



August 21, 2018

Via Email

BC Environmental Assessment Office  
836 Yates St, Victoria  
BC V8W 1L8

Attention: Karen Christie, Executive Project  
Lead, [Karen.L.Christie@gov.bc.ca](mailto:Karen.L.Christie@gov.bc.ca)

Attention: David Grace, Project Lead,  
[David.Grace@gov.bc.ca](mailto:David.Grace@gov.bc.ca)

Dear Ms. Christie and Mr. Grace:

**RE: Sukunka Coal Mine (the “Project”)**

We are the Chiefs of the Saulteau First Nations and West Moberly First Nations. We write to confirm our opposition to the Project.

In August 2015, a First Nations Independent Technical Review (FNITR) of the Environmental Assessment Certificate application for the Project was initiated by technical staff of Saulteau First Nations, West Moberly First Nations, and McLeod Lake Indian Band, with the assistance of ERM Consultants Canada. An initial review produced in December 2016<sup>1</sup> identified 61 key issues of concern and 366 secondary issues. An update from the FNITR to the EAO in January 2017<sup>2</sup> indicated that the proponent had not responded to any of the identified concerns, and that caribou remained a key concern.

The enclosed technical memorandum dated June 20, 2018 was prepared by ERM to summarize the status of the FNITR regarding the effects, effects assessment, and proposed mitigations respecting caribou. The memorandum concludes that the construction and operation of the Project, including in combination with potential operation of the nearby Bullmoose Mine, Mickle wind energy project, and other industrial development, is likely to result in significant adverse

---

<sup>1</sup> First Nations Independent Technical Review of the Glencore Sukunka Coal Project, December 2016, available online: <https://projects.eao.gov.bc.ca/api/document/589a18a95658e1001d22a065/fetch>

<sup>2</sup> Joint Letter, T. Dokkie (WMFN), C. Marshall (SFN), E. Spence (MLIB), to D. Grace (EA) “First Nations Independent Technical Review of Glencore’s Proposed Sukunka Coal Project, January 5, 2017, available online: <https://projects.eao.gov.bc.ca/api/document/589a18a85658e1001d22a042/fetch>



effects on the Quintette local population unit (LPU) of caribou and on the reestablishment of a Treaty 8 harvest.

This is consistent with the enclosed June 21, 2016 technical review of the Project undertaken by the BC Ministry of Environment's caribou biologist, Dr. Dale Seip, who wrote the following:

Recovery efforts should focus on preventing any additional destruction of critical caribou habitat, accelerating the recovery of currently disturbed habitat where possible, and using population management methods such as wolf control to maintain the caribou while habitat conditions improve. Any additional destruction of core caribou habitat is inconsistent with efforts to recover these endangered caribou herds, and will increase the risk of the animals being extirpated.

Earlier this year, the Minister of Environment and Climate Change Canada also determined that there is an imminent threat to the recovery of Southern Mountain Caribou. The Quintette LPU was identified as one of the areas of particular concern.

In addition, there are a number of other key concerns which were identified by the FNITR, and have been raised by our respective Councils, but which have not been addressed satisfactorily, including potential effects to water. These additional concerns need not be outlined in this letter, as the potential impacts to caribou alone are prevent our Nations from supporting the Project as currently designed.

Thank you for your attention to this matter.

West Moberly First Nations

---

Chief Roland Willson

Saulteau First Nations

---

Chief Ken Cameron

cc:

Honourable George Heyman, Minister of Environment and Climate Change Strategy  
Honourable Catherine McKenna, Minister of Environment and Climate Change Canada  
Council, Saulteau First Nations  
Council, West Moberly First Nations  
James Hickling, Legal Counsel to Saulteau First Nations  
Tim Thielmann, Legal Counsel to West Moberly First Nations  
Naomi Owens, Director of Treaty and Lands  
Tamara Dokkie, Land Use Manager