

## Ian McIntosh

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**From:** Girgan, Kyle <Kyle.Girgan@gofishbc.com>  
**Sent:** Monday, January 16, 2017 3:34 PM  
**To:** Ian McIntosh; Dean Strachan  
**Cc:** Yesaki, Tim  
**Subject:** Letter to District regarding Banks Cresc. Development

Mr. McIntosh,

The Freshwater Fisheries Society of BC (FFSBC) received a copy of Piteau Associates Ltd.'s report "Hydrogeological Assessment – 13610 Banks Crescent, Summerland BC" dated July 12, 2016, from the District on September 8, 2016. We subsequently received a District email (October 11, 2016) which stated that "*staff want to ensure that your water source remains unaffected should this development proceed*" and also requested that FFSBC provide "*comments on the hydrogeological report by Oct 28th at the latest*". Accordingly, FFSBC engaged an independent Hydrogeologist to review the Piteau report and provide comments regarding potential impacts of the proposed Lark Group project on our Summerland Trout Hatchery's sole source of water – Shaughnessy Springs. Our Hydrogeologist's resulting review comments were summarized in an email initially delivered to Piteau on October 24, 2016 and subsequently delivered to the District for consideration prior to a November 14, 2016 Council meeting.

Since issuing our initial Hydrogeology review comments, FFSBC staff have had some related communications with the project proponents (i.e., Lark Group and/or their consultants) to ensure our water concerns are fully understood and to additionally provide our sought input to the proponent's pending Erosion and Sedimentation Control Plan (ESC Plan). In those communications, FFSBC has been very careful to represent our position as a major stakeholder, but not as the lone stakeholder. Although we do recognize the project proponent's apparent commitment to understanding FFSBC's concerns and making efforts to reduce risks of impacts to Shaughnessy Springs, we've always anticipated that other stakeholders and/or interested individuals or groups might likewise contribute to the ESC Plan process.

We understand the District is not opposed to direct communication between the project proponents and stakeholders (e.g., FFSBC), as noted in a District email to Lark Group dated November 2, 2016. However, it is FFSBC's opinion that the most effective and appropriate approach for all Application-related communications, including interactions between a stakeholder and the project proponents, is through District staff. This centralized approach to managing written communications should help ensure the responsible decision makers (i.e., District) and public are continuously updated regarding the involvement, contributions and concerns of all stakeholders and interested groups/parties. Accordingly, all future FFSBC communications will be through District staff.

Regarding FFSBC's recent contributions to the development of the pending ESC Plan, we would like to continue providing review input and commentary specific to our primary operational objective, which is the maintenance of the Shaughnessy Springs water quality and water quantity to ensure uninterrupted operation of our Summerland Trout Hatchery during (and following) the proposed 3-year project construction schedule. FFSBC would welcome the contributions of other stakeholders and/or interested groups/parties to the on-going ESC Plan process, since their involvement could support FFSBC's stated water quantity and quality objectives.

However, at the time of preparing this email, FFSBC still has several outstanding concerns regarding confirmed hazards and related risks of impact to the Shaughnessy Springs. These concerns were either identified in our initial Hydrogeology review email (October 24, 2016) or later delivered to the District and/or Lark Group. Accordingly, FFSBC currently cannot support the proposed project until Spring water quality parameters and thresholds related to fish health are identified and quantified, and proponent commitments are in-place to continuously monitor both Spring water quality and Aquifer water quality to determine the cause(s) of any water quality variations during construction, and a contingency water source has been identified and confirmed to be accessible and capable of providing water of suitable quality and quantity required to maintain uninterrupted operations at the Summerland Hatchery. It is FFSBC's opinion that all aspects of the pending ESC Plan, including Spring and Aquifer monitoring, determination of related Spring and Aquifer water quality parameters and thresholds, and provision of a contingency water supply, are solely the responsibility of the project proponents, and are subject to both stakeholders' and decision makers' input and approval.

Regards,



**Kyle Girgan**

Hatchery Manager

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