mamquam (near Squamish) Clean Energy Project have been released. This is the latest in a series of informational releases on non-compliance issues for Clean Energy Projects throughout the Province that number in the thousands of pages.

The release contains information relating to a ramping incident in April 2012 in which a small number of pink salmon fry (five) were found stranded as a result. Two of the fry were found dead, and the remaining three were returned successfully to the water.

Previous releases relating to the Lower Mamquam include information on incidents in 2010 and 2011. This included a letter from the Department of Fisheries and Oceans included in the release provides more detailed information on eight incidents in the summer and fall of 2010 (half of which resulted in fish strandings) and an additional five incidents in spring 2011. Some of this information re-appears in the latest release.

s.13, Not Responsive

Province-wide there are about 68 operating waterpower projects, with 30 in the South Coast Region, although some projects will have multiple facilities involved. The total number of facilities is estimated at 127, with 33 of those in the South Coast Region. Some of the individual facilities are still under construction and not diverting water yet.

The ministry's requirements for waterpower projects are updated to reflect the most current science. With increasing complex projects, the ministry has responded with more refined policies and guidelines and increased requirements on proponents related to design, construction, and monitoring. Expanded operational reporting requirement and use of Independent Environmental Monitors/Independent engineers is resulting in improved environmental outcomes.

s.13

Compliance and enforcement staff and ministry's technical experts visit projects under construction and while operating. Ministry staff work directly with proponents to address any non-compliance issues. As well, since the creation of the Ministry of Natural Resource Operations in October 2010, inspection capacity has increased.

Communications Contact:	Logan Wenham	250-953-3675
Program Area Contact:	Remko Rosenboom	604-586-5629

Program Area	GCPE	ADM	Minister's Office
REMKO ROSENBOOM	LOGAN WENHAM		

ADVICE TO MINISTER

CONFIDENTIAL ISSUES NOTE

Ministry of Forests, Lands and Natural
Resource Operations

Date: Jan. 16, 2013

Minister Responsible: Hon. Steve Thomson

Waterpower Projects – non-compliance presentation

ADVICE AND RECOMMENDED RESPONSE:

- The documents are the result of a ministry-initiated review of industry-generated monitoring reports for small hydro projects in the South Coast.
- They demonstrate that ministry staff continue to actively review and address any environmental issues that may unexpectedly occur during project operations as well as have internal discussions amongst peers and professionals on how to improve on processes.
- Waterpower projects are an environmentally friendly source of power production.
- The ministry applies the best available science in its review and decision-making on proposed projects. Project reviews are comprehensive and consider environmental, social and economic values.
- As well, project proponents must use professional engineers and biologists in the project design, and Independent Environmental Monitors and Independent Engineers while constructing their projects. Ongoing monitoring reports are required during construction and while projects are operating.

KEY FACTS REGARDING THE ISSUE:

Twenty-nine pages of information relating to non-compliance concerns for Clean Energy Projects (also called 'run-of-river' or 'independent power projects') in the South Coast region has recently been released. The information is in the form of a 16 page Powerpoint presentation, and an additional 13 pages of explanatory notes.

The requested documents summarize a ministry review of industry-generated monitoring reports for small hydro projects in the South Coast. They reveal a number of environmental compliance issues associated with the operation of these facilities including: maintaining the required minimum instream flows, the rate of changes to instream flows (ramping), environmental mitigation requirements and notification of government agencies. Individual projects and facilities are named in the documents.

The documents reflect information contained in the required monitoring reports generated by professionals working on behalf of the various project operators. The purpose of the summary report is to inform the statutory decision-makers on compliance issues associated with the projects in question. This information may be used to enforce conditions on existing projects and set appropriate conditions for projects currently under review. This action supports the ministry's results-based and adaptive management approaches to natural resource management.

Province-wide there are about 68 operating waterpower projects, with 30 in the South Coast Region. On the South Coast, there have been three distinct waves of waterpower projects:

- **First** - early to mid-1990s – which were relatively straightforward in design. Because overall risk was considered low, reviews were more limited

- **Second** – end of 1990s/early 2000s – more complex projects, that included more extensive environmental reviews, particularly of fisheries. Very detailed and specific conditions related to the environment were added to water licences
- **Third** – 2006/07 – some projects coming in “clusters” and proposing inter-basin water diversions.

The ministry’s requirements for waterpower projects are updated to reflect most current science. With increasingly complex projects, the ministry has responded with more refined policies and guidelines and increased requirements on proponents related to design, construction, and monitoring. Expanded operational reporting requirement and use of Independent Environmental Monitors/Independent engineers were implemented to enhance the government’s capacity for careful management of these projects and to improve the environmental outcomes.

s.13

Compliance and enforcement staff and ministry’s technical experts visit projects under construction and while operating. Ministry staff work directly with proponents to address non-compliance issues. As well, since the creation of the Ministry of Forests, Lands and Natural Resource Operations in March 2011, the ability to coordinate inspections has improved.

Ministry staff are aware of all the compliance issues summarized in the report and are seeking to address where possible, concerns on a priority basis.

Communications Contact:	Logan Wenham	250-953-3675
Program Area Contact:	Julia Berardinucci Scott Barrett	604-586-4433 604-586-5647

Program Area	GCPE	ADM	Minister’s Office
JULIA BERARDINUCCI SCOTT BARRETT	LOGAN WENHAM	CRAIG SUTHERLAND	

Russell, Veronica A ENV:EX

From: Johnsrude, Allan N FLNR:EX
Sent: Wednesday, January 29, 2014 9:27 AM
To: Rosenboom, Remko FLNR:EX
Cc: Berardinucci, Julia F FLNR:EX; Anderson, Keith FLNR:EX; Barrett, Scott FLNR:EX; Davies, James W FLNR:EX; Ullah, Aman FLNR:EX; Akhtar, Khaled FLNR:EX; Kreye, Ross A FLNR:EX
Subject: RE: Critical IPP article The Province

If you feel a response is warranted, and this is often not profitable except to correct factual errors, please share with Julia and myself and we will then discuss with media relations (PAB).

We may get further inquiries on this and understand we have some developed speaking points. I would like a copy of these assuming they exist.

Allan Johnsrude, RPF
A/Director of Resource Authorizations - South Coast Region
Ministry of Natural Resource Operations
Ph. (604) 702-5700
Email: Allan.Johnsrude@gov.bc.ca

From: Rosenboom, Remko FLNR:EX
Sent: Wednesday, January 29, 2014 8:45 AM
To: Anderson, Keith FLNR:EX; Johnsrude, Allan N FLNR:EX; Barrett, Scott FLNR:EX; Berardinucci, Julia F FLNR:EX; Davies, James W FLNR:EX; Ullah, Aman FLNR:EX; Akhtar, Khaled FLNR:EX; Kreye, Ross A FLNR:EX
Subject: Critical IPP article The Province

Hi,

Maybe you have already read it, but if not, please see below a critical article on CEP projects in our region.
Do we feel the need to response?

Remko

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

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Fax: 604-586-4444
Email: remko.rosenboom@gov.bc.ca
Website: <http://www.env.gov.bc.ca/wsd/>



Page 26

Withheld pursuant to/removed as

Copyright

Please check out and like our Keep Pemberton Wild Facebook page (<https://www.facebook.com/KeepPembertonWild>) to stay informed about environmental issues that impact Pemberton Valley and other areas in British Columbia.

Pages 28 through 39 redacted for the following reasons:

Not Responsive

Russell, Veronica A ENV:EX

From: Thomas, Vivian P GCPE:EX
Sent: Thursday, January 30, 2014 2:54 PM
To: Rosenboom, Remko FLNR:EX
Subject: OPPRs - Satisfactory/Unsatisfactory

Importance: High

Thx for the chat. Is this accurate?

Currently in the South Coast, 6 of 24 run of river projects have OPPRs that are deemed "satisfactory." The remaining 18 projects have OPPRs that companies are in the process of updating to meet today's more stringent requirements.

For the most part, run-of-river projects are well-run. Both the ministry and industry are committed to continuous improvement of operating requirements associated with run-of-river projects.

Vivian
250 356-2475

From: Rosenboom, Remko FLNR:EX
Sent: January-30-14 1:12 PM
To: Clarke, Brennan GCPE:EX; Thomas, Vivian P GCPE:EX
Subject: Re: Innergex

I'm in a meeting right now, but will give her a call asap. I spoke with Innergex about this yesterday afternoon.

Remko

From: Clarke, Brennan GCPE:EX
Sent: Thursday, January 30, 2014 01:05 PM
To: Rosenboom, Remko FLNR:EX
Subject: FW: Innergex

Vivian needs a quick chat for further clarification, partly with regard to the note below.

250 356 2475

From: Thomas, Vivian P GCPE:EX
Sent: January-30-14 12:59 PM
To: Clarke, Brennan GCPE:EX
Subject: Innergex

I received this from Innergex, questioning the only 6 of 24 having OPPRs that are satisfactory:

As you know a run-of-river facility needs a Leave to Commence Operations (LTCO) from FLNRO before actual production is allowed to start. Prior to the issuance of LTCOs, OPPRs for each one of our facilities are submitted to the Regional Water Manager for acceptance. Each LTCO includes the statement: *"The information provided is considered satisfactory to fulfill the obligations of clause (k)"* where 'Clause K' is the requirement for the licensee to *"submit a report for*

acceptance by the Regional Water Manager on the parameters and procedures for the operation of the works". It is clear that with the issuing an LTCO the OPPR submitted is considered satisfactory and accepted.

Vivian Thomas

Communications Director

Ministry of Forests, Lands and Natural Resource Operations

Tel: 250 356-2475 cell: s.22

Vivian.Thomas@gov.bc.ca

Russell, Veronica A ENV:EX

From: Rosenboom, Remko FLNR:EX
Sent: Thursday, January 30, 2014 12:10 PM
To: Anderson, Keith FLNR:EX; Johnsrude, Allan N FLNR:EX
Subject: RE: Missed conference with Anderson, Keith FLNR:EX, Johnsrude, Allan N FLNR:EX
Attachments: Status OPPR's Jan 2014.xlsx

Hi,

I just checked the numbers in the article and they are the correct ones (see attachment). I instantaneously phoned Brennan to inform him about this.

So there will be no message being send to anybody to correct the numbers presented in the article.

Let me know if you have any questions,
Remko

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

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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: Anderson, Keith FLNR:EX
Sent: Thursday, January 30, 2014 11:52 AM
To: Anderson, Keith FLNR:EX; Johnsrude, Allan N FLNR:EX; Rosenboom, Remko FLNR:EX
Subject: Missed conference with Anderson, Keith FLNR:EX, Johnsrude, Allan N FLNR:EX

Anderson, Keith FLNR:EX [11:50 AM]:

I had a call from Brennan Clarke, the "Horror Story". apparently he had sent out the wrong information on the nubmer of tenrues taht were in compliance. We had todl him 19 were in compliance and he told the reporter it was only 8. so PAB is going to send out a statement to the Province, Gwen Barlee and Paul Koriea (?) saying that it was a typo and should have read 18, and they will not mention that it should have been 19.. I said I had no problem with that, even if it is a bit incorrect factually.

Johnsrude, Allan N FLNR:EX [11:52 AM]:

thanks.

Satisfeid

Aslu

Fitz

Furry

Upper Mamquam

Upper Clowhom

Lower Clowhom

In process of finalizing them

Tyson

E. Toba

Montrose

Upper Bear

Lower Bear

Lower Mamquam

Mc. Nair

6**7**

24 in operation

7 under construction

Russell, Veronica A ENV:EX

From: Thomas, Vivian P GCPE:EX
Sent: Thursday, January 30, 2014 3:58 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: OPPRs - Satisfactory/Unsatisfactory

So could we say, "6 of 13 projects have a satisfactory OPPR and another 7 are in the process of being updated."?

From: Rosenboom, Remko FLNR:EX
Sent: January-30-14 3:55 PM
To: Thomas, Vivian P GCPE:EX
Subject: Re: OPPRs - Satisfactory/Unsatisfactory

In the past it was common practice to not request an OPPR (the really old ones). So some of those 11 project have no OPPR, an insufficient, or an not approved one.

It also used to be common practice to approve the full operation of a project without a approved OPPR. That's the other part of the 11 projects.

Does this clarify your question?

Remko

From: Thomas, Vivian P GCPE:EX
Sent: Thursday, January 30, 2014 03:41 PM
To: Rosenboom, Remko FLNR:EX
Subject: RE: OPPRs - Satisfactory/Unsatisfactory

Thx. Yes I'm aware of what Brennan sent to the Province, but I'm finding it confusing why we would allow projects to operate if they have unsatisfactory OPPRs, so that is what I was hoping to clarify. If there are 6 with satisfactory OPPRs and 7 in process of being updated, what's the status of the remaining 11??

From: Rosenboom, Remko FLNR:EX
Sent: January-30-14 3:36 PM
To: Thomas, Vivian P GCPE:EX
Subject: RE: OPPRs - Satisfactory/Unsatisfactory

Hi Vivian,

This is what Brennan send to The Province:

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 (on top of the 24) are under construction and will need a satisfactory OPPR before they can start operating in the upcoming years.

In addition to that I would say regarding the question from Innergex :

Unfortunately, there are numerous operating facilities with OPPR's which were submitted to the province for review, but which were never formally approved by a SDM. Consequently, these plants are operating with an OPPR which might or might not qualify as satisfactory according to the provincial standards. As this is the case for a couple of projects on the South-Coast, this was discussed between Innergex and FLNRO during a meeting on January 29, 2014.

Remko

Section Head Water Allocations, South Coast Region
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Website: <http://www.env.gov.bc.ca/wsd/>

Our Vision: Economic prosperity and environmental sustainability

From: Thomas, Vivian P GCPE:EX
Sent: Thursday, January 30, 2014 2:54 PM
To: Rosenboom, Remko FLNR:EX
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Importance: High

Thx for the chat. Is this accurate?

Currently in the South Coast, 6 of 24 run of river projects have OPPRs that are deemed "satisfactory." The remaining 18 projects have OPPRs that companies are in the process of updating to meet today's more stringent requirements.

For the most part, run-of-river projects are well-run. Both the ministry and industry are committed to continuous improvement of operating requirements associated with run-of-river projects.

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250 356-2475

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Ministry of Forests, Lands and Natural Resource Operations

Tel: 250 356-2475 cell: s.22

Vivian.Thomas@gov.bc.ca

Russell, Veronica A ENV:EX

From: Thomas, Vivian P GCPE:EX
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To: Rosenboom, Remko FLNR:EX
Subject: RE: OPPRs - Satisfactory/Unsatisfactory

Can we say 6 of 13 projects have a satisfactory OPPR and another 7 are in the process of being updated. The remaining 11 were approved before the requirement for an OPPR was needed.

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To: Thomas, Vivian P GCPE:EX
Subject: Re: OPPRs - Satisfactory/Unsatisfactory

I'm a call, so I keep it short.

Why 13 as we have 24 operating projects in our region?
Remko

From: Thomas, Vivian P GCPE:EX
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Does this clarify your question?

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Unfortunately, there a numerous operating facilities with OPPR's which were submitted to the province for review, but which were never formally approved by a SDM. Consequently, these plants are operating with an OPPR which might or might qualifies as satisfactory according to the provincial standards. As this is the case for a couple of projects on the South-Coast, this was discussed between Innergex and FLNRO during a meeting on January 29, 2014.

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Our Vision: Economic prosperity and environmental sustainability

From: Thomas, Vivian P GCPE:EX
Sent: Thursday, January 30, 2014 2:54 PM
To: Rosenboom, Remko FLNR:EX
Subject: OPPRs - Satisfactory/Unsatisfactory
Importance: High

Thx for the chat. Is this accurate?

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250 356-2475

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Communications Director

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From: Rosenboom, Remko FLNR:EX
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To: Thomas, Vivian P GCPE:EX
Subject: RE: OPPRs - Satisfactory/Unsatisfactory

Hi Vivian,

I'm out of my conf. call with the AG and took a closer look at the numbers.

We have: 24 operating projects in the region:

- 6 with an OPPR which we considered satisfactory
- 7 are in the process of being updated to the same level
- 9 which are not satisfactory, but no action is undertaken yet (or not legally possible or not time to do so)
- 3 project (all started operating before 2004) with no OPPR at all

Does this clarify the situation?

Remko

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

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Vivian Thomas

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Ministry of Forests, Lands and Natural Resource Operations

Tel: 250 356-2475 cell: s.22

Vivian.Thomas@gov.bc.ca

Russell, Veronica A ENV:EX

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

Pages 55 through 78 redacted for the following reasons:

Not Responsive

Russell, Veronica A ENV:EX

From: Rosenboom, Remko FLNR:EX
Sent: Wednesday, January 29, 2014 8:45 AM
To: Anderson, Keith FLNR:EX; Johnsrude, Allan N FLNR:EX; Barrett, Scott FLNR:EX; Berardinucci, Julia F FLNR:EX; Davies, James W FLNR:EX; Ullah, Aman FLNR:EX; Akhtar, Khaled FLNR:EX; Kreye, Ross A FLNR:EX
Subject: Critical IPP article The Province

Hi,

Maybe you have already read it, but if not, please see below a critical article on CEP projects in our region.
Do we feel the need to response?

Remko

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Ministry of Forests, Lands and Natural Resource Operations

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Please check out and like our Keep Pemberton Wild Facebook page (<https://www.facebook.com/KeepPembertonWild>) to stay informed about environmental issues that impact Pemberton Valley and other areas in British Columbia.

Pages 82 through 99 redacted for the following reasons:

Not Responsive