



March 5, 2012

Susan Farlinger  
Regional Director, General  
Fisheries & Oceans Canada  
susan.farlinger@dfo-mpo.gc.ca

Re: Kokish River Hydroelectric Project

Dear Ms. Farlinger,

We understand DFO is to make a decision within the next few days on whether to grant a permit for the Kokish River Hydroelectric Project, and that yours is the only remaining permit required for this project. We urge you to deny the permit.

BC Nature is deeply concerned about the recent decision of the BC Government to approve the application of Kwagis Power Limited Partnership to develop a run-of-river hydro project on the Kokish River on northeast Vancouver Island, which would divert 9 km of the river to a power house for electricity generation. As your agency recognized in the environmental assessment, the project has the potential for significant adverse impacts on fish, including five species of wild salmon and, most significantly, the rare run of wild, summer-run steelhead. This alone should make the decision to deny a permit an obvious one.

Your agency has called for extensive mitigation measures, including compensation, and we note that the recently issued Environmental Assessment Certificate includes seventy-seven legally-binding requirements that Kwagis Power must adhere to throughout various stages of the project. However, DFO must be aware of the strong likelihood that such a large number of conditions will not be met over the projected 40 years of the project for a variety of reasons, including climate change and the potential for human error. Given this likelihood and the high fisheries values of the river, DFO's grant of a permit for this hydro project would be an abrogation of its responsibilities to conserve Canada's populations of anadromous fish.

Although not directly relevant to your decision, you may be interested to know that British Columbia does not need the modest 45 KW capacity / 183 GWh firm energy output of this project for domestic use for well over a decade, and maybe longer. These statistics are from BC Hydro's most recent supply/demand forecast (see BC Hydro, Ruskin Dam and Powerhouse Upgrade Project CPCN Application, February 2011).

So here we have a project with little or no foreseeable benefit but significant environmental downside. Considering the high fisheries values of the Kokish River, this makes no sense

whatsoever. Despite the very strong pressures you are undoubtedly under to approve the project, we urge you to fulfill your responsibilities and deny the permit.

Regards,

A handwritten signature in black ink, appearing to read 'J Neville'.

John Neville, President  
BC Nature (Federation of BC Naturalists)

cc The Political Minister for BC, James Moore [james.moore@parl.gc.ca](mailto:james.moore@parl.gc.ca)  
Local MP and Cabinet Minister John Duncan [john.duncan@parl.gc.ca](mailto:john.duncan@parl.gc.ca)  
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