**GRAND RIVERKEEPER LABRADOR INC.**
**P.O. Box 569, Station B**
**Happy Valley-Goose Bay**
**Labrador A0P 1E0**

15 January 2007

The Honourable Clyde Jackman, Minister
Environment and Conservation
Government of Newfoundland and Labrador
West Block, Confederation Building
P.O. Box 8700
St. John's, NL
A1B 4J6

RE : Lower Churchill River Hydroelectric Generation Project (Reg. 1305)

Dear Minister:

The Grand Riverkeeper Labrador, Inc. hereby requests to be listed as a stakeholder in the environmental assessment process of the Lower Churchill River Hydroelectric Generation Project and that we receive notice of all future meetings and pertinent events at the address stated above or to the attention of the following: Roberta Frampton Benefiel, Vice President- Telephone # 709-896-4164. or e-mail at refbnfl@yahoo.ca or Clarice Blake Rudkowski, President, -Telephone # 709-896-9530 e-mail cblake_rudkowski@hotmail.com

We have reviewed the project registration and description documents related to the abovementioned project and offer comments as follows.

INTRODUCTION

The Grand (a.k.a. Churchill) River is the longest river in Labrador (530 miles – 853 km) and the seventh largest in Canada. It has the largest watershed in Labrador, draining an area of 36,068 sq. miles (93,415 square km) – an area equivalent to Prince Edward Island, New Brunswick and almost half of Nova Scotia combined. The western boundary of the Grand River watershed forms part of the border between Labrador and Quebec as it follows the Height of Land Plateau. It is a river of rivers. Many tributaries flow into it such as the Cache, Wilson, Pena's, Metchin, Mininipi, Elizabeth, Fig, Tomahaws, Travespine, Valley, Unknown, Atikonak, as well as hundreds of smaller brooks and streams.

This magnificent waterway is also the most historic and ecologically diverse in Labrador.

A 4,000-5,000 year-old Maritime Archaic site has been found, documenting the earliest known human occupation of the river valley – around the time the Egyptian pyramids were built. The earliest permanent Euro-Canadian settlement in the Grand River watershed came in 1743, with the establishment of a series of trading posts. The Grand River was the economic artery for the whole region, holding great cultural significance for both the Innu and the Metis. By virtue of this fact, it was used to buttress the Newfoundland case in the Labrador/Quebec boundary dispute of 1927. The GRAND RIVER was called MISHTA SHIPU (meaning Big River) by the Innu and it is still known by those names locally.

The Grand River watershed spans portions of four ecoregions and provides habitat for rich communities of boreal flora and fauna. Cliffs as high as 800 ft. (235 m), tower above the deep lower valley creating microclimates that are often 10 degrees warmer than the upland plateau. This results in ecosystems that are very rich and diverse. The main portion of the lower valley lies within the High Boreal Forest-Lake Melville Ecoregion hosting the most productive forests in Labrador. Disjunct populations of plants characteristic of more southerly latitudes have been found along the main river. This boreal river valley is an important breeding, foraging and wintering habitat for many fur-bearing animals. It is considered an oasis for migratory songbirds. The river provides a corridor for fish migrating to tributaries for spawning. A total of 16 species of fish have been identified, including Atlantic Salmon.

This river is Labrador's treasure.

RELEVANCE OF OLD STUDIES AND OUTDATED DECISIONS:

The Proponent will be relying on information from a 1980 Environmental Assessment. We fail to understand how 27-year old studies can be still considered significant. Many changes occurred and more information became known in the intervening years so new studies must be done with consideration of this updated information. For example, much work has been done in the area of greenhouse gas emissions from reservoirs. These new, studies must be considered. Only baseline studies can be accepted as part of the current project. As well, all studies relating to this project have been conducted and financed by the proponent. The science could be biased in favor of the project. It may be necessary, therefore, in certain cases, to request further studies by independent, arms-length organizations. We recommend an independent committee to review all studies currently on file relating to this project.

SCOPE

From an environmental economics perspective there is a very geographically limited scope of analysis for considering costs and benefits of development. For example at the bottom of p. 42, of the Project Registration and Description document, where fish and fish habitat is being discussed, compensation would need to take into account the value placed on the resource by users of that resource including aboriginal (Innu & Metis) peoples and recreational fishers. In a recent Species at Risk Act (SARA) benefits survey

presented at a seminar by Dr. Murray A. Rudd, Canada Research Chair in Ecological Economics, Sir Wilfred Grenfell College, one of the main findings was that the proper geographic scope of analysis for considering economic benefits (of conservation projects) was national, even for relatively little known species. i.e., many people in central Canada, the Prairies and west coast exhibited preferences that favoured conserving Atlantic species and implied positive (and in some cases very substantial) economic values for Atlantic species right across Canada. *Rudd, M. 2006. Assessing the non-use economic values of six endangered species in Canada. Presented at Valuing Nature Conference, Corner Brook, NL, 7 July 2006.* Similar arguments about proper scope for considering historical and other ecological benefits could be made as well.

It is clear that this is not just a local or provincial issue. There are larger trade-offs that need to be considered on a national and even global scale.

GREENHOUSE GAS EMISSIONS (GHG) AND CLIMATE CHANGE

On p. 44 Section 5.1.10 of the Project Registration and Description document, Climate Change and Greenhouse Gases. By the proponents own admission reservoirs generate greenhouse gases so there must be baseline studies done to quantify current emissions (before new dams are constructed) in order to be able to determine the net GHG emissions after the addition of two more reservoirs. With regards to climate change, large increases or decreases in precipitation locally and globally, must be considered using the Precautionary Principal.

FISH AND FISH HABITAT

According to the Proponent, the project will result in the Harmful Alteration, Disruption or Destruction (HADD) of fish habitat. Sixteen species of fishes can potentially be impacted or even lost. Only a full Environmental Assessment would address this issue.

RIVER FLOW

Converting our free-flowing river to a series of reservoirs will have sweeping implications for the hydrology and chemistry of the river basin and presents one more example of the necessity of a complete EA.

COSTS

Transmission lines to deliver the energy to market are not mentioned in this report. It is impossible to determine the socio economic effects when a huge portion of the costs are not included.

NEED FOR THE PROJECT AND ALTERNATIVES

Alternatives to damming the river are not considered. If alternatives were examined it may determine there is no need for this project. Only an assessment by a review panel could determine this.

CUMMULATIVE EFFECTS

In the case of the Lower Churchill Hydroelectric Generation Project, several current and proposed projects and activities will also affect the watershed of the Grand River and beyond, namely:

1. Millions of gallons of raw sewage being pumped into the river daily.
2. Recently constructed causeway/bridge blocking up to 65% of the river flow.
3. We need an environmental audit of the Upper Churchill Project.
4. Construction of a new transmission line to deliver the power to market.
5. Proposal to suction-dredge mine the riverbed from bank to bank.
6. Climate change

The impacts of each activity combine with the activities of another in a synergistic manner. It is important that we know what these effects are.

IN A GLOBAL CONTEXT

According to "Dams and Development – A New Framework for Decision Making", the report for the World Commission on Dams, November 2000: (Partnership, Co Operation and Financing by The World Bank, The World Health Organization, CIDA, Hydro Quebec, Manitoba Hydro, SNC Lavalin, International Rivers Network, and many others.)

> "Consider: on this blue planet, less than 2.5% of our water is fresh, less than 33% of fresh water is fluid, less than 1.7% of fluid water runs in streams. We dammed half of our world's rivers at unprecedented rates of one per hour, and at unprecedented scales of over 45,000 dams more than four stories high"
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> …" Today, around 3,800 km3 of fresh water is withdrawn annually from the world lakes, rivers and aquifers. This is twice the volume extracted 50 years ago"
>
> … "Large dams have fragmented and transformed the world's rivers modifying 46% of primary water sheds."

Hydroelectric developments change the natural hydrological and nutrient fluxes in estuaries, with negative effects on the plant and animal communities adapted to them. They change temperature and water chemistry, convert riverine to lacustrine environments and alter the frequency and duration of daily and seasonal downstream flow regimes. All of which affects people and communities. More than 400,000 square kilometers – the area of California- have been inundated by reservoirs worldwide. We will be adding yet another huge project to that legacy, and adding our own negative effects to the already fragmented and transformed worlds rivers stated above. We have a moral obligation to consider this project in the widest context possible, that of the effects on global fresh water systems and on the biodiversity of the entire earth.

CONCLUSION

Grand Riverkeeper Labrador Inc. feels that this project is far too significant and too important to the future of Labrador to proceed without a full examination of the impacts. Grand River is the life support system for Central Labrador and beyond. The river is of key cultural significance to the Innu and Metis people. The area flooded and the effects on this 93,415-km² watershed will never be recovered. The project will have a legacy in perpetuity. Labradorians deserve the best environmental assessment for this project, including the most comprehensive assessment of the full economic and environmental costs. Newfoundland and Labrador Hydro and the Government of Newfoundland and Labrador are asking a lot of the people of Labrador and therefore they deserve the best possible science, public consultation process and a coordinated effort between the federal and provincial assessment process. Accordingly we respectively request that the Minister call for a full Provincial Environmental Impact Statement to be conducted as part of a joint federal and provincial panel review under the Canadian Environmental Assessment Act (CEAA).

Yours truly,

Clarice Blake Rudkowski, President
Grand Riverkeeper Labrador Inc.

Roberta Frampton Benefiel, Vice-President
Grand Riverkeeper Labrador Inc.

c.c. Premier Danny Williams, Government of Newfoundland and Labrador
Honourable Kathy Dunderdale, Minister of Natural Resources, Govt. of NL
Honourable John Hickey, MHA, District of Lake Melville
Honourable Gerry Reid, Leader of the Opposition, Liberal
Ms. Lorraine Michael, Leader of the New Democratic Party
Mr. William Coulter, P. Eng., Canadian Environmental Assessment Agency
Prime Minister Stephen Harper, Government of Canada
Honourable John Baird, Minister of Environment, Gov't of Canada
Honourable Todd Russell, MP for Labrador
Honourable Stephan Dion, Leader of the Opposition, Liberal
Honourable Jack Layton, Leader of the New Democratic Party
Ms. Elizabeth May, Leader of the Green Party