

York Factory Ten Shilling Aerodrome - Initial Project Description Review

MMF – National Government of the Red River Métis

May 26, 2025



1.0 Introduction

York Factory First Nation (the Proponent) has submitted an Initial Project Description (IPD) proposing to construct an aerodrome near York Factory, Manitoba, at the confluence of the Hayes River and Ten Shilling Creek (Figure 1). The Project (also referred to as Ten Shilling Aerodrome), would include the construction and operation of a 1530 m long gravel runway, up to 30 m wide, as well as an associated taxiway, parking apron, and other ancillary infrastructure for lighting, signage, and other aerodrome activities (Figure 2). The project site is remote, and as a result, electricity for aerodrome activities will be provided by on-site generators.

Specifically, at this stage, the Project will include the following:

- Mobilization of equipment to the Project;
- Construction surveying;
- Tree clearing;
- Stripping;
- Earthworks – cut to fill with grading and compaction;
- Install either soil cement or granular base;
- Construct ancillary facilities;
- Installation of airfield lighting and electrical works (generator powered);
- Runway inspection; and
- Runway operation.

Currently, Ten Shilling Creek is only accessible via helicopter, boat, and a seasonal clearing referred to as the CAT trail. Construction of the aerodrome would require equipment to access the area via the CAT Trail; however, it may require additional supports and equipment via helicopter and/or boat.

Operational activities will include site maintenance, storage of hazardous materials, including a small fuel cache, grading of the runway, and management of the aerodrome.





Figure 1. Map of Ten Shilling Aerodrome location relative to York Factory and the Hayes River.



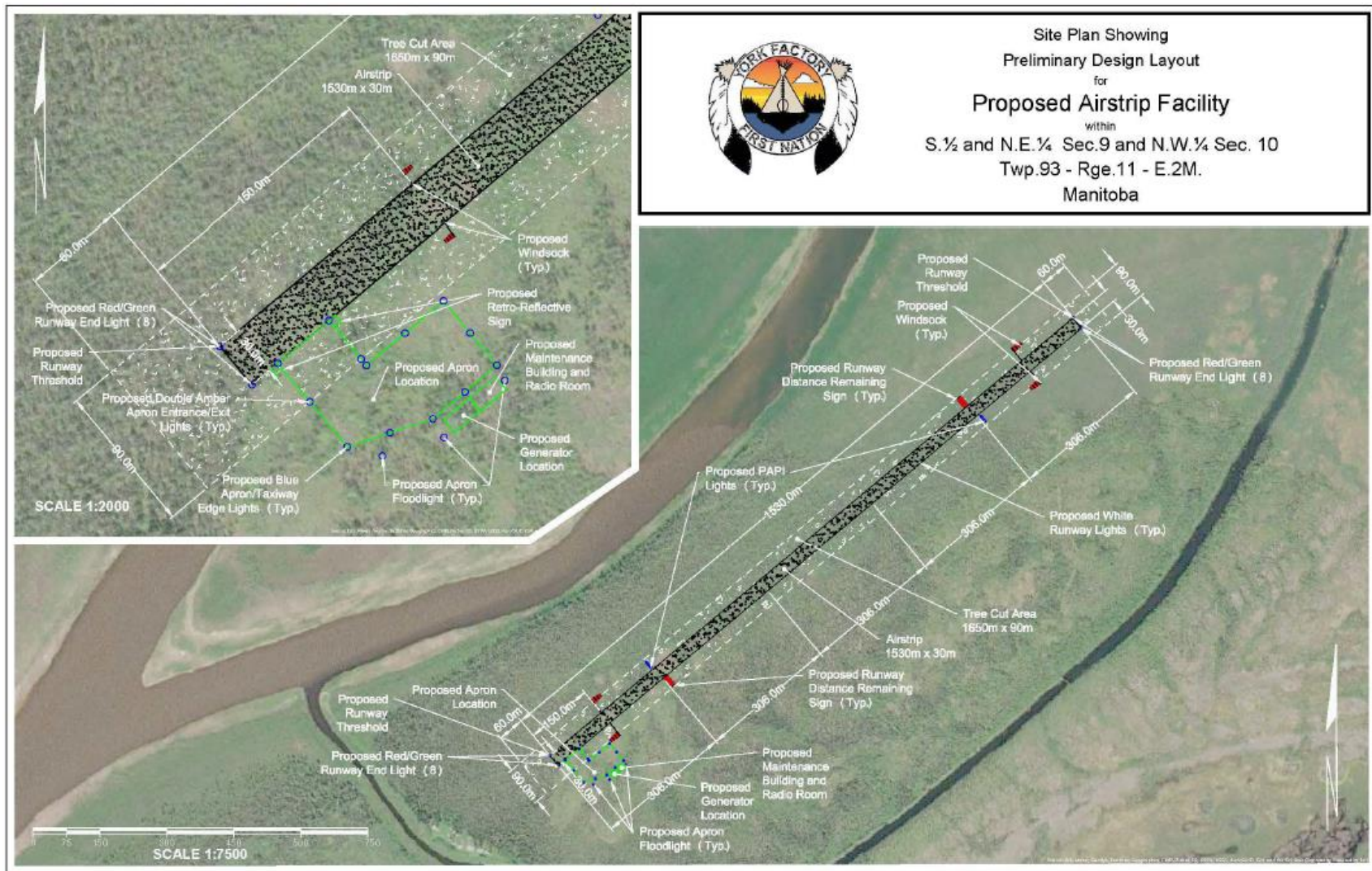


Figure 2. Map illustrating the Ten Shilling Aerodrome runway and ancillary features to be constructed within the scope of this project.



1.1 Project Purpose and Need

The Proponent has identified the construction and operation of the aerodrome as an important step in allowing opportunities for the Peoples of York Factory First Nation to return to their traditional territory along the west coast of Hudson Bay. The Peoples of York Factory First Nation were forcefully removed from the area in the mid-1950s, a process which included the destruction of several small settlements, including one located at Ten Shilling Creek. Though removed from the area, the Peoples of York Factory First Nation have continued to maintain a regular connection with their traditional homeland, accessing these lands by boat, helicopter, and snowmachine in the winter months. Further, the Peoples of York Factory First Nation re-established a small settlement at Ten Shilling Creek in the 1970s, which remains in active use today. The settlement at Ten Shilling Creek includes four sleeping cabins, a kitchen cabin, and several other outbuildings.

It is the desire of the Peoples of York Factory First Nation to continue to build a presence at Ten Shilling Creek as part of healing and reconciliation efforts focused on returning to the land. However, limited transportation options create a significant barrier for many to return to the area, with both boat and helicopter methods being cost-prohibitive. The construction of a runway and aerodrome would allow for small airplanes to land frequently at the community with the intent to significantly increasing the capacity for the Peoples of York Factory First Nation to return to the area, while reducing the per-person costs associated with transportation.

1.2 Impact Assessment Project Designation

As presented, the Ten Shilling Aerodrome is a designated project under the *Physical Activities Regulations* of the *Impact Assessment Act*, which designates:

- *The construction, operation, decommissioning and abandonment of one of the following:*
 - *(a) a new aerodrome with a runway length of 1000 m or more*

The Ten Shilling Aerodrome, as presented, would have a runway 1530 m in length, and therefore requires the submission and review of an Initial Project Description under the *Impact Assessment Act*. Based on the scope of the project and identified concerns by rights-holders and the public, the Minister responsible for the Impact Assessment Agency of Canada will determine whether a full impact assessment is necessary.

The Manitoba Environmental Approvals Branch advised that the Project does not fall within any Classes of Development and therefore is not subject to a provincial environmental approval.



1.3 Scope of Review

The Project, as proposed, is located within the National Homeland of the Red River Métis. With the development of York Factory as a Hudson’s Bay Company trading post, this area became important to maintaining the livelihood of many Red River Métis historically, a connection which is maintained by many today.

The Red River Métis are a distinct Indigenous people evolved primarily out of relations between European men and First Nations women who were brought together as a result of the early fur trade in the Northwest. In the eighteenth century, both the Hudson Bay Company and the Northwest Company created a series of trading posts that stretched across the upper Great Lakes, through the western plains, and into the northern boreal forest. These posts and fur trade activities brought European and Indigenous peoples into contact. Inevitably, unions between European men—explorers, fur traders, and pioneers—and Indigenous women were consummated. The children of these families developed their own collective identity and political community so that “[w]thin a few generations, the descendants of these unions developed a culture distinct from their European and Indian forebears” and the Métis Nation was born—a new people, indigenous to the western territories (*Alberta (Aboriginal Affairs and Northern Development) v. Cunningham*, [2011] 2 SCR 670 at para. 5; 2008 MBPC R. v. *Goodon*, 59 at para. 25; *Manitoba Metis Federation Inc. v. Canada (Attorney General)*, [2013] 1 SCR 623 at para. 2).

Red River Métis led a mixed way of life, “In early times, the Métis were mostly nomadic. Later, they established permanent settlements centered on hunting, trading and agriculture” (*Alberta v. Cunningham*, at para. 5). Red River Métis were employed by both of the fur trade’s major companies, being Hudson’s Bay and the Northwest Company. By the early 19th century, the Red River Métis had become a major component of both firms’ workforces.

The heart of the historic rights-bearing Red River Métis community in southern Manitoba was the Red River Settlement; however, the Manitoba Métis also developed other settlements and relied on various locations along strategic fur trade routes (Figure 3). During the early part of the 19th century, these included various posts of varying size and scale spanning the Northwest Company and the Hudson Bay Company collection and distribution networks.

The fur trade was vital to the ethnogenesis of the Red River Métis and was active in Manitoba from at least the late 1770s, and numerous posts and outposts were established along cart trails and waterways throughout the province. These trails and waterways were crucial transportation networks for the fur trade and were the foundation of the Red River Métis’ extensive use of the lands and waters throughout the National Homeland, including the lands and waters surrounding York Factory (Jones 2014; Figure 3).

The Manitoba Métis Federation (MMF) – the National Government of the Red River Métis – maintains an active interest in all development within the National Homeland of the Red River Métis, where impacts to Red River Métis rights, claims, and interests may exist. It is through this interest that the MMF has



in *R. v. Goodon*, 2008 MBPC 59. These decisions have affirmed that the Métis hold existing Aboriginal rights throughout their traditional territories. Our Citizens and harvesters rely on and use the lands, waters, and resources of our traditional territory throughout the Province of Manitoba and elsewhere within the historic Northwest, to exercise their constitutionally protected rights and to maintain their distinct Red River Métis customs, traditions, and culture.

2.2 Red River Métis' Rights, Claims, and Interests

The Red River Métis hold rights, claims, and interests throughout and beyond the Province of Manitoba, consistent with the United Nations Declaration on the Rights of Indigenous Peoples, including the rights of self-determination and self-government.

The Manitoba Métis Federation (MMF) is mandated to promote, protect, and advance the collectively held Aboriginal rights of the Red River Métis. Through this mandate, the MMF engages with governments, industry, and others about potential impacts of projects and activities within our community. In 2007, the MMF Annual General Assembly adopted Resolution No. 8, which provides the framework for engagement, consultation, and accommodation with the Red River Métis. Designed by Métis, for Métis, Resolution No. 8 sets out the process that is to be followed by governments, industry, and other proponents when developing plans or projects that have the potential to impact section 35 rights of the Red River Métis. It was unanimously passed by MMF Citizens and mandates a “single-window” approach to consultation and engagement with the Red River Métis through the MMF Home Office.¹

In engaging the MMF, on behalf of the Red River Métis, the Resolution No. 8 Framework calls for the implementation of five phases:

Phase I: Notice and Response;

Phase II: Research and Capacity;

Phase III: Engagement and Consultation;

Phase IV: Partnership and Accommodation; and

Phase V: Implementation.

¹ More information about Resolution No. 8 is available online at: <http://www.mmfmb.ca/docs/2013-Resolution%208%20Booklet-VFinal.pdf>



This Project has the potential to impact Red River Métis rights, claims, and interests and as such, engagement and consultation with the MMF, through the process set out above, must be followed. Red River Métis section 35 rights are distinct from First Nation’s rights and must be respected.

The “postage stamp province” of Manitoba was the birthplace of the Red River Métis. The MMF currently has an outstanding claim due to the Federal Crown’s failure to diligently implement the land grant provision of 1.4 million acres of land promised to the Red River Métis as a condition for bringing Manitoba into Confederation. It is set out in section 31 of the *Manitoba Act, 1870* and must be resolved in accordance with the honour of the Crown.²

Prior to the creation of Manitoba, the Red River Métis had always exercised their inherent right of self-determination and developed with self-government structures and institutions centered around the Red River Settlement and throughout the Northwest. As described by Louis Riel in his 1885 memoirs, Métis self-government was well-established and functioning when Canada came to the Red River Métis in the late 1800s:

When the Government of Canada presented itself at our doors it found us at peace. It found that the Métis people of the North-West could not only live well without it . . . but that it had a government of its own, free, peaceful, well-functioning, contributing to the work of civilization in a way that the Company from England could never have done without thousands of soldiers. It was a government with an organized constitution whose junction was more legitimate and worthy of respect, because it was exercised over a country that belonged to it.

Red River Métis self-government has evolved and changed over time to better meet the needs of the collectivity. Today, the MMF is the recognized, democratically elected, National Government of the Red River Métis. On November 30, 2024, the Red River Métis and His Majesty the King signed the Red River Métis Self-Government Recognition and Implementation Treaty. The Treaty recognizes the Manitoba Métis Federation as the government of the Red River Métis.

Since 1967, the MMF has been authorized by the Red River Métis through a democratic governance structure at the Local, Regional, and national levels. As part of this governance structure, the MMF

² *Manitoba Metis Federation Inc. v. Canada (Attorney General)*, 2013 SCC 14, [2013] 1 SCR 623 (“MMF Case”). The Supreme Court of Canada recognized that this outstanding promise represents “a constitutional grievance going back almost a century and a half. So long as the issue remains outstanding, the goal of reconciliation and constitutional harmony, recognized in s. 35 of the *Constitution Act, 1982* and underlying s. 31 of the *Manitoba Act*, remains unachieved. The ongoing rift in the national fabric that s. 31 was adopted to cure remains unremedied. The unfinished business of reconciliation of the Metis people with Canadian sovereignty is a matter of national and constitutional import” (para. 140).



maintains a Registry of Red River Métis Citizens.³ By applying for Red River Métis Citizenship, individuals are confirming that the MMF is their chosen and elected representative for the purposes clearly set out in its Constitution,⁴ including as related to the collective rights, claims, and interests of the Red River Métis.⁵

The MMF Constitution confirms that the MMF has been created to promote the political, social, cultural, and economic rights and interests of the Red River Métis. The MMF is authorized to represent the Red River Métis' collective rights, interests, and claims. This authorization is grounded in the MMF's democratic processes that ensures the MMF is responsible and accountable to the Red River Métis.

The MMF governance structure includes a centralized MMF President, Cabinet, Regions, and Locals. There are seven Regions and approximately 135 Locals throughout Manitoba (Figure 4). There are thousands of Red River Métis Citizens who live outside of Manitoba. All MMF Citizens are Members of a Local. Locals and Regions work together to authorize and support the MMF Cabinet, and the MMF's various departments and offices. Through elections held every four years, Citizens choose and elect the MMF Cabinet consisting of the MMF President, who is the leader and spokesperson for the MMF, a Vice-President of each Region, and two Regional Executive Officers from each Region. The MMF Cabinet also includes the spokeswoman from the Infinity Women Secretariat. Each Local's Membership elects a Chairperson, a Vice-Chairperson, a Secretary and a Treasurer (or a Secretary-Treasurer, as the case may be) to serve the Local for a four-year term.

Consistent with the direction of its Citizens back in 2014, the MMF removed the arbitrary provincial borders from our Constitution that separated Red River Métis who live outside of Manitoba from those within. Today, the MMF represents over 125,000 Citizens within Manitoba, and thousands more across its National Homeland, and around the world.

The MMF, as the duly authorized government of the Red River Métis, has been recognized by both the federal and provincial governments in agreements, policies, and legislation. For example, in 2002, *The Child and Family Services Authorities Act* recognized the MMF for the devolution of child and family services to MMF institutions. This Act establishes a series of Child and Family Services Authorities to

³ MMF Constitution, Article III outlines the citizenship definition and application process. This definition ("Metis" is defined to mean "a person who self-identifies as Métis, is of historic Métis Nation Ancestry, is distinct from other Aboriginal Peoples and is accepted by the Métis Nation") aligns with the definition of what constitutes a section 35 rights-bearing Metis community as outlined by the Supreme Court of Canada in *Powley* at para. 30.

⁴ *Newfoundland and Labrador v. Labrador Metis Nation*, 2007 NLCA 75 at para 47: "Anyone becoming a member of the [Labrador Metis Nation] should be deemed to know they were authorizing the LMN to deal on their behalf to pursue the objects of the LMN, including those set out in the preamble to its articles of association. This is sufficient authorization to entitle the LMN to bring the suit to enforce the duty to consult in the present case."

⁵ *Behn v. Moulton Contracting Ltd.*, 2013 SCC 26 at para 30: "[A]n Aboriginal group can authorize an individual or an organization to represent it for the purpose of asserting its s.35 rights."



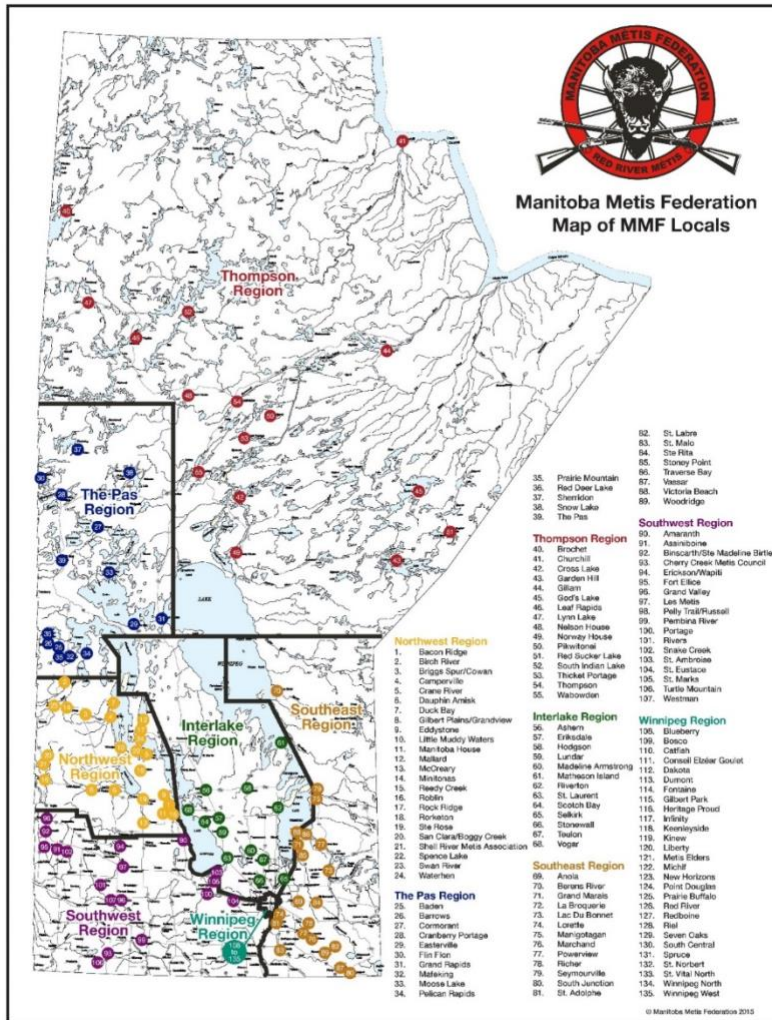


Figure 4. Manitoba Métis Federation (MMF) Regions.

themselves as the Métis Nation.... Recognition of the Manitoba Métis Federation as the primary representative of the Métis people is an important part of formalizing relationships.⁷

In 2012, the *MMF-Manitoba Harvesting Agreement (2012)* negotiated between the MMF and the Manitoba Government recognized some of the collective section 35 harvesting rights of the Red River

administer and provide the delivery of services to various distinct Indigenous communities in Manitoba. It creates a Métis Child and Family Services Authority, the directors of which are appointed by the MMF.

In 2008, the courts in Manitoba further recognized that “[t]he Métis community today in Manitoba is a well-organized and vibrant community. Evidence was presented that the governing body of Métis people in Manitoba, the Manitoba Métis Federation, has a membership of approximately 40,000, most of which reside in southwestern Manitoba.”⁶ In 2010, the Manitoba Government adopted a Manitoba Métis Policy, and stated that:

The Manitoba Metis Federation is a political representative of Métis people in Manitoba and represents in Manitoba the Métis who collectively refer to

⁶ *R. v. Goodon*, 2008 MBPC 59 para 52. Note that the number of MMF Citizens (40,000) identified by the Court was as of 2007.

⁷ Manitoba Métis Policy, September 2010 at 4, 12, online (PDF): <https://www.gov.mb.ca/inr/mbmetispolicy.html>



Métis and relied on the Citizenship processes of the MMF as proof of belonging to a rights-holding Indigenous community:

For the purposes of these Points of Agreement, Manitoba will recognize as Métis Rights-Holders, individuals who are residents in Manitoba and who hold a valid MMF Harvesters Card, issued according to the MMF's Laws of the Hunt. [. . . and will] consult with the MMF prior to implementing any changes to the current regulatory regime that may infringe Métis Harvesting Rights.⁸

In 2013, the Supreme Court of Canada recognized the “collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada.” It went on to grant the MMF standing as the “body representing the collective Métis interest” in the *MMF Case*.⁹ Additionally, in 2016, the *MMF-Canada Framework Agreement* stated:

the Supreme Court of Canada recognized that the claim of the Manitoba Métis Community was “not a series of claims for individual relief” but a “collective claim for declaratory relief for the purposes of reconciliation between the descendants of the Métis people of the Red River Valley and Canada” and went on to grant the MMF standing by concluding “[t]his collective claim merits allowing the body representing the collective Métis interest to come before the court.

[and that] Canada is committed to working, on a nation-to-nation, government-to-government basis, with the Métis Nation, through bilateral negotiations with the MMF.¹⁰

The MMF signed the *Manitoba Métis Self-Government Recognition and Implementation Agreement* (MMSGRIA) on July 6, 2021. This marked a major step forward in reconciliation between the Red River Métis and Canada. The MMSGRIA, among other things, immediately recognized the MMF as the National Government of the Red River Métis and sets out a path forward towards the completion of a modern Treaty. As noted above, that Treaty was signed on November 30, 2024. Once this Legislation is in place, the Treaty will become fully effective and will have constitutional protection, further strengthening the relationship between the Red River Métis and Canada.

The Treaty was ratified by thousands of Red River Métis Citizens in June 2023 and builds upon the important work of the MMSGRIA. The Treaty now awaits the passage of Federal implementation legislation. Once this legislation is in place, the Treaty will become fully effective and will have

⁸ MMF-Manitoba Harvesting Points of Agreement (September 29, 2012), ss. 3, 6-7.

⁹ *MMF Case*, *supra* note 6 at para 44.

¹⁰ MMF-Canada Framework Agreement on Advancing Reconciliation, November 15, 2016, Preamble.



constitutional protection, further strengthening the relationship between the Red River Métis, through its National Government, the MMF, and Canada.

3.0 Initial Project Description: Summary of Concerns

In review of the Ten Shilling Aerodrome, the MMF seeks to safeguard the rights, claims, and interests of the Red River Métis, which includes ensuring that proposed project activities will not have an adverse effect on harvest or cultural practice, while also seeking collaborative opportunities to identify meaningful benefits.

In working to identify potential project interactions and concerns regarding this project, the MMF has reviewed documented Red River Métis land use and occupancy within 10 km of the proposed aerodrome and existing CAT trail, which will be used to access the site. Since 2010, the MMF has collected and documented land use and occupancy information from Red River Métis Citizens across the National Homeland of the Red River Métis. This information is stored in the Red River Métis Land Use and Occupancy Catalogue (the Catalogue). The Catalogue is a database of locations where Red River Métis Citizens practice traditional harvesting activities, considered as Indigenous rights as identified in and protected under section 35 of the Constitution Act, 1982 and areas that are culturally and historically significant to the Red River Métis.

This Catalogue has over 22,500 features and represents data collected from over 400 interviews with individual Red River Métis Citizens. The number of individual interviews is not intended to be statistically significant compared to the 120,000 Red River Métis Citizens across the Homeland of the Red River Métis, but is indicative of patterns of use and occupancy historically until the present day. The MMF uses the Catalogue to guide discussions of impact, either cumulative or direct, during resource development projects. The MMF's studies are generally project-specific and include interviews with Red River Métis Citizens who frequently use or have knowledge of the lands and waters in a specific geographic area. This data is combined with the existing Catalogue to develop reports and inform recommendations.

The area surrounding the Ten Shilling Aerodrome site holds cultural and ecological significance to the Red River Métis. A review of the Catalogue shows sites of Red River Métis Knowledge and land use. Within 10 km of the proposed aerodrome, the following land use, occupancy, and Red River Métis Knowledge sites are found:

- Fur Trade Outpost (1684 – 1957);
- Historic settlement/residency by Red River Métis Citizens (1790s - 1950s);
- Hunting areas for moose, caribou, ducks, ptarmigan, and goose;



- Trapping and harvest areas for furbearers, arctic fox, fish;
- Transportation routes via dog sled, boat; and
- Red River Métis Knowledge of caribou migration routes, moose, polar bear and wolf habitat.

Additionally, along the CAT trail route, the following land use, occupancy, and Red River Métis Knowledge sites are found:

- Trapping and snaring sites for mammal species;
- Fishing sites for trout and other species;
- Gathering sites for medicines and plant-based foods;
- Hunting sites for caribou and ptarmigan; and
- Overnighting locations.

In consideration of the documented land use, occupancy and knowledge of Red River Métis Citizens, as well as the potential interactions with project-related activities through construction and operation of the aerodrome, the MMF have identified a series of concerns and recommendations. These concerns and recommendations, as detailed in full in Appendix A, represent the MMF's initial concerns based on the limited information provided within the IPD. Notably, a full assessment and understanding of potential impacts to Red River Métis rights, claims, and interests cannot be completed until additional targeted effort is made to better understand historic and contemporary use of the area by Red River Métis. To accomplish this, a full Red River Métis Knowledge and Land Use Occupancy Study would need to be completed to inform a full impact assessment. However, based on available information, the MMF's concerns can be divided into two general categories – overarching concerns with the project as presented, including knowledge and information deficiencies, as well as specific impact-focused concerns targeting potential adverse impacts to the rights, claims, and interests of the Red River Métis.

Overarching Concerns:

- Lack of information provided considering the potential impacts beyond the immediate aerodrome footprint, including those associated with the use of the CAT trail, and flight paths used during takeoff and landings.
- Lack of information provided regarding the siting of the aerodrome aimed at ensuring location and runway heading allow for the best balance of project needs and impacts to the local biophysical environment.



- Lack of description of the existing environment, including the utilization of lands and waters which are directly and indirectly impacted by the project by wildlife including caribou, beluga whales, polar bears, wolverines, and other species at risk.
- Lack of meaningful engagement by the Proponent in advancing the Project to date. The MMF was not afforded similar opportunity for engagement and dialogue with the Proponent as nearby First Nations prior to the submission of the project to the Impact Assessment Agency of Canada.

In addition to these overarching concerns, the MMF has identified concerns regarding the following which are provided in detail in Appendix A:

- Impacts on cultural heritage resources;
- Impacts on fish and fish habitat;
- Impacts on marine mammals and marine habitats;
- Impacts on migratory birds;
- Impacts on terrestrial Species at Risk; and
- Cumulative impacts as a result of foreseeable regional development projects.

Cumulatively, the MMF is concerned that these project effects and subsequent impacts may adversely impact the rights, claims, and interests of the Red River Métis. It is necessary that the Impact Assessment Agency of Canada and the Proponent work with the MMF to identify a resolution for these potential impacts through an Impact Assessment or alternative processes.

4.0 Conclusions and Recommendations

The MMF recognizes the benefits of this project for the Peoples of York Factory First Nation, enabling a return to the land. In advancing this project, it must be done in a way that minimizes potential impacts on the environment as well as the rights, claims, and interests of the Red River Métis. The MMF has identified a number of potential project interactions and subsequent adverse impacts on the environment and to the rights, claims, and interests of the Red River Métis. The MMF is interested in working collaboratively with the Proponent and applicable regulators to identify opportunities to avoid these impacts. This may be done through a bilateral process, an impact assessment, or other suitable regulatory processes aimed at fully understanding project impacts and developing plans and programs to address them. While the MMF does not specifically feel a full impact assessment is necessary given the scale and scope of this project, they are concerned that other processes, such as the provincial *Environment Act* assessment process, does not appear to apply. As a result, they are concerned that impacts on Red River Métis rights may not be meaningfully addressed, or done so in a patchwork manner that is ineffective of addressing



overarching concerns with this project. Therefore, in contemplating potential pathways forward it is strongly urged that active dialogue between the Proponent and the MMF take place to determine how Red River Métis concerns can be appropriately reflected and addressed within this project.



Appendix A: Comments and Recommendations

Reference	Comment	Recommendation
<p>Section 2.2.2 Provincial Stakeholders Engagement</p>	<p>The Proponent notes that Manitoba Sport, Culture, Heritage, and Tourism advised that a Heritage Resource Impact Assessment (HRIA) will be required before construction.</p> <p>Red River Métis have a strong tie to York Factory dating back to the fur trade era. Because of this, the MMF holds a keen interest in being an active participant in the HRIA process to ensure that the assessment is done in a manner that reflects how Red River Métis did and do use the land around the site, such that the assessment can be scoped in a way to be vigilant in recognizing cultural heritage resources unique to or otherwise associated with Red River Métis land use and occupancy.</p>	<p>The MMF requests that the Proponent engage directly with the MMF during the planning of HRIA activities to ensure that appropriate opportunity is provided to the Red River Métis to participate and advise heritage resource assessment work to ensure that it appropriately considers and reflects Red River Métis historic and contemporary land use.</p>
<p>Section 2.3 Indigenous Engagement</p>	<p>The project is located within the National Homeland of the Red River Métis, as a result decisions which contemplate actions that may adversely impact the section 35 rights of the Red River Métis are subject to the Crown's Duty to Consult, and the MMF's consultation framework (Resolution no. 8).</p>	<p>The MMF support the Proponent's development of engagement and communication materials, however, these materials do not replace the need for deep and meaningful consultation on the project. Therefore, regardless of whether this project ultimately requires undergoing a full impact assessment, or whether the project can proceed subject to permitting, the MMF requires ongoing and meaningful dialogue with the Proponent, and to be consulted fully on all decisions that hold the potential to</p>



Reference	Comment	Recommendation
		adversely impact the rights of the Red River Métis.
Section 2.3 Indigenous Engagement	The MMF is concerned with the Proponent's efforts to engage with the MMF to date on this project. As evidenced in their efforts to serve as a conduit for input from "other First Nations" the Proponent focused on engagement through a First Nations-only forum, thereby excluding appropriate opportunity for similar dialogue with the MMF.	The MMF must reinforce the need for meaningful dialogue between the Proponent and the MMF to ensure that the rights, claims, and interests of the Red River Métis are appropriately considered and reflected within the scope of this project.
Section 3.1 Project Purpose and Need	The Proponent suggest that the use of the existing CAT trail will allow for the first stage of equipment delivery and preparation of the runway surface. It is, however, unclear the state of the CAT trail and whether any clearing or modification is necessary before it can be used.	<p>The MMF requests additional discussion regarding the state of the CAT trail and consideration of whether preparation for its use should be considered within the scope of this assessment.</p> <p>Additionally, based on the existing state of the CAT trail, the MMF is concerned that insufficient information has been provided to discuss whether or not the use of the CAT trail by heavy machinery may result in adverse impacts, including those associated with the mobilization of sediment, and potential impacts to fish bearing habitat along trail water crossings.</p>



Reference	Comment	Recommendation
		<p>It is therefore recommended that all water crossings be identified, highlighting those water crossings which are fish-bearing, and a water crossing management plan be developed to consider the potential impacts of water crossings, and establishment of mitigations, monitoring, and management activities aimed at minimizing impacts.</p>
<p>Section 3.6 Potential Alternatives</p>	<p>The MMF acknowledges the challenges associated with alternative means including via barge, boat, or helicopter access, which has been evidenced by the community over time, however, the MMF is interested in assessments which have been conducted to identify the preferred siting location of this airstrip. Many of the potential impacts from this project are associated with possible flight paths (e.g., impacts from low-flying aircraft on approach), and physical disturbance of the land.</p>	<p>Understanding that proposed location is preferred due to the proximity to existing infrastructure and historic settlement, the MMF seeks clarity on how other factors were considered and assessed in selecting the preferred location and heading of the aerodrome.</p> <p>The MMF requests additional information on how the proposed site was selected and determined to be the best location for siting the aerodrome. This information should include discussion and analysis on how this site was selected based on the balance of maximizing benefit while minimizing adverse impacts to the biophysical environment. This analysis must consider impacts derived both</p>



Reference	Comment	Recommendation
		<p>from the construction and operation of the aerodrome as well as from associated aircraft activity using the aerodrome (e.g., assessment should consider impacts associated with flight paths, landing approach, take-offs).</p>
<p>Section 4.2.2 Vegetation</p>	<p>There is a significant lack of information provided by the Proponent to describe the existing terrestrial habitat that would be impacted through clearing activities, including the potential for species at risk or species of cultural importance to be disturbed. Notably, the Proponent has relied heavily on the use of drone imagery to identify general trends in dominant species cover, however, has not provided detailed information regarding what those trends are or the potential existence of species at risk, or species of cultural importances which may influence the determination of impacts and/or the creation of targeted mitigations.</p>	<p>The MMF recommends that additional information be provided regarding the current state of vegetation which is to be impacted by this project. Additionally, they seek information regarding the Proponent’s consideration and assessment of species at risk, and species of cultural importance for the Red River Métis. Where this information does not exist, they request the Proponent develop a plan to address this knowledge gap and implement measures to appropriately protect and minimize impacts to terrestrial vegetation, including terrestrial species at risk and species of cultural importance for the Red River Métis.</p>



Reference	Comment	Recommendation
Section 5.3 Jurisdictions with Powers, Duties, or Functions	Clearing of natural lands, as well as the maintenance of a gravel runway hold the potential to serve as a source of sediment which may mobilize and move downgradient towards surface waters.	The Proponent needs to establish a sediment and erosion management plan even if no water is planned to be released directly into water.
Section 6.0 Potential Effects of the Project	<p>The MMF is concerned that the Proponent has not fully contemplated the potential impacts of this project on terrestrial mammals. Most notably, the area is used by several species which hold special federal conservation status including polar bears (Special Concern), wolverines (Special Concern), and both Barren-ground and Boreal populations of caribou (Threatened).</p> <p>The proposed project will result in the disturbance of terrestrial habitat for these species during the construction and/or operational phases of the project through the clearing of habitat and increased noise, light, vibration, and other disturbances associated with an increased human presence.</p>	It is essential that, regardless of whether this project ultimately requires an impact assessment or is able to proceed with alternative forms of permitting, the MMF emphasizes the need for the proponent to consider, mitigate, monitor, and manage potential impacts of the project on terrestrial wildlife. It is therefore recommended that the Proponent provide an assessment of impacts to wildlife and habitat, as well as develop an appropriate wildlife monitoring and management plan aimed at minimizing adverse impacts to wildlife and habitat.
Section 6.1.1 Fish and Fish Habitat	<p>The Proponent states that all fuel storage areas will have adequate impermeable containment structures that will accommodate 110% of the fuel stored within.</p> <p>The MMF acknowledges the intention of ensuring that secondary containment exists to limit the potential effects of a possible spill, however, the use of impermeable containers should only be</p>	The MMF therefore recommends that fuel not only be contained within appropriate impermeable (and approved) containers but also given the quantity of fuel and other hazardous materials which may exist on site, be held within an appropriately lined and bermed area to ensure a spill does not escape immediate containment.



Reference	Comment	Recommendation
	<p>considered as a single line of defence, ensuring that appropriate redundancy is built into the design.</p>	
<p>Section 6.2.1 Impacts to the Marine Environment</p>	<p>The Proponent states that because the Project is located entirely on terrestrial environment and approximately 14 km from Hudson Bay, no impacts to the marine environment are anticipated throughout the project.</p> <p>The MMF are concerned that the Proponent do not appear to have considered how marine organisms utilize the Hayes River estuary in considering impacts to the marine environment. Of specific concern, the MMF is concerned about the potential impacts of noise and vibration from aircraft on marine mammals (notably beluga whales, ringed seals, and harbour seals).</p>	<p>The MMF requests that the Proponent provide additional information regarding the potential for noise and vibration disturbance on marine organisms utilizing the Hayes River and Hudson Bay coastline. Where noise and/or vibration are found to exist in levels above background or otherwise may result in disturbance to the natural behaviour of marine mammals, the MMF requests that the Proponent identify an appropriate monitoring and management plan aimed at eliminating noise and vibration impacts on the marine environment, including potentially avoiding or reducing aircraft activity during areas identified to be sensitive.</p>
<p>Section 6.1.3 Migratory Birds</p>	<p>The section outlining potential impacts and mitigations measures for the protection of migratory birds focuses on the direct potential for interaction between the presence of nesting migratory birds and the area to be cleared for the creation of the aerodrome. The MMF agrees that this is an important aspect to be considered, however, they are concerned that no information is presented regarding what species are expected to be found in the</p>	<p>The MMF requests that the Proponent provide analysis identifying species which are likely to be found in proximity to the proposed project and develop targeted mitigations to minimize impacts to these species.</p>



Reference	Comment	Recommendation
	<p>area, as a result, they are concerned that mitigation measures may not be effective.</p> <p>Additionally, they note that the Proponent has not considered the potential for project interactions beyond the scope of the aerodrome footprint. As this project is located in proximity of the Hudson Bay coastline, and within the Atlantic and Hudson Bay migratory flyways, the MMF is concerned with the potential for interaction between the flight path of aircraft utilizing this aerodrome and the presence of migratory birds</p>	<p>The MMF further requests that the Proponent provide analysis on the potential impacts of the aerodrome flight path(s) as they relate to areas of known migratory bird use, especially along the Hudson Bay coastline. From this analysis, the MMF requests the Proponent develop a plan aimed at minimizing impacts to migratory birds that may utilize areas near the flight paths.</p>
<p>General – Cumulative Effects</p>	<p>The MMF notes the general absence of consideration and assessment of cumulative effects from the IPD. Several projects have been planned and are considered regional, including the Project 6 Road, R44H transmission line and the Kivalliq transmission line. The MMF believes that interactions between these projects must be appropriately considered within the scope of the Ten Shilling Aerodrome project impacts.</p>	<p>The MMF recommends that additional analysis be performed to understand the potential cumulative impacts of the Ten Shilling Aerodrome, within the regional context of other foreseeable projects in northeastern Manitoba. The MMF is specifically interested in understanding impacts to species such as caribou who require large tracts of undisturbed habitat, as well as the cumulative impacts of these projects on regional harvest pressure and ultimately the rights of Red River Métis Citizens.</p>

