

# Valhalla Wilderness Society

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Box 329, New Denver, British Columbia, Canada V0G 1S0  
Phone: (250) 358-2333, Fax: (250) 358-7950, E-mail: [vws@vws.org](mailto:vws@vws.org), Web:  
<http://www.vws.org>

June 14, 2009

Darlene Clark  
Integrated Land Management Bureau  
#200-1488 4th Avenue  
Prince George, BC V2L 4Y2

Re: Morkill River Independent Power Plant, File #7408964

Dear Ms. Clark:

This letter provides comments on Robson Valley Power Corporation's (RVPC) proposal to build an independent power plant on the Morkill River at the site of a falls that is popular with local residents. Since 1998 the members of the Valhalla Wilderness Society (VWS), who reside throughout the province, have been working to protect BC's old-growth forest and wildlife of the Interior Wetbelt (also known as the Inland Rainforest Region.) This region has rare inland temperate rainforest and many rare or endangered species, and the Morkill River area is one of the richest and most important sites. This is a provincial, national and global heritage that belongs to everyone and to future generations, not to RVPC.

According to the proponent's own consultant, Triton Environmental Consultants, Ltd., most of the development would occur within wet Interior Cedar-Hemlock (ICHwk3) forest. According to the Conservation Data Centre, there are one red-listed and four blue-listed plant communities in this subzone. (Triton's report is erroneous in stating there are one red- and only three blue-listed communities.) But this is perhaps misleading, because ICH wk3 of whatever sub-type is found nowhere else in the world but in the northern Interior Wetbelt, and there is not a lot of it left intact in the Robson Valley.

The summary of the Triton report, that further environmental assessments (other than those recommended for fish) "are not expected to indicate the presence of any rare species or ecosystems at the site," is professionally irresponsible. It is based in part upon Triton's claim that the powerlines will run along the Morkill Forest Service Road, requiring virtually no logging, only brushing and widening of the road. Instead we have learned that at a public meeting RVPC made it apparent that there would be extensive logging.

Recent scientific studies show that wet ICH is loaded with hundreds of species of lichens, many of which may be regionally, provincially or nationally rare. Indeed, recently scientists have discovered nine species new to science in the wet ICH of the Incomappleux Valley even quite a bit south of the Robson Valley. (Spribille et al., 2009)

Furthermore, waterfall spray zones are places where rare plants, lichens, mosses and liverworts, as well as small animals such as salamanders, are found. According to expert lichenologists Trevor Goward and Curtis Björk,

“The spray zones created by waterfalls are effectively ‘vertical wetlands’ kept cool in summer, mild in winter, and consistently moister than surrounding habitats as a result of constant exposure to atomized water .... waterfall zones can be thought of as ecological "petri dishes", that is, tiny islands of habitat conducive to the establishment of species otherwise much more common elsewhere. Effectively they function as range extenders, especially in inland areas, where several macrolichens – for example *Anaptychia setifera*, *Lobaria oregana*, *Pilophorus clavatus*, *Pseudocyphellaria crocata*, *P. mallota* – occur predominantly or even exclusively in the vicinity of waterfalls. For species such as these, the highly localized conditions characteristic of waterfall zones often promote stable, durable "source populations", thereby sustaining them in regions far outside their main ranges ...

“By diverting water from creeks, IPPs are certain to diminish the ability of affected waterfalls to support rare bryophytes and lichens. No less disturbing, road construction associated with these developments will give access to some of the province's last remaining low-elevation old-growth rainforests....

Creek diversion projects are becoming common in many parts of the world. Biologists in other countries – India, New Zealand, Tanzania, the U.K. – have begun to speak out about the threats to biodiversity posed by the loss of waterfall zones .... With more than 100 diversion projects already up and running, and nearly 700 more awaiting government approval, maybe it's time we began to take the implications of all this activity seriously.” (Goward and Björk, “Wilf Schofield: a Waterfall Tribute,” BEN, No. 404, Feb. 25, 2009)

Logging associated with this project could open rare inland temperate rainforest to drying winds and changing temperatures that could wipe out rare species. The diversion of most or all of the water from the river just above the waterfall could decimate those species associated with the spray zone.

In addition, a Conservation Area Design by Dr. Lance Craighead of the Craighead Environmental Institute shows that the middle portion of the Morkill River is in one of the most valuable wildlife areas in the Interior of BC, having core habitat for six species (lynx, grizzly bears, cougars, wolves, wolverines, and mountain caribou.) Already-existing fragmentation by logging along the river means that it is critical to keep remaining forested slopes intact, and to keep additional development away from the river.

Lastly, the Triton report acknowledges that the area beneath the falls is good Chinook salmon and bull trout rearing habitat. Triton claims the area beneath the falls is not good spawning habitat, completely dismissing the observations of residents and scientists that these fish have

spawned there for many years. They say that the area is the largest Chinook salmon and bull trout spawning and rearing raceway for hundreds of kilometers.

**THIS PROJECT HAS NO ENVIRONMENTAL IMPACT ASSESSMENT. The government decision-makers are relying upon information provided by the proponent, who has a large conflict of interest in the matter. The ILBM review and comment process is meaningless because a project based upon inadequate information is no process at all, and a process based upon the proponent's information is worse, because the information is slanted and the public and government can be misled. Valhalla Wilderness Society says this project is too damaging to too many rare and sensitive values, and that it is a private profiteering scheme that it will permanently damage critical values of provincial, national and global significance. It should be rejected, but if the government insists upon running a public process, it should run a real process, not a charade for a done-deal.**

## Details

### PUBLIC PROCESS

The ILMB says it posted material on its website for review and comment on May 21, 2009. The deadline for public input is June 30. At best, the public has been given about 5 weeks to respond. But in reality, it takes a considerable amount of time for the public, and even for environmental groups, to learn about such a posting. Further, local people say that the material was not posted on May 21, but days later. VWS learned about it only two weeks before the deadline.

On its website, the ILMB does not list any further steps to the public process. Apparently the next few weeks form the only input opportunity we will have.

The ILMB mentions that it will conduct a “referral” process after public input has closed, meaning that the project will be vetted to various government ministries. But the public should have an opportunity to know how government experts assess the impacts of this proposal *before* they provide their input. We pay our taxes so that government will evaluate projects such as these and consult the public based on adequate information.

Please note that documents recently obtained through the *Freedom of Information Act* by the Western Canada Wilderness Committee revealed that government scientists had made 1,800 pages of complaints against an IPP at Harrison Lake (*The Province*, June 17, 2009). The public had no idea until WCWC investigated the project. ***The public has a right to know.***

### INADEQUATE AND MISLEADING INFORMATION

Some basic elements of the project concerning the location of transmission lines, the diversion of water, and the amount and location of logging are not clear, or are contradictory with statements

elsewhere, or are not mentioned at all in the proponent's report. This makes the report very misleading. For instance:

The proponent makes a broad claim that the transmission lines will follow the existing road, which only needs to be brushed out along the sides. But people who attended the local meeting says that the proponent told the audience that RVPC had "identified many areas of *'outstanding timber.'*" Mr. Blagborne went on to say that, there are many forest industry workers out of work in McBride and that cutting the timber would be beneficial to them ... the RVPC plans to log off legislated Spatial Old Growth Management Areas and to make roads inside and within 2 kilometres of Endangered Mountain Caribou Reserves, all illegal activities under FRPA (U-7-003 GAR rat amend 20 Fe 09).

In addition, the proponent's report fails to state the distance over which the flow of the river will be diverted, resulting in dramatically reduced flow or (in seasons of low flow) completely dewatering the river bed. The report states that the water will re-enter the riverbed "as close to the waterfall as possible." This vagueness is utterly UNACCEPTABLE. The proponent must know very well where the piped water will re-enter the river. We are told by local residents who have attended meetings that the distance is over a kilometre downstream.

#### NO ENVIRONMENTAL IMPACT ASSESSMENT AVAILABLE

The only environmental report made available to the public is a cursory six-page report based upon a one-day field investigation by the proponent's consultant, Triton Environmental Consultants Ltd. The Triton report acknowledges that it is only a preliminary assessment and that more studies are needed, for instance, to determine the impact of the project upon salmon and bull trout.

#### DAMAGE TO FISH HABITAT

The proposal to remove most or (in times of low water) all of the water from the river bed for over a kilometre raises the question whether perhaps the only impact would be to stop migratory fish a mere 1 kilometre short of where they would have had to stop anyway, due to the falls. This puts a focus on what kind of habitat that kilometre of river provides. Do the fish just migrate to the falls and stop? Do they spawn there? Do they rear young there? These questions are important, but the potential impacts are not limited to that kilometre. How will the associated roads and other construction affect the silt and bedload? What will be the affect downstream of where the water re-enters the river bed? What will be the effect upstream of the reservoir that is created? These things we do not know and will not know until we get independent expert reports.

Triton acknowledges that "Historically, Chinook salmon have been recorded spawning up to the base of the falls (the dam will be right above the falls)," but then dismisses the records, stating that the area appears to be poor spawning habitat. Triton also acknowledges that:

"Based on the escapement numbers provided, the Morkill River is an important upper Fraser River chinook salmon producer."

“Rearing habitat quality is good...”

Triton states that its *one-day* fish sampling operation did find juvenile Chinook salmon and bull trout 3.06 kilometres downstream from the falls, just above of the confluence of the Morkill River and Forgetmenot Creek:

“Although this sampling does not conclusively indicate that Chinook do not spawn near the falls, the fact that juveniles were caught at the Forgetmenot Creek confluence, yet none were captured near the falls in poor quality spawning habitat supports the hypothesis that spawning does not occur in the vicinity of Morkill Falls. Chinook salmon have been reported from Forgetmenot Creek.”

Yet the Morkill falls is in Resource Management Zone D (RMZ D) of the LRMP land use plan. The ILMB states on its own website on this RMZ that:

“The Morkill River system is highly rated for fisheries value. Chinook salmon and fresh-water fish species are present in the main Morkill River up to the Morkill Falls which creates a natural barrier. The salmon use the lower reaches of Forgetmenot Creek for spawning as well.”  
([www.ilmb.gov.bc.ca/slrp/lrmp/princegeorge/robson\\_valley/plan/2322.htm](http://www.ilmb.gov.bc.ca/slrp/lrmp/princegeorge/robson_valley/plan/2322.htm))

In February, 2009, the Fraser Basin Council released a report stating: “Sockeye, Coho and Chinook salmon returns are in varying states of decline, with significant cause for concern in recent years.” VWS would expect any real environmental impact assessment to include an up-to-date assessment of the status of Chinook salmon. *The disappearance of BC salmon is an emergency. The government has no right to permit developments that would have such powerful destructive impact on salmon habitat.* *Vancouver Sun* columnist, Miro Cernetig, had this to say in response to the Council’s report:

“The reason the plight of our great fish matters is that, as go the salmon, so goes the Fraser River, and as goes the mighty river, so goes what makes us Super, Natural. If salmon aren’t surviving and thriving in the 1,400-kilometre-long Fraser and its tributaries it means that something profound and disturbing is happening to the riparian system draining 240,000 square kilometers of the province.” (*Vancouver Sun*, February 19, 2009.)

Then there are the bull trout. Triton acknowledges that bull trout were captured below the falls, that they are blue-listed, that the area is good rearing habitat and that bull trout may use the area more than salmon. Triton says nothing about the potential impacts.

The potential for impacts to bull trout populations from IPPs is high because the proposed sites for IPPs often coincide with waterfalls that form natural fish barriers, or with steep gradients that bull trout are able to ascend, but other species are not. These sites are selected for IPPs to maximize the elevation difference between diversion point and penstock. But adult bull trout often congregate at the foot of these barriers and hold there

for up to a couple of months prior to finding mates, and distributing back downstream to spawn.

The Morkill River IPP may wipe out critical bull trout habitat at the same time that this is happening in many other places. Sixty-eight new IPPs have been short-listed by the government. This is only one glimpse into the number of these projects that are being pushed through without real environmental impact assessment, selectively targeting critical bull trout habitat and waterfall spray zones.

The impacts on fish are being ignored, using the pretext of a global warming emergency and the claim that run-of-the-river projects do not harm fish. *Real* run-of-the-river developments such as those in Japan or Sweden do not have a dam and do not harm fish, but that's not what we are getting in BC. We are getting the privatization of power in a massive gold rush of private entrepreneurs to capture projects that will make them wealthy forever selling power to people at a much greater cost than British Columbians currently pay. Nowhere is there any indication that this will substitute for the use of fossil fuels, it is simply an add on, with projects that will have a very large carbon footprint.

## LARGE WILDLIFE

The logging associated with this project would occur in designated ungulate winter range and old-growth management areas. The area is winter range for mountain caribou, moose, elk, mule deer and white-tailed deer. The proponent says mountain caribou do not range there. We take the fact that it is designated protected mountain caribou habitat by the government as proof positive that it is. The proponent seems to be implying that the government and its scientists have scammed the public by creating protection where caribou do not go. But local residents insist they do, and it is apparent that government scientists agreed with them.

The Triton environmental report states that Northern ecotype caribou (also an endangered species) use the Morkill watershed as summer habitat, and it acknowledges that the valley bottom of the Morkill Valley is a cross-valley travel corridor for mountain caribou in winter. Triton then states of biologist Dale Seip's 2004 study: "No evidence of use by caribou was noted in the Morkill River watershed" (Seip 2004).

Seip in fact stated in the *BC Journal of Ecosystems and Management*, 2003, in an article entitled "Winter distribution and abundance of mountain caribou in relation to habitat management zones in the Robson Valley." That report acknowledges that his survey was for winter use only and did not cover summer use; it also states definitively that: "Upper Morkill River and Forgetmenot Creek ... (are) used as summer range for caribou that winter in Alberta."

Extensive areas of the Morkill watershed are rated high for caribou habitat. The ILMB website on Resource Management Zone D states:

“This RMZ is used year-around by a local population of mountain caribou and is frequented in the summer months by the woodland caribou from the east slopes of the Rocky Mountains. The majority of the forested area in this resource zone is rated high for grizzly habitat ... The wide Morkill valley bottom downstream from Hellroaring Creek is known as important winter range for moose, elk, mule deer and white-tailed deer.”

The transmission lines will stretch for 50 kilometres. Any logging through caribou habitat will destroy it for that purpose. Grizzly bears, a blue-listed species, could also be impacted. Studies have found that in the Morkill Valley, grizzly bears make less use of alpine and more use of mid-elevation forest than elsewhere in the Interior Wetbelt.

The potential *upstream* impacts of the project need to be examined by independent biologists. This project follows the tendency for development to concentrate at lower elevations, thereby removing and fragmenting the lower component of habitat that animals such as caribou and bears need seasonally, isolating them increasingly in smaller and less diverse fragments of their range.

#### SUMMARY

In summary, this project should be rejected right now because of evident impacts on rare biodiversity, on one of the very few most important wildlife areas in the province, and on an important contributor to Fraser River Chinook salmon that are now in an alarming decline. If the project is not summarily rejected, the ILMB has a profound responsibility to see to it that everyone involved has sufficient information about the risks to make informed decisions.

Sincerely,  
Anne Sherrod, Chair  
Valhalla Wilderness Society

Cc: MLA Shirley Bond  
Save-the-Cedar League  
Western Canada Wilderness Committee  
Purcell Alliance for Wilderness  
*Prince George Citizen*  
*Vancouver Sun*