2012

Métis Valued Ecosystem Components:

Traditional and Environmental Interests & Concerns for Potential Impacts from the Stillwater Marathon Project to the Métis Way of Life

Métis Nation of Ontario

the Métis Nation of Ontario

Written and prepared by the Lands, Resources & Consultations Branch of the Métis Nation of Ontario.

Métis Valued Ecosystem Components: Traditional and Environmental Interests & Concerns for Potential Impacts from the Stillwater Marathon Project to the Métis Way of Life

Prima Facie

Section 1: What is Aboriginal Traditional Knowledge?

Aboriginal Traditional Knowledge can be summarized as: "a cumulative body of knowledge, practice and belief evolving by adaptive processes and handed down through generations by cultural transmission, about the relationship of living beings (including humans) with one another and with their environment." The full scope of Aboriginal Traditional Knowledge includes knowledge about uses of the land, environment and resources; the implications of those uses for a community; the related relationships and responsibilities among and between people, communities and organizations on social, economic, cultural and spiritual levels; and patterns of change over time.

The National Energy Board states:

> "The term 'traditional knowledge' is used here to refer to two of the most important types of information that can be provided by Aboriginal peoples and used in impact assessments. The first type of information, traditional land use information, is used to build a picture of patterns of Aboriginal use and to discover how a proposed project may impact that use. This information is needed to assess the potential impacts of a proposed project on traditional use (traditional use assessment).
>
> The second type of information, traditional environmental knowledge, refers to knowledge about the environment that is held by local Aboriginal people. This knowledge can be generally considered as knowledge about resource management. It can include knowledge about animal movements and population trends, locations of permafrost, changes in water and air quality, berry patches, and the reaction of animal species to different disturbances, to name just a few examples. In the context of impact assessments, it could include information about changes to community wellness, climate and health, the importance of heritage resource sites and resource use."

It is important to note that Traditional Knowledge is not static, nor does 'traditional' imply 'old'. Rather, Traditional Knowledge is adaptive, evolving and growing with the needs of its holders, and the natural, social, cultural and economic environments they operate within. Because of this, Traditional Knowledge varies among nations, locations and communities. Traditional Knowledge is not a universal set of facts, beliefs and values; it is a way of being that is relevant to each people and their place.

Traditional Knowledge exists in the hearts and minds of those who possess it, and who will share and pass it forward for the well-being of their communities.

Section 2: Why is Aboriginal Traditional Knowledge important to government and proponents?

In Environmental Assessments led by the Provincial or Federal government, proponents often come from an understanding of impacts on habitats, ecosystems or species in a particular place over a particular period of time. From a Métis community's perspective, however, it is also important to examine how the impact spreads throughout a community on multiple levels, including economic, social, cultural and spiritual, and what that means to its way of life, including its rights and interests.

There is broad agreement among Aboriginal peoples that the federal EA process pays greater attention to examination of impacts on the non-human components of the environment. As an example, Aboriginal peoples recognize the importance of analyzing the direct impacts of a project on fish. However, they feel that a disproportionate amount of time, effort and money is spent on analyzing the possible direct impacts on the fish than on the potential impacts on Aboriginal peoples (i.e. changes in fish quality, quantity or availability as a source of food or income).

Aboriginal peoples hold the view that the non-Aboriginal driven value system and framework (impact-benefit analysis) used in EAs to identify and assess social, heritage and economic impacts prevents accurate identification of the direct and indirect cultural, social and economic impacts of projects on Aboriginal communities. For example, EAs examine impacts on archaeological sites, but not on sites that are culturally and historically important to Aboriginal peoples, including:

- Places where important events occurred (i.e. an intercultural battle)
- Valuable campsites (i.e. meeting places, areas where one can always find fish)
- Places of spiritual significance (i.e. isolated areas where certain medicinal or ceremonial plants grow); and
- Burial sites of ancestors.

These potential impacts are more recently reflected by proponents and government in an assessment of Aboriginal communities' "Valued Ecosystem Components" (VEC's).

Section 3: Information on Métis Community

The MNO asserts it represents a regional rights-bearing Métis community that lives throughout, uses and relies on the Lakehead/Nipigon/Michipicoten traditional territory. The harvesting rights of Métis living in this traditional territory have been accommodated by the Ontario Government based on actual knowledge of Métis claims in the Ontario-MNO Harvesting Agreement.

There has been a distinct Métis presence in the Lakehead/Nipigon/Michipicoten region since the late 1700s/early 1800s. The community was in existence prior to effective control in the region and was excluded, as a collective, from the Treaty that was negotiated with First Nations (i.e., the Robinson-Superior Treaty). However, some of the Métis families (i.e., Halfbreeds) living in the region were noted in Commission Robinson's notes from the treaty negotiations. Other observers of the day also noted the well-established presence of Halfbreed families in and around Lake Superior:

> "*... at present I am not certain whether the Government will acknowledge* ***the rights and claims of the half breeds, to a share of the payments to be made for the lands about to be ceded by the Indians of Lake Superior,*** *but should hope they would, as many of them have much juster [sic] claims then [sic] the Indians, they having been born and brought up on the land, which is not the case with many of the Indians, particularly the Sault Chiefs Shin gwa konse and Neh bai ne co ching, whose lands are situated on American Territory.*"[1]

Many of the Métis citizens living in this region today are the descendants of the historic regional rights-bearing Métis community as well as the descendants of Métis from throughout the historic Métis Nation. Notably, both the provincial and federal governments have conducted historical research on the Métis in this region. In the MNO's opinion, many parts of these research reports support Métis claims of a historic Métis presence throughout the region prior to effective control.

Both the Ontario Government and the Federal Government have conducted historical research on the Métis in this region. These research reports support the MNO's claims of a historic Métis presence throughout the region. The fisheries have always been key to the identity and way of life of the Métis in this region. While the Métis of the west had the buffalo, the Métis of the Great Lakes had fish. The Métis in this region are well known for their reliance on the fisheries (i.e., there continue to be Métis involved in the

[1] John Swanston, Halfbreed HBC Employee at Michipicoten, writing to Governor George Simpson in August 1850.

commercial fisheries in the region), trapping (i.e., there are many Métis with trap lines in the region) and other traditional pursuits throughout the territory.

Notably, the MNO's Registry documents the presence of the descendants of the historic rights-bearing Métis community that still live in the region today. Many of these historic Métis family surnames (Olsens, Clement, Bear, Deschamps, Delaronde, Folbert, Goodman, McGuire, Merchands, Dick, Michaelson/Michelson, Matheson, Watts, Musquash, Lasage, McKay, McLeod, Deschamps, etc.) are still present throughout the region and are represented by the MNO today.

As of April 2008, the MNO represents nearly [redacted] Métis adults living throughout the region. This number increases to approximately [redacted] Métis citizens in total when children are factored in. Just some of the locations where these Métis citizens live in the region include: Armstrong, Beardmore, Dorion, Geraldton, Gull Bay, Heron Bay, Hurkett, Kakabeha Falls, Kaministiquia, Longlac, MacDiarmid, Manitouwadge, Marathon, Murillo, Nakina, Nipigon, Nolalu, Puslinch, Red Rock, Rossport, Schreiber, Terrace Bay, Thunder Bay.

These Métis citizens mandate the MNO to represent their collectively held rights and interests. The Métis community democratically elects their leadership at the local, regional and provincial level through elections held at regular intervals. Within the Lakehead/Nipigon/Michipicoten territory there are three (3) Community Councils who represent MNO citizens in defined areas within the region, along with a Regional Councilor who represents the interests of Métis citizens living throughout the region. However, all of these governance structures are a part of the MNO's overall governance structure.

In order to address consultation issues, the Métis living in the region have established processes and procedures to ensure all Métis citizens are effectively engaged and consulted on policies, projects and development that may potentially affect the Métis community's rights, interests and way of life. A copy of the Regional Consultation Protocol signed for the Lakehead/Nipigon/Michipicoten territory is available on MNO's website: www.metisnation.org. This Protocol establishes a Regional Consultation Committee that is mandated to work with the MNO's Lands, Resources and Consultation branch to ensure meaningful consultation with the regional, rights-bearing Métis community takes place.

The MNO's consultation model is currently supported by the Ontario Government's New Relationship Fund ("NRF"). The NRF provides funding for core staff and basic capacity, while proponents are expected to cover consultation related costs that are specific to their proposed Project.

Section 4: Métis Species of Interest

The MNO and our Chartered Community Councils are often asked to provide government and proponents with a list of species of interest to the Métis way of life in order to contribute to the identification of Valued Ecosystem Components. It would be impossible to develop a conclusive list that represents the interests of all Métis in Ontario, but the list below is a good start. The MNO retains the right to edit and add to this list at any time, but we believe it is a good starting point for discussions on potential impacts to the Métis way of life and VEC's.

It is also important to note that, although a list of specific species has been provided, all ecosystem components and their interactions are important to the Métis way of life at some level. This is because the Métis depend on fully functioning ecosystems to provide food, medicine, and cultural and spiritual fulfillment. We take the view that all ecosystem components form an integrated system that is much more than the sum of its component parts. Although some ecosystem components (species) might be used more than others by the Métis, it is the integration of all species that determines ecosystem functioning. A consequence of this is that if a "non-VEC" is impacted, it could have indirect or direct effects on a VEC.

Plants/Fungi/Lichens:

- Wild Mushrooms (Chantrelles, Morels, Puffball, Shaggy Mane, etc.)
- Fiddleheads: various fern species (Bracken, Ostrich, Cinnamon, Royal, etc.)
- Berries: raspberries, strawberries, blueberries, blackberries, wild choke berries, bare berry, black cherry, bilberry, elderberry, Saskatoon berries, bog cranberry, etc.
- Cattails (Typha spp.)
- Sweet grass
- Wood: black walnut, basswood, black cherry, red oak, yellow birch, paper birch, swamp birch, gray birch, hickory, amur maple, striped maple, Manitoba maple, Norway maple, red maple, silver maple, black maple, sugar maple, mountain maple, sycamore, American chestnut, horse chestnut, catalpa, prehistoric woods (old growth forests), butternut, ash, Jack Pine, spruce, balsam, tamarack, cedar, White Pine, Red Pine, alder
- Fruit trees (apple, cherry, etc.)
- Various lichen species
- Various mosses
- **Medicinal plants**:
    - Agrimony

- Bedstraw
- Chamomile
- Clover
- Coltsfoot
- Comfrey
- Dandelion
- Golden rod
- Greater Celandine
- Horse Tail
- Labrador Tea
- Lamb's Quarters
- Leeks
- Lung wart
- Mallow
- Milkweed
- Plantain
- Red-Rooted Pigweed
- Shepherds Purse
- Stinging Nettle
- Sumac
- Wild Thyme
- Wood Sorrell
- Yarrow

Fish:

- Lake Sturgeon
- Trout
- Northern Pike
- Sucker
- Cisco
- Lake Whitefish
- Perch (yellow, etc.)
- Chub
- Salmon
- Smelts
- Walleye
- Sauger
- Burbot
- Crappie

- Smallmouth and largemouth bass

Terrestrial:

- Muskrat
- Beaver
- Fox
- Coyotes
- Racoon
- Black bear
- Rabbit and hare species
- Deer
- Moose
- Caribou (including Woodland)
- Small footed brown bat
- Northern brown bat
- Wolf
- Otter
- Mink
- Ermine
- Fisher
- Marten
- Squirrel and chipmunk
- Wolverine
- Lynx
- Bobcat

Avian:

- Ruffed Grouse and Spruce Grouse
- Pheasants
- Wild Turkey
- Turkey vultures
- Duck species (Canvasback, redhead, etc.)
- Goose species
- Golden eagle
- Bald eagle
- Peregrine falcons

- Hawks (red-tailed, rough-legged, red-shouldered, broad-winged, ferruginous, Swainson's)
- Morning dove
- Blue Jays
- Whiskey Jacks
- Crows
- Ravens
- Humming birds (black-chinned, ruby-throated, broad-billed, rufous)
- Piping plover
- Various songbirds
- Gulls
- Common loon

Reptiles & Amphibians:

- Snake species (Massassauga rattle, milk, northern brown, Garter, etc.)
- Tortoise
- Turtle species (snapping, etc.)
- Frog species
- Eastern red striped salamander
- Four toed salamander

Section 5: Métis Environmental Concerns

The MNO is often asked to comment throughout the Regulatory Approvals process for projects that have the potential to impact the Métis way of life. It is the opinion of the MNO, however, that the current environmental assessment process does not address the concerns of Métis people, nor does it provide MNO with a clear explanation of what the impacts to the environment, and subsequently the Métis way of life, could be. As a result, the MNO has actively been pursuing consultation during the early stages of the regulatory process to ensure Métis interests and concerns are considered at the beginning of the EA process, as opposed to at the end as an after thought. The MNO is pleased to have developed a positive working relationship with Stillwater Canada Inc. early in the regulatory process and looks forward to continuing to contribute to the regulatory process as Stillwater Canada Inc. seeks its approval from Federal and Provincial authorities.

Métis Valued Ecosystem Components: Traditional and Environmental Interests & Concerns for Potential Impacts from the Stillwater Marathon Project to the Métis Way of Life

Prima Facie

Below is a list of questions that MNO uses to obtain information from proponents and government on projects where the EA has not considered Métis interests or way of life. Answers to these questions are helpful in determining potential impacts to the Métis way of life as well as further delineating Métis Valued Ecosystem Components. The list below is not conclusive of all of the questions MNO might ask of a proponent or government.

1. The scale of the proposed project may weaken the natural systems and disturb wildlife species that depend on large, intact areas or require the specific habitats in this area to survive. The proposed project may have impacts that significantly affect the area ecosystems:
    a. What are the impacts to the soil on the project site and surrounding area, especially if any clear- or selective-cutting of this area of land occurs?
        i. How will those impacts to the soil affect the ecological and biological systems of the surrounding plant life?
        ii. How will those impacts to the soil affect the ecological and biological systems of the surrounding animal life?
        iii. How will those impacts to the soil affect the ecological and biological systems of the surrounding avian life?
        iv. How will those impacts to the soil affect the ecological and biological systems of the surrounding insect life?
        v. How will those impacts to the soil affect the ecological and biological systems of the surrounding aquatic life?
        vi. Soil in the areas surrounding the project site lacking stabilization after clear- or selective-cutting will have the potential to erode into nearby waterways, contributing to nutrient loading. What will be the impact on the nearby waterways and downstream ecosystems?
        vii. How will those impacts to the soil affect the Métis way of life?
    b. What are the impacts to mosses and lichens as a result of the proposed project? How will the loss of populations of moss and lichen species in the area affect other populations of the same species? Are metapopulation dynamics considered?
        i. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding plant life?
        ii. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding animal (especially woodland caribou) life?
        iii. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding avian life?

iv. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding insect life?
v. How will those impacts to the mosses and lichen affect the ecological and biological systems of the surrounding aquatic life?
vi. How will those impacts to the mosses and lichen affect the Métis way of life?

c. What are the impacts to shrubs (willow, alder, blueberry, red-osier dogwood, honeysuckle, etc.) as a result of the proposed project?
   i. How will those impacts to shrubs affect the ecological and biological systems of the surrounding plant life? What are their roles in the vegetation communities in which they inhabit? Do the shrubs influence the soil conditions (e.g., contribute to nitrogen enrichment via root nodules) which in turn influences other plant life?
   ii. How will those impacts to shrubs affect the ecological and biological systems of the surrounding animal life? Are they used for food, shelter, nesting, and reproduction (e.g., insect galls)?
   iii. How will those impacts to shrubs affect the ecological and biological systems of the surrounding avian life? What is the role of the shrubs in providing habitat for birds (e.g., nesting, shelter, food through the production of seeds and berries)?
   iv. How will those impacts to shrubs affect the ecological and biological systems of the surrounding insect life? Are they important for gall-forming insects or pollinators?
   v. How will those impacts to shrubs affect the Métis way of life?
d. What are the impacts to deciduous trees as a result of the proposed project?
   i. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding plant life?
   ii. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding animal life?
   iii. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding avian life?
   iv. How will those impacts to the deciduous trees affect the ecological and biological systems of the surrounding insect life?
   v. How will those impacts to the deciduous trees affect the Métis way of life?
e. What are the impacts to coniferous trees as a result of the proposed project?
   i. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding plant life?

ii. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding animal life?
iii. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding avian life?
iv. How will those impacts to the coniferous trees affect the ecological and biological systems of the surrounding insect life?
v. How will those impacts to coniferous trees affect the Métis way of life?

f. What are the impacts to wetlands (bogs, fens, marshes) as a result of the proposed project?
   i. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding plant life? Do they serve as important source populations for other areas?
   ii. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding animal life? Are they used for feeding and cover?
   iii. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding avian life? Are they used for feeding and nesting?
   iv. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding insect life? Are they used as sources of food (pollinators), cover, and reproduction?
   v. How will those impacts to the wetlands affect the ecological and biological systems of the surrounding aquatic life? Do they serve important roles in reducing run-off, soil erosion, and nutrient loading?
   vi. How will those impacts to the wetlands affect the Métis way of life?

g. What are the impacts to insects as a result of the proposed project?
   i. How will those impacts to insects affect the ecological and biological systems of the surrounding plant life (loss of pollinators and decomposers)?
   ii. How will those impacts to insects affect the ecological and biological systems of the surrounding animal life (loss of important food source)?
   iii. How will those impacts to insects affect the ecological and biological systems of the surrounding aquatic life (loss of important food source)?
   iv. How will those impacts to insects affect the ecological and biological systems of the surrounding avian life (loss of important food source)?

   v. How will those impacts to insects affect the Métis way of life?

h. What are the impacts to avian life (birds and bats) as a result of the proposed project?
   i. How will those impacts to avian life affect the ecological and biological systems of the surrounding plant life?
   ii. How will those impacts to avian life affect the ecological and biological systems of the surrounding animal life?
   iii. How will those impacts to avian life affect the ecological and biological systems of the surrounding aquatic life?
   iv. How will those impacts to avian life affect the ecological and biological systems of the surrounding insect life?
   v. How will those impacts to avian life affect the Métis way of life?

i. What are the impacts to reptiles and amphibians as a result of the proposed project?
   i. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding plant life?
   ii. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding animal life?
   iii. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding aquatic life?
   iv. How will those impacts to reptiles and amphibians affect the ecological and biological systems of the surrounding insect life?
   v. How will those impacts to reptiles and amphibians affect the Métis way of life?

j. What are the impacts to mammalian herbivores as a result of the proposed project?
   i. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding plant life?
   ii. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding mammalian predator life?
   iii. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding aquatic life?
   iv. How will those impacts to mammalian herbivores affect the ecological and biological systems of the surrounding insect life?
   v. How will those impacts to mammalian herbivores affect the Métis way of life?

k. What are the impacts to mammalian predators as a result of the proposed project?
   i. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding plant life?

ii. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding mammalian herbivore life?
iii. How will those impacts to mammalian predators affect the ecological and biological systems of the surrounding aquatic life?
iv. How will those impacts to mammalian predators affect the Métis way of life?

l. What are the impacts to aquatic life as a result of the proposed project?
i. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding plant life?
ii. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding mammalian predator life?
iii. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding aquatic life?
iv. How will those impacts to aquatic life affect the ecological and biological systems of the surrounding insect life?
v. How will those impacts to aquatic life affect the Métis way of life?

2. Many species in boreal lakes are near their thermal limits in normal conditions. More warming could cause decline or disappearance of aquatic species.
a. What are the impacts to water temperature in the watershed surrounding the Stillwater Marathon site as a result of the proposed undertaking?
i. Will varying geology in the area of the proposed project contribute to potential temperature change in the surrounding watershed?
ii. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the nearby waterways?
iii. Will a potential temperature change influence the primary productivity of the surrounding watershed?
iv. Will a potential temperature change influence the oxygen levels in the surrounding watershed?
v. How will potential temperature change in the nearby waterways affect the ecological and biological systems downstream?
vi. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the surrounding plant life?
vii. How will potential temperature change in the surrounding watershed affect the ecological and biological systems of the surrounding animal life?
viii. How will potential temperature change in the surrounding watershed affect the Métis way of life?

3. There is a potential for permanent destruction of Métis sites of spiritual and cultural importance through the proposed undertaking.
    a. What are the affects of the potential permanent destruction of Métis sites of spiritual and cultural importance to the Métis way of life?
4. There is a potential for disruption of fishery activities in the downstream waterways through sedimentation and negative impacts on fish habitat in the surrounding watershed.
    a. What, if any, work has been done by the proponent to begin identifying and consulting with the Métis fisheries in the downstream waterways?
    b. Can the proponent guarantee that there will be no impact on fish spawning in the downstream aquatic eco-system, including the immediate waterway?
    c. What would the impact be of disruption to fishery activity or fish spawning on the Métis way of life?
5. There is a potential for negative impacts to Woodland Caribou, a species of interest to the Métis.
    a. Woodland Caribou require enormous areas of undisturbed land. They are extremely sensitive to disruptions to their habitat and migratory routes. Recent studies have shown that Woodland Caribou have much larger migratory ranges than originally thought, and subsequently impacts to Woodland Caribou in the project area could affect herds across Northern Ontario, from the Manitoba boarder to the Quebec boarder, and perhaps even further.
        i. What studies have been conducted to determine how such a large project could affect Woodland Caribou?
        ii. How will impacts to the surrounding watershed and to area wetlands affect Woodland Caribou?
        iii. Any destruction to Woodland Caribou habitat requires that habitat creation be conducted to off-set impacts. What, if anything, does the proponent plan to do to ensure no net loss to important Woodland Caribou habitat?
        iv. What would the impact be of disruption to Woodland Caribou habitat to the Métis way of life?
6. The Project will result in a large mine site, access roads, transmission corridors, tailings pond, waste rock piles, power generation, and clearings for access, work and operations. These activities will result in fragmentation of habitat at both the terrestrial and aquatic levels.
    a. What will be the impact of such fragmentation on terrestrial and aquatic species, particularly
        i. species that use waterways for travel, dispersal, and habitat (e.g., otter, mink, beaver)

   ii. species that have large home ranges (e.g., wolves, wolverines) or significant migrations (e.g., caribou)
   iii. What is the potential for isolation of aquatic species along the waterway, and what is the potential long-term (e.g., genetic) impacts of such isolation?

7. There is a potential for negative impacts to plants harvested for medicinal and traditional uses by the Métis.
   a. What medicinal and traditional use plants could be impacted by the Stillwater Marathon site activities?
   b. What medicinal and traditional use plants have been surveyed and how have those surveys been conducted to ensure all plants were identified?
   c. What would the impact to the loss of medicinal and traditional use plants be to the Métis way of life?
8. Restricted access for Métis harvesters on project sites may impact Métis way of life in the area.
   a. How will access be restricted to Métis harvesters in the area of the proposed project?
   b. How will loss of access impact the Métis way of life?
   c. How will loss of access impact the socio-economic conditions of the area Métis communities?
9. Restricted access for species of interest to the Métis to the project sites and surrounding areas may impact Métis way of life in the area.
   a. What are the migratory species whose patterns may bring them near or on the site area?
   b. How will restrictions to access of the project area impact migratory species whose patterns may bring them near or on the site area?
   c. What are the local species who rely on the ecosystems near or on the site area?
   d. How will restrictions to access of the project area impact local species that rely on the ecosystems near or on the site area?
10. Disruption to ecological interactions and processes (e.g., migratory patterns, reproduction, or feeding) of species of interest to the Métis because of project-related activities may impact Métis way of life in the area.
   a. What impact could loud equipment and construction-related activities (blasting, dredging, grubbing, helicopters, etc.) have on species in the surrounding area?
   b. What is the total range of influence for such audible activities on sensitive species such as Woodland Caribou?
   c. What are the migratory patterns of species in this area?
   d. How could those migratory patterns be disrupted by construction related activities?

e. Are there winter, breeding, calving or feeding locations of species important to Métis way of life that will be impacted by the construction activities?

11. The potential for one or more fish-bearing water body to be "scheduled" by CEAA/EC/DFO is of great concern to the Métis. The MNO looks forward to more detailed information regarding the fish-bearing water bodies that may require an MMER Schedule 2.

Section 6: Additional Research Required

This VEC's report is draft and prima facie because additional research is currently underway that will further contribute to the dialogue between Stillwater Canada Inc. and MNO regarding potential impacts to the Métis way of life. Specifically, a traditional knowledge study has recently begun in the region with a focus on the area of the Stillwater Marathon project. The results of this study will help to further delineate VEC's of the rights-bearing Métis community in the area. While this report highlighted general concerns, the findings of the traditional knowledge study will likely shed light on more specific details regarding VEC's including:

- Historic, spiritual and culturally significant features
  - Example: trade routes, burial sites, spiritual sites
- Cultural activities
  - Example: traditional and family gatherings, shared celebrations
- Wilderness features
  - Example: air quality, noise, access to views, traffic, barriers to movement, lighting, habitat loss, species loss
- Traditional economic activity
  - Example: value and potential disruption of those activities
- Country food and medicinal plants
  - Example: access, availability and quality
- Current and future land uses
  - Example: hunting, fishing, trapping, berry picking, gathering of medicinal and edible plants
- Surface water and groundwater
  - Example: Quality and quantity

Additional research may be required, such as a socio-economic impact assessment and baseline demographic profile of the potentially impacted rights-bearing Métis community in the region, in order to determine VEC's and potential affects related to:

- Employment opportunities

- Business and business development opportunities
- Skills and skills development
- Social services and institutions
- Individual and family well-being