



April 30, 2020

Chelsea Fedrau, Project Manager
Impact Assessment Agency of Canada
Prairie and Northern Region
9700 Jasper Ave., 11th Floor
Edmonton, AB T5J 4C3

**Re: Regional Municipality of Wood Buffalo's Comments on the Determination of
Impact Assessment Requirement for the Suncor Base Mine Extension Project**

Dear Ms. Fedrau,

In response to the invitation to provide comments to the Impact Assessment Agency of Canada regarding Suncor's Base Mine Extension Project (dated March 23, 2020), the Regional Municipality of Wood Buffalo (RMWB) has reviewed the initial project description and provides the following comments.

The RMWB supports the responsible development of the oil sands industry. As the economic engine of our region, the Municipal government, our businesses, residents and social profit organizations depend on the taxes, charitable donations, and other direct, indirect and induced economic effects that come from the construction and operations of projects such as Suncor's Base Mine Extension (BMX). The importance of these types of positive social and economic impacts cannot be understated.

Through the early stages of development of the BMX project, Suncor has engaged with the RMWB and communicated the project's stage of development and upcoming milestones. In addition to this, Suncor has relayed information related to the Impact Assessment Act of Canada and the new process that it lays out for projects such as BMX. Through these conversations, and the review of the initial project description, the RMWB grew to understand the unique way in which this project may impact the region, especially the residents and businesses within Fort McMurray.

The proximity of this project to Fort McMurray, and the potential ensuing impacts to residents and businesses, is the primary lens through which the RMWB will be viewing this project as it engages in this regulatory process. To that end, the RMWB is interested in the assessment of both the potential real and perceived impacts of this project. More specifically, from the RMWB's perspective, the following areas need to be thoroughly addressed through the impact assessment process for this project:

- Air emissions
- Odours
- Noise
- Dust
- Visual aesthetics
- Engagement with local community (in addition to the RMWB)

Page 2 of 2

Comments from RMWB re. Suncor's Base Mine Extension Project

Additional important areas to assess during this process include, but are not limited to:

- Positive and negative impacts to property values
- Local employment totals trends for the life of the project
- The implementation of automated haul trucks on local employment
- Local expenditures for the life of the project
- Impacts to municipally owned infrastructure and the increased financial and environmental liabilities that may occur from re-routing the existing Poplar Creek Road
- Maintaining constant road access for oil sands projects west of the propose project area that rely on the Poplar Creek and AOSTRA roads

As stated previously, Suncor has done an exemplary job of ensuring that the RMWB is aware of the project at this early stage. Understanding that details are yet to come, preliminary conversations have already begun regarding many of the potential impacts and areas that will need to be assessed. The RMWB is confident that this positive relationship will continue.

Questions or comments related to the RMWB's involvement in this regulatory process for the Base Mine Extension project can be directed to Dennis.Vroom@rmwb.ca The RMWB is appreciative of the opportunity to participate in this process and is looking forward to continuing to be involved in the review of this project.

Sincerely,

Matthew Hough, P.Eng.
Deputy Chief Administrative Officer
Regional Municipality of Wood Buffalo

Cc: Council of the Regional Municipality of Wood Buffalo
Jamie Doyle, Chief Administrative Officer, RMWB
Brad McMurdo, Director, Planning and Development, RMWB