



**Métis Nation of Alberta, Region 3
Métis Cultural Heritage Resources and
Traditional Knowledge Report**

**Springbank Off-Stream Reservoir Project
Alberta Transportation**

August 29, 2019

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Abbreviations

AT	Alberta Transportation
CPR	Canadian Pacific Railroad
EIA	Environmental Impact Assessment
HRIA	Historical Resources Impact Assessment
HBC	Hudson's Bay Company
MNAR3	Métis Nation of Alberta, Region 3
MTKU	Métis Traditional Knowledge and Use
SR1	Springbank Off-Stream Reservoir

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Introduction

In January 2018, the Government of Alberta publicly announced it had acquired approximately 188 hectares (465 acres) of land required to build the Springbank Off-Stream Reservoir (SR1) project. The scope of the project is to protect the City of Calgary from possible future catastrophic climatic and hydrological events. The SR1 project will reduce flood risk by managing downstream river flow rates and volume. The project will be located 15 km west of Calgary and will consist of a diversion channel that will carry, during hydrological events, water from the Elbow River to the off-stream reservoir which would have a storage capacity of 70.2 million cubic metres. Outlet structures will release the stored water back into the Elbow River once the peak waters have passed. Alberta Transportation (AT) engages with stakeholders and Indigenous groups to encourage consultation about project impacts and how they will be mitigated. AT has inquired about the potential project impacts that Métis Nation of Alberta - Region 3 (MNAR3) anticipate. MNA3 has concerns about this project, including potential impacts to Métis traditional and historical land use within the project and surrounding area, cumulative effects, and the quality of Historical Resources Impact Assessment (HRIA). We have included a list of our concerns and mitigation recommendations.

Project Significance to the MNAR3

The proposed project area is rich in Métis Traditional Knowledge and Use (MTKU) and the land acquisition affects many Métis families and their past-current land use practices. The project agreement was made primarily with one affected party, the Robinson family, however, the project area is also situated inside the MNAR3. Métis customs and knowledge are normally passed down from generation to generation for the future. There is a concern this project has the potential to disrupt this oral and lands and waters usage continuity. There is the risk Métis sites will be demolished and Métis mobility impacted. In particular, the SR1 zone covers about three quarter-sections of lands and waters, and will involve, among many other human-cultural mitigation measures, the relocation of the Robinson's Springbank ranch. Métis-rich history was

missed under the same umbrella of inter-generational cultural transmissions, despite the fact that some of the first project mitigations were highly promoted under a provincial and regional discourse of heritage conservation and protection for both natural and cultural resources (e.g. ranchlands and buildings). For Métis resource users and Métis knowledge keepers, the pressure of a proposed project in a known Métis traditional area is not negligible. Métis and Ranchers are equal in needing the same certainty for their children and grandchildren. Métis families have close ties to the lands and waters all over the prairies and will be critically impacted. Of particular interests for the MNAR3, is a block of lands and waters, about 15 km west of Calgary near Springbank Road; especially between the Elbow River and the east side of Alberta Highway 221. It is important for MTKU people to be involved in the data collection for the project. More direct Métis engagement is advised.

Albertans were able to read about a step-by-step proposition to return most of the vital water resource to its original fluvial source. However, in the details of the many studies on the types and levels of ecological protection needed in order for this project to proceed, Métis human-environmental factors have not been considered. This is one of the many fundamental reasons why this MTKU study is so important at the community level. There was a moral imperative to gather informant primary data, to support the newly collected respondent information included in this report via a previous online survey for the entire SR1 project.

Métis Traditional Use around the project area

Interviews were conducted of families who have connections to the project area to understand the extent of the potential negative impacts on the cultural values, recreation, and experiences of MNAR3 citizens. These individuals identified that they routinely fish in the Bow and Elbow Rivers in Calgary, near Cochrane, Turner valley, Black Diamond, Bassano, Red Deer, and Bragg Creek regions. Water areas were consistently listed as very important to all respondents and uses range from fishing, gathering medicines, swimming, camping, water dowsing, healings, ceremonies, blessings, clearings, prayer, sweat lodges, guiding, baptisms, gathering, kayaking, canoeing, and more. Access to the river and riverbed is important for all the

above reasons and restricted access or the creation of difficult approaches will restrict the traditional use of Métis communities, with greater impact to the more senior/ limited mobility individuals. There are also a variety of vegetation along the riverbanks that Métis gather, harvest, and use for ceremonies and medicinal use. Such plants include, but are not limited to, sweetgrass, sage, choke cherries, Indian roots (turnips), Saskatoon berries, bung berries, dandelion, blue birch, blueberries, mint, wild rose hips and paintbrush flowers. Destruction of areas around the riverbank may reduce certain foliage from returning, so proper reclamation needs to be ensured. Crystals, colorful rocks and wood are also gathering along rivers and are used in traditional Métis blessings and ceremonies and maintaining river access is a must. Recreational activities such as painting “en plein air” and creating art outdoors is another common activity of Métis in the area. Camping along riverbanks was also a common activity among the individuals interviewed. In an interview, one Métis individual noted that their fourth great Grandfather used to trap small animals in the project area, along with many others who indicated that they currently trap and hunt deer, rabbit, and muskrat in the area. Métis, in general, do not have one particular collecting site, tradition site or fishing spot that they go to collectively. Each family has a different spot that is sacred to them and encompassing all Métis together will create a vast net of importance over the rivers and fields in Southern Alberta. This creates a great risk as some sites of traditional use may be missed and destroyed. Consultation needs to be conducted on a greater scale than what has been done and needs to include Elders early in the process to help mitigate the risk. Since this SR1 project is geographically located inside the MNAR3, it is essential for Métis to be included in the consultation of this project

The project needs to incorporate both ethnographic and natural ecology analyses to ensure both past and current MTKU is not being missed. From a pure hydrological Elbow River model, everything was well calculated, including captured and estimated times of most runoffs. However, from a social sciences point of view, the Indigenous watershed and Indigenous ecological inter-river water model was either severely downplayed or totally ignored. The balance between positives and negatives for the most vulnerable Métis lands/waters-users was not weighed to its true value for this project, and even less for what is sustainable for the long-

term. Extreme weather and climatic events are very difficult to predict, and the potential for intergenerational long-term effects caused by the destruction of sensitive Métis areas and sites is even more difficult to predict. Sustained damages will not be limited to short term sediments and debris loads. As we know from the destruction of other sensitive Indigenous areas in Southern Alberta, like the Siksika (Blackfoot) Gleichen area, when it comes to loss of traditional lands/waters, provincial reparation and compensation plans for MTKU people during and after floods is extremely poor and slowly coordinated, even with supposedly revised Emergency Response Plans.

Given that, for Métis, shorter vegetation (e.g. shrubs, bushes, etc.) is more significant overall in Region 3 for MTKU, the conclusion that, at the Springbank location, there is less of an environmental sacrifice of large botanical species (e.g. standing trees and forests) compared to the Mclean Creek Dam location, is biased. From the political side of manipulating the habitat position however, this argument does not stand alone for this Métis Nation. This vision promotes wildlife in forested environments as being more significant, whereas, in reality for Métis, riparian zones and their combination of faunal-floral species is where the desired preys of choice, including many fish species, are located.

Métis Historical Land Use around the Project Area

There is a general misconception that Métis do not have significant history in southern Alberta, but even a preliminary review of primary and secondary historical sources, as provided here, shares some of the deep and lively history of the Métis throughout southern Alberta. Additional research is necessary, especially into primary sources, to reasonably speak to the historic and contemporary significance of Métis people in the project area and southern Alberta. It is essential the lingering misinformation that dismisses Métis presence be corrected.

Métis historical ways of life were diverse, using areas around fur trade forts, permanent settlements in some locations, farms, temporary villages related to buffalo hunting, cart and foot trails, and campsites related to hunting and canoe travel. The area around the SR1 project shows historical evidence for Métis land use since at least the 1870s and likely significantly earlier from

the historical record of Métis in the area in the larger context (Devine 2010/11). Areas around water bodies, including rivers, streams, and lakes, were used in many of the diverse Métis ways of life and should be considered high potential for archaeological material.

For example, in the city of Calgary where the project's Elbow River meets the Bow River is the site where the Métis community leader Alexis Cardinal relocated the Our Lady Peace Mission, previously of Bragg Creek. This site became the Hudson's Bay Company (HBC) trading fort in 1871. The Northwest Mounted Police arrived in the area in 1874 and built Fort Calgary. When Canadian Pacific Railroad (CPR) annexed the land in 1883, the Métis living in what is now the Calgary neighbourhood of Inglewood moved to what is now downtown Calgary. There are only two Métis cabins that remain in this original settlement location: the Red River style mission cabin (*see Figure 1*), currently used for storage by the Deane House, and the Hunt House (*see Figure 2*) (Gervais, 2019).

Métis archaeological sites have been identified in different ecological and archaeological contexts in Alberta. These sites can be challenging to distinguish from other historical period sites, but there are some material correlates that may help to determine whether a site is related to Métis land use and lifeways. Red River frame architecture, including standing remains of structures, along with storage pits, mudding pits, cellars, and other culture depressions suggest over-wintering sites. High occurrences of beads and fragile transfer print ceramics also point to Métis occupancy. Because of the challenges distinguishing archaeological remains of Métis historical lifeways, heritage monitors need to be particularly attentive if historic era remains are uncovered during Springbank construction. All monitors should be familiar with Red River style architecture and Métis site identification to ensure Métis sites are correctly protected.

Archaeological Site Types

Two different Métis material culture patterns have been identified in the archaeological record by McLeod (1982, 1983, 1986), matching up with the types of sites associated with Métis that have been excavated. The first is the Métis Farmer-Merchant pattern, consisting of a cluster of artifact types associated with farms and more permanent settlements in the Red River vicinity.

The other, the Hivernant pattern, appears when Métis people moved out onto the Prairie and away from the settlements. The main difference in Hivernant material culture when compared to the Farmer-Merchant pattern is the relatively high occurrence of beads at over-wintering sites, a pattern which McLeod suggests might separate Métis sites from other sites of the same age on the Prairies.

From a review of previous work, a number of elements can be extracted to define known site types associated with Métis history in the prairies. This is not a comprehensive picture of the Métis archaeological record, however it provides some guidance as to the types of Métis archaeological sites that might be encountered during the SR1 project. The discussion of site characteristics is broken down into categories of location, architecture, and artifact types.

Location

Métis sites are located relative to the economic and social activities of Métis families. Characteristics of known over-wintering villages, several of which are noted outside of the current boundaries of Calgary in the 1870s include (adapted from Burley et al 1992): natural protection from the environment, supply of wood for winter fuel, water source, diverse base of resources, area for early staging of spring hunt. Village layout at Hivernant village seems to follow natural topography (Burley et al. 1992:96) and is variable depending on the local landscape. Other areas where Métis sites might be located include river junctions and campsites with similar characteristics listed above; for example, where the Bow and Elbow meet. In addition, fur trade posts, such as Fort Calgary, and surrounding settlements are highly likely to have associated Métis archaeological material.

Architecture

One of the hallmarks of most historically Métis site architecture is the use of Red River framing for construction. Many intact Métis sites can be recognized from the presence of some form of standing architecture or visible surface remains. One or two-room cabins were the most common forms of structure (Monks 1992) and were often outfitted with chimneys. Chimney

mounds were noted at all excavated Hivernant sites. When they collapse, chimneys leave a distinct mound associated with a nearby depression that may represent a cabin structure or a cellar underneath a cabin. Mounds and depressions can be variable in shape and size, but have been noted as "round, elongated, and angular depressions, linear trenches, mounds, [and] linear rises" (Burley et al 1992:46). Other forms of architecture and landscape modification at sites might include remains of barns, underground cellars, mudding pits for preparation of plaster, and pits associated with storage and/or refuse (Burley et al 1992; Doll et al 1988; McLeod 1986).

Artifacts

Typical material culture that is associated with Métis sites is usually classified using categories common in historical archaeology. These include kitchen, architecture, personal, arms, household, metal, hunting and subsistence, and lithic materials. The following list is compiled from Burley (1989, 2000), Burley et al. (1992), McLeod (1982, 1983, 1986), and Doll et al. (1988). Many different types of artifacts are found at Métis sites, including, but not limited to: nails (both square and round), chinking used in architecture, pane glass of several types, HBC transfer-printed ware ceramics, including rare and delicate ceramics, other forms of ceramics, kitchen utensils and other kitchen tools, pipes, brass buttons, large numbers of beads, weaponry, bones of fish, birds, small, and large mammal, lithic materials, including flakes, points, and scrapers, and knapped glass materials (flakes, points, etc.).

The exact types of material culture present at Métis archaeological sites will vary depending on the activities that took place at that location. As noted above, beads appear to be more common in Métis sites than in other sites from the same time period. Any sites dating to the historic period uncovered during the course of SR1 construction that has a high concentration of beads should be considered a likely Métis site. If mitigation becomes necessary at possible Métis sites, excavation methods, such as using a small screen gauge, should be implemented to ensure that beads are collected in the field. Ceramics are also likely to be found in Hivernant sites, even fine transfer printed ceramics, which Burley (1989) ties to the role of Métis women in maintaining social relations.



Figure 1: Our Lady Peace Mission cabin, circa 1870s. Photo 2019



Figure 2: Hunt House, circa 1875. Photo 2019

HRIA Evaluation

As part of the work of evaluating impacts of the SR1 project on the cultural heritage of the MNAR3, the HRIA prepared by Stantec, was reviewed to determine whether Métis archaeological heritage was adequately considered as part of the HRIA. Upon review, significant deficiencies were uncovered in the HRIA wherein Métis archaeological heritage is not considered at all in the project area. The singular mention of Métis in the entire 362-page document is limited to a note about Alexis Cardinal accompanying the first Catholic missionaries to the region. There is evidence of sustained historical land use by the Métis in the region around Calgary and suggestive evidence of earlier use of the region for various purposes (Devine 2010/11). The lack of a consideration of a Métis archaeological record in the HRIA is of significant concern.

The results of the HRIA indicated 11 historic sites located in the project development area. In the discussion of these sites, it is noted that there is “a long history of Euro-Canadian settlement of the Project area”; however, Métis use of the area likely predates this history (or is, at very least, concurrent with the earliest Euro-Canadian uses). Several sites reviewed may have had a Métis component, but there does not appear to be any consideration of Métis cultural heritage, nor any consultation of MNAR3. First, EgPo-71 is noted as a cabin of approximately 6 m x 4 m, containing ceramics, bricks glass, metal, and faunal remains. The authors suggest this could have been a location of the Jumping Pound School or a building related to Patrick Drummond, who began settling there in 1894. Further research on the topic is suggested in order to rule out if this is a possible Métis-associated location, since it was known to have Métis in the area during the last several decades of the 1800s and some sources indicate that Sam Livingston, one of the first settlers in the Calgary region, and his Métis wife Jane Howse first set up a trading post near Jumping Pound. During the early years in the Calgary region, few women of European descent were in the region, so many of the early settlers married Métis women, and thus, their children were also Métis.

The site of EgPo-135 is of even more significant concern, since it was located along a seasonally wet floodplain. Based on this preliminary work, the site also strongly suggests a Métis

presence, as the types of ceramics and nails are congruent with other Métis wintering sites; however, no consideration is given to this possibility in the report. If work is to continue at this site, it is strongly recommended to actively consult with the MNAR3, and have a Métis archaeology expert review any findings to help mitigate the unbalanced assessment and consequent missing representation of Métis occupation in the Alberta archaeological record.

Other sites of interest for further review as relating to Métis connections include the historic site of EgPo-144, since materials from the late 1800s, such as sheet cut nails and possible Bison bone, were observed. While currently unclear, this site could have a Métis connection and further research should be undertaken, in consultation with the MNAR3, to demonstrate whether it was the home of Louis Blache, as suggested in the report.

Finally, the Our Lady of Peace Mission is a location of high significance to the Métis, as they were among the first Catholics in the region, and the main body of parishioners when the mission was founded. The original building was built by Alexis Cardinal, Métis, at this site in 1873. Any impacts to this significant site need to be clearly articulated to the MNAR3, as this site has high heritage value for the Métis of Region 3 today.

Overall, the HRIA is significantly deficient when it comes to a consideration of the historic resources of the MNAR3. There is no discussion of possible Métis archaeological sites in the region, even though several suggest a Métis connection and the original site of Our Lady of Peace Catholic Mission is of high significance to Métis cultural heritage. Impacts to any of the sites that may have a Métis connection is essential to ensure that Métis cultural heritage is protected.

MNAR3 Concerns about the project

In assessing impacts, at a minimum, one must consider the following six main factors and their interconnected relationships: a) faunal (including fishes); b) flora; c) minerals; d) waters; e) lands; f) overall human activities; g) human trails/water-travels; and h) access to Métis area/sites. Whether the project's direct impacts will be on only one of those areas or on a combination of them, creating a new SR1 structure will have some severe terrestrial and aquatic implications to

the Métis homeland. For example, the preliminary assessment states that even if the entire area west of Calgary consists primarily of cultivated and grassed lands, there are also some significant patches vegetated and occupied with native Prairie plant and animal species. Publicly, the people of Alberta were informed that this particular SR1 diversion structure, with its several inner and outer components, will function as one closed system; the first usages will show how well operators can control water levels. Given that Métis people, historically, are from a water-navigable culture, Métis niche construction theories on the perception of channel formation must be investigated from a MTKU perspective. There are very few details on how water resources entering the diversion channel will be monitored or mitigated to minimize the risk on all species, especially those linked to human subsistence and livelihood. In addition, there was not enough information given on the channel modifications (e.g. widening, dredging, etc.), besides the fact that at the end of the construction period, the waterway should be 4.5 km long, with differential width, from bottom to top, between 24-60m³. This is a concern because it is not known how these channel modifications may impact the Métis lands/waters users' mobility.

While Western scientists are mainly concerned with bio-physiological data (e.g. erosion protection), there is a great deal of MTKU data to be collected on the intangibles. Those include, but are not limited to, Métis "collective memories", especially those of potentially sensitive sites, like perished-marker burials. Also included would be selected locations deemed by provincial engineers to be worthy of protection due to well-considered hydrological factors (e.g. water velocities, etc.) because those specialists are not trained to discern inconspicuous Métis lands/waters artifacts. Those field workers are most likely not capable of evaluating which Métis features are the most relevant in relation to MTKU, specifically, prioritizing those with the greatest impact on Métis population health. Secondly, there are also the impacts of the storage reservoir itself, as a land-based structure, prior to, during and after construction, as well as relating to floods. Here, we are not talking about the SR1 being an "eyesore", but the overall Métis-environmental effects of taking down the original existing ground to the proposed concave grade. Métis users were not given an exact amount of the volume represented in this soil disturbance, even if it can easily be estimated. Finally, like any development project, there are

also further instabilities linked to new permanent service and maintenance roads in this area of MTKU. Meaning, that from a Métis epistemological standpoint, the new reservoir site can, and surely will, block the flow of many resources, not only in way they were/are now extracted, but also how they are accessed and are visible or invisible. The same can be said about the convex “earthen dam”, mapped at the southeastern end of the SR1. A well-designed area with planned terraces and re-vegetative grass species on them, given its height of 27 metres, will have direct effects on Métis site users, like those more hidden sites now exposed at higher elevations.

Alberta Transportation is responsible for the initial phases of project development, but as soon as the SR1 is ready to be managed and operated long-term, Alberta Environment and Parks will take over. Currently, the MNAR3 members have very little information on an agreement in place with either agency, or one that would be transferable. On paper, Indigenous and Métis engagements have been a priority for the SR1 project throughout its lifecycle, since the initial discussions back in 2015 when the idea was evaluated. As with most projects during their preliminary phase, the first step the Alberta Government took was a review of land access, for the greater legal purposes of conducting an Environmental Impact Assessment (EIA). The Indigenous-Métis problem here is that the Province only negotiates land rights with landowners, and little research is done at that stage into the more modern and ethnic Métis land-based “scrip titles” system. In terms of legal land acquisitions, from 2016 to present, even if the Province of Alberta did invest in the purchase of almost 7,000 acres, very little of these socio-economic benefits fall into the hands of the Métis closely living, occupying and holding MTKU in the Foothills of southern Alberta. Now that we are entering the more administrative phase of this SR1 project, with actual land possessions and pre-contract/contract procurements (e.g. approvals, awarding, permitting, tending, etc.), Métis businesses and companies are also being left out, predominately, from an Indigenous preferential situation, despite many verbal accords with the MNAR3 over the years.

In regard to the EIA, the 2016-2017 season was not long enough to do all the armchair historical and archival surveys needed on Métis data, especially to pin-point which lands/waters-based Métis sites and which evidence should be prioritized. So, by the time the final EIA report

was submitted (as one of the first major project milestones), and then reviewed, re-submitted and finally approved in 2018, the Elders and other Métis community members in Region 3 still have not had a chance to voice their direct opinions orally. This project should be the direct collaborative efforts between Alberta Transportation and MNAR3 for supplementary data and sustained Indigenous-led research efforts, even if in the media, “First Nations” has been heavily utilized, instead of “Métis.” Métis users may be viewed as mere “stakeholders,” as opposed to “Indigenous rights-holders,” so MTKU data is buried deep inside all concerns expressed by landowners, municipalities, corporations and others. After the 2018 announcement there was very little media coverage about the Métis site-specific impacts, especially those in the general area east of Bragg Creek. In Alberta, there are very few legal, and fewer punishable, requirements to represent Métis interests inside the EIA process, besides written Indigenous Engagements plans. At times and in places, those are not applied for greater lands/waters-based MTKU purposes. The reality on the ground is that very few Métis Elders were invited to partake in “Indigenous site visits” and “cultural walks” in the pre-construction phase of the SR1 project and their direct participation is minimal. Appropriate Indigenous methodologies, such as sharing and talking circles, are non-existent. This is why, besides the online distant survey process, more face-to-face interviews is crucial for an overview of Métis issues directly related to the SR1 project. From an environmental sciences elaboration, MNAR3 members are always invited to discuss more distant Western topics (e.g. air quality, noise pollution, wetland restoration, etc.), as opposed to MTKU questions from archaeological, archival, cultural, heritage, historical and Indigenous resources angles.

At the beginning of the Operational phase, where construction is expected to begin very soon, it is mandatory that even preliminary oral interviews will be conducted. Newly collected Métis data will offer some better directives, even before the 1:100-year flood capacity levels are achieved, closer to 2021. Another aspect of what this study hopes to achieve is to envision what would it be like by MTKU people in 2023, after all the deadlines are met and the project is fully in-place and operational. Indigenous-Métis Studies is not Western earth science, so this summary of the SR1 project timeline and schedule has some severe gaps. If the primary concerns of the

Government of Alberta are to protect the citizens of Calgary, there are many other downstream and up-stream communities which will suffer differential cumulative effects. The MNAR3 regional office is especially concerned that all its members will be able to continue to have knowledge and use of the lands/waters not only in Rocky View County, but also all along the Elbow River from its headwaters in Kananaskis to the confluence of the Bow River. The MNAR3 understand that the damages are perceived as inevitable, but would like mitigation to reduce this impact.

The construction, maintenance, and associated access to the SRI will have ramifications on Métis archaeological heritage resources. Based on the examination of the historical and archaeological record, there are areas in the project's proximity that have potential Métis historic resources. These historic resources most likely would relate to camp sites, wintering villages, the Our Lady of Peace Mission site, and trails/ rivers through the region along which Métis would have moved goods and people between the foothills/Rocky Mountain House, Calgary, and beyond. As a significant amount of soil will be disturbed in the building of the reservoir, there is potential to negatively impact Métis historic resources and associated cultural heritage. Any future planning for site disturbance should be done with clear consideration of these potential impacts and consult with the MNAR3, to best mitigate damages.

The MNAR3 has Aboriginal/Indigenous rights in the project area including; hunting, fishing, trapping, and gathering. This area has been home to Métis dating back as early as 1842 and is part of the Métis homeland. Many members of the MNAR3 have and continue to use this area for recreational and cultural purposes. Many members of the MNAR3 or their ancestors have harvested plants, both edible and medicinal, caught fish, and hunted/trapped in the project area. Many actively fish or harvest plants in the project area today, so the impacts to country foods by the construction of the reservoir has the potential to limit the access or have adverse effects on the ability of members of the MNAR3 to access country foods that form an important part of expressing, maintaining, and passing on cultural values. The nature of the project means the landscape will be altered, potentially disrupting the connections of these members to the lands and waters of the area.

Management Recommendations

After reviewing the existing HRIA, the current Métis land use, and material on the Métis archaeological record in Western Canada, several areas have been identified that need to be addressed prior to the approval of the SR1 project. Six specific recommendations are outlined below.

- 1) Additional research must be done to identify areas of high potential for Métis archaeological heritage throughout the SR1 project area. This should include field research, archival research, in person interviews, and review of previous archaeological reports relating to Métis research in Alberta
- 2) Before a heritage permit is issued by the Archaeological Survey of Alberta for archaeological monitoring of the construction of the SR1 project, the MNAR3 should be given the opportunity to review and comment on the permit application. While not common in Alberta, this is standard practice in other provinces. For example, all permits in British Columbia are sent to Aboriginal communities who have traditional territory and interest in the region covered by the permit. Communities have an opportunity to comment on the permit and identify any concerns. When making a decision about whether to issue a permit, the Archaeology Branch considers issues raised by the Aboriginal communities.
- 3) Given the reality that the SR1 project will be built on the Métis homeland, the proponent should financially support a full-time MNAR3 Heritage/Cultural Sites Coordinator throughout the duration of the project's construction. This Coordinator will act as a point of contact for the proponent in relation to Métis heritage, cultural, sites and archaeological issues. The Coordinator will also act as a liaison between MNAR3 in relation to Métis heritage, cultural sites, and archaeological issue
- 4) During all segments of the Project's construction, Métis Heritage Monitors should be identified by the MNAR3. Specifically, these Monitors will:
 - be included in the monitoring process when construction is taking place in locations of high potential for Métis related sites;
 - be contacted and meet with proponent prior to any decision about Métis heritage resources that are located during construction are made and be involved in the decision-making process with respect to those heritage resources.

- 5) Explicit protocol requiring regular reporting to MNAR3 when sites with potential Métis archaeological heritage are found during the construction phase of SR1 project.
- 6) Continuing consultation the MNAR3, including monitoring and similar programs, would help to ensure that Métis voices are heard as the project moves forward.

The above recommendations, when implemented, will enable the necessary consultation to take place in order to protect and limit impacts on Métis heritage resources throughout the course of the project.

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