



KELLY LAKE FIRST NATION

Consultation Department
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“A Community Located in British Columbia”

January 25, 2021

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

Attention: Shelly Boss

Delivered via Email to: iaac.heartland.aeic@canada.ca

RE: LETTER OF CONCERN: Value Chain Solutions – Heartland Complex Expansion Project

“Indigenous peoples have the right to maintain and strengthen their distinctive spiritual and material relationship with the lands, territories, waters, coastal sea, and other resources which they have traditionally owned or otherwise occupied or used; and to uphold their responsibilities for future generations in this regard...”
The U.N. Declaration of Rights of Indigenous Peoples, Geneva, SWT.

On behalf of Kelly Lake First Nation (KLFN), this letter serves to advise the Impact Assessment Agency of our concerns relative to the proposed Heartland Expansion Project noted above. We recognize that the deadline for participation in the current Comment Period, has lapsed and appreciate the opportunity to add comment prior to the completion of the Agency’s assessment.

KLFN traditional lands and their members are a community of persons who’s constitutionally protected harvesting and other rights are exercised throughout the traditional territory of KLFN and whom may be directly affected by this work. Although historically, land usage of KLFN covered a vast territory, more recently through interviews, recorded oral history and testimony from the Elders and custodians of knowledge; the area has refined to what is commonly referred to as KLFN traditional lands.

The project is within the KLFN traditional territory and its specific location is in an area that has been significantly affected by cumulative industrial and urban development. This letter represents KLFN’s initial response to the proposed project, and confirmation of the need for further assessment as to:

- ✚ The potential adverse impacts on the exercise of Indigenous Rights and Traditional uses on the Nation’s traditional lands.
- ✚ Work opportunities related to construction, operation, ongoing maintenance, and eventual decommissioning of the infrastructure and restoration of the sites involved.



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KLFN faces challenges in securing the necessary funding and capacity to conduct a thorough and comprehensive traditional land use study, and as such, is unable to determine with certainty its specific concerns, however we do wish to list the following based on our knowledge of the project and the area.

- Heavy industrialization, traffic, and construction will have a significant impact on water and air quality, which in turn will impact the entire biodiverse eco system (soil, plants, aqua life, small and large game). Mitigation of water disturbance, contamination, quality, and quantity is paramount.
- There is the potential for toxic substances to leach into the soil and make their way into the North Saskatchewan River and underground waterways, which will negatively disturb the natural rhythm of Mother earth and the health of all living things.
- The project’s cumulative impacts are unknown and will be difficult to measure given the density of industrial development in area.
- Changes to the cultural and traditional practices of the community (i.e., traditional ways of life, food and health, cultural and spiritual practices, protection of scared practices and knowledge transfer) are not yet unknown or understood.
- Project Monitoring and emergency response practices during and after construction are not known or understood.
- Indigenous participation in the project (i.e., construction, monitoring, employment, and training) are not known or understood.

In closing, KLFN wishes to make it clear that this letter should not be interpreted as opposition to the project, however, the Nation requires an opportunity to consider the full impact of the work on itself and its members, and to engage with the project proponent and the Agency in a *meaningful manner* to address these concerns.

Should you have any questions, please contact Marnie Suitor at <personal information removed>.

Regards,

On behalf of
KELLY LAKE FIRST NATION, Industry Consultation

Marnie Suitor

Marnie Suitor,
Senior Consultation Coordinator

cc: Chief Norman Calliou: <email address removed>
