

December 8, 2016

To:

The Honourable Christy Clark, Premier – via email premier@gov.bc.ca

Ray Morello, Director of Authorizations, Ministry of Forests, Lands and Natural Resource Operations – via email: Ray.Morello@gov.bc.ca

The Honourable Steve Thomson, Minister of Forests, Lands and Natural Resource Operations – via email: FLNR.Minister@gov.bc.ca

The Honourable Bill Bennett, Minister of Energy and Mines – via email: MEM.Minister@gov.bc.ca

Shawn Tomlin, CAO, Regional District of East Kootenay – via email: stomlin@rdek.bc.ca

Re: Applications for commercial-scale solar power generation in East Kootenay

On behalf of BC Nature, which represents 53 naturalist clubs and 6,300 members across the province, I am submitting the following comments on the 10 applications for the disposition of Crown land in the East Kootenay for commercial-scale solar power generation. The applications are for Investigative Licences to collect solar data for the feasibility of locating solar power generation facilities on Crown land.

BC Nature recommends that the Ministry of Forests, Lands and Natural Resource Operations (MFLNRO) rejects all of these applications and places a moratorium on solar power developments on Crown land until the Province of British Columbia adopts policies to effectively evaluate such developments in order to permit or deny them.

BC Nature is not opposed to all solar power generation, as solar power is a viable option for transitioning from a carbon-based economy to one that is greener and reduces BC's greenhouse gas emissions. BC Nature is, however, concerned about these solar applications because of their location and scale.

We oppose the location of solar power facilities on Crown land in the East Kootenay because these lands have significant ecological, cultural and economic values. Specifically, some of the major reasons we oppose these applications for the following reasons:

- The valley bottoms of the Rocky Mountain Trench are unique in North America primarily because of the diverse and abundant large mammal populations this area supports. Thus, this area has been called the Serengeti of North America and is of global significance. Some of these mammal species live year-round in the valley bottoms whereas others use the bottomlands for critical winter range.

- The solar power applications are for locations in the rare grassland ecosystems of the Trench, and this an ecosystem that provides critical habitat for many endangered, threatened and sensitive species. For example, one of the applications is for a facility to be located on the Skookumchuck Important Bird/Biodiversity Area. This area has been specifically designated as an important area for at least three SARA-listed species: American Badger (red listed in B.C.); Long-billed Curlew (blue-listed in B.C.); and Lewis's Woodpecker (blue-listed in B.C.). Other BC-listed and important species that could be impacted by such solar power facilities include Bighorn Sheep, Grizzly Bear, Williamson's Sapsucker, Barn Swallow, Bobolink, Common Nighthawk, Sandhill Crane, Great Blue Heron, Olive-sided Flycatcher, Painted Turtle, and Spurless Touch-me-not.
- The people who live and work in the East Kootenay, as well as the tourists who visit this area, cherish the Crown lands of the Trench. Some, such as commercial cattle operations, farmers, and guide outfitters make their living from this landscape, while others avidly pursue outdoor recreational activities, such as wildlife viewing and horseback riding.
- The East Kootenay valley bottoms have had many pressures on them over the years, from transportation corridors and forestry to the development of homes, businesses and dams. Habitat loss and fragmentation are two of the biggest contributors to the decline of plant and animal species. The infrastructure required for solar power generation—including solar panels, fencing, transmission lines, and service roads—would be disruptive to cattle and wildlife and cause more habitat loss and fragmentation in this region.

We maintain that there are many other locations that are better suited for such solar power facilities that would not result in the loss of ecologically valuable lands and or significantly reduce the impacts to wildlife. The prime example in the East Kootenay is the Sun Mine, located on a brownfield that was contaminated by Kimberley mining operations. Other appropriate locations for such installations could include other brownfields and old industrial sites, gravel pits, road cuts, dumps and rooftops.

The East Kootenay has lost hundreds of square kilometres of critical bottomlands due to flooding from the Libby Dam and Lake Koochanusa. This region has sacrificed enough for the province's power generation.

Many individuals, organizations and branches of government have invested a great deal of time and money in the grasslands of the East Kootenay, specifically in terms of ecosystem restoration. One example is the Columbia Basin Trust, which has awarded large amounts of compensation monies due to the loss of land from dams, and moreover,

some of those monies have been spent on ecosystem restoration in the bottomlands of the Trench. Another example is The Nature Trust of British Columbia that owns many thousands of hectares of land in the trench in at least 27 properties. Why would the provincial government now award licences for solar power generation on these same lands in contradiction to the principles for awarding compensation monies?

In terms of the concept of scale, why do we need all of our power generating facilities to be massive? Commercial solar power generation facilities have large footprints. As an example, two of the applications before MFLNRO are for the disposition of 2,336 and 2,426 hectares of land. A decentralized, local approach to power generation especially makes sense for solar power generation, for example, putting solar panels on individual rooftops.

To summarize, we request that the MFLNRO reject these applications and implement a moratorium on all solar power facilities on Crown land until a science-based provincial policy for the management of this industry and its impacts is in place. BC Nature would be happy to contribute to the development of such a policy. In the meantime, our members look forward to your response regarding our concerns about these applications and this industry.

Sincerely,



Alan E. Burger, PhD
President: BC Nature
(Federation of BC Naturalists)