

LRRCN TAILORED IMPACT STATEMENT-SUNCOR BASE MINE EXTENSION
From review of Detailed Project Description Summary document, July, 2020

Following a review of the Detailed Project Description Summary for the Suncor Base Mine Extension Project, I compiled a list of the matters which LRRCN Lands could address in relation to this project's potential for positive or negative impacts on the LRRCN. In these Notes, I have used an asteric * to identify matters which are related to the Nations desire/opportunity to use FMU F 23 for provision of ecosystem services.

I note that Suncor is committed to working with Indigenous communities (among others) to seek approval for this Project, while caring for each other and the earth, with a view to the long-term interests of Canada and its Peoples (pg 1).

I note that Suncor will concurrently be pursuing paths to reduce emissions...and sequester carbon in ways that produce net benefits (pg 1).

These statements are relevant to the intent and objective of the LRRCN to seek an agreement with Canada, the government of Alberta, and Suncor, for conversion of the Nation's forest tenure-FMU F 23- into a First Nation Forest Conservation Management Area (i.e, an area-based forest tenure, managed under the provisions of a provincial Forest Management Agreement between Little Red River Askee and AA & F, setting out the provincial regime under which Little Red River Forestry Ltd. would be responsible for some agreed-upon combination of growth, sustainable harvest and regrowth of timber, which is compatible with provision of some list of environmental services to corporations, such as Suncor; and a long-term contract with corporations, such as Suncor, for provision of ecosystem services related to carbon and/or conservation offsets to be managed within the Nations corporate forest tenure. To this end, FMU F 23 could be designated as a corporate high conservation management forest area.

During the Project Planning phase, Suncor has undertaken early engagement with the LRRCN, and LRRCN provided preliminary feedback to Suncor, during preparation of the Detailed Project Description for the Suncor Base Mine Extension. Details of this early engagement can be found in Appendix D of the Detailed Project Description (pg 5).

Strategic Assessments Relevant to the Project (pg 10-11)

The draft Strategic Assessment of Climate Change (Government of Canada, 2019b) provides guidance and detailed information on the estimated greenhouse emissions from projects such as the Suncor Base Mine Extension Project, including;

- Explaining how avoided emissions and greenhouse gas offsets are to be factored into estimates of greenhouse gas emissions.

Estimate of Potential Greenhouse Emissions Associated with the Project

An initial estimate of the annual greenhouse gas emissions associated with the Project, based on models for other Suncor operations, is approximately three million tonnes of carbon dioxide equivalent per year over the thirty-year life of the Project.

Part E: Project Information Relevant to development of the LRRCN Tailored Impact Statement

7: Purpose of and Need for the Project The potential benefits of the Project include satisfying the Alberta Energy Regulators (AER) mandate to “ensure the safe, efficient, orderly and environmentally responsible development of oil, oilsands, natural gas, and coal resources over their entire life cycle”.

10: Estimate of Maximum Production Capacity & Description of Production Processes (pg 13)

Reclamation: Disturbed areas are reclaimed progressively as the necessary reclamation criteria are met. The final landscape is expected to be a mix of uplands, wetlands, lakes, and streams.

18: List of Permits, Licenses or Authorizations Required in Relation to the Projects Environmental Effects (pg 20)

Federally, a decision statement will be required from the Impact Agency of Canada. Additionally, Fisheries & Oceans Canada ...could include changes associated with Fisheries offsetting options located outside of the proposed Project development area. (pg 20)

Part F; Potential Effects of the Project (pg 20-21)

The key issues that will be addressed as part of the Project Impact Statement, that LRRCN could address* in their detailed impact assessment statement could include:

- Positive and negative social effects, including community wellbeing and archaeology*;
- Positive and negative environmental effects including those on:

- Air quality;
- Greenhouse gas emissions*;
- Climate change effects on the Project: air emissions and their effects on water quality, wildlife, vegetation, and soil: noise and light: aquatic health: fish and fish habitat: soils vegetation, including wetlands*, and old growth forests*:
- Wildlife, including species at risk* and other wildlife*
- Wildlife health*:
- Biodiversity*:
- Pace and outcomes from reclamation, considering sustainable ecosystems and end land-uses:*
- Positive and negative human health effects, human health risks related to:
 - air quality,
 - noise,
 - water quality*, and
 - food quality*:
 - Health-related social infrastructure:
 - Potential effects of accidents and malfunctions*:
 - The role of the Project within Canada’s environmental and climate obligations*
 - The Projects contribution to sustainability*.

Appendix E of the Detailed Project Description provides a description of the approach and methodology that will be undertaken to assess the potential effects of the Project, including identification of mitigation and monitoring plans or programs appropriate to the predicted effects of the Project.

19: Potential Changes to Components of the Environment within the Legislative Authority of Parliament (pg 21)

The development of the Project may impact fish and aquatic habitat* due to diversion or elimination of waterbodies and watercourses in the Project Development Area.

The development of the Project may impact wildlife*, (including species at risk*) and wildlife habitat*. Potential impacts may result in changes to wildlife habitat, wildlife availability, movement, health, and populations*.

The hydrology and water quality assessment will evaluate potential impacts on water quality and quantity in WBNP (pg 22).

21;Impact to Indigenous Peoples, Physical and Cultural Heritage, Current Use of Lands and Resources for Traditional Use, and Archaeological, and Paleontological Resources* (pg 22)

Concerns listed by Indigenous Peoples during ongoing engagement activities are listed in Section 4. The Project may result in impacts to Indigenous Peoples Treaty rights and Traditional Uses through potential changes to land access. Loss of Traditional lands and ability to hunt, fish, gather and/or trap, as well as their ability to practice their culture.

Suncor's response to input received from the review of the Initial Project Description, and identified potential impacts to Indigenous peoples on physical and cultural heritage, Indigenous rights, traditional land use, historical, archaeological and paleontological resources is provided in Appendix C of the Detailed Project Description for the Project.

22: Impact to Indigenous Peoples Social, Economic, and Health Conditions

Concerns raised by Indigenous people during ongoing engagement activities are listed in Section 4.

Suncor understands there are both positive and negative impacts to social, economic, and health conditions to Indigenous peoples due to oil sands development (pg 22).

Key Socioeconomic Issues raised by Indigenous Groups include:

- The ability to participate in employment and business opportunities:
 - The effects of development on traditional lands and ways of life/culture:
 - The effects of developments on traditional lands Indigenous peoples health and well being:
 - Contribution of the Project to cumulative effects already being experienced in the region:
 - Impacts to physical infrastructure in the region:
 - Impacts to social infrastructure and ability to access needed services for Indigenous communities:
 - Changes in social conditions brought on by population change in the region:
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- **Suncor's response to input received from the review of the Initial Project Description and how impacts/issues affecting Indigenous peoples social, economic and health conditions will be provided in Appendix C of the Detailed Project Description.**