



Splatsin

PO Box 460 Enderby BC V0E 1V0

5775 Old Vernon Road

Tel: (250) 838-6496

Fax: (250) 838-2131

www.splatsin.ca

Project Name:

Record Ridge Industrial Mineral Mine

FN Consultation ID:

RRMO 2023-2024

Consulting Org Contact:

Tracey Janes

Bailey Spiteri

Consulting Organization:

[BC Environmental Assessment Office](#)

Date Received:

Monday, May 6, 2024

Splatsin acknowledges receipt of your letter dated 2024-05-06T09:58:12 providing notice of Record Ridge Industrial Mineral Mine (the "Project"). Splatsin has reviewed the information that you have provided, which raised a number of questions and concerns. Splatsin expects to be meaningfully consulted to ensure that adverse impacts are substantially addressed and accommodated prior to any decision regarding the Project.

About Splatsin

Splatsin is the southernmost campfire of the Secwepemc people, and we have occupied the south-central part of British Columbia for at least 10,000 years. Secwepemc territory stretches from the British Columbia-Alberta border near the Yellowhead Pass to the plateau west of the Fraser River, southwest to the Arrow Lakes and the upper reaches of the Columbia River.

Splatsin are the caretakers or Yucwmenlúcucw of our area of responsibility of Secwepemculucw. Our stewardship area is generally considered to be the Eagle River Valley. Historical and genealogical records as well as oral history link Splatsin to the Arrow Lakes, to the Sicamous Narrows, to the Columbia River at Revelstoke, north to where the Mica Dam is now located, and everywhere in between. We have cared for the lands and waters in our territory for thousands of years.

Our caretaker responsibilities, or Yucwminmen, are a deeply imbedded aspect of Secwepemc law and way of life. These responsibilities guide us in our role as stewards of the land. The protection and maintenance of Secwepemculucw means the resources Splatsin people rely on for sustenance and cultural practices will continue to support current and future generations. Our stewardship allows us to continue our way of life, which is constitutionally protected under s. 35(1) of the Constitution Act, 1982.

Duty to Consult Where Potential Impacts to Aboriginal Rights and Title

Splatsin asserts Aboriginal rights and title in Secwepemculucw. As the Project falls within this area, any potential impact arising from the Project or cumulative impacts resulting from the Project on Splatsin's Aboriginal rights and title will trigger the duty to consult and accommodate Splatsin.

Given the extent of cumulative impacts in Splatsin's traditional territory, even a small project may have serious consequences for the exercise of our constitutionally-protected rights and title and may therefore require deep consultation and accommodation. Further, Splatsin asserts Aboriginal and other common law rights to the lands and water resources within, under, and adjacent to our reserve lands, and Splatsin has the right to govern those lands and water resources. To the extent the Project potentially impacts Splatsin's reserve land and/or water resources and/or Splatsin's ability and

authority to govern our reserve lands and water resources, the duty to consult is engaged at the higher level, including the requirement to obtain Splatsin's consent.

Concerns Regarding the Project

Splatsin supports the recommendation from Wildsight for an environmental assessment to be required prior to any development or approval of this work.

Splatsin reserves the right to provide further comments and concerns and to have these concerns addressed by the proponent before we consider supporting any of the proposed works. Please forward along any monitoring reports and notify Splatsin immediately if there are non-compliance events.

Sincerely,

Splatsin Referrals
