



Lac Ste. Anne Métis Community Association

September 8, 2022

VIA EMAIL: Jennifer.Dallaire@iaac-aeic.gc.ca

Impact Assessment Agency of Canada
Suite 210A - 757 W Hastings St.
Vancouver, BC V6W 3M2

Dear Jennifer Dallaire:

Re: Lac Ste. Anne Métis Community Association - Designation Request for the Proposed Summit Mine 14 Project under the *Impact Assessment Act*

Lac Ste Anne Métis Community Association (LSAMCA) writes to support the designation of the Summit Mine 14 to undergo an impact assessment pursuant to the Impact Assessment Act. LSAMCA is a corporate entity which was designed and incorporated by the contemporary Lac Ste Anne Métis community to represent the Métis Aboriginal rights and interests of the historic and contemporary Lac Ste. Anne Métis ("LSAM") community. LSAMCA is the representative organization that represents the contemporary Lac Ste. Anne Métis community which is a rights-bearing (*Powley*) Métis community which has section 35 *Constitution Act*, 1982 Métis Aboriginal rights.

The Lac Ste. Anne Métis Community

LSAMCA members are the contemporary descendants of the historic Lac Ste. Anne Métis community. All our members have historical and genealogical linkages to the historic Métis people of Lac Ste. Anne.

The historic Lac Ste. Anne Métis community emerged in west-central/northwest Alberta by the early 19 century in the context of the fur trade. Access to fresh water and abundant and diverse wildlife in a geography webbed with interconnecting waterways that are easily adapted for travel and transport was critical to the community's sustenance and well-being, including development of a commercial mixed-use economy of fishing, hunting/trapping, farming, and freighting.



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Lac Ste. Anne Métis community's traditional territory includes the Grand Cache area, an area important in the context of contemporary LSAM community's Métis aboriginal rights to harvest the waters and lands for subsistence, medicinal, spiritual, economic, commercial, recreational and cultural purposes, and all activities necessarily incidental to these rights.

Potential Adverse Effects to Aboriginal Rights in the Project Area

Members of LSAMCA have participated in traditional land use and occupancy interviews in the context of various industrial projects and impact assessment processes. Areas and sites of interest for traditional purposes for the exercise of Section 35 rights to hunt, fish, trap and gather food have been documented for the future benefit of the Lac Ste. Anne Métis Community.

The LSAM community information shows extensive and active traditional land and resource use in areas around Grande Cache, and in and around the Summit Mine 14 Project Area. This is an area used for hunting, gathering berries and medicinal plants, fishing, processing traditional food plants, and occupying land, either temporarily or for permanent residence.

Due to bonds of family and community stretching back to the 19 century, LSAMCA members are aware of sites of historical and cultural interest, including old cabin remains, village sites, food caches and burial sites in the Grande Cache area. A key concern with the Summit Coal Mine 14 Project is the potential destruction of these sites and the related cultural impacts to the Lac Ste. Anne Métis Community.

Interviews with LSAMCA members completed within the past decade and more have provided insight into the extent and use of portions of the traditional territory between Jasper and Grande Cache for subsistence hunting, trapping, gathering, camping and guiding. A variety of large animals, including moose, elk, bighorn sheep, mule deer, white tailed deer and bears, are hunted for food and other traditional purposes.

The Lac Ste. Anne Métis community used crown lands around Grande Cache to participate in the fur trade and to exercise subsistence rights to trap for food. This area continues to be a place to hunt game birds for food and to trap smaller game. Respected community Elders have described hunting in the eastern slopes, including in the Grande Cache area, from the 1960s to the present day. Hunting for elk, moose and mule deer occur in the higher elevations.



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While the highway provides ease of access by motor-vehicle into broader hunting areas, LSAMCA members also use logging roads, trails and cut lines on foot or All-Terrain Vehicle to access the wildlife habitats at a variety of elevations around Grande Cache. During hunting trips, it is common for LSAMCA members to camp along the Smoky River and fish in the evenings after hunting.

Harvesters from LSAMCA have identified the presence of a wide variety of large animals around Grande Cache, including deer, fox, grizzly bear and black bear. This includes in areas accessible via the south end of the proposed Summit Mine 14.

Due to the importance of the Grande Cache area for big game hunting for food, LSAMCA is concerned that the Summit 14 Mine would create negative environmental impacts to wildlife populations and the availability of crown land and would therefore adversely impact our Section 35 Métis harvesting rights. The significance of such impacts must be considered in the context of the proponent's plans for development in this area.

Furthermore, due to the importance of watersheds downstream from the Project for subsistence fishing, LSAMCA is concerned about Project-related negative impacts to waterbodies, fish habitat and LSAMCA members' Section 35 fishing rights.

Harvesters from LSAMCA have identified the presence of a wide variety of food and medicinal plants in the Grande Cache area which are indicative of the types of plants available within the Project area. The area is valued for willows, wild rose, goose berry, wild raspberry and other species. Traditional knowledge holders from LSAMCA know there are various rare and culturally significant food and medicinal plants all around Grande Cache.

The area north and west of Grande Cache is important caribou habitat. In past visits, LSAMCA harvesters have located the animals high up in the mountains on what appeared to be marginal terrain, above areas that had been decimated by large-scale, open pit coal mining. LSAMCA is concerned that the expansion of the mining and related facilities footprint in the area will reverse efforts to promote caribou habitat recovery and could accelerate the extirpation of woodland caribou in the west-central ranges.

The Project will increase industrial activities and pollution in this already highly used area. Industrial and human activity deters and disturbs LSAMCA members from exercising their



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section 35 Métis aboriginal rights in areas to which they remain connected, and disturbs and harms the traditional resources relied upon for that exercise of rights.

In light of the cumulative effects of development, further disturbance to LSAMCA members' section 35 rights resulting from additional negative cultural and social impacts have not been fully assessed by the proponent or the Crown. The Project's potential for subsidence, water resource destruction and contamination, soil erosion, hydrological resources, air pollution and adverse effects to biodiversity will contribute to the decline of healthy and abundant flora, fauna, land, water and air needed to support LSAMCA members' exercise of their section 35 rights.

Considering the potentially adverse impacts of the Project to wildlife, waterbodies and vegetation, LSAMCA are concerned that the Project will negatively affect their ability to hunt, trap and fish for food in the Project area and surrounding crown lands. These potential adverse impacts negatively influence LSAMCA members meaningful and accessible practice and intergenerational transmission of cultural heritage and language, current use of lands and resources for traditional purposes including fishing, hunting, medicinal harvesting, and ceremony, and disruption to sites of physical heritage or significance, and their use. The Project would also potentially reduce the habitat available for a species at risk (woodland caribou).

Designation for Potential Adverse Effects

While the Project is lower than the production threshold to be a designated project; the Summit Mine 14 is part of the Mine 16S Project and thus part of a much larger coal lease. The Project's effects should not be artificially limited but should be considered as the whole of which it is a part.

The Project may result in adverse effects to SARA species, including critical habitat for the endangered Rainbow Trout (Athabasca population) and species of special concern Bull Trout, including to their habitat. The project may also result in the deposit of deleterious substances into important fish habitat, including selenium and calcite.

Broadly speaking, there is a potential for changes to Indigenous peoples' health and social well-being through changes to water and air quality that could adversely affect food security or safety, including mental well-being. Changes in health, social and economic conditions relate to



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a number of factors: loss of access and changes to the baseline environmental conditions and impacts on cultural well-being linked to loss of access to sites of cultural and ceremonial significance; cumulative impacts of increased industrial activity on resources and ecosystems critical for the practice of rights-related activities; limitations on current use of traditional lands and resources and the ability to practice rights-related activities through lack of confidence in resource safety, and direct removal, loss of access or avoidance due to sensory disturbance to areas or routes of importance; impacts on water quality and quantity that would impair the ability to safely use as a source of drinking water and harvest of plants and animals that rely on water in the area; and, impacts related to eventual reclamation and restoration activities that would impair the ability of future generations to continue practicing rights.

Thank for the opportunity to provide LSAMCA's input.

Sincerely,

<Original signed by>

Dale Friedel, President

cc: Tarlan Razzaghi (<Email address removed>)
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