



**ERMINESKIN
CREE NATION**



INDIGENOUS KNOWLEDGE AND USE SUMMARY: SUMMIT COAL MINE 14 PROJECT

AUGUST 2022



1. Foreword, Limitations, and Terms of Use

This Indigenous Use summary was prepared in relation to a request by Ermineskin Cree Nation to designate the Summit Coal Mine 14 Project for federal review under section 9(1) of the *Impact Assessment Act* SC 2019, c. 28, s. 1. The summary is based on a review of the existing Ermineskin Cree Nation Indigenous Knowledge and Use database. Because no interviews have been conducted specifically for this summary or for the Summit Coal Mine 14 Project, this summary does not necessarily represent the full extent of Ermineskin Cree Nation's Indigenous Use, Knowledge, and Occupancy of the areas in and around the Summit Coal Mine 14 Project.

This summary is the exclusive property of Ermineskin Cree Nation. The information contained in this summary are solely for use by the Minister of Environment and Climate Change and the Impact Assessment Agency of Canada in the decision on whether to designate the Summit Coal Mine 14 Project for federal review. The summary, extracts of the summary, and/or original information from the summary may not be used, reproduced, or disseminated by any other party or for any other purpose without written permission from Ermineskin Cree Nation Chief and Council. Nothing in this summary should be construed so as to define, limit, or otherwise constrain the Treaty, Aboriginal, Indigenous, or legislative rights and interests of Ermineskin Cree Nation.





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2. Ermineskin Cree Nation Historical Use and Occupancy

Ermineskin Cree Nation can trace its lineage to the great Cree migration from the eastern woodlands along the North Saskatchewan River to the Rocky Mountains in conjunction with the expansion of the Euro-Canadian fur trade and its network of forts and posts. These Mountain Cree, as Hudson Bay Company's Governor-in-Chief George Simpson would call them,ⁱ have lived in the Alberta foothills and the Rocky Mountains since the 1700s.ⁱⁱ The Mountain Cree trapped furbearers in the winter to be sold at the trading posts at Jasper House, Fort Edmonton, and Rocky Mountain House while maintaining their traditional way of life hunting, fishing, and gathering in the rich boreal forest landscapes and hunting buffalo on the plains in the summer.

While the territories regularly used and occupied by the Mountain Cree ranged beyond the Rocky Mountains and its foothills into what would become the Provinces of Saskatchewan and Manitoba, as well as northwestern states such as Montana and North Dakota, this historical summary will focus more narrowly on the areas in the eastern foothills of the Rocky Mountains. Historical records and oral histories identify the Rocky Mountains and the Alberta foothills from Grande Prairie-Grand Cache-Hinton in the north to Pincher Creek to the south as among the primary use and occupancy areas for the Mountain Cree.

Consistent with the broader west-east migratory pattern that is characteristic of the Cree in Western Canada, who would trap, trade, and explore to the west and then return east in the summer to hunt





buffalo and other big game and stock up for the winter,ⁱⁱⁱ oral histories and historical records confirm the early use and occupancy of the Rocky Mountains and the eastern foothills by the Cree in the winter and the subsequent migrations east in the summer. As one Elder recalled, ancestors of the Ermineskin Cree Nation would winter in the Rocky Mountains, particularly around Jasper:

We were always in the eastern slopes; that was one of our main areas. It was a wintering area. It was, especially Jasper and Banff...once you enter those mountains in the Jasper area, it's like night and day. It might be cold and blowing, but once you enter in there, it's warm, and there's shelter.^{iv}

Historical records support oral histories. Dempsey identifies Jasper, the Kootenay Plains, Banff/Morley/Pincher Creek, and the Flathead Reservation in Montana as areas where the Mountain Cree would regularly spend the winter.^v

In the summer months, the Mountain Cree would migrate east along the Red Deer, Battle, and North Saskatchewan Rivers towards the east to gather, conduct ceremonies, and hunt buffalo as far as the Battleford area where they would visit friendly Cree communities. In the fall, the Mountain Cree would return along the Saskatchewan River and trade in Edmonton and occupy the Bear Hills and Peace Hills areas before returning to the mountains for the winter. Areas identified in the Alberta foothills as used and occupied by the Mountain Cree in the historical records include Jasper, the areas to the north up to Pipestone Creek (south of Grande Prairie), and the areas to the south, including the Kootenay Plains, Banff, and Pincher Creek, among many other locations.^{vi}





The historical use and occupancy of the Mountain Cree and their connection to Ermineskin Cree Nation is perhaps most visible in the figure of Louis Piche (*Pesew/Pisu/Peechee*). Born to a French-Canadian fur trader and his Cree wife, Piche would join the Mountain Cree in the 1820s, when he married Magdeline O’Piatastewis, the daughter of the Cree Chief Ahenekew.^{vii} An Ermineskin Elder told of how Piche married into the Mountain Cree who had already settled the foothills in the 1700s: “His [Piche’s] wife was already here. Like I was telling you, there's that Oblate Dad mentioned, who, her father [Chief Ahenekew], he's the first Chief of the Mountain Cree. He’s Bobtail and Ermineskin's mother's father.”^{viii}

Piche travelled extensively through the traditional territory of the Mountain Cree, guiding David Thompson from Rocky Mountain House to Jasper and HBC Governor George Simpson from Edmonton to Washington State. In terms of geographic extensiveness, the core territory of Piche and his followers extended from Banff north past the Saskatchewan River to Jasper, west through the mountain passes, and east into the plains. However, the group was highly mobile and ranged as far as north as Grande Prairie and Lesser Slave Lake, south through the mountains into Washington State and Oregon, and southeast into Montana and North Dakota and east to Battleford.^{ix} In the 1830s Piche became Chief of the Mountain Cree and had two sons who would themselves go on to become Chiefs and play critical roles in the founding of the Ermineskin Cree Nation: Alexis Piche (Bobtail) and Baptiste Piche (Ermineskin).





Following the death of Louis Piche in 1845, the Mountain Cree gradually began to fragment. Driven by poor trapping conditions and competition from other groups, Bobtail and Ermineskin migrated towards the plains near Pigeon Lake. Bobtail would ascend to the position of Head Chief of the Mountain Cree and would command the largest band of the Western Cree. However, droves of Euro-Canadian settlers provoked a rapid decline in wild game, particularly buffalo, and the intensification of disease. Having witnessed the fate of the Plains Cree, Bobtail adhered to Treaty Six at Blackfoot Crossing in 1877, despite his initial boycott of negotiations. After selecting a reserve around the Bear Hills, near the present-day Maskwacis, Bobtail divided his reserve to accommodate his younger brother Ermineskin, as confirmed in the annuity lists from 1880. Ermineskin had his reserve surveyed in 1885 and became the first Chief of the Ermineskin Band, recognized by the Government of Canada in May of 1889. Despite their settlement on the reserve, however, Ermineskin members continued to travel throughout their traditional lands in the foothills from Grande Prairie and the Kootenay Plains to Morley and Pincher Creek, to hunt, fish, and gather according to traditional customs and for subsistence purposes.

The connections between the Ermineskin Cree Nation and the eastern foothills of the Rocky Mountains were strengthened and reinvigorated in the 1960s with the founding of Smallboy Camp by Robert “Bobtail” Smallboy, the maternal grandson of Alexis Piche (Bobtail). Born in 1898 on the Ermineskin reserve, Smallboy was one of the most productive and financially successful farmers in the community. Respected for his knowledge of Cree culture and traditions, he was selected to be Chief of the Ermineskin Cree by his predecessor Dan Minde, a post he held from





1959 to 1968. Despite his personal success, however, Chief Smallboy had become increasingly disenchanted with reserve life and the influence of white-settler culture on his people. In 1968, Chief Smallboy and over 100 of his followers decided to leave the Ermineskin reserve to establish a camp on the Kootenay Plains, near the homeland of his grandfather Bobtail, on the eastern slopes of the Rocky Mountains.

Chief Smallboy left the Ermineskin reserve to pursue the traditional Cree lifestyle, which he felt was becoming increasingly unviable on the reserve, and preserve Cree culture and traditions. Camp members hunted and continue to hunt all throughout the foothills. One Ermineskin Cree Nation citizen who grew up at Smallboy Camp describes how his father, who guided in the Grande Cache area, and his uncles would hunt and harvest medicines all through the foothills to the north, through Chungo and Thistle Creeks to the Grande Cache area, where they hunted bighorn sheep:

My Dad knows all the trails around Grande Cache. Used to be a guide, like an outfitter, take people out on horseback, go hunting. Then my Dad and my uncles, they'd go there along the Foothills all the way. Sometimes right inside the mountains. Right on the doorstep of the mountains. It's where they used to go, used to go get sheep up there. They used to go hunt sheep up around Grande Cache and further past.^x

To this day, camp members continue to hunt and fish for subsistence, gather berries and plants for sustenance and medicinal purposes, and engage in traditional spiritual ceremonies, throughout the foothills. Camp residents remain members of Ermineskin Cree Nation and many residents of the Ermineskin Reserve 138 regularly visit camp and have family members and friends who live there.





3. Project Description in Relation to ECN

Summit Coal Incorporated (the Proponent) is proposing the construction, operation, decommissioning, and abandonment of an underground metallurgical coal mine located approximately four kilometres northeast of Grande Cache, Alberta. As proposed, the Summit Mine 14 Project (the Project) would have a coal production capacity of approximately 3,562 tonnes per day, or 1.3 millions tonnes per year. The Permit Area would include an access road and a portal site (Figure 2) that includes the Project Facilities, mine water, wastewater, and stormwater ponds, and topsoil stockpiles, among other features. The project would have a surface footprint of 53.5 hectares and a subsurface area of approximately 512 hectares. The Proponent expects to begin operations in 2023 and remain functional until 2032, with a restoration period of 2-3 years following Project closure.

The Project is located within the territory historically and contemporarily used and occupied by the Ermineskin Cree Nation Citizens and their ancestors (Figure 1), including important harvesting and land use areas, such as those in and around Grande Mountain, the Smoky and Muskeg Rivers, and Knife Mountain. The Project's Regional Study Area (RSA), a 25-kilometer buffer around the Permit Area, is located approximately 170 kilometers to the northwest of Smallboy Camp, where many Ermineskin Cree Nation Citizens reside and visit, 290 kilometres northwest of the Buck Lake Lands, and 360 kilometers northwest of Ermineskin Cree Nation Reserve 138.



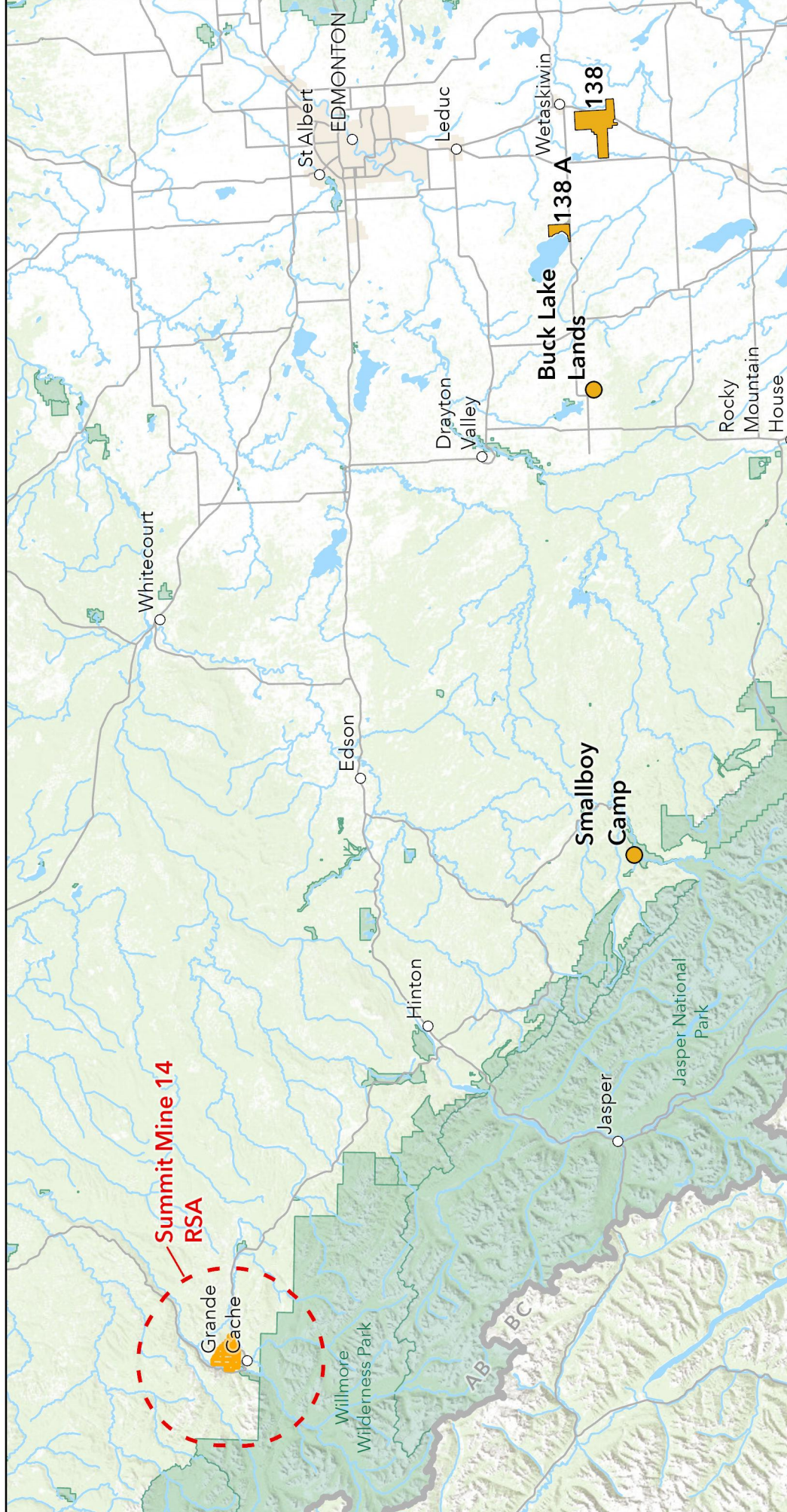
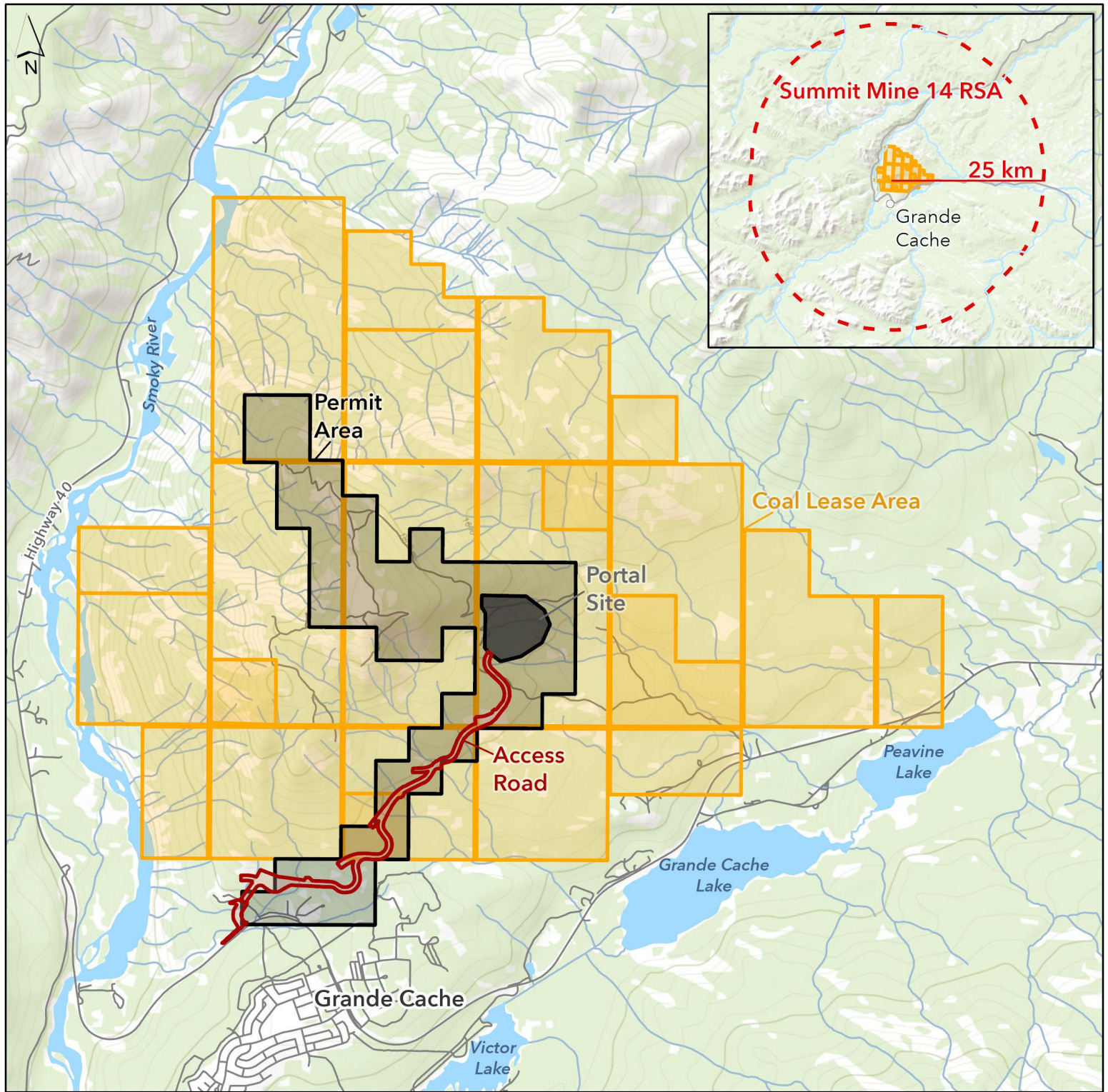


Figure 1
Ermineskin Cree Nation Lands and Summit Mine 14 Project

Projection: WGS 1984 UTM Zone 11N
 Map by: Emily Boak, Willow Springs Strategic Solutions
 Date: 02 Sep 2022
 Data Sources: Ermineskin Cree Nation TLU database, ESRI Canada, Government of Alberta Open Data, Summit Coal Inc.

-  Ermineskin Cree Nation lands
-  Summit Mine 14 RSA
-  Coal Lease Area
-  Parks and Protected Areas

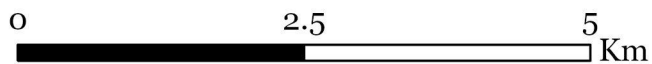




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**Figure 2
Summit Mine 14 Proposed Footprint**

- Summit Mine 14 RSA
- Portal Site
- Permit Area
- Access Road
- Coal Lease Area

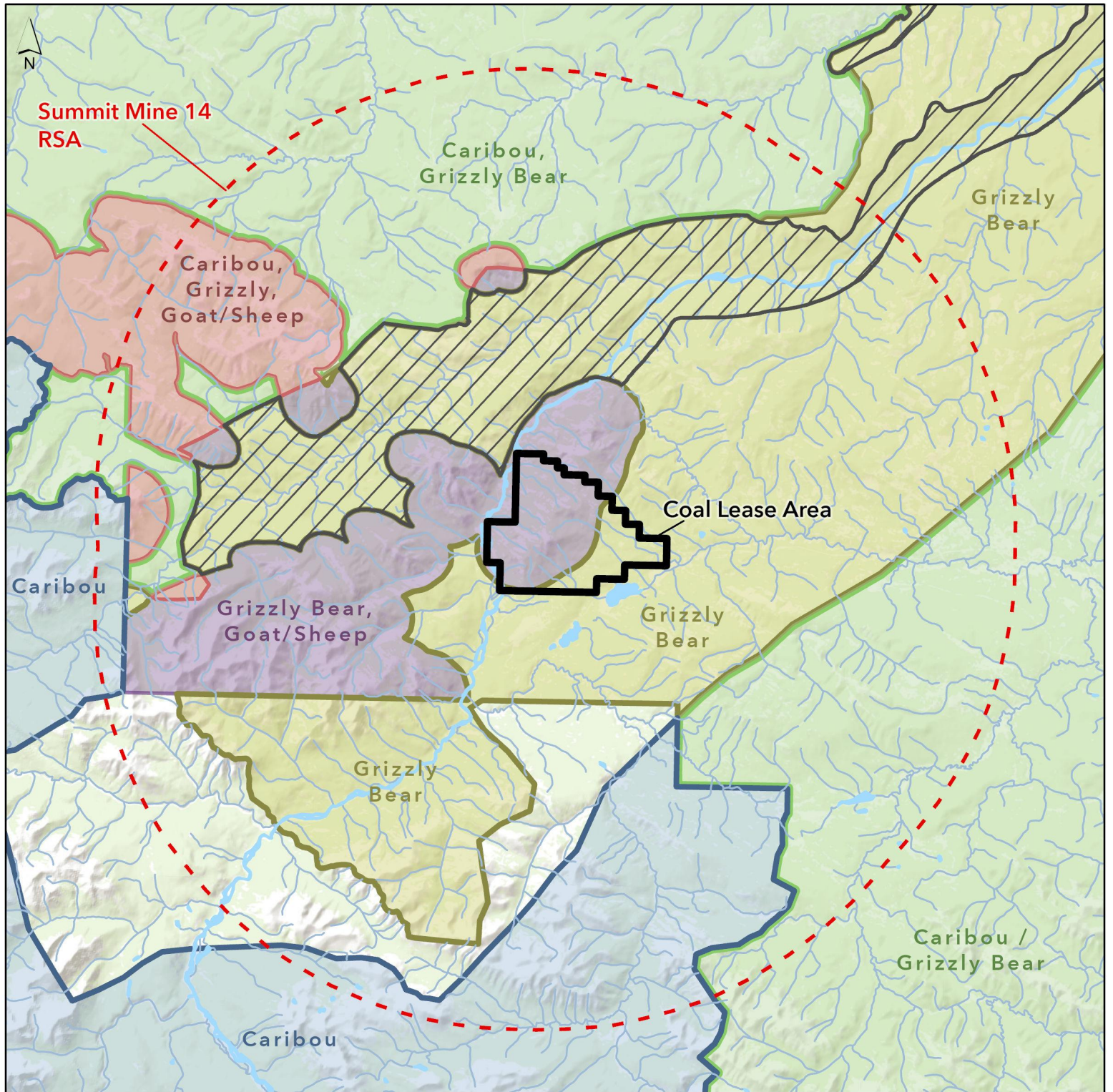


Projection: WGS 1984 UTM Zone 11N

Map by: Emily Boak, Willow Springs Strategic Solutions

Date: 02 Sep 2022

Data Sources: Ermineskin Cree Nation TLU database, ESRI Canada, Government of Alberta Open Data, Summit Coal Inc.



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**Figure 3
Key Wildlife Ranges in Summit Mine 14 RSA**

- | | |
|---|--|
|  Caribou |  Grizzly Bear / Caribou / Mountain Goat & Sheep |
|  Grizzly Bear |  Key Wildlife and Biodiversity Zones |
|  Caribou / Grizzly Bear | |
|  Grizzly Bear / Mountain Goat & Sheep | |

0 10 20 Km

Projection: WGS 1984 UTM Zone 11N

Map by: Emily Boak, Willow Springs Strategic Solutions

Date: 02 Sep 2022

Data Sources: Ermineskin Cree Nation TLU database, ESRI Canada, Government of Alberta Open Data, Summit Coal Inc.



The Permit Area, Coal Lease Area, and Project RSA intersect with areas designated by the Government of Alberta with the highest wildlife habitat sensitivity ranking.^{xi} Most of the Permit Area and parts of the Project RSA are encompassed by an area designed a “Critical Wildlife Zone.” According to Alberta Environment and Parks, Critical Wildlife Zones “are either designated as protected areas or identified as critical importance for one or more wildlife species of conservation concern.”^{xii} Most of the remainder of the Project RSA has been designed as a “High Risk Area,” which “...are likely used by one or more species at risk or priority management species.”^{xiii}

The Permit Area, Coal Lease Area, and Project RSA likewise contain critical habitat for species identified by Ermineskin Cree Nation as culturally significant, i.e., as critical for the practice of their culture and the exercise of their Treaty, Aboriginal, and Indigenous rights, including caribou, grizzly bear, big horn sheep, mountain goats, arctic grayling, and bull trout (Figure 3). The Project RSA intersects with both the A La Peche and Redrock-Prairie Creek Caribou ranges. As of 2016, 49% of the Redrock-Prairie Cree range had been disturbed by anthropogenic activity, while 88% of the A La Peche winter range was found to be disturbed by human activities.^{xiv} The Permit Area rests squarely within core grizzly bear habitat, a species that is listed as threatened by the Government of Alberta. Finally, the northern portions of the Project RSA intersect with a Key Wildlife and Biodiversity Zone (KWBZ), which tracks the Sheep Creek and the Smoky River all the way to Peace River. According to the Government of Alberta, KWBZs “...play a disproportionately large role...in maintaining the overall productivity of regional ungulate populations and source of biodiversity.”^{xv} The primary strategies for protecting KWBZs include



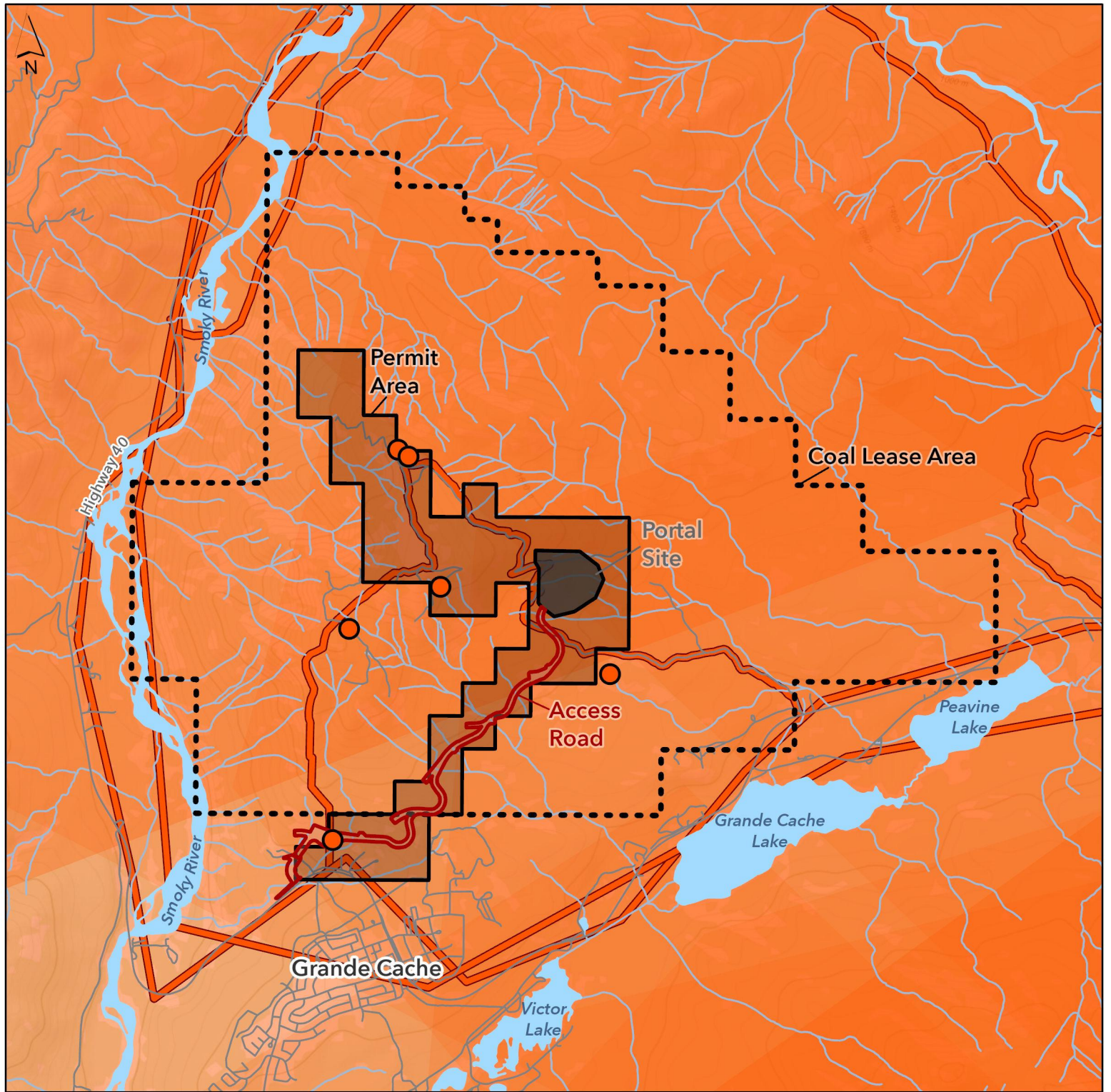


minimizing all industrial activity; minimizing activity during winter months; and reducing access and/or do not create new access, among other potential strategies.

4. Current IKU Intersections

This section presents the findings of cross-referencing the Ermineskin Indigenous Knowledge and Use (IKU) database and the Permit Area, Coal Lease Area, and Project RSA. In Figures 4 and Figure 5, IKU polygons are presented in the form of an ‘intensity’ map. To produce these, polygons were set at a transparency of 90%. Where there is no recorded IKU, there is full transparency (background colour). The maximum extent of ‘intensity’ is achieved when 8 or more IKU values overlap. While the main IKU activity found in the database was hunting, it should be highlighted that because no Project-specific interviews were conducted for this summary, the absence of other IKU activities (fishing, harvesting medicines and berries, camping, et cetera) does not mean that Ermineskin Cree Nation Citizens do not practice those activities within the Project areas. Moreover, because no Project-specific interviews were done, the findings of this summary do not necessarily represent the full extent of use and occupancy of the Permit Area and Project RSA by Ermineskin Cree Nation Citizens. In fact, because use and occupancy activities tend to agglomerate within certain areas, i.e., people camp and harvest plants where they hunt because animals feed off the plants, and land users tend to exercise their rights in groups, the IKU depicted in this summary most likely represents an *underrepresentation* of the full extent of Ermineskin Cree Nation IKU of the Permit Area and the Project RSA.





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Figure 4
**Ermineskin Cree Nation Hunting within
and around Summit Mine 14 Lease Area**

- Portal Site
- Coal Lease Area
- Permit Area
- Hunting Trails
- Access Road
- Hunting Points

Hunting intensity
(based on
previous studies)

Lower

Higher

Projection: WGS 1984 UTM Zone 11N

Map by: Emily Boak, Willow Springs
Strategic Solutions

Date: 02 Sep 2022

Data Sources: Ermineskin Cree Nation TLU
database, ESRI Canada, Government of
Alberta Open Data, Summit Coal Inc.

0 2.5 5 Km



As the discussion of historical use and occupancy above noted, the ancestors of Ermineskin Cree Nation continuously used and occupied the Rocky Mountains and their eastern slopes – from Pipestone Creek to Pincher Creek and beyond – since at least the 1700s. Contemporary Ermineskin Cree Nation Citizens, moreover, continue to use and occupy the territories of their ancestors to practice their way of life and culture and exercise their Treaty, Aboriginal, and Indigenous rights, including in the areas around Grande Cache.

Cross-referencing the Ermineskin Cree Nation IKU database with the Coal Lease Area and the Project RSA produced a total of 54 IKU value intersections, concentrated in the categories of hunting and access (trails, staging areas, et cetera), as shown below in Table 1.

Table 1 – Current IKU Intersections with Coal Lease Area and Project RSA				
<i>Study Area</i>	<i>IKU Category</i>	<i># Values</i>	<i>Species/Type</i>	<i>Timeline</i>
Coal Lease Area	Hunting	18	Big Horn Sheep, Mountain Goat, Elk	1950s to the present
	Access	14	Big Horn Sheep, Mountain Goat, Elk, Moose, Deer	1950s to the present
Project RSA	Hunting	20	N/A	1950s to the present
	Access	2	N/A	1950s to the present

Within the Coal Lease Area, the Ermineskin Cree Nation IKU database contained 18 hunting values, including 6 sites where animals were killed in and around the Permit Area. The species hunted within the Coal Lease Area included big horn sheep and mountain goats. The database





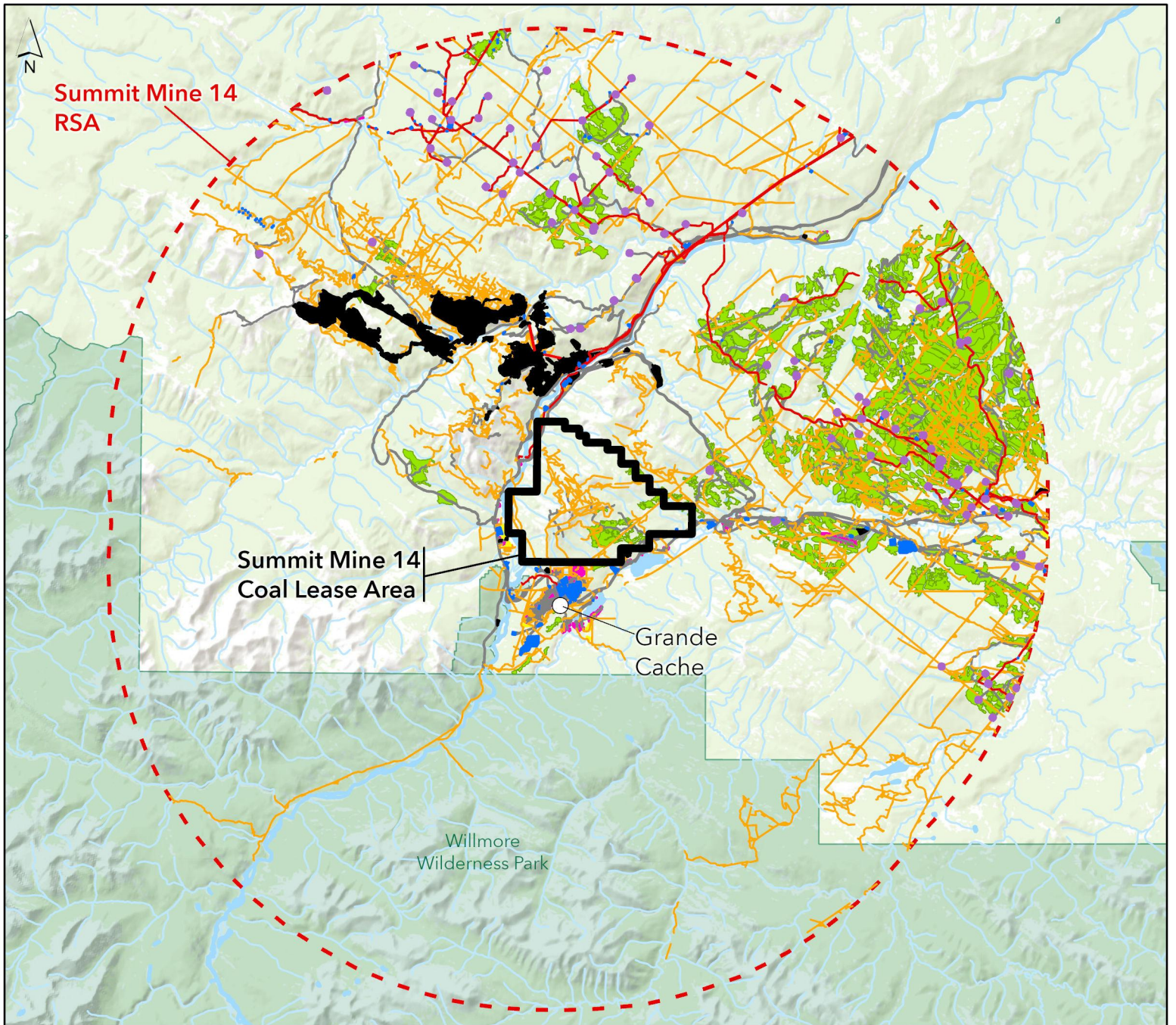
indicated that Ermineskin Cree Nation land users have hunted in the Coal Lease Area continuously from the 1950s to the present. It should be noted that only current Indigenous Use – the living memory of current Ermineskin Cree Nation Citizens – was searched and thus these findings do not include the historical use by deceased ancestors and relatives.

The main access road is Highway 40, which wraps around Grande Cache and tracks the Smoky River to the northeast. Ermineskin Cree Nation hunters use the smaller access roads and seismic lines created by industry to hunt in the Grande Mountain area, as well as to the north of Grande Cache Lake and along the Smoky River. Several Ermineskin Cree Nation Citizens lived and worked at camps in the Grande Cache area before the town existed, and hunted the area on horseback to feed themselves and camp members. Within the RSA, Ermineskin Cree Nation Citizens hunt the slopes and mountains to the south, west, and north of Grande Cache, as well as to the southeast, throughout the foothills, and the northeast towards Grande Prairie.

5. Cumulative Effects in the Project RSA

Since Bobtail's adherence to Treaty 6 in 1877, Ermineskin Cree Nation has experienced significant and sustained infringement of their Treaty Rights as a result of human activities and government policies throughout their traditional territory, including colonial settlement, environmental fragmentation and degradation, and a lack of meaningful consultation, among many other drivers.






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Figure 5
Existing Landscape Disturbance within
Summit Mine 14 RSA

- Agriculture
- Seismic Lines
- Pipelines & Transmission Lines
- Residential & Recreational Areas
- Active & Abandoned Well Sites
- Industrial Sites, Landfills, and Excavated Areas
- Forestry Harvest Areas
- Mines
- Roads & Railways

0 10 20
 Km

Projection: WGS 1984 UTM Zone 11N

Map by: Emily Boak, Willow Springs Strategic Solutions

Date: 02 Sep 2022

Data Sources: Ermineskin Cree Nation TLU database, ESRI Canada, Government of Alberta Open Data, Summit Coal Inc., Alberta Biodiversity Monitoring Institute Human Footprint Inventory (2018)



The areas around Grande Cache are no different. As Figure 5 demonstrates, the areas within the RSA outside of the parks and protected areas are already significantly disturbed. To the east of the Coal Lease Area, there is an extraordinary degree of deforestation, as well as disturbances from oil and gas well, pipelines, and seismic lines. Clear cutting is a consistently recorded in the Ermineskin Cree Nation IKU database as one of the primary concerns of land users in the eastern slopes of the Rocky Mountains: “There’s too much clear cutting going on. They took all the trees out, what the moose use for protection and the elk, eh? It’s just like going out here now, seeing a farmer’s field. That’s how it looks out there.”^{xvi}

To the north of the Coal Lease Area, there is significant disturbance from coal mining, as well as forestry, seismic lines, and oil and gas well. Environmental contamination from coal mining – and its impact on the health of wildlife – is another major concern of Ermineskin Cree Nation land users in the IKU database. Hunters have reported an increase of sick and diseased animals in the areas around the coals mines to the southeast of Grande Cache:

So, right in that area there, that’s where we I killed a moose that had what I figure was tuberculosis. It was, the lungs were pink and bloody vessels, yeah and it was growing against the ribs, yeah. I was afraid to bring it home, so I cut it up and I left it to the coyotes.^{xvii}

We shot a moose one time...and it had cysts inside its liver, and there was white spots on his kidneys. It was blotches on its lungs. And we just left it. My brother felt really bad that he had to leave it because it just didn’t look healthy. He made an offering. He left some tobacco there just as a prayer for the animal because it was more of a mercy killing than anything else.^{xviii}





Hunters have likewise observed a decline in the availability of animals in the areas around the southern coal mines: “That area [Cadomin], used to be a lot of bighorn sheep. Now there's hardly any. They've moved away.”^{xix}

Given that the eastern slopes of the Rocky Mountains are among the last accessible areas in which Ermineskin Cree Nation Citizens can practice their way of life and culture and exercise their Treaty, Aboriginal, and Indigenous rights, the continued disturbance of these areas by human activities threatens the very ability of Ermineskin Cree Nation to pass down their way of life and culture and meaningfully exercise their Treaty, Aboriginal, and Indigenous rights. As one land user in the IKU database observed: “That’s one of the things that scares me today, is what is going to be there for them [future generations]? You know, it’s so much disturbance. Like, you look 20, 30 years down the road, what are they going to know and what is taken that was supposed to be there? And how are they supposed to follow our traditions in hunting, in medicine pickings, berry pickings, when there’s nothing going to be there?”^{xx}

6. Conclusion

The proposed Project is situated within the territory historically and contemporarily used and occupied by Ermineskin Cree Nation Citizens and their ancestors. To this day, Ermineskin Cree Nation Citizens continue to travel to, use, and occupy the Permit Area, Coal Lease Area, and Project RSA to practice their way of life and culture and exercise their Treaty, Aboriginal, and





Indigenous rights. In total, 54 current IKU hunting and access points, lines, and polygon intersections were identified from cross-referencing the Project areas with the Ermineskin Cree Nation IKU database, including hunting for big horn sheep, mountain goats, elk, moose, and deer.

Because no Project-specific interviews were conducted, this report does not necessarily represent the full extent of Ermineskin Cree Nation IKU of the Project areas. Further consultation will be required to assess adequately the potential impacts of the proposed Project to Ermineskin Cree Nation's Treaty, Aboriginal, and Indigenous rights and to develop mitigation, offset, and compensation measures. Given the evidence presented here – prepared with limited time and resources – on the potential infringement of the Treaty, Aboriginal, and Indigenous rights of Ermineskin Cree Nation, as well as the potential environmental and cumulative effects of the proposed Project, it is the position of Ermineskin Cree Nation that the proposed Project should be designated for federal under section 9(1) of the *Impact Assessment Act* SC 2019, c. 28, s. 1.

NOTES

ⁱ Simpson, George. *An Overland Journey Round the World: During the Years 1841 and 1842* (Philadelphia: Lea and Blanchard, 1843), p. 70.

ⁱⁱ Hugh Dempsey, *Maskepetoon: Leader, Warrior, Peacemaker* (Toronto: Heritage House, 2010)

ⁱⁱⁱ John S. Milloy, *The Plains Cree: Trade, Diplomacy, and War from 1790 to 1870* (Winnipeg: University of Manitoba Press 1988), p. 24; David G. Mandelbaum, *The Plains Cree: An Ethnographic, Historical, and Comparative Study* (Regina: University of Regina, 1979), p. 13.





iv CA-33-P5.

v Dempsey, Hugh. *Maskepetoon: Leader, Warrior, Peacemaker*, p. 21; Dempsey, Hugh. *A History of Bobtail and the Bear Hills Cree to 1885*, prepared for Ermineskin Cree Nation, February 2002.

vi Hutchinson, Gerald M. and Hugh Dempsey. *The Rundle Journals* (Calgary: Historical Society of Alberta, 1977), pp. 136-137 and 259-270; Dempsey, *Maskepetoon*, p. 21; Jones, Gwynneth. *Chief Bobtail, the Maskwachees Cree, the Department of Indian Affairs, and the Bobtail Indian Reserve 139: A Historical Chronology of Developments Prior to the Surrender of June, 1909*, prepared for Ermineskin Cree Nation, February 2002, pp. 1-8.

vii CA-33-P12; Johnson, Paulina. *E-kawôtiniket 1876: Reclaiming Nêhiyaw Governance in the Territory of Maskwacîs through Wâhkôtowin (Kinship)*, Ph.D. Dissertation, The University of Western Ontario, 2017, p. 23.

viii CA-33-P8.

ix Jones, *Chief Bobtail*, p. 4; Goyette, Linda. *Rocky Mountain Kids* (Victoria: Brindle and Glass, 2008), pp. 28-29.

x CA2018-26-7.

xi Government of Alberta, *Interpreting the Areas of Wildlife Habitat Sensitivity Map*. Edmonton: Alberta Environment and Parks, 2017.

xii Government of Alberta, *Interpreting the Areas of Wildlife Habitat Sensitivity Map*, p. 1.

xiii Ibid.

xiv Government of Alberta, *Draft Provincial Woodland Caribou Range Plan*, Edmonton: Government of Alberta, 2017.

xv Government of Alberta, *Recommended Land Use Guidelines: Key Wildlife and Biodiversity Zones*. Edmonton: Environment and Sustainable Resource Development, 2015, p. 1.

xvi RT2015-4-45.

xvii RT2015-03-37

xviii RT2015-06-15-16

xix RT2015-01-52

xx RT2015-06-30

