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*Watching Out for BC's Wild Salmon*

July 12, 2011

Greg Savard  
A/Regional Director  
Fisheries and Oceans Canada  
Regional Director, OHEB  
Suite 200 - 401 Burrard Street  
Vancouver, British Columbia V6C 3S4

Dear Greg:

**RE: Kokish River and DFO's approval of diverting water from anadromous fish habitat**

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Watershed Watch is extremely concerned about a disturbing trend apparently developing with respect to the approval and/or planning of so-called run-of-river hydroelectric projects in rivers and streams hosting anadromous populations of salmon.

The latest, but likely not the last, cause for concern is the Kokish River. It's no secret that diverting the majority of water in anadromous fish habitat can result in major impacts to salmon at an individual and population level. Drastically decreasing in-stream flows also substantially increases uncertainty around the extent and measurement of impacts on both fish and fish food. Our science just isn't that good, and the human tendency to minimize concerns about impacts and uncertainty, or simply to put off quantifying those until some later date (e.g. by agreeing to 'monitor' already-built projects), is nothing short of a recipe for compromised habitat. The province, by admission of their own water management officials, lacks the capacity and resources for adequate monitoring. There are also major concerns related to the use and effectiveness of the main tool used for approving development around rivers, that is, of attempting to 'mitigate' impacts by ordering compensation or some form of untested remediation.

I realize that DFO is often put in a tight spot with respect to authorizing HADDs and attempting to mitigate impacts to the wild fish they are charged to protect. I reviewed your June 30 letter to the proponent and remind you of what you already know: That flow mitigation measures remain uncertain tools, and the outcomes are in most cases sub-par to the original functioning habitat. I would appreciate learning how such proposed flow regimes were derived. But more importantly, can you please inform me of how likely it is that the proponent could actually achieve any agreed-to flows? Is there sufficient storage in this system to meet such targets, even assuming

these flows could serve as appropriate mitigation? If not, this so-called plan should not be supported by DFO.

Watershed Watch recently raised similar concerns about a project proposed on Sedan Creek, a salmon-bearing system in the Skeena region. It is just unthinkable to even consider sacrificing salmon to produce seasonal, non-firm power, especially in the absence of any strategic plan by the province to identify those electricity sources that will provide the highest quantity and quality for the least amount of environmental impact. Vancouver Island summer-run steelhead populations have been seriously depressed for several years, and DFO and the Province should be doing everything in their power to protect and restore these remarkable fish—not accommodate development that directly impacts their habitat and threatens their existence.

DFO is under an intense spotlight on how well it does or doesn't protect salmon and salmon habitat at the Cohen Inquiry into the Decline of Fraser Sockeye. DFO's commitment to implementing an effective Wild Salmon Policy that, among other things, considers the health of salmon habitat, is also being examined. Now is thus the perfect time to demonstrate that commitment.

Watershed Watch wishes to add its voice to that of others opposed to this project and similar ones located or proposed in anadromous fish habitat. Further, we specifically request DFO show leadership by denying HADD authorizations for this and other projects that damage wild salmon habitat.

We have also raised these concerns directly with Clean Energy BC, the Province, and BC Hydro, and will continue to do so. While there is a place for clean energy development, it shouldn't occur at the expense of wild salmon that have existed in our streams and rivers for millennia.

Sincerely,

A handwritten signature in black ink that reads "Craig Orr". The signature is written in a cursive, slightly slanted style.

Craig Orr, Ph.D.  
Executive Director

Cc:

Adam Silverstein, Sue Farlinger, DFO  
Zoltan Fabian, CEA  
Kathy Eichenberger, EAO  
Ted Down, Greg Ashcroft, Martha Anslow, John Mazure, Glen Davidson, Province of BC  
Ray Pillman, Mark Angelo, ORC  
Paul Kariya, CEBC  
Cam Matheson, BC Hydro  
Tim Leadem, Ecojustice