

**From:** [Marian Ngo](#)

**Sent:** April 6, 2022 1:54:14 PM

**To:** [Ministre / Minister \(ECCC\); minister@ec.gc.ca; steven.guilbeault@ecc.gc.ca](#)

**Cc:** [Enviroinfo \(ECCC\)](#)

**Subject:** Request for Regional Assessment and Comparative Study - DP4 and RBT2

**Response requested:** Yes

**Sensitivity:** Normal

**Attachments:**

[2022.03.31 - SSIGA request for regional assessment.pdf](#);

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Dear Minister Guilbeault,

On behalf of the Salish Sea Indigenous Guardians Association (SSIGA), including our President Steven Stark, with whom you met with recently, please see attached a letter from our Board (representatives from Tsawwassen, Semiahmoo and Kwantlen First Nations).

The letter provides a bit of background to our organization along with an official request for a Regional Assessment and Comparative Study between the proposed DP4 and RBT2 projects. These proposed projects have major impact implications for the Salish Sea the Traditional Territories of our member First Nations and we believe require a lot of data around holistic cumulative effects to understand. In the spirit of reconciliation, our organization would be happy to lead these studies in coordination with other interested and affected Nations and with IAAC. SSIGA is Independent and Indigenous-led and these studies fall under the resources we provide. We believe that tangible cumulative effects and clear data (that takes into account Indigenous needs and perspectives) is a precursor to "informed decision making" and a required to bridge the gaps in the shortfalls of the assessment process.

Please let us know if you have any questions.

Best regards,

Marian Ngo, Executive Director  
Salish Sea Indigenous Guardians Association (SSIGA)



March 31, 2022

Dear Minister Guilbeault,

On behalf of the Salish Sea Indigenous Guardians Association (SSIGA) an Indigenous-led non-profit focused on cumulative effects and monitoring in the Salish Sea (and its interconnected inner bodies of water), we are requesting for a Regional Assessment that incapsulates both the RBT2 and DP4 proposed projects. We believe this approach is the only viable option that can begin to address the ongoing concerns and lack of clarity on the impacts of both projects that has been relayed by Indigenous communities. The Regional Assessment must also be conducted in a way that properly addresses cumulative effects by expanding the scope to includes our environmental and socio-economic priorities, culture, heritage, health, and way of life by incorporating holistic perspectives with western science.

The Salish Sea and its ecosystem are vital to the health, heritage, livelihood, and way of life of a multitude of First Nations. Our mission is to ensure that we are supporting our members and their staff with holistic data that reflects Indigenous perspectives and priorities as it pertains to development and resource policy in the Salish Sea. Our work is intended to be a regional amalgamation of data that bridges the gap of information and is intended to complement the ongoing stewardship programs of individual First Nations and our database, planning, and monitoring programs are built jointly and will ongoing feedback from members. Regional Assessments and comparative studies are within the parameters of data related support we can offer to support Indigenous communities that constantly find themselves in a cycle of untenable referrals processes where the time and energy required of staff does not yield fulsome understanding of impacts because the information presented is always piecemeal.

SSIGA was formed to practically apply the principles UNDRIP as a solution to the ongoing shortfalls of environmental assessment. Only with cumulative effects can there be a fulsome gauge to determine avoidance, mitigation, and accommodation measures for development. Our objective is to support Indigenous communities to meaningfully participate in government processes and make informed decisions regarding impacts to their territory.

Based on feedback our proposed approach is to start with a comparative study of the impacts of the RBT2 project and the DP4 project, which seem quite alike and are proposed in a similar sensitive area. It is important to understand the impacts of the projects on valued components such as Traditional Food Sources (Salmon, bivalve, crab) and overlay these impacts to gauge regional cumulative effects overall. Everything is interconnected and cannot be taken in isolation. This is the start of a responsible and



thorough decision-making process. The scope and considerations of Indigenous governments and their communities making is not a process that can be driven and dictated by government and industry. This is an Indigenous process that must be respected and accommodated.

We believe that everyone would benefit from meaningful Indigenous participation. We hope you will accommodate our call for Regional Assessment and accept our offer of support and work together towards rectifying insufficiencies. We look forward to hearing from you.

All our relations,

Sləq̓sit , Steven Stark (Tsawwassen First Nation)

President, SSIGA

<original signed by>

Xwopokton, Chief Harley Chappell (Semiahmoo First Nation)

Vice President, SSIGA

<original signed by>

spaləl', Tumia Knott (Kwantlen First Nation)

Treasurer & Secretary, SSIGA

<original signed by>