

August 14, 2013

The Honourable Steve Thomson,
Minister of Forests, Lands and Natural Resources Operation
Via email

Dear Steve:

BC Nature is deeply disturbed by the application of Fortis BC for a Crown Land Allocation of 750 hectares along the Similkameen River about 15 km south of Princeton for a dam and large storage reservoir.

We ask that this application be rejected and the Similkameen be allowed to remain a free-running, wild, and healthy river for the benefit of wildlife and humans, for the following reasons:

- This area has extremely high wildlife and habitat values, including Red and Blue-listed species. The river is the focal point and source of much of this value both in the area proposed for the dam and reservoir and downstream into the Lower Similkameen Valley and Washington State.
 - The Similkameen is one of very few remaining undammed or otherwise compromised wild rivers in the Southern Interior of BC. The location of its lower reaches in the dry Similkameen Valley make it and the associated Black Cottonwood riparian thickets lining the riverbanks particularly important for healthy ecosystems in the valley and for the survival of many species dependent upon it.
 - Both in the upper and lower reaches, the river and shoreline habitat provide critical water and other life requirements for a wide variety of large and small mammals: Mule Deer, Elk, Moose, Mountain Goat, Black Bear, California Bighorn Sheep, Cougar, Lynx, Bobcat, Coyote, Pine Marten, Mink, Red Squirrel, Golden-mantled and Columbia Ground Squirrel, Yellow-pine Chipmunk, Long-tailed Weasel, and four bat species.
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- The wide range of habitats, from mountain forests and cliffs to bunchgrass-sage and cottonwood-riparian stands in the area support a wide range of bird species including Red- and Blue-listed species such as White-throated Swift, Lewis's Woodpecker, Canyon Wren, and Flammulated Owl.
 - Habitat in the area suitable for a number reptile and amphibian species including the Red-listed Tiger Salamander.

- Fishery studies for the Similkameen date back to 1982 when Bonneville Power researched the possibility of introducing anadromous fishes to the Canadian portion of the river, species that have never been in this section because of the impassible falls near the junction with the Okanogan River. The study showed that the river supported an abundant population of native Rainbow Trout (approximately 13,000) and Mountain Whitefish, a result supported by the experience of long-standing fishermen in the Keremeos Rod and Gun Club. In addition, on a snorkel float down the river near the Similco Mine in August, 1993, Fisheries Biologist Chris Bull saw “a total of four hundred trout in an approximate two-kilometre stretch”. He added “that wild fish are abundant in this section of the river”. One detrimental effect of the reservoir-dam on fish would be the release of cold, oxygen-poor, water to the lower reaches and retention of warmer waters in the reservoir which would dramatically affect the existing and any future fisheries.
- The spring runoff brings down nutrients from the mountains along with the increased water flow, the effect of which is to flush out the riverbed and shift sand and gravel bars. Plant species in the riparian zone are dependent on this annual cycle of higher water and the flood of nutrients to maintain growth and renew their numbers. Healthy riparian areas are critical for mammals, birds, reptiles, and amphibians that inhabit both the floodplain-riparian zone and the dry grasslands-shrub steppes and dry upland forests.
- The natural values of the Similkameen and its importance for human livelihoods were recognized in 1998 when the BC Heritage Rivers Board recommended its designation under that program. The chief reason the river was not so designated was local opposition from investors in a similar power dam proposed on the river.
- Assuming the current proposed dam is similar to the previously proposed dam, it would create a reservoir upriver of the canyon that is estimated to destroy not only the canyon ecosystem, but 634 hectares of wildlife habitat stretching 14 km south towards Manning Provincial Park. This would irrevocably change the spring freshet regime of the free-flowing river with the downstream effects of compromised lower-valley riparian stands and thickets from decreased spring flow, lower flow of nutrients to the valley riverbed, changes in annual water-temperature regimes and the consequent loss of critical riparian and water habitat for a wide variety of wildlife.
- An estimate of lost habitat from the previous dam proposal was 179 hectares of winter range for Mule Deer; resulting in a proportionate decline in population. Elk would be in a similar situation and the decline in these prey species would affect predator populations. The previous proposal’s assessment did not give any details on possible/likely effects on predators; however, the existence of the reservoir would clearly change established wildlife movement patterns.
- At the dam site, winter conditions pose additional hazards to wildlife that now cross the river in winter. Draw-downs of the water would leave steep slopes that wildlife might not be able to negotiate or if they did in normal movements or to escape predators, the reservoir lake ice could be unsafe and animals drown. Even in other seasons, the cold water of the reservoir would be dangerous for animals attempting to swim across.

- The effects on agriculture in the Lower Similkameen, which depends on the river for irrigation water, and on the valley communities, could be drastic when considered in light of climate change and lowered snowpack levels. The dam would provide flood control, but in the absence of significant flooding, the lack of water would have other, even more dramatic, effects which have been shown in various ways at many other dams in North America and elsewhere in dry climates.
- “A key piece of information is that the Climate Impacts Group at the University of Washington are predicting that by 2080 the Similkameen Basin will no longer be a “snowmelt-dominant basin but in a transition between a rain and snowmelt-dominance, (USCE p11)” with a forecast reduction in summer stream flows of 39% by 2080” (from Ken Farqharson. Review of Similkameen Watershed Study, 2009. In fact, higher summer temperatures, lower late summer flow, and earlier freshet have already been observed

Again, we urge that this application be rejected and the Similkameen River be allowed to remain a free-running, wild, and healthy river for the benefit of wildlife and humans.

Yours Truly



John Neville
President of BC Nature

cc

Land Tenures Branch Forests, Lands and Natural Resources Operations
FLNRO Opposition critic
Andrew Weaver, MLA, Oak Bay