

Howe,Jennifer [CEAA]

From: Ryan Blackmore <email address removed>
Sent: November 15, 2015 9:58 PM
To: Amisk [CEAA]
Subject: Amisk Hydroelectric Project
Attachments: CEAA Nov 15, 2015.pdf

Hello Karen Fish

Please find attached a letter of concern about the Amisk Hydro Project and the need for a federal environmental assessment.

Thank you for the opportunity to submit comments.

Could you please confirm that you received and were able to open the attachment, and whether you need a signed copy?

Thanks very much

Heide Blackmore

November 15, 2015

<address removed>

Amisk Hydroelectric Project
Canadian Environmental Assessment Agency
9700 Jasper Avenue, Suite 1145
Edmonton T5J 4C3

Hello Karen Fish

Thank you for the opportunity to comment on the summary of the project description for the Amisk Hydroelectric Project. I read the document several times and admire the writing, but am of the opinion that details about the environmental impacts are a bit sketchy and that the document does not describe adequately how the proponent intends to mitigate impacts .

I care about this project because I grew up on the banks of the Peace River and still own a quarter (SE 5-83-6W6) in the proposed project area where I reside periodically in the summer. I heard about the Amisk proposal in October while visiting neighbors; I have had no direct contact from the proponent, despite an email to them.

For your information, my father and his brother came to Canada in the late twenties, to homestead and then farm west of Fairview in the Lubeck/Royce district; as homesteaders they hunted and fished along the Peace, ate onions on the sunny dry south facing banks in the early spring, knew exactly where it was possible to pack meat up the steep banks, where the few places are that could support a campsite and a winter hunting tent, where to launch a scow. They respected the power of the water, knew when the ice pack was safe, and listened for the boom as it broke up in the spring. They were resilient and pragmatic people understanding the need for 'progress'. At the same time, they often took the long view, making principled choices with my generation in mind. They did not base all decisions primarily on economics, but on what was the smartest approach for the future. There has been more than one hydro project proposed for this stretch of the Peace River. They have all been shelved, as far as I know, due to riverbed and bank instability. If you have grown up on the Peace you know firsthand of the decades of instability of the banks from enduring the slumping on road construction projects (the highway at Dunvegan itself is one example) and from seeing the banks' ongoing slippage processes from your favorite valley lookout.

I have two thoughts regarding the question of whether a federal environmental assessment is required for this project.

First, seeing that we have new governments in both Ottawa and Alberta, and new Ministers at both levels of government who are responsible for environmental stewardship, I think it would be very smart to exercise due diligence and to have the project assessed at the federal level. Or, if the Province is conducting an environmental assessment, then perhaps the CEAA could work with the Province to

ensure an assessment is completed. I read on the CEAA website that *“Environmental assessments may be coordinated so that a single environmental assessment meets the legal requirements of both jurisdictions. A responsible authority may delegate any part of an environmental assessment it is required to conduct to another jurisdiction.”* I see that the Amisk document itself (p. 17) states that the Project requires an environmental assessment under the terms of the *Canadian Environmental Assessment Act, 2012*.

Second, I think the project description is weak in describing mitigating strategies for adverse environmental effects. *(An environmental assessment should be conducted as early as possible in the planning stage of a designated project in order for the proponent to be able to consider the analysis in the proposed plans, including incorporation of mitigation measures to address adverse environmental effects. CEAA website).*

I am concerned about negative impacts on the watershed and the water table and wetlands. The area has been experiencing drought for the past decade or so.

The Dunvegan West Wildland Provincial Park was created to protect environmentally sensitive lands on the west side of the river. The same configuration of features exists on the east side of the river: *“unique mixture of grassland, aspen forest and steep sided creek valleys”* and plants and birds *“more typical of those in the Foothills Parkland subregion”*. *“Key Wildlife and Biodiversity Zones are present throughout the river valley of the Project area.”* (AHP. 13, 14) Both sides of the valley are environmentally sensitive. The document describes impacts, (see for example Section 5.3 vegetation, Section 5.3.1 vegetation and wetlands) but mitigation measures are not given. Impacts on wildlife, direct and indirect habitat loss will be permanent (p.27). What mitigation is proposed?

It is true that the slopes of the valley are steep and unstable. Section 5.2.4 describes the erosion risks and slope instability but control strategies are not provided. 5.4.3 states *“historically the Peace River Lowlands are considered to be one of the most active regions of mass movement in western Canada.”* Upstream and downstream impacts of sedimentation are described, (Section 5.4.3) including the statement that over time the sediment deposition will *“reduce headpond depth and increase flow velocities, producing a back water effect that will extend the headpond further upstream”*. I take this to mean that more and more of the valley will be submerged over time, creating more slope instability and more sedimentation. What mitigation is proposed?

I appreciate the opportunity to submit my comments.

Sincerely

Heide Blackmore