

ECOLOGICAL STEWARDSHIP  
RESOURCE CONSULTATION



CULTURAL CONTINUITY  
TRADITIONAL LAND USE

January 25, 2016

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**RE: Horse Lake First Nation's written comments on the draft Environmental Impact Statement Guidelines for the proposed Amisk Hydroelectric Project**

Dear Ms. Testart and Ms Trembath,

Thank you for providing Horse Lake First Nation ("HLFN") with the opportunity to comment on the draft Environmental Impact Statement ("EIS") Guidelines for the proposed Amisk Hydroelectric Project ("Project").

AHP Development Corporation is in the planning stages of the Amisk Hydroelectric Project. Amisk has proposed a 330 MW run-of-river hydroelectric project on the Peace River in northwestern Alberta. The proposed Project is slated to generate approximately 1,875 GWh per year of electricity, which is enough power to supply approximately 250,000 homes.

HLFN currently exercises our constitutionally protected Treaty and Aboriginal rights and other interests within the vicinity of the proposed Project. Moreover, HLFN is very concerned about the potential combined effects of the many different resource sectors operating within our territory. We believe that the combined or cumulative effects of industrial development may be long lasting, significant and

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adverse and that the overall effects may be more severe than the sum of the individual projects' effects.

HLFN has reviewed the Environmental Impact Statement Guidelines for the proposed Amisk Hydroelectric Project. We would ask that the Canadian Environmental Assessment Agency and Alberta Environment and Parks seriously consider the comments and suggested changes that we have proposed (table attached to this letter) and respond back to us via letter.

Please feel free to email me [<contact information removed>](#) with respect to any questions that you may have.

Sincerely,

<original signed by>

Chief Eugene Horseman  
Horse Lake First Nation

**Proposed Amisk Hydroelectric Project  
Draft Environmental Impact Statement Guidelines  
January 25, 2016**

**Horse Lake First Nation (“HLFN”) Comments**

<b>CHAPTER</b>	<b>SECTION</b>	<b>PAGE #</b>	<b>HORSE LAKE FIRST NATION COMMENTS AND/OR SUGGESTED CHANGES</b>
<b>Part 1 - Background</b>			
<b>3.2 Scope of the Environmental Assessment</b>			
	3.2	4	Page 4 of the Draft Environmental Impact Statement Guidelines mentions “factors to be considered” with respect to the Environmental Impact Statement. Unfortunately, there is no mention of First Nations. First Nations should be added to this section.
	3.3.2	5	Section 3.3.2 discusses “Valued Components to be examined”. Horse Lake First Nation recommends adding spirituality and sense of well being to the list of changes caused to the environment.
<b>4.3 Use of Information</b>			
	4.3.2	9	Section 4.3.2 discusses Community knowledge and Aboriginal traditional knowledge. Horse Lake First Nation recommends that Amisk have Confidentiality Agreements in place with affected First Nations, prior to discussing Community Knowledge and/or Aboriginal Traditional Knowledge.

CHAPTER	SECTION	PAGE #	HORSE LAKE FIRST NATION COMMENTS AND/OR SUGGESTED CHANGES
	4.3.4	9	Section 4.3.4 discusses Confidential Information. Horse Lake First Nation recommends that any Confidential Information provided by our Nation not be shared with anyone, unless the Horse Lake First Nation Knowledge Holder or Land User has consented to its disclosure.
<b>Part 2 – Content of the Environmental Impact Statement</b>			
<b>2.1 Purpose of the Project</b>			
	2.1	13	Section 2.1 speaks to the purpose of the project. The second paragraph states, “The EIS will also describe the predicted environmental, economic and social benefits of the project”. Horse Lake First Nation recommends adding ‘cultural’ to this sentence.
<b>5.1 Aboriginal Groups to Engage &amp; Engagement Activities</b>			
	5.1	17	Section 5.1 mentions that the proponent will ensure that views of Aboriginal groups are recorded. The second sentence speaks to “how the proponent addressed the concerns raised”. This sentence should be revised to include how concerns will be either mitigated and/or accommodated.

CHAPTER	SECTION	PAGE #	HORSE LAKE FIRST NATION COMMENTS AND/OR SUGGESTED CHANGES
<b>6. Effects Assessment</b>			
	6	19-23	Section 6 discusses the Effects Assessment, which includes fish and fish habitat, Migratory birds and their habitat and Species at Risk. However, there is no mention of what wildlife or furbearers (not considered a Species at Risk) will be considered. Horse Lake First Nation recommends listing what wildlife and furbearers (not considered a Species at Risk) will be considered.
	6.1.5	21	Section 6.1.5 discusses fish and fish habitat. This section should include potential changes in aquatic habitat within the reservoir including invertebrate populations, nutrient levels, temperature, turbidity, pH, methylmercury in fish and increased fishing pressures from sport fishers.
	6.1.8	22	Section 6.1.8 lists the valued components (VCs) and baseline information for Aboriginal groups. Location of Culture Camps and rare medicinal plants should also be added to the list of VCs identified in section 6.1.8.
	6.1.9	23	Section 6.1.9 speaks to the Human environment. Given the potential influx of workers and the potential strain on services (i.e. health care, child care, emergency services, crime prevention, etc.) a section titled "Social Effects" should be added to this section.
	6.2	24	Section 6.2 discusses predicted changes to the physical environment. A section for climate change should also be added, including potential effects to weather patterns in the surrounding areas.

CHAPTER	SECTION	PAGE #	HORSE LAKE FIRST NATION COMMENTS AND/OR SUGGESTED CHANGES
	6.3.3	30	<p>Section 6.3.3 mentions the cumulative effects assessment for the proposed Amisk Project. Horse Lake First Nation has raised concerns in relation to cumulative effects for the past several years. For all present or future cumulative effects assessments, Horse Lake First Nation recommends using a pre-industrial baseline to assess the past, current condition to assess the present and all other future proposed developments to assess the future. Furthermore, the cumulative effects assessment for the proposed Amisk Project should consider the effects of the WAC Bennett Dam, the Peace Canyon Dam and the proposed Site C Hydroelectric Dam on the Peace River, including potential effects downstream to the Peace-Athabasca Delta. Moreover, Section 6.3.3 should include a paragraph, which identifies how the proponent will assess and manage the potential cumulative effects of the Amisk project on the exercise of Horse Lake First Nation's Treaty and Aboriginal rights and other interests.</p>
<b>8. Follow-up and Monitoring Programs</b>			
	8.2	32	<p>Section 8.2 mentions monitoring programs. Should the proposed Amisk Project receive Environmental Approval, Horse Lake First Nation recommends that a Horse Lake First Nation Environmental Monitor be on-site pre, during and post construction including for the life of the Project.</p>

CHAPTER	SECTION	PAGE #	HORSE LAKE FIRST NATION COMMENTS AND/OR SUGGESTED CHANGES
<b>OTHER SECTIONS to be Added to the EIS</b>			
<b>Acknowledgement that the Project falls within Treaty 8 Territory</b>			An acknowledgement that the proposed Amisk Project is in Treaty 8 Territory. Amisk should consider adding the following under a heading titled Treaty 8 First Nations, "Treaty #8 was 1 of 11 numbered Treaties negotiated between the Federal Crown and First Nations in northern Alberta, northwestern Saskatchewan, northeastern British Columbia and the southern portion of the Northwest Territories. Treaty #8 was signed on the shores of Lesser Slave Lake on June 21, 1899".
<b>Project Alternatives</b>			Horse Lake First Nation recommends adding a section to the EIS Guidelines titled "Project Alternatives" that compares why a run-of-river Project is better than other project alternatives such as wind energy, gas-fired electricity generation, et cetera.