



Otipemisiwak Métis Government

Métis Nation within Alberta

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

Re: Marguerite Lake Compressed Air Energy Storage Project – Initial Project Description

To whom it may concern,

The Otipemisiwak Métis Government, as the authorized representative body for the Métis within Alberta, now represents more than 60,000 registered Citizens across the province and stands as the largest single Indigenous collectivity in Alberta. Recognition of the Otipemisiwak Métis Government as the authorized representative of its citizens is most recently confirmed by the signing of the *Métis Nation within Alberta Self-Government Recognition and Implementation Agreement* on February 24, 2023. Unlike many First Nations within Alberta, the Métis homeland, which is encumbered by the Aboriginal rights, claims, and interests of the Métis within Alberta, encompasses the totality of the Province of Alberta.

Since its inception in 1928, the mandate of the Otipemisiwak Métis Government, formerly the Métis Nation of Alberta, is to be the representative voice on behalf of Métis people in Alberta, to provide Métis people an opportunity to participate in government's policy and decision-making process and, most importantly, to promote and facilitate the advancement of Métis people through the pursuit of self-reliance, self-determination, and self-management.

With respect to the Initial Project Description for the Marguerite Lake Compressed Air Energy Storage Project currently being evaluated by the Impact Assessment Agency of Canada, the Otipemisiwak Métis Government Consultation Department has completed a preliminary review and has made the determination that the project as proposed may have negative or adverse impacts on the aboriginal rights, claims, interests, or the historical and contemporary practices related thereto, of the Métis Nation within Alberta and its citizens. Accordingly, there are outstanding concerns about the project which are described below.

Consultation

1. The Initial Project Description lists the Indigenous groups identified as having traditional territory in the project area, or whose traditional land use activities or aboriginal rights may be affected by the project. The Otipemisiwak Métis Government is missing from the list.
2. The Alberta Aboriginal Consultation Office failed to direct consultation with the Otipemisiwak Métis Government, which has resulted in a significant consultation gap in the proponents



consultation activities which began in May 2021.

3. The Alberta Aboriginal Consultation Office issued an Indigenous consultation adequacy decision on July 21, 2021. In failing to consult with the Otipemisiwak Métis Government, it is our position that Federation has not fulfilled its duty of consult.

Impacts to the exercise of Métis rights

1. Citizens of the Otipemisiwak Métis Government have the right to harvest under the Government of Alberta's Métis Harvesting Policy. The proposed project overlaps with Harvesting area 'B' and Harvesting area 'D'. The Otipemisiwak Métis Government currently has over 10,000 registered Harvesters, with the vast majority of those registered able to utilize all four Harvesting areas under Alberta's policy.
2. In addition to overlapping with Harvesting areas described by Alberta's Métis Harvesting Policy, the project also overlaps or is within 5km of traditional use areas that have been described by Métis Citizens in previous traditional land use studies.

Environmental Impacts

1. The Initial Project Description states that no important wildlife habitat or wildlife features were noted during their field surveys. Western science metrics for assessing whether wildlife habitat or features are important are inherently colonial in nature, and do not necessarily align with Métis perspectives on the types of features and habitat that are important.
2. The Initial Project Description notes that moose and whitetail deer, species of importance to Métis citizens and integral to the exercise of harvesting rights, were observed during field studies. The Initial Project Description goes on to state that potential project-related effects to wildlife and their habitat include habitat loss, loss of connection between habitats, change in movement patterns, and an increase in wildlife mortality or injury. While Federation lists a number of proposed mitigation measures, it is not clear how these measures will result in the project being expected to not have high impacts to wildlife.
3. Federation's environmental noise assessment does not account for how additional acoustic sources within the area could affect wildlife behavior and movement patterns. The ability of Métis citizens to exercise their harvesting rights in the area could be impacted if wildlife begin to avoid the area due to the additional noise during construction and during operation of the proposed project.



Social and Economic Effects

1. Federations socioeconomic study does not consider Métis in its assessment, and in not engaging at the outset of the project, Federation has effectively excluded the Otipemisiwak Métis Government from providing feedback on how to ensure economic participation in the project by the significant population of Métis citizens in both Bonnyville and Cold Lake.

There are a number of outstanding questions, concerns, and potential impacts that require further exploration, study, and discussion. Due to the lack of consultation with the Otipemisiwak Métis Government on the part of Federation, there has unfortunately not been sufficient time to engage in discussions or studies that would help us better understand these impacts and concerns, and identify ways to mitigate or accommodate them.

We recognize that responsibility for this lack of consultation also rests with Alberta's Aboriginal Consultation Office in their failure to direct consultation with the Otipemisiwak Métis Government (formerly the Métis Nation of Alberta at the time the ACO provided Federation with direction) and we trust that going forward Federation will strive to fulfill best practices in its engagements and consultations with the Otipemisiwak Métis Government, working with us collaboratively and in the spirit of reconciliation to address the concerns expressed in this letter.

Sincerely,

Theo Peters
Director of Consultation
Otipemisiwak Métis Government