

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION
and
STATE OF MAINE
LAND USE PLANNING COMMISSION

IN THE MATTER OF

CENTRAL MAINE POWER COMPANY

map of Nitassinan, drawn from the Government of Canada's Aboriginal and Treaty Rights Information System.

7. The Innu of Labrador have never surrendered our Aboriginal rights in Nitassinan. We are currently negotiating a modern treaty with the Governments of Canada and Newfoundland and Labrador. The three parties reached an Agreement-in-Principle on November 18, 2011.
8. The Innu of Labrador and our ancestors have always lived, used and protected the lands and waters of our traditional and ancestral territories. We were and remain hunters with a deep connection to the land. Prior to our forced settlement into communities in Labrador in the 1950s, the Innu way of life involved travelling across Nitassinan in family groups to hunt, fish, gather, and trade. This travel was central to our identity, since through our travel we maintained our social and ceremonial connections with other Innu, neighbouring peoples, and the land.
9. Our people used to come together for trade and cultural events at important gathering places. One such gathering place was the Meshikamau Lake area, in the interior of Labrador.
10. Meshikamau Lake was a place where several Innu travel routes extending across Nitassinan converged. Innu families from different parts of the Quebec-Labrador peninsula gathered there. The area was rich in fish and wildlife and was on the migration path of two herds of Atiku (caribou), which are an integral part of our identity and culture. Exhibit C is an academic article by Stephen Loring and others that outlines some of this background.
11. Meshikamau is the location of Petshishkapushkau, an important spiritual site for my people. Petshishkapushkau is a rocky hill and is said to be the mystical place of residence of Anikapeu, the Toadman, an animal master of frogs and toads.
12. The Meshikamau area was also a

Impacts of Churchill Falls Generating Station

15. Mista-Shipu, known in English as the Churchill River, is the longest river in Labrador and was an important travel route for the Innu until the construction of the Churchill Falls Generating Station (“CFGS”). It is one of the travel routes that led to Meshikamau.
16. Mista-Shipu had a significant waterfall just past Meshikamau called Patshetshuna. It is known in English as Churchill Falls.
17. .

generations lost their canoes, traps, Atiku-hide scrapers, and other tools that they stored in caches along the river's edges. Beaver in the headwater ponds froze to death because of reduced water levels. Salmon spawning grounds were destroyed. Fish living in the Reservoir have been poisoned with methylmercury. Atiku calving grounds and waterfowl nesting areas were drowned.

24. We also lost the bones of our ancestors. Their burial grounds are now underwater. Attached as Exhibit H are

31. The energy that would be passing through Maine and flowing to Massachusetts consumers as a result of the NECEC would come from waters that continue to wash away the bones of our ancestors, destroy our lands and the subsistence resources upon which we depend for our cultural identity and our livelihoods – our very way of life.

Our attempts to seek redress

32. In 2011, Nalcor Energy (the provincial utility for the Province of Newfoundland and Labrador), and the Province of Newfoundland and Labrador entered into the Upper