



Athabasca Landing Metis Community Association
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August 19, 2022
Jeff Winsor
Suncor Energy Ltd.
150, 6th Avenue S.W., Calgary, Alberta
T2P 3E3

Re: Athabasca Landing Métis Community Association – Comments on the Baseline Study Design for the Suncor Base Mine Extension Project

Dear Mr. Winsor,

Athabasca Landing Métis Community Association (ALMCA) participated in the Suncor Base Mine Baseline Study Design Workshop (Workshop) on July 21, 2022. At the Workshop, Suncor Energy Ltd. (Suncor) provided information on the previously performed field studies, planned 2022 field studies and proposed future data collection efforts for the Base Mine Extension Project (BMX; the Project).

Based on Suncor’s current proposed design for the Project, ALMCA expects that the Project will have a high level of adverse impacts on our Métis rights, claims, interests and way of life. ALMCA also asserts that the current baseline study design does not propose to gather some key information that will be required for Suncor to fully and properly assess the potential impacts of the Project. To address the gaps we have identified in the proposed baseline study design, we have prepared a series of comments and recommendations to ensure that the Federal Impact Assessment of the BMX project accurately and comprehensively assesses the potential impacts of the Project on Métis rights, claims, interests and way of life. Our comments and recommendations are included in Table 1 of this letter.

The Alberta Métis possess Aboriginal rights, including pre-existing Aboriginal collective rights and interests in lands recognized and affirmed by section 35 of the Constitution Act, 1982. As affirmed by the Supreme Court of Canada, such rights are “recognize[d] as part of the special aboriginal relationship to the land” (R. v. Powley, 2003 SCC 43, at para. 50).

ALMCA will require Suncor and the Crown to provide reasonable capacity, resources and opportunity to be appropriately and adequately consulted to ensure that the potential impacts of the proposed Project to our Métis rights, claims, interests and way of life are avoided, mitigated and/or accommodated. As such, ALMCA will require capacity support from Suncor to facilitate our ongoing engagement and participation and negotiations with Suncor on the Project beyond specific funding opportunities associated with milestones in the Impact Assessment Process. ALMCA requests that the Proponent commit to the development of an agreement with ALMCA which details the process by which Suncor will obtain our consent for the Project.

We look forward to continuing to develop a relationship with Suncor that is based on the identification of shared interests, and which is working towards our free prior and informed consent for the BMX Project.

Sincerely,



Ron Donald
President, Athabasca Landing Métis Community Association

Cc: Tracey Stephen, Suncor Energy Ltd.
Diane Scoville, Athabasca Landing Metis Community Association
Claudette Bois, Impact Assessment Agency of Canada
Andrew Bubar, Shared Value Solutions
Chris Wagner, Shared Value Solutions



Table 1. ALMCA's comments on Suncor's Baseline Study Design for the Base Mine Expansion project.

Comment #	Document Name	Slide Title; Slide #	Comment	Recommendations
1.	NA	NA	ALMCA notes that there are a number of sites that are of importance to our community that may be impacted by the BMX Project or that could serve as beneficial reference locations that have not been sampled by Suncor.	<p>ALMCA requests that Suncor undertake further environmental baseline data collection activities at the following sites (as shown in Figure 1:</p> <ul style="list-style-type: none"> • Reference Site #1 ([REDACTED]): reference site to collect baseline data on water quality, hydrology, hydrogeology, aquatic health, and water, sediment, and snow quality • Reference Site #2 ([REDACTED]): reference site to collect baseline data on wildlife, and vegetation • Reference #3 ([REDACTED]): reference site to collect baseline data on noise, air quality, wildlife, vegetation, aquatic health, fish, water, sediment and snow quality, hydrology and hydrogeology • Reference Site #4 ([REDACTED]): reference site to collect baseline data on water quality, hydrology, hydrogeology, aquatic health, and water, sediment, and snow quality • Reference Site #5 ([REDACTED]): reference site to collect baseline data on wildlife, and vegetation

Comment #	Document Name	Slide Title; Slide #	Comment	Recommendations
				<ul style="list-style-type: none"> • Baseline Site #1 ([REDACTED]): potentially impacted site to collect data on noise, air quality, wildlife, vegetation, wildlife road mortality and traffic volumes • Baseline Site #2 ([REDACTED]): potentially impacted site to collect data on noise, air quality, wildlife, vegetation, aquatic health, fish, water, sediment and snow quality, hydrology, hydrogeology, wildlife road mortality and traffic volumes • Baseline Site #3 ([REDACTED]): potentially impacted site to collect data on noise, air quality, wildlife, vegetation, wildlife road mortality and traffic volumes • Baseline Site #4 ([REDACTED]): potentially impacted site to collect data on noise, air quality, wildlife, vegetation, wildlife road mortality and traffic volumes • Baseline Site #5 ([REDACTED]): potentially impacted site to collect data on noise, air quality, wildlife, vegetation, wildlife road mortality and traffic volumes <p>These locations will either be impacted by the project or should be used as a reference</p>



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				<p>sites to assist in reclamation and monitoring activities as part of the BMX Project.</p> <p>These locations are a small snapshot of the areas of importance to ALMCA, and further locations for use as a reference locations or baseline assessment locations may be provided pending further conversations with our community members and pending the results of our Métis Knowledge and Land Use Study.</p>
2.	NA	NA	<p>The baseline study designs that Suncor presented at the Workshop do not touch on the following subjects which are requirements of the Tailored Impact Statement Guidelines:</p> <ul style="list-style-type: none"> • Human health conditions • Social conditions • Economic conditions <p>This is concerning to ALMCA as, we have noticed significant impacts on health, social and economic conditions within our community as a result of on-going oil and gas developments within our traditional territory.</p>	<p>Suncor must provide the details of the proposed baseline studies they are undertaking to assess the current status of human health conditions, social conditions and economic conditions to ALMCA for our review and comment.</p> <p>If Suncor intends for all Human Health, Social and Economic baseline information to be collected by ALMCA, they must confirm that this is the case.</p>
3.	2022 Baseline Field Work – Wildlife and Wildlife Habitat	NA	<p>Suncor has shown where wildlife and wildlife habitat will be surveyed in 2022 within the LSA, but has not indicated whether baseline studies are being completed along potential</p>	<p>ALMCA requests that Suncor provide further details of the baseline studies that have been or will be completed along the main transportation routes (e.g. [REDACTED]).</p>



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			<p>transportation routes () that will likely experience substantial increases in traffic volumes as a result of the BMX Project construction and operations.</p> <p>This is concerning to ALMCA, as our community is nearby transportation routes that may be impacted by traffic volume changes during both construction and operation of the BMX Project. Changes in traffic volumes have the potential to alter noise and light pollution, which could alter habitat use of wildlife species of importance to our community. As well, changes in traffic volume have the potential to lead to increased incidence of road mortalities directly impacting wildlife populations that our community members harvest.</p>	<p>() to assess the impacts of increased traffic on wildlife populations.</p> <p>If Suncor does not intend to conduct baseline studies along the main transportation routes, ALMCA request that Suncor include wildlife baseline studies along ().</p>
4.	2022 Baseline Field Work – Wildlife and Wildlife Habitat	Previously Collected or Publicly Available Data; slide 5	<p>Suncor notes in slide five that survey activities include:</p> <ul style="list-style-type: none"> • “spring and fall aerial waterbird (ducks, geese, grebes, herons) surveys via helicopter” • “shoreline point count surveys for shorebirds, marsh birds, and waterfowl” <p>Suncor does not mention whether migratory land birds are surveyed</p>	<p>ALMCA requests that Suncor confirm whether migratory land birds are surveyed during both the spring and fall migration seasons to assess the diversity and abundance of species that use the BMX local and regional study areas.</p>



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			<p>during the spring and fall migratory season to identify the use of the BMX local and regional study areas as stopover habitat.</p> <p>This is concerning to ALMCA, as migratory stopover locations provide important habitat for all migratory bird species, including land birds, during both the spring and fall seasons. The BMX project could result in adverse impacts to this important habitat and baseline studies should be completed in order to understand the magnitude of potential impacts. Migratory land birds such as geese are important components of the natural environment, which our community members rely upon to practice their Métis rights, claims, interests and way of life.</p>	
5.	2022 Baseline Field Work – Wildlife and Wildlife Habitat	2022 Study Design - Wildlife; slide 7	<p>Suncor has noted that they plan to complete bat detector surveys, bird species at risk surveys and terrestrial invertebrate surveys in 2022. Suncor has not provided sufficient details of the specific methods that they will be using for each survey nor have they cited any standards survey methodologies for these surveys.</p>	<p>A. ALMCA requests that Suncor commit to including the following details for bird species at risk surveys and terrestrial invertebrate surveys in the Impact Statement:</p> <ul style="list-style-type: none"> • Weather conditions for surveys • Time of day for surveys • Number of visits • Equipment used during surveys



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			<p>This is concerning to ALMCA, as without these details we are unable to confirm if the proposed studies by Suncor will be sufficient in characterizing and assessing the baseline environment. Misaligned baseline studies could lead to a mischaracterization of the impacts of the BMX Project and lead to adverse impacts to our Métis rights, claims, interests and way of life.</p>	<ul style="list-style-type: none"> • Number of surveyors • Spatial extent of the survey locations • Citation for standard survey methodologies that will be followed <p>B. ALMCA requests that Suncor provide the following further details for bat detector surveys:</p> <ul style="list-style-type: none"> • Bat detectors models to be used • Bat detectors settings that will be used (e.g. frequency range, time of recordings, duration of recordings, etc.) • Methodology and software for analyzing bat detector data • Citation for standard survey methodologies that will be followed • Duration of bat detector deployment <p>C. ALMCA requests that Suncor provide justification for the proposed number of survey locations and placement of survey locations.</p>
6.	2022 Baseline Field Work – Wildlife and Wildlife Habitat	Previously Collected or Publicly	Suncor notes that field surveys were previously completed for the BMX Project in 2013 and 2021, and noted that these included:	<p>ALMCA requests that Suncor must commit to including the following further details for these surveys in their baseline reporting in the Impact Statement:</p>

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		Available Data; slide 5	<ul style="list-style-type: none"> • remote cameras surveys for mammals • winter track count surveys for mammals and birds • auditory surveys for breeding birds and amphibians • bat detector surveys • aerial waterbird (ducks, geese, grebes, herons) surveys • shoreline point count surveys for shorebirds, marsh birds, and waterfowl <p>Suncor has not provided sufficient details of the survey locations, the specific methods used during for each survey, the standards these survey methodologies are based on.</p> <p>This is concerning to ALMCA, as without these details we are unable to confirm if these surveys by Suncor were sufficient in characterizing and assessing the baseline environment. Misaligned baseline studies could lead to a mischaracterization of the impacts of the BMX Project and lead to adverse impacts to our Métis rights, claims, interests and way of life.</p>	<ul style="list-style-type: none"> • Weather conditions for surveys • Time of day for surveys • Number of visits • Equipment used during surveys • Number of surveyors • Mapping showing survey locations for each survey type • Spatial extent of the survey locations/transects • Details of detector/trail camera settings (e.g. frequency range, time of recordings, trigger sensitivity, trail camera height, etc) • Citation for standard survey methodologies that were followed

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7.	2022 Baseline Field Work – Wildlife and Wildlife Habitat	NA	<p>Suncor has not provided any details of road mortality monitoring associated with the baseline survey activities for the BMX Project. Ground based transportation routes could be impacted by the construction and operation of the BMX Project () through changes to traffic volumes. These changes in traffic volumes could lead to adverse impacts to wildlife populations through increases road mortality.</p> <p>This is concerning to ALMCA, as our community members rely on healthy wildlife populations to provide country foods through hunting activities. If higher traffic volumes associated with the BMX Project increase road mortality of these wildlife populations this would have a direct impact on our Métis rights, claims, interests and way of life.</p>	<p>Suncor must confirm whether they have a baseline study in place assessing levels of wildlife road mortalities along main transportation routes to and from the BMX Project. If Suncor does not have a study in place then they must undertake to fully assess the baseline conditions that are present to ensure that potential impacts of the BMX Project can be fully characterized, monitored and potential mitigation measures (e.g. wildlife underpasses) could be employed should impacts of the project become to severe (e.g. significant impacts to wildlife populations).</p>
8.	2022 Baseline Field Work – Vegetation/Wetlands	Previously Collected Data; slide 3	<p>Suncor notes that field survey data was previously collected for the BMX Project in 2001, 2004, 2006, 2008, 2012, 2013, 2014, 2017, 2019 and 2020, and noted that these included:</p> <ul style="list-style-type: none"> • detailed vegetation inventory plots 	<p>ALMCA requests that Suncor commit to including the following further details for these surveys in their baseline reporting in the Impact Statement:</p> <ul style="list-style-type: none"> • Weather conditions for surveys • Time of day for surveys • Number of visits



Comment #	Document Name	Slide Title; Slide #	Comment	Recommendations
			<ul style="list-style-type: none"> • ground-truth plots • listed plant plots • listed ecological communities • wetland function assessment plots • weed plots <p>Suncor has not provided sufficient details of the survey locations, the specific methods used during for each survey, the standards these survey methodologies are based on.</p> <p>This is concerning to ALMCA, as without these details we are unable to confirm if these surveys by Suncor were sufficient in characterizing and assessing the baseline environment. Misaligned baseline studies could lead to a mischaracterization of the impacts of the BMX Project and lead to adverse impacts to our Métis rights, claims, interests and way of life.</p>	<ul style="list-style-type: none"> • Equipment used during surveys • Number of surveyors • Mapping showing survey locations for each survey type • Spatial extent of the survey locations • Citation for standard survey methodologies that were followed • Qualifications of surveyors undertaking the surveys
9.	Baseline Field Work –Noise	Monitoring Locations; slide 6	<p>On slide 6, Suncor provides a map showing the noise monitoring locations for the BMX Project. This map does not show any noise monitoring locations that designed to assess baseline noise levels associated with main transportation routes that could be impacted by the BMX Project [REDACTED]</p>	<p>A. As per comment 1 above, ALMCA requests that Suncor add noise monitoring stations along the main ground based transportation routes ([REDACTED]) to assess the baseline levels of noise, so that impacts to noise levels caused by changes to traffic volumes can be accurately characterized.</p>

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			<p>[REDACTED]). These transportation routes may experience changes to traffic volumes as a result of the BMX Project construction and operations.</p> <p>As well, noise levels by altered by changes in incoming and out-going flights from Fort McMurray associated with the construction and operation of the BMX Project (e.g. construction/operations personnel traveling to and from site).</p> <p>This is concerning to ALMCA, as our community is nearby transportation routes (ground based and air based) that may be impacted by vehicle traffic volume changes during both construction and operation of the BMX Project. Changes in vehicle traffic volumes have the potential to alter noise levels, which could alter habitat use of wildlife species of importance to our community.</p>	<p>B. ALMCA requests that Suncor add noise monitoring stations along the main air based transportation routes (e.g. main flight routes for airlines) to assess the baseline levels of noise, so that impacts to noise levels caused by changes to air traffic volumes can be accurately characterized.</p>
10.	Baseline Field Work –Air Quality	Previously Collected or Publicly Available Data; slide 3	On slide 3, Suncor provides a map showing the air monitoring locations where data was previously collected or publicly available and slide 7 show the air monitoring locations where data	As per comment 1 above, ALMCA requests that Suncor add air quality monitoring stations along the main ground based transportation routes ([REDACTED]) to assess the baseline levels of



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		2022 Monitoring Locations; slide 7	<p>will be collected during 2022 for the BMX Project. These maps do not show any air monitoring locations that are placed to assess baseline air quality associated with main transportation routes that could be impacted by the BMX Project ([REDACTED]). These transportation routes may experience changes to traffic volumes as a result of the BMX Project construction and operations, which would impact air quality.</p> <p>This is concerning to ALMCA, as our community is nearby transportation routes (ground based and air based) that may be impacted by changes in air quality associated with increases in vehicle traffic volume changes during both construction and operation of the BMX Project. These could have health implications for our community members while they are out on the land.</p>	<p>air quality, so that impacts to air quality caused by changes to traffic volumes can be accurately characterized.</p>
11.	2022 Baseline Field Work – Hydrogeology	Previously Collected Data Hydrogeology; slide 4	<p>On slide 4, Suncor presents the project area and aquatic resources local study area on a map. No rationale or method is provided to explain how the aquatic resources local study area was delineated.</p>	<p>ALMCA requests that Suncor commit to providing details on the method used to delineate the aquatic resources local study area in their baseline reporting in the Impact Statement. The details should include:</p>

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12.	2022 Baseline Field Work – Hydrogeology	Previously Collected Data Hydrogeology; slide 6	The table provided by Suncor presents field sampling events but is lacking considerable detail. The table does not indicate how many wells were sampled during each event. The locations of the wells that were sampled are not shared either. The water quality parameters are also missing. Additionally, the rational and methods for selecting the wells and water quality parameters is missing.	<ul style="list-style-type: none"> • How the method(s) used to delineate the aquatic resources local study area will capture all potential impacts to groundwater and surface water quantity and quality • Scientifically defensible rationales with references from literature and regulatory guidelines/standards to support the method used
				<p>A. ALMCA requests that Suncor commit to providing the following details in their baseline reporting in the Impact Statement:</p> <ul style="list-style-type: none"> • The number of wells sampled during each sampling and monitoring event • The location of all the wells sampled during each sampling and monitoring event • The water quality parameters that were measured from each sample • A scientifically defensible method for selecting wells and water quality parameters for each sampling and monitoring event <p>B. The Proponent must confirm that groundwater drawdown from the Project will not result in a net water loss from the Athabasca River due to a change in the hydraulic gradient.</p>

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13.	2022 Baseline Field Work – Hydrogeology	2022 Study Design – Hydrogeology What are we planning to do in the field?; slide 8	The information provided by Suncor presents field sampling events but is lacking considerable detail. The slide does not indicate how many wells were sampled during each event. The locations of the wells that will be sampled are not shared either. The water quality parameters are also missing. Additionally, the rationale and methods for selecting the wells, depths from which groundwater will be sampled, sampling dates and water quality parameters is missing.	ALMCA requests that Suncor commit to providing the following details in their baseline reporting in the Impact Statement: <ul style="list-style-type: none"> • The number of wells sampled during each sampling and monitoring event • The location of all the wells sampled during each sampling and monitoring event • The water quality parameters that were measured from each sample • A scientifically defensible method for selecting wells, sampling dates and water quality parameters for each sampling and monitoring event
14.	2022 Baseline Field Work – Fish and Fish Habitat	2022 Study design – Fish and Fish Habitat	Suncor has not disclosed the sampling methods for the four field programs that will be ongoing in the LSA and RSA, as well as the standards that sampling results will be compared to, and any measures that will be in place to mitigate adverse effects. ALMCA must be aware of the entire process from sampling to mitigation actions to be confident that their Métis rights, claims, interests and way of life are being adequately protected.	ALMCA requests that Suncor commit to disclosing the following details in their baseline reporting in the Impact Statement: <ul style="list-style-type: none"> • Sampling methods for all sampling procedures noted in the four field programs • Standards that sampling results will be compared to • Protocols for how Suncor will react to exceedances to protect our Métis rights, claims, interests and way of life
15.	2022 Baseline Field Work – Fish and Fish Habitat	2022 Study design – Fish and Fish Habitat	Suncor has noted that there is an abundance of information available for the Athabasca River. The subject of this information as well as when it was	Suncor must identify available information on the Athabasca River that has the potential to be impacted by the Project and

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			collected/how often is updated is not included. ALMCA must be aware of the information being used to supplement Suncor's sampling plan.	include that information in their baseline reporting in the Impact Statement.
16.	2022 Baseline Field Work – Fish and Fish Habitat	2022 Monitoring Locations – Fish and Fish Habitat	Suncor has shared a map of sampling locations for benthos, fish, water quality, and hydrology but this map includes features that are not listed in the legend and does not include a North arrow to allow ALMCA to interpret the map accurately.	ALMCA requests that Suncor includes these attributes in all maps for accurate interpretation and suggests including flow direction arrows on watercourses for best interpretation of monitoring location data.
17.	2022 Baseline Field Work – Aquatic Health	2022 Study Design – Aquatic Health	Suncor has described the laboratory analysis that will be conducted to monitor aquatic health. Suncor has not included the pace sample analysis and how quickly they will be able to react to results that indicate impacts to aquatic health. ALMCA must be aware of the actions and commitments that will be upheld after sample analysis, and how quickly these actions will be implemented.	ALMCA requests more information about: <ul style="list-style-type: none"> • The length of time they anticipate it will take for Suncor to mitigate aquatic health impacts • The detection limits for analysis of samples to ensure comparison to standards and guidelines is possible • The standards and guidelines they will be comparing sample results to • The actions that will be triggered by an exceedance
18.	2022 Baseline Field Work – Hydrology	Previously Collected or Publicly Available Data Hydrology; slide 3	The years of meteorological data available from each station is missing from the map for many stations. It is unclear what type, if any precipitation data is/was collected at each station.	Suncor must commit to including the following details in their baseline reporting in the Impact Statement: <ul style="list-style-type: none"> • The year each meteorological station was established, and the year data collection concluded. If

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				<p>the station is still collecting data, please indicate this on the map.</p> <ul style="list-style-type: none"> A list of the stations indicated on the map and what methods/instruments are used at each station to (a) collect precipitation data and; (b) what months precipitation data is collected.
19.	2022 Baseline Field Work – Hydrology	2022 Monitoring Locations Hydrology; slide 13	Suncor has not provided a comprehensive list of what and where data will be collected. Data collection methods are not shared.	Suncor must provide a comprehensive list of what data will be collected at what stations what methods and equipment will be used to collect them in their baseline reporting in the Impact Statement.
20.	2022 Baseline Field Work – Water Quality, Sediment Quality, and Snow Quality	2022 Study Design – Sediment Quality; slide 10	Suncor does not indicate whether they will be sampling for methyl mercury in their sediment surveys as it is absent on the table provided on Slide 10.	ALMCA requests that Suncor commit to expanding their sediment sampling to include methyl mercury at all sampling sites for sediment, surface water and shallow groundwater..
21.	2022 Baseline Field Work – Water Quality, Sediment Quality, and Snow Quality	2022 Study Design – Sediment Quality What are we planning to do in the field?; slide 10	ALMCA appreciates the level of detail in this slide, however; Suncor does not provide methods, academic references or regulatory framework to support their choice of sediment quality parameters.	Suncor must commit to providing methods, academic references or regulatory framework to support their choice of sediment quality parameters in their baseline reporting in the Impact Statement.
22.	2022 Baseline Field Work – Water Quality, Sediment Quality, and Snow Quality	2022 Study Design – Snow Quality	ALMCA appreciates the level of detail in this slide, however; Suncor does not provide methods, academic references or regulatory framework to support	Suncor must commit to providing methods, academic references or regulatory framework to support their choice of snow

Comment #	Document Name	Slide Title; Slide #	Comment	Recommendations
		What are we planning to do in the field?; slide 11	their choice of snow quality parameters.	quality parameters in their baseline reporting in the Impact Statement.



Figure 1. ALMCA's proposed reference and baseline sampling locations for Suncor's Base Mine Expansion project.

