



云南省金沙江中游水电开发有限公司
罗军先生
传真：0871-3117614

中国水电顾问集团昆明勘测设计研究院
国环评证甲字第3402号
强继红先生
传真：0871-3062215

2007年, 11月, 15号

关于: 阿海水电站 环境影响报告书

罗军 先生, 强继红先生:

We are pleased to submit the following comments regarding the阿海水电站 环境影响报告书, released to the public for comment during November 1-15, 2007. International Rivers is a non-profit organization based in the United States whose mission is to protect rivers and rights, and promote real solutions for meeting water, energy and flood management needs.

We applaud the decision to include a public comment period in the decision- making process for Ahai Dam, and the release of the summary EIA. However, there are a number of technical problems that we see with the summary EIA that has been released.

First, the report made available to us online appears only to be a summary of the full EIA prepared. It is unclear why the full version was not released to the public. The summary provided lacks information about when the assessment was conducted, what data collection methods were used, and what standards and parameters were used to structure the study. The summary includes very few details on the specific outcomes of the impact assessment. This lack of information makes it difficult for us to provide specific comments regarding the quality of the EIA or whether or not we agree with its assessment of the Ahai Dam's potential impacts.

Another problem that we see is that the public comment period for the EIA for Ahai dam is 15 days in length. This is too short a period for a project of this magnitude. A comment period of several months or more is standard in other countries, as this allows sufficient time for members of the general public to read, collect information about, assess, and develop informed responses to the proposed project. With such a short window for public involvement in this project, it is difficult for us to spend sufficient time analyzing the proposed project and the EIA prepared. We are concerned that both the brevity of the public comment period and the fact that the full EIA was not released to the public indicates a lack of

serious consideration of the value that public comments on projects of large environmental and social impact can provide.

With regards to specific information included in the summary document, some of our concerns include:

- 1) The assessment does not include information on project beneficiaries. Why is this project needed at this time, and what will the benefits be? The report includes few details on the economic cost-benefit analysis conducted for the project, which is needed in order to assess whether or not the social and environmental costs of the project can be justified.
- 2) Details are not included on the methods used for conducting the social or environmental impact assessments. Thus, it is difficult for members of the public to determine by reading the document whether it is an accurate reflection of conditions on the ground.
- 3) The report claims that there are three protected fish species that will be impacted by the project. We do not believe the measures to be taken to protect these species – such as limiting fishing and building fish hatcheries – are sufficient to guarantee the continued proliferation of these species. If there will be losses to traditional and commercial fishing operators, they should be compensated. The report does not state whether or not this will occur.
- 4) The report does not state whether or not people to be relocated for the project have been consulted about proposed relocation plans, nor what the details of these plans will be. If one of the major proposed benefits of the project is to reduce poverty, it is important that details about how communities that are directly impacted by the project will be compensated and rehabilitated during and after construction is critical to an assessment of the project. There is also no assessment of impacts to other communities living downstream and upstream of the project who may be affected by changes to the river ecosystem.

We sincerely congratulate the Ahai Dam project owners and EIA preparers for soliciting comments on the project and for publicly releasing components of the plan. If there is further opportunity for stakeholder involvement, please contact using the information provided below,

Sincerely,

Nicole Brewer
International Rivers
1847 Berkeley Way
Berkeley, CA 94703 USA
nicole@internationalrivers.org
www.internationalrivers.org
Tel: +1 510-848-1155 x 317
Fax: +1 510-848-1008