



**GUNN METIS LOCAL NO. 55**

*Preserving Our Past...Ensuring Our Future*

Gunn Métis Local #55

Lac Ste. Anne Métis

P.O. Box 2057

Stony Plain, AB T7Z 1X6

Email: <email address removed>

December 9, 2020

**EMAIL:** iaac.heartland.aeic@canada.ca

Impact Assessment Agency of Canada  
Prairie and Northern Region  
Suite 1145, 9700 Jasper Avenue  
Edmonton, AB T5J 4C3

**Attention: Shelly Boss, Project Manager**

Dear Ms. Boss:

**Re: Value Chain Solutions – Heartland Complex Expansion Project (the "Project")**

On behalf of Gunn Metis Local #55 (Lac Sté. Anne Métis) ("GML/LSAM"), I write in response to the Impact Assessment Agency of Canada's (the "Agency") letter of November 19, 2020 and provide our comments on the Initial Project Description for the Project.

We have provided details of our initial concerns in the attached Guiding Question form included in your letter of November 19, 2020. We highlight key issues below.

**A. PROJECT COULD ADVERSELY IMPACT LSAM'S RIGHTS AND CONSULTATION IS REQUESTED**

GML/LSAM represents individuals who self-identify as the descendants of the historical Lac Ste. Anne Métis community ("LSAM") and asserts collective Métis

aboriginal rights and interests stemming from its historical and genealogical linkages to the historic Métis community of Lac Ste. Anne.

These rights include the use of LSAM's traditional lands, waters and resources for subsistence, medicinal, spiritual, economic, commercial, recreational and cultural purposes and all activities necessarily incidental to these rights.

LSAM's traditional lands include the Project location, which are significantly and adversely affected by the cumulative industrial, agricultural and urban development in the area. The Project impacts could further contribute to these existing impacts. Accordingly, GML/LSAM is interested in the Project and would like to engage in consultation with the federal Crown on its consideration of the Project.

#### **B. MEANINGFUL RIGHTS ASSESSMENTS REQUIRES A BASELINE TRADITIONAL LAND USE STUDY**

The Project is proposed to be located in an area that has been the subject of significant development for decades, even before Métis rights have been recognized in Canada. GML/LSAM still faces challenges in securing the necessary funding and capacity to collect thorough and comprehensive traditional land use and cultural data as part of its rights recognition and protection efforts. A key challenge is collecting the information in a manner that recognizes the existing state of affairs – that LSAM's current use of and rights to the Project area reflects a highly impacted community. Accordingly, the collection of baseline traditional land use and cultural information for the area is necessary for a meaningful rights assessment by the federal Crown in the Project impact assessment.

#### **C. POTENTIAL IMPACTS TO CULTURAL VALUE OF NORTH SASKATCHEWAN RIVER VALLEY**

The North Saskatchewan River is a historical and current travel route that is an important part of LSAM's cultural landscape. Travelling the river by canoe is a cultural activity that helps to connect members with their roots and helps to reinforce cultural identity and transmission of culture to younger generations. The community also asserts harvesting rights in the river valley. Increased

sensory disturbance of industrialization along the river affects the cultural landscape and also affects members' experience and could result in avoidance of this important cultural area and activities. This likely has negative consequences to the social values, health, culture, sustainability and resilience of the community that requires assessment as part of the Project impact assessment.

#### **D. AIR QUALITY IMPACTS ON THE QUALITY OF TRADITIONAL RESOURCES IN THE AREA**

The Project is proposed within a heavily industrialized area that already suffers from poor air quality. LSAM is concerned that the increase in air pollution from the Project will further deteriorate the meaningful exercise of LSAM's aboriginal rights; cause potential impacts to the quality of traditional resources for harvesting and cause potential human health impacts for members while out on the land.

#### **E. WATER QUALITY AND QUANTITY CONCERNS**

LSAM is concerned about increased water withdrawals from the North Saskatchewan River and potential water quality impacts affecting water resources; fish and fish habitat and transportation use in the North Saskatchewan River and the Astotin Creek Watershed. We request these issues also form key components of the impact assessment process.

#### **F. EFFECTS OF MALFUNCTIONS AND ACCIDENTS OF STORAGE AND PIPE/RAIL TRANSPORT**

The Project proposes a significant increase in petroleum storage at the Project location in addition to the significant increase of transport on railway and pipeline across LSAM's traditional territory. LSAM's traditional territory within the Wababum Lake area has already suffered the impacts of a significant oil spill due to a CN Rail derailment in 2005. The implications of increased transport of refined bitumen along rail and pipeline within our traditional territory must be incorporated and within scope of the Project impact assessment process.

## **G. APPROACH TO CONSULTATION AND ENGAGEMENT**

It is GML/LSAM's understanding that a federal impact assessment is mandatory for the Project and we look forward to developing an Indigenous Engagement and Partnership Plan.

A key component of our community's consultation process is to obtain detailed information about the Project from the Crown and the proponent to engage directly with members for proposed mitigation and accommodation measures to bring back to the proponent and the Crown for implementation. As stated above, this necessary information includes baseline, cumulative and project specific traditional land use and cultural information as part of a rights assessment. Further, capacity is needed to obtain technical advice on key environmental matters. Our preference is for face-to-face engagement and consultation with both the Crown and proponent directly.

Thank you for the consideration of our concerns and comments. We look forward to working with the Agency within the consultation process on the Project.

Sincerely,

<Original signed by>

Murleen Crossen, President

Enclosure

cc: Dan Brown, Senior Funding Officer (<email address removed> )  
Camille Almeida, Alberta Energy Regulator (<email address removed>)  
Nicole Nicholls, Contractor, Lac Ste. Anne Métis  
(<email address removed> )