



**KTUNAXA
NATION**

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Fraser Ross
Project Manager
Pacific and Yukon Region
Impact Assessment Agency of Canada

sent via IAAC website comment submission

Regarding: Teck Fording River Operations expansion, Castle Project's addendum to the BC Initial Project Description

Ki?suk kyukyit,

The Ktunaxa Nation Council (KNC) has received and reviewed Teck Coal Limited's (Teck) amendment to their BC Initial Project Description (IPD) for the proposed Castle Project (the Project) in order to satisfy the federal requirements under the Impact Assessment Act.

As outlined in KNC's federal designation request (Appendix A) and KNC's review of Teck's BC IPD submission, the KNC has serious concerns with the proposed Project. The Project is in an area where evidence of Ktunaxa title and rights is clear and well documented and due to the location, size and lifespan of the proposed Project, the KNC considers that it will have serious adverse impacts on the Ktunaxa Nation's Indigenous title, rights and interests, as well as other impacts within federal and provincial jurisdiction. These Project impacts will be in addition to, and act cumulatively with, ongoing effects from existing and past developments in the area.

In response to the amendment to the BC IPD, KNC would like to draw IAAC's attention to previous submissions related to the Project in addition to comments on the amendment and IAAC's "What We Heard" document. Please consider the following as KNC review comment submission:

- Appendix A: KNC's June 23, 2020 letter, requesting the Castle project be federally designated. The letter also details a number of the KNC's concerns with the Project. (link)
- Appendix B: KNC's submission on the BC IPD (document and link to comment tracking table)
- Appendix C: KNC review comments embedded into the IAAC's What We Heard document

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Lower Kootenay

Tobacco Plains

We trust that this submission will assist the IAAC in the preparation of the Summary of Issues. Please do not hesitate to contact us.

Sincerely,



Erin Robertson MSc, RPBio, PMP
Team Lead, Mining Oversight, Lands and Resources
Ktunaxa Nation Council

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- Appendix A: KNC June 23, 2020 letter to IAAC, requesting Castle be a federally designated project: <https://iaac-aeic.gc.ca/050/documents/p80702/135195E.pdf>
- Appendix B: KNC BC IPD memo and link to Technical Advisory Committee comments: https://projects.eao.gov.bc.ca/api/public/document/5f24878f8a68e00021591de5/download/Castle%20IPD%20Comment%20Tracker_for%20EPIC.pdf
- Appendix C: KNC comments embedded in the IAAC's 'What We've Heard' document