

Howe,Jennifer [CEAA]

From: Alison Ronson <email address removed>
Sent: November 16, 2015 3:48 PM
To: Amisk [CEAA]
Cc: environmental.assessment@gov.ab.ca
Subject: Letter re Amisk Hydro Project
Attachments: Ltr to CEAA re Amisk Nov 16 2015.pdf

Dear Sir/Madam,

Attached please find our letter outlining our concerns with the Amisk Hydroelectric Project proposed for the Peace River in Northern Alberta. For the reasons stated therein, CPAWS Northern Alberta submits that the CEAA must conduct an environmental assessment that takes into account the impacts of the project on Wood Buffalo National Park, Dunegan Wildland Provincial Park, and other areas of wilderness impacted by the project.

Sincerely,
Alison Ronson

Alison Ronson

Executive Director

CPAWS Northern Alberta

<contact information removed>

www.cpawsnab.org



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Amisk Hydroelectric Project
Canadian Environmental Assessment Agency
9700 Jasper Avenue, Suite 1145
Edmonton, AB T5J 4C3
Sent Via Email: CEAA.Amisk.ACEE@ceaa-acee.gc.ca

November 16, 2015

Dear Sir/Madam,

Thank you for providing the opportunity for the Canadian Parks and Wilderness Society's ("CPAWS") Northern Alberta chapter to comment on the proposed Amisk Hydroelectric Project (the "Amisk Project"), located on the Peace River in northern Alberta.

CPAWS is a charitable non-profit organization dedicated to the protection of Canada's public lands and waters. CPAWS Northern Alberta has worked for conservation in this province since 1968, and regularly collaborates with government, industry, and First Nations communities to protect wilderness and manage our impact on our shared land. CPAWS has over 10,000 supporters in Alberta, of which half of those are supporters of the Northern Alberta chapter.

CPAWS Northern Alberta submits that the Canadian Environmental Assessment Agency ("CEAA") must undertake an environmental assessment of the Amisk Project for the following reasons:

1. If allowed to proceed without an environmental assessment, the Amisk Project will contravene the recommendations of the World Heritage Committee of the United Nations Economic, Social and Cultural Organization ("UNESCO") related to industrial impacts on Wood Buffalo National Park;
2. The Amisk Project has the potential to negatively impact both upstream and downstream wildlife habitat; and
3. The Amisk Project as proposed will negatively impact Alberta's protected areas network.

The following paragraphs set out in detail the above concerns.

1. The Amisk Project's Environmental Impacts Must be Assessed in Accordance with UNESCO Recommendations

In December of 2014, the Mikisew Cree First Nation sent a petition to UNESCO requesting that Wood Buffalo National Park (the "Park") be placed on the List of World Heritage Sites in Danger. Wood Buffalo National Park is Canada's largest national park and was listed as a World Heritage Site in 1983. The Park contains the Peace-Athabasca Delta, the world's largest inland freshwater delta (the "Delta") and is the only nesting place the world for the endangered whooping crane.



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The Mikisew Cree First Nation requested that Wood Buffalo National Park be placed on the List of World Heritage Sites in Danger because of upstream industrial developments along the Peace and Athabasca Rivers which were having negative impacts on the health and viability of the Delta. In particular, damming along the Peace River upstream of the Park has contributed to a drying of the Delta, leading to loss of wildlife habitat within the Park and an alteration of wildlife movements. This activity has also impacted the Mikisew Cree First Nation's traditional ways of life and cultural practices.

In July of 2015, the UNESCO World Heritage Committee made the following recommendations regarding the Park:

It is recommended that the [UNESCO World Heritage] Committee urge [Canada] to review the cumulative impacts of all of the hydroelectric dam projects, oil sands development and open pit mining on the property's [Outstanding Universal Value], taking the effect of climate change into full consideration, and to complete a Strategic Environmental Assessment (SEA), in line with IUCN's World Heritage Advice Note on Environmental Assessment. Furthermore, in accordance with Paragraph 172 of the Operational Guidelines, it is recommended that the [UNESCO World Heritage] Committee request [Canada] not to take any decision related to any of the development projects that would be difficult to reverse, and to submit the SEA to the World Heritage Centre for review by IUCN.¹

Thus, the CEAA must conduct an environmental assessment on the Amisk Project in order to determine the impacts the Amisk Project will have on the Park and its associated Delta and wildlife. Furthermore, in light of UNESCO's recommendations, the CEAA must not take any decisions with respect to development along the Peace River which may be irreversible and which may increase the negative impacts on the Park and the Delta. If an environmental assessment is conducted, the Terms of Reference for the Amisk Project must include an assessment of the impacts on the Park and the Delta.

2. The Amisk Project Will Impact Wildlife Habitat

The Amisk Project's location on the Peace River in northern Alberta means that it has the potential to impact an area of high conservation value in Alberta which is also, historically, one of the most endangered places in Canada – the Peace River Valley which is listed by the National Trust of Canada on their list of the Top 10 Endangered Places in Canada. Ecologically, the Peace River Valley is one of the most diverse areas in Alberta, containing numerous natural landscapes and an abundance of wetlands. It is an important area for boreal birds such as songbirds, shorebirds, and waterfowl, and provides habitat for important fish species in Alberta.

¹ UNESCO, <http://whc.unesco.org/archive/2015/whc15-39com-7BAdd-en.pdf>



CPAWS Northern Alberta is concerned about the potential impacts of a hydroelectric project on wildlife habitat both upstream and downstream of the Amisk Project's proposed dam location. Upstream, CPAWS Northern Alberta is concerned about potential flooding of riparian areas and islands. Flooding of these areas would not only destroy sensitive wildlife habitat, but could also lead to the production of methyl mercury, a compound that further impacts wildlife by removing oxygen from waterbodies and leading to fish kills and associated bird deaths. Methyl mercury also has the potential to negatively impact human health.

Downstream, CPAWS Northern Alberta is concerned about the further regulation of water along the Peace River which has the potential to impact wildlife habitat, riparian areas, and further increase the negative impacts already felt at Wood Buffalo National Park (as described above).

In CPAWS Northern Alberta's opinion and in consideration of the negative impacts of the Amisk Project to wildlife and habitat both upstream and downstream of the proposed dam, the CEAA must conduct an environmental assessment of the Amisk Project.

3. The Amisk Project will Impact Alberta's Protected Areas

Finally, the Amisk Project as proposed will situate access corridors to the proposed dam within the Dunvegan West Wildland Provincial Park ("**Dunvegan Park**"), effectively removing the purpose of the Dunvegan Park (protection of wilderness). For this reason alone, the CEAA must conduct an environmental assessment.

Recent scientific study shows that, in order to protect current levels of biodiversity and avoid species extinctions, and to safeguard natural ecological processes such as fire, carbon storage, and air and water filtration, *at least* 50% of landscapes must be protected. This means precluding industrial development from these areas for all time. In 2010, Canada agreed to protect *at least* 17% of its terrestrial and inland waters by 2020 in accordance with Aichi Target 11 of the United Nation's *Convention on Biological Diversity*.

The Amisk Project, if allowed to proceed without an environmental assessment, would remove protected land from Dunvegan Park, which would have the following effects:

- a direct negative impact on wilderness, wildlife, and biodiversity in Dunvegan Park and in northern Alberta as a whole;
- a direct negative impact on recreational experiences of Albertans in Dunvegan Park by removing the wilderness character of the area;
- a reduction in percentage of land protected in northern Alberta, thereby moving Canada and Alberta away from the 17% Aichi Target; and
- a precedent-setting undermining of Alberta's protected areas legislation, thereby allowing all protected areas to be opened up to industrial development with no consideration of the impacts on wilderness, wildlife, and biodiversity.





For the above reasons, CPAWS Northern Alberta submits that the CEAA must conduct an environmental assessment on the Amisk Project, which would have serious impacts on protected areas in northern Alberta and which would hinder Canada's progress in meeting its international commitments to achieve at least 17% terrestrial protection by 2020.

In summary, CPAWS Northern Alberta has many concerns with the Amisk Project and requests that the CEAA conduct a rigorous and transparent environmental assessment which allows for public comment and feedback. The Amisk Project has the potential to seriously impact northern Alberta's wilderness, wildlife, and biodiversity. On top of the ecological impacts, the Amisk Project has the potential to impact Canada on the international level by negatively impacting the Peace-Athabasca Delta in Wood Buffalo National Park and by hindering Canada's ability to meet international commitments set under the UN's *Convention on Biological Diversity*. For these reasons, the CEAA must conduct an environmental assessment of this project.

Please do not hesitate to contact me if you have any questions or concerns regarding this letter.

Sincerely,

<original signed by>

Alison Ronson

Executive Director, CPAWS Northern Alberta

cc: Director, Environmental Assessment Operations Division Alberta Environment and Parks
5th Floor, Petroleum Plaza, South Tower,
9915 – 108 Street, Edmonton, Alberta T5K 2G8
Sent Via E-mail: environmental.assessment@gov.ab.ca



PO Box 52031, Edmonton, Alberta T6G 2T5
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