



February 21, 2018

File: 76975-35/Bridge

Heather Matthews
Director, Generation Resource Management
BC Hydro
9-6911 Southpoint Dr
Burnaby BC V3N 4X8

Via Email: Heather.Matthews@bchydro.com

Dear Ms. Matthews:

Re: Terzaghi Target Monthly Flow Releases and Long Term Flow Strategy

British Columbia Hydro and Power Authority (BC Hydro) holds water licences for and is the dam owner and operator of the Terzaghi Dam (part of the Bridge-Seton Generation Facilities). An Order dated March 30, 2011, made pursuant to Sections 87 and 88 of the *Water Act*, directed the implementation of operating parameters and procedures for the facilities based on the Bridge River Power Development Water Use Plan.

Clause 8 of the March 30, 2011 Bridge Seton Water Use Plan Order read as follow:

8. For the period between May 1, 2011 and April 1, 2015, the licensee shall discharge from Terzaghi Dam to the Bridge River the equivalent to an annual water budget of 6.0 cubic metres per second (cms) and target the following monthly flows:

<i>DATE</i>	<i>TARGET FLOW (CMS)*</i>	<i>DATE</i>	<i>TARGET FLOW (CMS)*</i>
<i>Jan 1</i>	<i>1.5</i>	<i>Aug 2</i>	<i>11.0</i>
<i>Feb 1</i>	<i>2.0</i>	<i>Aug 8</i>	<i>9.3</i>
<i>Mar 1</i>	<i>3.0</i>	<i>Aug 9</i>	<i>7.7</i>
<i>Apr 1</i>	<i>6.0</i>	<i>Aug 16</i>	<i>6.4</i>
<i>Apr 15</i>	<i>8.5</i>	<i>Aug 17</i>	<i>5.1</i>
<i>Apr 23</i>	<i>11.0</i>	<i>Aug 23</i>	<i>4.1</i>
<i>May 1</i>	<i>11.0</i>	<i>Aug 24</i>	<i>3.0</i>
<i>May 7</i>	<i>13.0</i>	<i>Sept 1</i>	<i>3.0</i>
<i>May 21</i>	<i>14.0</i>	<i>Oct 1</i>	<i>1.5</i>
<i>Jun 1</i>	<i>15.0</i>	<i>Nov 1</i>	<i>1.5</i>
<i>Jul 1</i>	<i>15.0</i>	<i>Dec 1</i>	<i>1.5</i>
<i>Aug 1</i>	<i>12.9</i>		

**The transition between target monthly flows may occur up to ±5 days of the beginning of each month. Target monthly flows less than 5.0 cms may vary instantaneously by ±0.25cms from the target flow. Target monthly flows greater than 5.0cms may vary instantaneously by ±5%. The total annual flow will be determined on a calendar year basis and may vary ±5%.*

.../2

**Ministry of Forests, Lands,
Natural Resource Operations
and Rural Development**

Resource Stewardship Division

Office of the Comptroller
of Water Rights

Water Management Branch

Mailing Address:
PO Box 9340 Stn Prov Govt
Victoria BC V8W 9M1
Telephone: 778-698-7344
Facsimile: 250-356-0605

Location:
3rd Floor, 395 Waterfront Cres
Victoria BC V8T 5K7



Clause 9 of the March 30, 2011 Bridge Seton Water Use Plan Order reads as follow:

9. After April 1, 2015 the licensee will work with the Comptroller of Water Rights, provincial and federal fisheries agencies to determine a long term flow release strategy for the Terzaghi Dam based upon information and data from the flow trials collected under Appendix A. May 1, 2015 will be the target decision and implementation date for a long term flow release strategy. The subsequent recommended flow release from Terzaghi Dam will not be less than an annual water budget of 3.0cms and will not exceed an annual water budget of 6.0 cms.

I am in receipt of BC Hydro's letter dated December 20, 2017 requesting an extension of the decision date on the long term flow strategy for Terzaghi Dam from that identified in Clause 9 of the Bridge Seton Water Use Plan Order to December 31, 2018.

In addition, I am in receipt of BC Hydro's letter dated January 23, 2018 requesting an order to alter the operations of the Terzaghi Dam to vary releases from those outlined in Clause 8 of the Bridge-Seton Water Use Plan Order for a further period of March 1, 2018 to February 28, 2019.

The above variance request is due to a dam safety requirement to reduce storage on LaJoie Dam at Downton Reservoir and due to capital works upgrades on Bridge 1 and Bridge 2, which are also part of the Bridge Seton system. As a consequence, BC Hydro advises that it is not in a position to meet the terms and conditions set out in Clause 8 and Clause 9 of the Bridge-Seton Water Use Plan Order (hereinafter the "WUP order"). It is recognized that, while BC Hydro is not in a position to meet Clause 8 and 9 of the WUP order, BC Hydro is remaining in compliance with the rest of the WUP order, specifically following clause 18 which identifies the priorities for operation of the Bridge Seton system.

In that regard, dam safety concerns are always an important consideration, which the province does not take lightly. Currently available information supplied to this office and shared by BC Hydro with other parties suggests that the dam safety concern at LaJoie Dam poses a significant public safety concern due to seismic and other considerations. As defined in the Bridge River Power Development Water Use Plan, dam safety requirements are a priority, which is the case for all dams in British Columbia. Section 4.4. of the Bridge River Power Development Water Use Plan (Emergencies and Dam Safety) contemplates that "...*emergencies and dam safety requirements shall take precedence over the operational constraints outlined in this Water Use Plan...*".

As concerns about the Bridge Seton system operations have been raised by the St'at'imc Chiefs Council, including certain members of their communities, the province will be entering into consultation with the St'at'imc. While consultation is underway and until a decision is made, BC Hydro is to continue to operate Terzaghi Dam in accordance with the Variance order made pursuant to Section 93 of the *Water Sustainability Act* on February 16, 2017. Please advise this office, through notification, the day when the flows shift from those identified in Clause 8 of the WUP order in order to meet the terms and conditions identified under the February 16, 2017 Variance order.

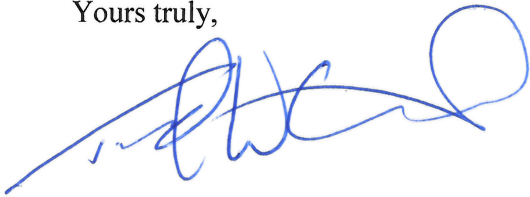
If BC Hydro is unable meet terms and conditions of the February 16, 2017 Variance order relative to target monthly flow releases from Terzaghi Dam, due to an emergency, other dam safety requirement, or an extreme hydrological event, operations in accordance with Clause 22 of the WUP order are permitted. Clause 22 states "...*The licensee may operate the works in an alternate manner in the event of an emergency, dam safety requirement, or an extreme hydrological event...*"

However, the requirements of Clause 23 of the WUP order will also have to be met in that case. Clause 23 states that "...*All emergency operations or other deviations from operations ordered above shall be reported to the Comptroller of Water Rights in a timely manner...*" For those purposes, "timely manner" is defined as a 2 week period.

Finally, we have asked the St'at'imc Chiefs Council to provide any written information and comments on BC Hydro's applications within 60 days of our correspondence to them and we have requested that they copy BC Hydro with their submissions on the applications. It is my intention to review the parties' submissions on these applications, as well as to consider the results of any consultation with the St'at'imc, in making my decisions on these applications. Taking into account the dam safety concerns and other operational considerations, I would like to proceed with decision-making on these applications before this year's freshet.

Please keep this office apprised of any changes.

Yours truly,



Ted White, BSc.
Comptroller of Water Rights

pc: Chief Don Harris, Chair, St'at'imc Chiefs Council, Lillooet, BC
Rich McCleary, Regional Aquatic Ecologist, Thompson-Okanagan Region, FLNRORD
Dan Sneep, Habitat Assessment Biologist, DFO