



CRESCENT SPUR-LOOS COMMUNITY ASSOCIATION

General Delivery, Crescent Spur, British Columbia, Canada V0J 3E0

15 Dec 2008

Standing Offer Program Coordinator

Power Acquisitions

BC Hydro

10th Floor – 333 Dunsmuir Street

Vancouver, BC V6B 5R3

Email: standing.offer@bchydro.com

Re: Robson Valley Power Corporation Morkill Falls Proposal

Dear Sir/Madam:

We are writing you regarding Robson Valley Power Corporation's (RVPC, also Ptarmigan Creek Power Inc.) proposal to construct a hydroelectric plant on the Morkill (Smoky) River near our communities to increase production of electrical energy under the BC Hydro Energy Plan. We are very concerned about the future state of our communities' sustainable economic activities on the Morkill River. The Morkill's magnificent waterfalls, its world-unique biodiversity, and other values provide thousands of dollars of income to our communities every year. RVPC's proposal severely contradicts the sustainability of both our local economies and our vision of the Morkill watershed for present and future generations. Hence, we submit to you a set of pressing concerns aimed at stopping RVPC's proposal to construct a hydroelectric plant on the Morkill River Falls in Robson Valley, BC.

We understand the threats of unsustainable development and RVPC's proposed unsustainable hydroelectric plant will:

1. Permanently degrade and deface the Morkill Falls by blasting deep holes through the rocks of the Falls, permanently destroying present and future sustainable ecotourism economies of our local communities. Many of us operate sustainable businesses that allow both local and international visitors to view the rare natural wonders of the Morkill Falls and surrounding Walker Rainforest Wilderness. Morkill Falls is the largest and most spectacular waterfalls in the entire Robson Valley and part of a rare natural treasure where three cascades nourish globally-significant salmon and bull trout spawning grounds.
2. Permanently destroy the magnificent salmon spawning raceway at the base of Morkill Falls, the largest salmon raceway for hundreds of kilometres with hundreds of spawning salmon, exactly where the industrial activities are proposed.

3. Permanently destroy world-unique wildlife, biodiversity, and wilderness with RVPC's proposed 50km long power line and access road, opening the Morkill Valley to unrestricted vehicle use, unpoliced hunting, ATV, snowmobile, and other motorized degradation. The Crescent Spur-Loos Community Association requested that the Morkill Forest Service Road be closed to vehicle hunting shortly after the road was created to conserve the world-class wildlife populations occurring in the watershed. Residents have had peace-of-mind knowing the wildlife we depend upon and care about was protected from excessive hunting and other pressures for more than 20 years.
4. Increased human activities will permanently destroy the world-unique and endangered wildlife populations surrounding our communities, wildlife populations our communities, government, and others have worked for decades to protect. Residents of Robson Valley volunteered many years of their lives to participate in government-initiated land-use planning processes to protect wildlife and other resources of the Morkill Valley. RVPC's proposal aggressively pushes aside all these efforts. The proposal ignores: the government-initiated Robson Valley Land and Resource Management Plan (LRMP); the Crescent Spur Land and Resource Use Plan (LRUP); the endangered mountain caribou legislation (UWR 7-003); the legislated Old Growth Management Areas (OGMAs); the 20 km long Cabinet designated wildlife corridor, and other land use designations. All these designations clearly articulate conservation as the major use of the Morkill watershed while specifically legislating no development. For example, the UWR 7-003 Order prohibits ANY road, snowplowing, or snowmobiles within two km of the legislated boundaries of Core Caribou High Populations, and yet almost ALL 50 km of access roads and power lines proposed by RVPC fall within this legally prohibited area. The RVPC plan will violate several legislated Orders, and seriously undermines long-term planning efforts by our communities, government, and others.
5. Permanently destroy or degrade world-unique legislated Old Growth Management Areas, legislated Endangered Mountain Caribou Reserves, the Walker Rainforest Wilderness which is Southeastern BC's largest remaining wilderness outside of Parks, and will destroy or degrade critical riparian habitat all of which our communities and others have worked for decades to protect. What will we tell our clients who come to view the outstanding wilderness qualities of the Morkill watershed when they are faced instead with 50 km of power lines completely spoiling the wilderness experience which they are paying for?
6. Permanently degrade and destroy present and future local economic opportunities. Crescent Spur-Loos and area residents are currently employed by home-based, tourism, wildlife-viewing, recreation, science, conservation, farming, ranching, and other businesses along the Morkill watershed. Many of these businesses depend upon the high quality natural values, features, and wilderness ecosystem services of the Morkill and surrounding landscapes. The economy generated by these businesses contributes millions of dollars more to the local economy than RVPC ever will. In light of this, RVPC is ignoring substantial local economies, while aggressively pursuing their own interests for self-gain at the expense of Robson Valley residents' sustainable economic activities. Sacrificing existing and future economic opportunities is not in Crescent Spur's, Loos' or Robson Valley's best interests and cannot be justified by allowing RVPC to destroy the globally-unique ecological values of the Morkill River watershed and waterfalls, and while contributing nothing to our local economies.
7. Adversely affect ongoing, sustainable tourism businesses, Robson Valley's most important industry by planning locked gates at the sites of sustainable tourism operations.

8. RVPC's proposal will seriously threaten the following unique ecological features found ONLY within Robson Valley: (a) The world's largest remaining endangered Mountain Caribou herd (600 animals), and the only watershed in Canada that contains 3 federally-recognized at-risk woodland caribou ecotypes (Southern Mountain, Northern, and Alberta Mountain ecotypes); (b) Some of the last watersheds where grizzly bears are watched feeding on ocean-going salmon in all the Rocky Mountains; and (c) The largest Conservation Biology Core Area remaining outside of Parks that maintains healthy populations of seven charismatic focal species of Conservation Biology: mountain caribou, grizzly bear, wolverine, Chinook salmon, lynx, wolf, and cougar.

BC Hydro and government must make the proper decision on the unsustainable proposal submitted by RVPC, a company that has already displayed disrespect to local residents by:

1. Distributing a "Notice of Public Meeting" dated 10 July 2008 stating signs would be posted directing community members to the location of their 16 August 2008 meeting, writing "follow signs." However, NO signs were posted ANYWHERE and when this fact was pointed out to the president and secretary of RVPC BEFORE their purported "Public Meeting" started; they refused to post the signs, causing many interested residents to miss the meeting after they drove many kilometres to attend. Clearly the intent of RVPC was to discourage attendance and therefore to avoid public scrutiny of their plan.

2. Telling those that were able to attend the above "Public Meeting" that if 50% of the community was against their proposal they would abandon their plans. However, more than 90% within our communities are against RVPC's plans and this is being ignored.

3. Providing false information at the "Public Meeting" by repeatedly stating "salmon never spawn near the Morkill Falls and the proposed power plant is located above the upper limits of salmon habitat." It is well known that many residents, scientists, government officials and others have viewed thousands of salmon spawning and rearing directly below the Morkill Falls, at the location of the planned power plant for several decades.

4. Stating at the "Public Meeting" that they have already talked to most residents of Crescent Spur-Loos and that EVERYONE was supportive of their proposal. As it turns out, only one person may have been talked to and the name of the person RVPC claimed was in favour of the RVPC proposal comes from OUTSIDE our communities.

5. Falsely stating that the Morkill Falls would "not be impacted" by their development "in any way other than a slight reduction of water flow". In fact, the RVPC's proposal plans to back the Morkill River up for miles to store water, plans to blast big holes in the rocks which could collapse the entire falls, plans to remove the forest surrounding the falls, and plans to turn the magnificent ancient falls into an ugly pipe!

6. Repeatedly stating that they have no plans to increase the size of their operation, or sell their license to another company, while at other times saying that if we did not let them develop the watershed somebody else would.

7. Falsely stating that "none of the works will be visible from the falls or bridge area above," when in fact a dam, a holding pond, ugly pipes, and a power plant will replace the natural wonders of this exact area.

8. Falsely stating that there would be no impacts to the tourism operations of our communities or the world class values of the Walker Rainforest Wilderness. In fact the RVPC plans to log a 50 km

swath of pristine forest to erect power lines through the heart of a world class wilderness. This will destroy the world class viewsapes and biodiversity that our communities' businesses depend upon to attract thousands of tourism dollars every year.

9. Repeatedly falsely stating that the Morkill Falls are inaccessible to vehicles without radios "and therefore any vehicle attempting to access the falls area must communicate by radio" and that "travel on this road is not recommended" when in fact radios have not been needed anywhere along the Morkill Forest Road and travel has been recommended by government for more than five years.

10. Telling Crescent Spur, Loos, and Dome Creek residents that "written comments or suggestions are invited and can be delivered" at the meeting or before the meeting to "possibly be passed along to authorities." This attempt by the RVPC to pretend that public comment will be considered is absurd and insulting since it is impossible to write a letter about the RVPC plans before they are available for review!

The above leaves us all with absolutely no trust in the RVPC and their proposed activities, since to date RVPC's actions have been nothing but deceptive and dishonest. They have made numerous false statements regarding their communications and proposed activities and have misrepresented scientific facts. Based upon this alone, we have every reason to fear they will destroy our watershed, our sustainable economic activities, and our world class wildlife and wilderness for their own self gain. In short, local communities have everything to lose and nothing to gain from their proposal.

RVPC's proposal WILL NOT fulfill BC Hydro's Energy Plan goals of:

- conserving more electricity;
- creating more jobs;
- minimizing environmental impact; or
- putting BC at the forefront of environmental and economic leadership, and greater prosperity.

RVPC's proposal WILL:

- violate several legislated Orders;
- cause severe environmental degradation;
- cause loss of current and future local economic opportunities;
- degrade a world-unique Inland Rainforest;
- severely harm endangered species; and
- cause destruction of our communities' sustainable economies, values, and futures.

BC Hydro and government must promote energy conservation in a much more meaningful and effective way other than encouragement of environmental and economic degradation as RVPC has proposed. We get nothing, lose income, and then WE have to pay for the 50 km of destructive power lines.

In summary, RVPC must not be extended consideration by BC Hydro and Government over local residents and communities and allowed to take away the resources and ecological values Robson Valley residents have worked very hard to protect and safeguard. Residents and stakeholders have not maintained the integrity of our globally-unique Morkill River, Morkill Falls, Walker Wilderness, landscape linkages, salmon and wildlife populations, and high biodiversity for RVPC to destroy and

profit from at our expense. RVPC made it clear at their so called “Public Meeting” that their proposal will not benefit our local communities in ANY way. RVPC’s contribution to Robson Valley will be insignificant compared to what they will take away. RVPC’s proposal leaves local communities with nothing to gain and everything to lose.

We ask you to commit to an environmentally sustainable future for Crescent Spur, Loos, and surrounding communities. We require an economically secure future free of environmental degradation, and we require effective protection of our globally unique ecosystem. The Robson Valley we want for tomorrow requires us to exercise restraint and decisiveness now. We live here and must be given first priority and consideration in any decisions for the area.

We respectfully require that BC Hydro and government fully reject RVPC’s application to construct a hydroelectric plant on the Morkill River because this issue is critical to us and because we completely reject the proposal for the many reasons stated above. It is undemocratic and a severe threat to society at large to allow a private company to override our lives, lifestyles, and sustainable economies with ecologically devastating, economy destroying, life altering, and unsustainable development.

We the undersigned residents of local communities and people working in the Morkill watershed on projects that will be directly degraded by the RVPC proposal fully reject Robson Valley Power Corporation’s (also Ptarmigan Creek Power Inc.) proposal to develop Morkill Falls in the Walker Rainforest Wilderness Conservation Biology Core Area. We may each submit further briefs and documents on our behalf as we see fit:

Charles Mamo
Elizabeth Mamo
Adrian Mamo
Janet Granskou
Dr. Andrew Mamo
Robert Roberson
Gordon Clay
Gus Vassos
Bronwen Kettleon
Harry Beckner
Mary Beckner
Dana Kelley
David Eckland
Laurella Gabert
Trevor Gabert
Ben Stoner
Mishal Stoner
Rachel Stoner
Sarah Stoner
David Spooner
Claudia Clayton

Dave Willard
Carol Fairhurst
Bill Karr
Virginia Karr
Warren Bryanton
Kimberly Bryanton
Morgan Bryanton
Karissa McGhee
Avery McGhee
Sara McGhee
George Mah
Gregory Byrne
Paul Morgan
Hugh Perkins
Kathy Juncker
Russ Purvis
Donna Quinn
Carolyn Linden
Dick Bocking
Baden Cross
Julie Zammuto
Dr. Rick Zammuto

In addition to the above, the following organizations representing some 40,000 people support our Communities' text above in principle, and may submit other reasons for their interests to stop the Robson Valley Power Corporation's proposal in separate processes and documents:

Applied Conservation GIS
The Dome Creek Forest Information Committee
The Purcell Alliance for Wilderness
The Save-The-Cedar League
The Valhalla Wilderness Society
The Western Canada Wilderness Committee