

Jan 22, 2009



Environmental Assessment Office
PO Box 9426 Stn Prov Govt
Victoria, BC
V8W 9V1

Attention: Kathy Eichenberger

Re: Stlixwim Hydro Corporation
Narrows Inlet / Tzoonie River Proposal

Thank-you for the time you personally spent discussing this proposal at the Egmont public meeting. You have encouraged me to believe the staff of the Environmental Assessment Office is genuinely interested in providing answers for the concerns of all stakeholders, including myself as a part time resident of Narrows Inlet. It is important for me to feel that a decision has not already been made on this project and that the Ministries involved value the opinions of your staff. This is a very time consuming and expensive study for all involved.....one that I have been least prepared to recently hear about. It has come as a surprise that this proposal has advanced as far as it has without the courtesy of consultation from either the proponents or governing bodies. This is a major commercial/industrial construction within metres of the boundary of our residential/rural zoned properties. The proposed Lower Ramona powerhouse is equally close to our established domestic water intake.

It is true my concerns may be construed as a "NIMBY" approach. The Ramona Creek powerhouses are literally in my backyard. Though there are a limited number of deeded properties in Narrows Inlet, it is not just the residents that are affected. Each resident proudly entertains countless visitors, many from abroad. All of these visitors in turn relay their positive experiences to others. Many Sunshine Coast residents have thriving businesses in the tourism industry, including wilderness camps, bed and breakfasts, kayak rentals, diving charters and Tzoonie River fishing adventures. Included beneficiaries are marinas in the

surrounding area that cater to the resident and visiting boating public that frequent the head of Narrows Inlet.

The cumulative impact of so many powerhouses, power transmission lines, penstocks, tunnels, weirs and watershed diversions in such a small area detracts from the original "green" concept. It is a rare thing anywhere in the world to have the experience of untouched remoteness such as Narrows Inlet or Upper Pitt Lake so close to a populated area. Vancouver and surrounding areas must place importance on this benefit, we are accustomed to something that others hold in awe. Residents are offered a nearby easy getaway with no visual or audible reminders of the modern world. It is more than 10km to the nearest powerline. The visual of "alien" concrete structures, large above ground pipelines and power transmission lines contradict the original 1990 Sechelt Inlets Coastal Strategy to "retain the quiet, park-like and wild character of the area". Visitors are able to spend time in the cities and towns, yet still have ample time to experience our Super, Natural BC as officially touted. This has brought about a much larger tourist base, it need not be for only the hardiest of adventurers. The official BC Tourism site states Sechelt is home to many provincial parks..... . "many are water access-only marine parks where you can spend hours without seeing a single soul".....and..... "If you're looking for a true wilderness experience, head to Smuggler Cove Marine Provincial Park or Sechelt Inlets Marine Provincial Park, both popular with kayakers".

An immense amount of time and money was spent by BCFP/Interfor to dismantle a major camp at the head of the inlet. They did an excellent job of meeting their obligations.....there is currently no sign of it. It seems inconsistent to oblige them to do this and now allow the area to be used as a base for more construction operations. The recently logged areas have been replanted and are returning to their natural state. All visual impact studies were done and followed during their last tenure. This does not appear to be true of penstocks, weirs and power transmission lines criss crossing the mountainside. Once these are cut into the mountainside they will be there forever.

Large amounts of tax dollars have been spent to restore fish habitat, yet there is a proposed powerhouse on the most sensitive of marshlands at the mouth of the Tzoonie. This is a favourite canoe destination for fishing and viewing shorebirds, eagles, bear and deer. The sound of a whining powerhouse here would be bothersome to both human visitors and animal inhabitants.... and even more disruptive for dwellings at the base of Ramona Creek.

This project is much more than the term "Run of the River" implies. The cumulative effects of 186 projects in the south coastal area may be more than increasing the capacity of the already built BC Hydro projects. This proposal is a true hydro-electric project. Dams will be constructed on high alpine lakes where water levels are to be drastically varied, stream flows will be greatly changed from their natural state during different times of the year, there will be

temperature and dissolved oxygen variations, higher volumes of non filterable residues in the rivers, and creeks will be diverted to different drainages. There is significant drilling, blasting, excavating and road building on extremely adverse terrain that is historically instable for most of the areas proposed.

A major portion of this is directly above our home at the base of Ramona Falls.

With the political directive to put these natural resources into private control I am concerned we will lose the ability to have the same review process should power generation capacity be increased in the future. The penstocks are sized larger than required for current output. River flows and lake levels will be altered once again if capacity is increased at a later date. There is the potential that water already used for industrial use may be deemed acceptable as an export commodity....the infrastructure will already be in place, especially if the penstocks are oversized for the size of turbines installed.

I respect the initiative for "clean" generation of power and understand worldwide capacity has to increase, barring a major development in slowing of world population growth. This project is not using already naturally flowing water and returning it to the river, as the term "run of the river" indicates. The draft proposal appears to be too large in scale for the Narrows Inlet / Tzoonie River drainage, with almost every lake, stream and river being impacted.

Please review and provide answers for the following specific questions, I look forward to an assessment performed in good faith for all stakeholders, proponents included.

- Draft proposal map is not correct in that not all of the 10 deeded lots are shown for DL5268 at the base of Ramona Creek, adjacent to the proposed Lower Ramona powerhouse. I am part owner of Lot 2 and Lot 3.
- What other lakes in the world are presently used in the same manner as proposed? Do these lakes have the same level changes? Do these lakes endure the same consequences of ice breakup during level changes with respect to scouring of the shoreline? Do these lakes have the same shoreline flora and fauna species? Please supply a visual rendering showing weir structure as viewed from inlet. How will flows during construction and issues with uncured concrete be dealt with? How are the submersible pumps in Ramona Lake to be powered? This applies to all 3 lakes in the proposal.
- How will the tunnel tailings be transported and disposed of? What geological assurances are there to ensure no chance of landslides during or after

construction? Please supply a rendering of the penstock (both above and below ground sections) as visible from the inlet. What provisions are there for wildlife crossings for above ground portions? This applies to all 3 lakes in the proposal.

- What is the temperature difference of the water being diverted from the bottom of the lakes? What amount and what make up are the extra sediments from the depths of the lake that will be deposited at the discharge of Lower Ramona? What effect will the change in water chemistry, level of non-filterable solids, temperature, flow rate and aeration have on the fish bearing stream that is immediately below the Lower Ramona discharge? How will this affect our domestic supply? What are the implications of high volumes of water being discharged from Lower Ramona powerhouse into a concentrated area adjacent to our property line? The riverbank has not been subject to this with normal, natural flow distributions.
- What percentage of the flow of water over Ramona Falls will be diverted? Please supply a visual rendering of the waterfall after diversion, during low flow times of the year. How will the change from cyclic river levels to constantly high levels affect the fish habitat, bank erosion and general stability of terrain for Lower Ramona River? Note there have been several large rockslides in recent years.
- What area of land will be cleared for the Lower Ramona powerhouse? Please supply a rendering as viewed from the inlet. What level of noise and what frequency will be emanating from the structure. This is a factor for wildlife and human residents.....note wildlife typically have significantly better hearing. How will the extreme terrain around the Lower Ramona powerhouse be stabilized? This commercial/industrial construction is only metres from our residential/rural property line.
- How will the road to Lower Ramona powerhouse be built to ensure stability of the up to 30 degree slopes above our residence? Please provide a rendering of the road as viewed from the inlet. How will potential unauthorized traffic from the main logging road be restricted from access to our property?
- Please supply a rendering of all power transmission lines as they would appear from the inlet after all phases of construction are finished. Will future logging operations be compromised? Will helicopter logging be required where normally truck logging would be employed? What total area of forested land will be permanently lost for the entire power transmission system all the way to the BC Hydro connection?
- How will property owners be compensated in the event of any damage caused by catastrophic landslides, rockslides or flooding that may be caused by errors in engineering, negligence during construction, permanent changes

in mountainside stability or malfunction of equipment? This applies not only during construction phase, but for the duration of the future.

- What financial mechanism is in place in the event above catastrophes occur on Crown Land? This applies to all sites. The Chickwat area is a real concern.
- How will the Tzoonie estuary be affected by the proposed construction? This is an alluvial fan with extensive eelgrass and marshland.....with rich habitat for salmon, trout, many species of waterfowl, birds, deer and bear. Please provide a visual rendering of the final construction as it would appear from the Tzoonie River. This river has only just started to recover from poor logging practices of the past.
- What period of time is required for construction of each phase? What mechanism is in place to return the land to its original state should financing for the proponents fall through? Is there a time limit imposed to minimize impact on environment during construction?
- What period of time is the water use license valid for? Does it expire and require re-application or can it be renewed in perpetuity with no requirement for government review? Is this water license transferable? Is this license only for the purposes of power generation and nothing else? What legal mechanism is in place to prevent the spent water from being deemed for industrial use and therefore eligible for export under NAFTA?
- How many full time employees after the construction phase? Where will monitoring of operations be done? What failsafes are in place in the event of equipment failure or problems with wireless data transmission to the monitoring site?
- In the event portions of this project are deemed too large to be sustainable for the area and the resultant total power output is less than 50Mw, is the proponent able to proceed with other portions without EAO involvement?

Sincerely,
Ken Holowanky

cc Premier Campbell, Premier of British Columbia
Nicholas Simons, MLA Powell River-Sunshine Coast
Diane Thorne, MLA Coquitlam-Maillardville
Kathy Eichenberger, Project Assessment Director, EAO
David Rafael, Senior Planner Sunshine Coast Regional District