



June 6, 2020

**Honorable Bruce Ralston**

Minister of Energy, Mines & Petroleum  
PO Box 9060 Stn Prov Govt  
Victoria, BC V8W 9E2

**Re: Opposition to the mining exploration application for Tenure #1049752, “New Brenda” site in the Peachland Watersheds**

The Peachland Watershed Protection Alliance (PWPA) is writing to voice our strong objection to the Flow Metals Corporation application for mining exploration in the Peachland watershed.

The District of Peachland has formally voiced their objection to this application. They have also asked the Province that an updated comprehensive watershed assessment be prepared by industry should the Flow Metals application receive approval from the Province. The PWPA endorses the District’s objection but is opposed to the multi-use system of our watershed and for that reason opposes conditions that would facilitate additional exploration or mining.

Once fully protected from all industrial activity, the Peachland Watershed is now the poster child for the failure of the multi-use system for watersheds which places legislative priority on resource extraction over the protection of source water quality and quantity of flow. We are host to numerous logging efforts with up to 40% of forest cover having been clear cut with more cut blocks approved to be harvested. The prevalence of legacy forestry roads – for which no one is held legally responsible to maintain or rehabilitate - exceed by up to three times the density noted in government guidelines. Our water reservoirs are hosts to provincial campsites and boating is unrestricted. Range cattle licenses exist giving cattle access to the creeks feeding our water source. And finally, the existing Brenda Mine and tailings ponds permanently removed over four square kilometres of forest cover in the Peachland and Trepanier watersheds – both of which are the source of Peachland’s drinking water.

The multi-use system is a failure because each of these activities is approved in a silo without the necessary scientific data and fundamental knowledge of the cumulative effects logging, mining, recreation, highway building, cattle ranging have had together on the health of the watershed. Approval of more mining exploration or new mines without this understanding is flawed and puts the residents of Peachland at risk.

Peachland has experienced consecutive years of devastating floods, slides closing Highway 97 caused by sudden changes in groundwater and neighbourhoods placed on evacuation alerts due to wildfire. Increased fires, floods and slides are all symptoms of an ecosystem in distress. The provincial government experts we have consulted have advised us to gain a better understanding of the cumulative effects and impacts of the industries in our watershed. They have also advised us that while the activity may be meeting legal requirements, there is insufficient legislative protection for source water, and a lack of science and expertise to understand their cumulative impacts. In our words, if the province continues to approve more mining in our watershed, they are doing so blindly.

We are a community of 5000 whose citizens bear a 20 year tax levy to pay for a new \$26M water treatment plant that cannot guarantee it can supply clean water under the same events we have recently experienced in the watershed. Forest cover is the best insurance against flooding – we cannot accept new mines permanently removing multiple square kilometres from the forest increasing the risk – not to mention the additional risk from tailings ponds and more road networks.

Our District of Peachland has no jurisdiction over activity in the Peachland and Trepanier watersheds and yet they must supply clean drinking water from the watershed to its residents. They must pay to repair flood and slide damaged infrastructure and put off other much needed public works as a result. Not to mention that our community's tourist dependent economy was severely impacted by these events. All of this - we emphasize – are problems stemming from the poor health of our watersheds.

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 and **in advance of any consideration or approval** of any additional activities in our watershed. Further:

- The PWPA believes the assessment should be carried out by an independent consultant and not one tied to industry to avoid a real or perceived 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 resulting from changes in the watershed which a Chronological Pairing experimental methodology has been shown to underestimate. While this may be a forestry concern it applies to mining activity where forest cover is removed from the watershed as a result.
- The PWPA asks for a mineral, petroleum and coal reserve within the Peachland and Trepanier watersheds as recommended in the 2010 Watershed Assessment Report for Drinking Water Source Protection, Peachland Creek and Trepanier Creek, Golder Associates.

Finally, we would like to confirm that our comments apply to all mining applications within the Peachland and Trepanier Watersheds 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**

**cc:**

Dave Nikolejsin, Deputy Minister of Energy, Mines & Petroleum Resources

Hon. Doug Donaldson, Minister of Forests, Lands, Natural Resource Operations and Rural Development

Hon. George Heyman, Minister of Environment and Climate Change Strategy

Hon. Dan Ashton, MLA, Penticton

Hon. Dan Albas, MP, Central Okanagan—Similkameen

Mayor Cindy Fortin, District of Peachland

Mayor Toni Boot, District of Summerland