

GRAND RIVER: SUSTAINABLE ALTERNATIVES OR THE DEATH OF OUR RIVER?

Presentation to the Joint Panel reviewing the Lower
Churchill Hydroelectric Generation Project

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Member: Waterkeeper Alliance®



The Environmental Assessment Act

statement on sustainability & alternatives:

SUSTAINABILITY

- ▣ “Whereas the Government of Canada seeks to achieve sustainable development by conserving and enhancing environmental quality and by encouraging and promoting economic development that conserves and enhances environmental quality;”

ALTERNATIVES

- ▣ Chap. C-15.2 Page 18
(The Act)
- ▣ Every....assessment by a Review Panel shall include consideration of the following factors:
(e) ... alternatives to the project,

Balanced Assessment?

- ▣ “Dam building, like other natural resource extraction activities, is a socially and environmentally sensitive industry. Good hydropower projects are the result of a balanced assessment of **all available water and energy options**, a thorough environmental impact assessment that leads to well implemented management plans, the participation of affected communities in decision-making and the **sharing of benefits with these communities.**”

ALL available water and energy options?

- ▣ Information not provided to determine whether other hydro projects in NALCOR'S portfolio have lower generation costs as stated! (IR JRP.26 (b) iv.)

Sharing Benefits with Local Communities

- ▣ Adjacency Principle not likely to be adhered to.
 - Voisey's Bay experience.
- ▣ No power allocated for Labrador communities.
- ▣ therefore, no chance for future development.
- ▣ History shows most construction benefits accrue to outside firms/engineers/consultants/and very little to local people. (blackrock bridge/causeway experience.)

Sustainable Development

□ 2.4 SUSTAINABLE DEVELOPMENT

- Sustainable development seeks to meet the needs of present generations without compromising the ability of future generations to meet their own needs.
- The objectives of sustainable development are:
 - **The preservation of ecosystem integrity, including the capability of natural systems to maintain their structures and functions and to support biological diversity;**
 - **The respect for the right of future generations to the sustainable use of renewable and non-renewable resources; and**
 - **The attainment of durable and equitable social and economic benefits.**
- Promotion of sustainable development is a fundamental purpose of environmental assessment, and the Proponent shall include in the EIS consideration of:
 - (a) The extent to which biological diversity is affected by the Project;
 - (b) The capacity of renewable resources that are likely to be significantly affected by the Project to meet the needs of present and future generations; and
 - (c) The extent, distribution and duration of social and economic benefits.
- The Proponent shall strive to integrate these factors into the planning and decision-making process for the Project, including seeking the views of interested parties, and report on the results in the EIS.

For Further Consideration

- ▣ “The positive contribution to sustainability and respect for the precautionary principle is substantially different from the “mitigation of significant adverse environmental effects” criterion that has been the focus of most assessments under CEAA” (see footer)
- ▣ NALCOR’S entire premise is that all adverse effects of the Project can be mitigated to NOT-SIGNIFICANT!

The Preservation of ecosystem integrity?

- ▣ For each and every Valued Ecosystem Component that will be adversely affected by this project NALCOR says, those effects are “NOT SIGNIFICANT”
- ▣ We say it depends on:
 - ▣ Who decides?
 - ▣ Who/what is affected?
 - ▣ Spatial consideration? . i.e. river valley, entire watershed, Labrador, Canada.
 - HOWEVER: For the fish species that will disappear and for those that will be chewed up in the turbines: **Extremely Significant..**
 - For the riparian zones, and wetlands that will disappear: **Extremely significant.** (Grand River valley contains riparian habitat and wetlands unique to Labrador)
 - For the loss of ashqui (open water in spring used by migrating waterfowl)and the resulting loss of waterfowl: **Extremely Significant.**
 - For even just one more member of the Red Wine Caribou Herd that might die from hunting due to easier access and loss of habitat: **Extremely Significant.**
 - For our group and others who enjoy this river as an eco experience, the loss of the river will be **Extremely Significant**
 - Loss of the 7th largest river in Canada, added to hundreds of watersheds and drainage basins already adversely affected by hydro dams: **Extremely Significant**

Does the Project respect the rights of future generations?

What should we pass on to them?

THIS? OR THIS?

- | | |
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| <ol style="list-style-type: none"> 1. NALCOR'S jobs-short-term, boom/bust-nothing left over 2. NALCOR'S "created" fish-habitat not likely to work (Quigley) 3. Water, fish and wildlife: Promises more contamination in lower Churchill. 4. Fragmented & loss of habitat for Caribou/Moose etc. 5. No energy source for future development on Labrador Coast and no relief from expensive utility bills: Several years wait for transmission line construction for Central Labrador's needs 6. Current promotion of large projects like aluminium smelters, uranium mines, and other destructive, large industries =outside corporate control, very little trickle down! 7. LIFE OF DAMS-75-100 yrs then huge decommissioning or reconditioning costs to future generations. (up to 5Billion) | <ol style="list-style-type: none"> 1. Eco- Tourism- local, infinite, very small footprint 2. Natural fish habitat-it's worked for eons. 3. Current fish and wildlife: mercury levels from upper Churchill finally beginning to abate. 4. Maintain & protect the current range of GR and RWM caribou herds and moose to ensure their survival for future generations. 5. Develop small, sustainable energy sources such as run-of-river hydro, wind, solar, for current needs and future development. 6. Small businesses, locally owned, economic benefits stay in the communities. 7. Cost-Benefit analysis that shows true costs and benefits over full life of the Project may prove project not viable and negate expense of decommissioning to future generations. |
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Attainment of durable and equitable social and economic benefits?

THIS?

- ▣ Nalcor: boom- (short-term) jobs then bust!
- ▣ Energy profits into Provincial coffers and used to garner votes.
- ▣ Town of HVGB ,Mudlake, North West River and Sheshishiu responsible for all infrastructure damage and any evacuation plan in event of Dam Failure ! (Evacuation Plan for HVGB not yet presented)

OR THIS?

- ▣ Alternative energies with better and more local, long term jobs i.e. small hydro, wind, tidal, solar!
- ▣ An Impact Benefits Agreement benefitting all Labrador residents. It's our river!
- ▣ Investments of Labrador royalties from Labrador Resources in Labrador for infrastructure to attract small businesses- more sustainable, more local, more equitable.

Statement on Alternatives EIS Guidelines

- ▣ 4.3.2.1 Alternatives to the Project
- ▣ The alternatives to a project are defined as functionally different ways of addressing the need for the project. The EIS shall contain an analysis of alternatives to the Project, including the following:
 - ▣ (a) Management of electricity demand through utility-based energy efficiency and conservation initiatives;
 - ▣ (b) Alternative generation sources to the Project (e.g., hydrocarbons, wind, other hydro projects such as run-of-river projects);
 - ▣ (c) Combinations of alternative generation sources with hydroelectricity (e.g., hydro-wind);
 - ▣ (d) The addition by the Proponent of more capacity at existing generation facilities; and
 - ▣ (e) Status quo (no Project).
- ▣ EIS Guidelines – Lower Churchill Hydroelectric Generation Project
- ▣ (emphasis added-red highlight)

IR # JRP.26

(a) Panel asks for detailed discussion of “no project” option, including alternative ways to meet the projected energy demand increases for the Island, and asks the Proponent to examine alternatives that meet the energy needs intended to be supplied by the Project including using demand side management and a combination of alternative generation sources (e.g. fossil fuels, wind, other hydro projects such as run-of-river, solar, nuclear, tidal); and (b) asks for a presentation of each alternative with description of technical and economic feasibility of each

NALCOR dismisses request of the panel and provides no justification. Public has no opportunity to examine alternatives to the project!

NALCOR says– No Alternatives to the Project!

- ▣ They say; natural Gas Fired more expensive? – **SHOW US!**
 - ▣ -Inconsistent with current energy reports?
 - ▣ Wind or wind and hydro combo more expensive? –**SHOW US!**
 - Costs of wind decreasing due to economies of scale.
 - Wind provides more skilled local jobs, more stable local economy
 - Hydro first, then wind, per NALCOR- (JRP.26 (b) vi.
 - However: CFLCo and HQ already have hydro..therefore build wind, transmit over new HQ lines
 - What would cost be? Compare cost to Project! **SHOW US!**
 - Other Hydro projects in NALCOR's portfolio more expensive?
 - Perhaps several small hydro projects and wind would be less expensive and less environmentally damaging? **SHOW US!**
 - Environmental damage not accounted for in dollars!
- Calculate ecosystem services , loss of potential eco- tourism , decommissioning costs, and SHOW US!**

NL Energy Plan statement on Wind

- ▣ “One of the goals of this Energy Plan is to maximize the value from resource developments, including the benefits from wind generation. To Maximize these benefits, the Provincial Government believes the Energy Corporation should **control the development of all wind projects** and determine when to develop alone or with private sector partners. We will enable this by adopting a policy that *no new leases for wind development on crown land will be issued except to the Energy Corporation or another company acting in partnership with the Energy Corporation.*” (emphasis added)

NALCOR exercises it's Control over development of wind and other alternatives

- ▣ Projects turned away or ignored:
 - Argentia wind project (The Telegram: Business-01-22-2011)
 - Ventus Energy/LMN 1000MW Height of Land Wind Farm (see LMN Submission to Joint Panel)
 - Feasibility of bringing natural gas to the Island of Newfoundland and the role of the Fischells Brook Salt Dome, Western, NL. (see footnote, copy of assessment will be provided)

NALCOR

Tunnel vision/Out of date technology

- ▣ Committed to one project only!
- ▣ Not forward thinking! Greener Alternatives Possible!
- ▣ WCD states “Large dams...have a marked tendency towards schedule delays and cost overruns.” (see footnote)
- ▣ Public deserves to see the “whole picture” / best way to spend public funds!
- ▣ And: Alternatives not addressed as demanded by requested by the guidelines and requested by the Joint Panel!

Thank you for listening!