

TIMISKAMING FIRST NATION

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April 24, 2022

General comments from Timiskaming First Nation

The Timiskaming First Nation (TFN) wants to state that participating in the process of commenting on documentation from the Impact Assessment Agency of Canada, does not mean that in any way that TFN agrees with the timeframe or budget that the Federal government has provided. Both are minimal to allow for meaningful review of the impact assessment of the Initial Project Description for the Alexandra Bridge Project.

Furthermore, TFN considers the Impact Assessment process to be an information sharing process to which we can assess the project and is not yet consultation in which TFN can deem satisfactory.

Comment Form – Information to Inform the Summary of Issues

Project: Alexandra Bridge Replacement Project

Proponent: Public Services and Procurement Canada and National Capital Commission

CIAR No.: 83444

End of comment period: **April 24, 2022**

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|---|------------------------|
| Indigenous Group Name: Timiskaming First Nation | |
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The Impact Assessment Agency of Canada invites your community to provide information it has available at this time on the Project and its potential effects or impacts (both positive and negative) to the environment and to your community and your Aboriginal and/or Treaty Rights. We also welcome your input on how you would like to be engaged throughout the potential assessment process. Your comments will inform the Summary of Issues¹ with respect to the Project and will be provided to the Proponent to address. You may use this form or use another format of your choice.

All comments should be submitted via the **Submit a Comment** feature available on the Project's Canadian Impact Assessment Registry page (Reference 83444at <https://iaac-aeic.gc.ca/050/evaluations/proj/83444?culture=en-CA>). Letters and forms can be uploaded using this feature. If you have any difficulties submitting this way, please contact the Agency at alexandra@iaac-aeic.gc.ca for assistance.

1. General environmental effects

Please identify any environmental effects of the Project that are of concern to your community, including any that you think of that were not identified in the Initial Project Description.

We are concerned with the long-lasting work within the waters and disturbance to the surrounding fish, wildlife and habitat. The impacts that cannot be mitigated, such as the loss of riparian zones, harbour species at risk plants, could have devastating effect to the rights of indigenous people and to the ecosystem. With the deconstruction of the bridge, loss of bat roosting habitat will be lost, With the research and field work at TFN we have noticed a lot of bridges are being used by bats as day night roosts. TFN is also concerned with the noise over such a long period of time, could also have additional disturbance to fish and wildlife.

Furthermore, the cumulative effects of hydro dams, log drives, and various industrial development has changed the water ways and passage drastically. Constant disturbance has environmental effects.

2. Effects to physical and cultural heritage

Please describe how the potential change, resulting from project effects to the environment, could result in changes to your community's physical and cultural heritage (e.g. ceremonial sites, burial sites, cultural landscapes).

¹ The Summary of Issues is a list of issues raised in the Planning Phase prepared by the Agency, as per section 14(1) of the *Impact Assessment Act*. This document provides the proponent with an understanding of issues and allows participants to see how their comments and concerns have been characterized.

Cultural Landscape includes the overall heritage of the bridge but for TFN, we see the Ottawa river as a historical site for Algonquin people as a travel route. In the creation of reserves, indigenous people were kept idle and the Ottawa River travel route was guarded by mercenaries. Although, we no longer travel in canoes and are now in cars, we see that a project in this site has the opportunity to bridge Algonquins to the city of Ottawa and its residents. Decisions should include the Algonquin people in any way possible, and could mean changing the name of the bridge to reflect our history.

3. Effects to current use of lands and resources for traditional purposes

Please describe how any potential change, resulting from a project effect to the environment, could result in changes to your community's current use of lands and resources for traditional purposes (e.g. hunting, fishing, trapping).

A big part of TFN is harvesting berries, plants, mushroom species. The potential to riparian zone loss of the during dewatering will make these species not present to harvest. A good example species is high bush cranberry *Viburnum Trilobum* which is harvest frequently by TFN members. With these riparian zones being altered, the buffer they form to protect the water's edge will be affected.

We are also concerned about the fish and fish habitat, as it is a staple in our culture.

The developments all contribute to loss of traditional land use and have deterred First Nations from gathering in that area. Although, there are still some ceremonies conducted, travel routes and traditional land use there, will continue to be impacted.

4. Effects to structures, sites or things of historical, archaeological, paleontological or architectural significance.

Please add any further detail, and please describe how the potential change, resulting from a project effect to the environment, could result in changes to your community's structures, sites or things of historical, archaeological, paleontological or architectural significance (e.g. artifacts, important historic buildings or symbols).

In TFN, we know there are aboriginal artifacts scattered everywhere in the territory from over 2000 years of travel on the land. Knowing this, it is very important to do an archeological survey of the de-watered and areas being disturbed, in the proposed work site.

5a. Effects to social conditions

Please describe how the Project could potentially affect social conditions that are important to your community.

Overall, our initial comments for social conditions would entail a holistic approach around the history of First Nations peoples. Cumulative effects on the environment but also, residential schools, sixties scoop, the Indian act, the lack of basic right to clean drinking water, are all ways that communities have been impacted negatively. This bridge was built in the time that communities were being shuffled to reservations. Now, in the bridge's state of repair, we should look at how First Nations can be impacted positively. Here is an opportunity to unite our nations again, make a gathering and a find First Nation specific practices site for the bridge and/or surrounding site.

With the site being altered, the loss of gatherings, and traditional land use like harvesting of said species, and fishing the areas, members will miss out on social experiences with one another which lead to decline in mental health.

5b. Effects to health conditions

Please describe how the Project could potentially affect health conditions that are important to your community.

At this time, we do not have a point of reference in the health conditions. The connection to "social conditions" could lead to poor mental health such as the loss of wild foods or impacts to the environment.

5c. Effects to economic conditions

Please describe how the Project could potentially affect economic conditions that are important to your community.

TFN Programs such as Ni dakinan's, The Wild Basket, employ community members to harvest traditional plants, berries, and mushrooms and offer them to the local region. TFN sees potential to affect any species in the area. TFN also wants to explore the potential to benefit community members by way of capacity building or business opportunities.

6. Impact to exercise of rights

Please describe if you expect the Project may impact your community's exercise of rights as protected under section 35 of the *Constitution Act, 1982*, please describe how.

The project is expected to impact the exercise of TFN's rights on the basis that the project is on Algonquin territory with inherent rights. TFN will reserve comments in the initial project description.

7-8. Consultation and Engagement

Assuming a federal assessment is required for the Project, please provide information on how you would like to be consulted by the Agency.

- e-mail relevant documents, presentations and notices in timely manner
- community summary docs, Conduct Follow ups
- sufficient funding and timelines to review and assess
- work collaboratively when possible
- allow extensions when requested
- set expectations for proponent's duty to consult

If a federal assessment is required for the Project, please provide information on how you would like the proponent to engage your community.

- duty to consult with respect,
- meaningful dialogue
- accommodate where possible
- e-mail relevant documents, presentations and notices in timely manner
- community summary docs, Conduct Follow ups
- sufficient funding and timelines to review and assess
- work collaboratively when possible
- allow extensions when requested

Based on the information presented in the proponent's Initial Project Description, is there any information about your community that was provided to the proponent that is not adequately documented?

IPD-Preliminary comments

Comment: TFN would like wording in the project description that it is located on Algonquin Territory lands.

Pg. 237 "Valued components and concerns identified by Algonquins of Ontario based on meetings held to date are described below."

Comment: It should read Timiskaming First Nation if that is TFN section.

9. Additional considerations under the impact assessment process

Are there any additional issues, (i.e. gender-based analysis plus, sustainability, Indigenous knowledge or Indigenous cultures) that you wish to note for the Agency's consideration?²

During the De-watering stage, it's a race to save fish and mollusk species. TFN would like a mitigation effort to invite communities to help put these species back into the water. Communities could also harvest the deceased individuals for consumption, and crafts.

General questions.

What is done with the diseased individuals after the de watering process?

What is done with the dead fish?

What is done with the dead mollusks?

What is done with the dead *Odonata spp.* And other benthic invertebrates?

What is done with dead vegetation?

And what is done with all other organic/biota mortality?

Please provide your comments on the Summary of the Initial Project Description using the **Submit a Comment** button on the Canadian Impact Assessment Registry **by April 24, 2022**. Thank you.

² The text of the *Impact Assessment Act* is available online: <https://laws-lois.justice.gc.ca/eng/acts/I-2.75/index.html>