



May 4, 2020

Mayor and Council

District of Peachland
5806 Beach Avenue,
Peachland, B.C. V0H 1X7

Re: Council opposition to the mining exploration application for Tenure #1049752, “New Brenda” site (tracking number 100246696); Council Meeting April 21, 2020

Dear Mayor and Council;

The Peachland Watershed Protection Alliance (PWPA) endorses the District of Peachland’s strong opposition to the Flow Metals Corporation application for mining exploration in the Peachland watershed.

We understand that the District of Peachland has no jurisdiction over activity in our watershed and has therefore asked that an **updated comprehensive watershed assessment** be prepared by industry should the Flow Metals application receive approval from the Province. The PWPA is opposed to the multi-use system of our watershed and for that reason cannot endorse conditions that would facilitate (or appear to facilitate) additional exploration or mining.

Rather, the PWPA strongly endorses the Mayor’s letter of June 26, 2019 to Minister Doug Donaldson in which a request that a Comprehensive/Complete watershed assessment be conducted so that the cumulative impacts on water quantity, quality and flow can be thoroughly examined. It is our position that a **Cumulative Effects Assessment (CEA)** of all industrial, commercial, agricultural and recreation activities in the Peachland Watershed be prepared regardless. This was further reinforced to the PWPA by Kevin Kriese, Chair of the Forest Practices Board last December – that a CEA is an essential first step to creating a Watershed Level Water Protection Plan. Mr. Kriese underlined to us that a Water Protection Plan is the document that would be most beneficial to managing the watershed. Additionally:

- The PWPA believes the assessment should be carried out by an independent consultant and not one tied to industry to avoid conflict of interest.
- The PWPA asks that the **Cumulative Effects Assessment** include **Flood Frequency Distribution analysis** (as detailed in the *Journal of the Association of Professional Engineers and Geoscientists of BC*, May / June 2012, “Forests and Flood Risks”). This controlled experimental design methodology is widely used by climatologists and is the one supported by the International Panel on Climate Change (IPCC). Key to Peachland, it provides a prediction of the frequency and magnitude of anticipated flood events as a result of changes in the watershed which a Chronological Pairing experimental methodology (the standard commonly used by Forestry) has been shown to underestimate.

Finally, we would like to confirm that our comments apply to all mining applications within the Peachland Watershed inclusive but not limited to applications by Flow Metals, Troubadour (Amarillo Claims 1 and 2) and Bitterroot Resources.

Regards

Alison Moore and Janice Liebe, Co-Chairs, **Peachland Watershed Protection Alliance**