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March 16, 2012

VIA EMAIL

Environmental Assessment
& Licensing Branch
Manitoba Conservation
123 Main Street, Suite 160
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Jason T. Madden
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Matter No.: MMF-511

Dear Sir or Madam:

**RE: Comments on Manitoba Hydro's Environmental Impact Statement for
the Bipole III Transmission Project**

I am counsel for the Manitoba Metis Federation in the abovementioned matter. Pursuant to Manitoba Conservation's public notice requesting comments from interested Parties no later than March 16, 2012, my client is pleased to submit its comments in the attached report.

The MMF has reviewed the Environmental Impact Statement (EIS) relative to the information requirements contained in Manitoba Hydro's Environmental Assessment Scoping Document (June, 2010) and with respect to good practice environmental assessment procedure and methods. The MMF's review and comments are focussed on two key areas: treatment of Manitoba Metis rights and interests and assessment of impacts on Manitoba Metis use of lands and resources for traditional purposes.

Yours very truly,

A handwritten signature in black ink that reads 'J.T. Madden'.

Jason Madden

Attach (1)

MMF#: 1	Manitoba Hydro’s definition of “Aboriginal Community”		
EIS Volume #: 1	Chapter #: Glossary	Page #(s): 1	
EIS Scoping Document Reference:			
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:			
<ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 			

Rationale:

Throughout the EIS, MH has referred to plans to communicate, involve, and otherwise consult with “Aboriginal Communities” on an array of matters, including adjustments to the HVdc routing and transmission line infrastructure within the right of way, location of construction phase-related infrastructure such as marshalling yards, location of permanent project components such as repeater stations, construction and operational phase access management plans, and other mitigation measures. MH has defined an “Aboriginal Community” as “[a] community where most of the residents are Aboriginal (i.e. Indian, Metis or Inuit) and that has a separate form of government, provides some level of service to its residents, and has clear community boundaries.”

Aside from the legal matters discussed below, the EIS fails to acknowledge and address the fact that many Manitoba Metis who engage in traditional use within the Project Area reside in areas outside the Project Study Area and in locations that would not be considered ‘Aboriginal Communities’ per MH’s chosen definition. For example, the screening survey deployed in MMF’s Traditional Use and Knowledge Study (contained in an appendix of the EIS titled Aboriginal Traditional Knowledge Technical Report 2) indicates that 40.8% of the Manitoba Metis who engage in traditional activities in the Project Study Area reside in MMF Regions of Winnipeg, Interlake and Southeast, i.e. these are Metis rights holders who are not living in Aboriginal communities as defined in MH’s EIS. Further, Table 6 of MMF’s Study indicates that 53.1% of the 49 Manitoba Metis who participated in detailed interviews and whom engage in traditional activities in the Project Study Area also reside in these three MMF Regions. Figure 6 in MMF’s Study indicates that Manitoba Metis, who reside in areas that do not meet MH’s definition of an Aboriginal Community, utilize the Project Study Area and areas within the HVdc Right of Way (ROW) for traditional purposes.

Review Comments:

This definition of “Aboriginal Community” for the purposes of the EIS is inconsistent with legal and constitutional definitions of Metis communities, as set out by the Supreme Court of Canada. In *R. v. Powley*, [2003] 2 S.C.R. 207, the Supreme Court of Canada held at paragraph 19, “[a] Metis community can be defined as a group of Metis with a distinctive collective identity, living together in the same geographic area and sharing a common way of life.”

Moreover, in Manitoba, courts have recognized that rights-bearing Metis communities do not fit within the arbitrary definition set out and used by MH in the development of the EIS. For example, in *R. v. Goodon*, 2008 MBPC 59, the Manitoba Provincial Court held,

[46] The Metis community of Western Canada has its own distinctive identity. As the Metis of this region were a creature of the fur trade and as they were compelled to be mobile in order to maintain their collective livelihood, the Metis "community" was more extensive than, for instance, the Metis community described at Sault Ste. Marie in *Powley*. The Metis created a large inter-related community that included numerous settlements located in present-day southwestern Manitoba, into Saskatchewan and including the northern Midwest United States.

[47] This area was one community as the same people and their families used this entire territory as their homes, living off the land, and only periodically settling at a distinct location when it met their purposes.

[48] Within the Province of Manitoba this historic rights-bearing community includes all of the area within the present boundaries of southern Manitoba from the present day City of Winnipeg and extending south to the United States and northwest to the Province of Saskatchewan including the area of present day Russell, Manitoba. This community also includes the Turtle Mountain area of southwestern Manitoba even though there is no evidence of permanent settlement prior to 1880. I conclude that Turtle Mountain was, throughout much of the nineteenth century, an important part of the large Metis regional community.

...

[52] The Metis community today in Manitoba is a well organized and vibrant community. Evidence was presented that the governing body of Metis people in Manitoba, the Manitoba Metis Federation, has a membership of approximately 40,000, most of which reside in southwestern Manitoba.

...

[58] I conclude that there remains a contemporary community in southwest Manitoba that continues many of the traditional practices and customs of the Metis people.

...

[75] I have determined that the rights-bearing community is an area of southwestern Manitoba that includes the City of Winnipeg south to the U.S. border and west to the Saskatchewan border. This area includes the Turtle Mountains and its environs.

In the abovementioned case law, there is no requirement regarding "some level of services", "clear boundaries" or a "form of self-government" in order to for a Metis community to be a s. 35 rights-holder, which is the trigger for consultation and accommodation in relation to this project. MH provides no rationale for inclusion of these additional prerequisites in order to be recognized as an Aboriginal community for the purposes of the EIS.

Further, MH makes no mention of the abovementioned judicial determinations generally or the *Goodon* case specifically, even though the rights-bearing Metis community recognized in that case is within the Project Study Area. This lack of any assessment, explanation of understanding

of Aboriginal rights claims (proven or asserted) within the Project Study Area renders the EIS incomplete. Moreover, based on the points outlined above, MH's definition of "Aboriginal Community" is arbitrary, biased and incorrect in law in relation to the identification of Metis communities for the purposes of s. 35 rights, who required consultation and accommodation.

The MMF also notes MH's definition attempts to create pan-Aboriginal "Aboriginal Communities" (i.e., newly formed communities that include Indian, Metis and/or Inuit individuals) that do not exist in law and do not possess s. 35 rights, which is the trigger for the Crown's duty to consult and accommodate. There are rights-bearing Indian communities (i.e. First Nations), Metis communities and Inuit communities, consistent with s. 35 of the *Constitution Act, 1982* and related jurisprudence.¹

While there may be locations where Indian, Metis and Inuit live in the same location together – that does not equate to these populations forming distinct rights-bearing "Aboriginal Communities" for the purposes of consultation or accommodation. In these locations, the rights of individual Indian, Metis and Inuit people to be consulted still flows from their membership in rights-bearing Indian, Metis and Inuit communities. Notably, in *Little Salmon Carmacks First Nation v. Beckman*, [2010] 3 S.C.R. 103, at paragraph 35, the Supreme Court of Canada wrote,

[35] [o]n the other hand, the entitlement of the trapper Johnny Sam was a derivative benefit based on the collective interest of the First Nation of which he was a member. I agree with the Court of Appeal that he was not, as an individual, a necessary party to the consultation.

MH's attempt to consult with "Aboriginal individuals" or amorphous pan-Aboriginal "Aboriginal Communities", rather than through the potentially affected s. 35 rights-holding groups (i.e. First Nations, Metis communities) does not fulfill consultation requirements. Pan-Aboriginal "Aboriginal communities" are legal fictions, and cannot be used or created as a means to avoid meaningful engagement and consultation with affected groups who actually hold the s. 35 right, which is the trigger for consultation and accommodation.

Based on the above, MH's definition is incorrect in law and results in the arbitrary exclusion of rights-bearing Metis communities throughout the EIS. Unfortunately, this flawed approach permeates the EIS document as a whole because MH has used an incorrect definition of "Aboriginal Community" throughout. Simply put, an EIS cannot adequately assess or address the impacts of Metis communities with s. 35 rights, if it uses a definition that arbitrarily excludes them. This results in a deficient EIS in relation to Metis.

Further, the EIS does not assess, explain and describe the affected rights-bearing Aboriginal communities (i.e. s. 35 rights holders) in the Study Area. For example, the EIS does not include information about existing court decisions related to Metis harvesting rights (i.e., hunting, timber harvesting, fishing, etc.) in the Study Area (*R. v. Goodon*, 2008 MBPC; *R. v. Beer*, MBPC 82), ongoing litigation in relation to the Study Area (i.e., a decision in the *Manitoba Metis Federation*

¹ For example see *Cunningham v. Alberta*, [2011] 2 S.C.R. 670 where the Supreme Court of Canada recognizes that "line drawing" between First Nation and Métis communities is necessary in order to achieve the promise of s. 35 to the Métis as well as other Aboriginal peoples.

v. *Canada* is pending from the Supreme Court of Canada), existing Crown-Aboriginal negotiations in relation to the Study Area, etc. These deficiencies make it impossible for the Crown to rely on the EIS in any way in order to assess whether the Crown's duty to consult and accommodate has been fulfilled. In effect, if the EIS has largely excluded Metis communities (by virtue of the definition of "Aboriginal Community" used and a complete lack of any understanding or recognition of Metis rights in the Study Area) – how can it be relied upon to determine whether those Metis communities have been meaningfully consulted?

Information Request(s):

- How did MH arrive at its definition of "Aboriginal Community" for the purposes of its EIS? Who was consulted (i.e. the Crown, Aboriginal peoples, etc.)? What was considered? Why would this definition not be consistent with judicial determinations since consultation is owed to s. 35 rights-holders – not individuals or entities created by government (i.e. Northern Affairs Communities)? Did MH consult the Crown on this?
- Within the Supreme Court of Canada's definition of Metis community and the *Goodon* case, there is no requirement that a rights-bearing Metis community needs to "provide some level of services to its residents" or "clear community boundaries." Where does MH obtain its authority to add these requirements in relation to consultation with Aboriginal communities? How can MH impose requirements that are not supported by the law as it relates to Metis communities? Did MH consult the Crown on this?
- MH does not explain what is required to meet its standard of a "separate form of government." Does this mean in order to be a government the Aboriginal community needs to have a legislation from other governments that recognizes them (i.e. *Indian Act* bands)? Does this government need to be recognized by other levels of government or is recognition by the Aboriginal peoples themselves sufficient? How and where does MH derive the authority to make these determinations? What are the standards or criteria used? How does MH make these assessments?
- Why would specific Aboriginal individuals or pan-Aboriginal communities be consulted by MH? What is MH's understanding of the legal basis for consultation with pan-Aboriginal "Aboriginal communities"? What is the legal basis to consult directly with Aboriginal individuals versus consulting with the relevant s. 35 rights-holder to whom the duty is owed? Did MH consult with the Crown on this use of this methodology (i.e., consulting directly with Aboriginal individuals)?
- Why does MH's EIS include no assessment of s. 35 rights-bearing Metis community claims (proven or asserted) within the Project Study Area?
- How can the EIS effectively assess and understand the impacts of the project on the affected rights-bearing Metis communities when MH's definition of "Aboriginal Community" by and large excludes Metis?
- How can this EIS be relied upon by the Crown to determine whether rights-bearing Aboriginal communities in the Study Area have been consulted if the definition of "Aboriginal Community" is not consistent with the law with respect to who is to be consulted?

MMF#: 2	Failure to describe Manitoba Metis population in baseline characterization of Project Area demographics and health status		
EIS Volume #: 2	Chapter #: 6.3.6.1, 6.3.6.2	Page #(s): 6-204 6-205	
EIS Scoping Document Reference:			
7.4.3.4 The EIS will provide available information on personal, family and community life as it relates to the Project including the following:			
<ul style="list-style-type: none"> • Population characteristics of communities including, for example, total population, population growth rates, and structure by age and sex; • Household characteristics including breakdowns by family unit, status, children, ages, etc; • Health status and issues; 			

Rationale:

Metis are a distinct segment of the population with constitutionally protected Aboriginal rights (*Constitution Act, 1982, Section 35*).

Review Comments:

MH restricted its description of the Project Study Area population to three types of communities: First Nations, Northern Affairs Communities, and Municipal/Incorporated Communities. MH based its demographic description on the 2006 federal census reports of Statistics Canada. The Statistics Canada, a source that contains sufficient information for MH to have characterized the Metis population in the Project Study Area (2006 Aboriginal Identity, Single Response “Metis”, available by Census Metropolitan Areas and Census Agglomerations and by Forward Sortation Area).

Information concerning Metis population and health by Regional Health Authority area was available to the authors of the EIS in June of 2010 when the Manitoba Centre for Health Policy (Department of Community Health Sciences, University of Manitoba) in collaboration with the MMF made a report entitled “Profile of Metis Health Status and Health Care Utilization in Manitoba: A Population-Based Study” publically available on the internet.²

Information Request(s):

- Please explain why the Manitoba Metis population in the Project Study Area was not described?
- Please provide a description of the Manitoba Metis population in the Project Study Area based upon the sources identified in the review comments above.

² http://mchp-appserv.cpe.umanitoba.ca/reference/Metis_Health_Status_Full_Report.pdf

MMF#: 3	Socio-Economic and Cultural Baseline Characterization of, and Effects Assessment regarding Manitoba Metis				
EIS Volume #: 2 3	Chapter #: 6.3.7.1 8.3.6	Page #(s): 6-213 to 6-216 8-344 to 8-360			
EIS Scoping Document Reference:					
7.4.3.4 The EIS will provide available information on personal, family and community life as it relates to the Project including the following:					
<ul style="list-style-type: none"> • Personal, family and community well-being including community cohesion, outdoor recreation, aesthetics, culture (i.e., way of life) and spirituality; • Traditional economy including Aboriginal hunting, fishing, trapping and gathering; 					

Rationale:

Metis are a distinct segment of the population with constitutionally protected Aboriginal rights (*Constitution Act, 1982, Section 35*).

Review Comments:

The EIS acknowledges that there are distinct Aboriginal groups within the Project Study Area, identifying Metis as one of these distinct groups (Volume 2, pg. 6-213). Neither the main body of the EIS or the Aboriginal Traditional Knowledge Technical Report or the Socio-Economic Baseline Data Technical Report presents baseline information about personal, family and community well-being including community cohesion, outdoor recreation, aesthetics, culture (i.e., way of life) and spirituality, or the traditional economy including Aboriginal hunting, fishing, trapping and gathering, specific to Manitoba Metis (except the MMF's study is included in the Aboriginal Traditional Knowledge Technical Report #2). In fact, throughout the EIS, all Aboriginal cultural groups are lumped into a single category with respect to both baseline descriptions and effects assessment. This approach fails to identify differences and/or similarities between Metis and First Nations and Metis and other Aboriginal people or groups with respect to issues such as culture, community cohesion, well-being, traditional economy and legal rights and interests. In particular, this approach fails to highlight the large urban-based Metis community which has Aboriginal rights and interests, and exercises its rights and interests throughout the Project Study Area.

In addition to the information provided by the MMF in its report "Manitoba Metis Traditional Use, Values and Knowledge of the BiPole III Project Study Area", there is a substantial body of literature publically available concerning Manitoba Metis rights, culture, etc. Examples include: MMF's Metis Laws of the Harvest³; publications at the Metis Resource Centre⁴; and the academic and/or professional works of authors such as Brown, 1980; Van Kirk, 1980; Spry, 1981; Ens, 1996; Devine, 2004; St-Onge, 2004; Macdougall, 2006, 2010; and Ray, 2009, to name a few, and legal decisions such as *R. v Goodon* (2008 MBPC 59) and *R. v. Powley*, (SCC 43, 2003, 2 SCR 207). None of these sources have been reviewed or considered by MH.

³ <http://www.mmf.mb.ca/images/pdf/Metis%20Laws%20of%20the%20Harvest%20Web.pdf>

⁴ http://www.metisresourcecentre.mb.ca/index.php?option=com_content&view=category&id=1:history&Itemid=2&layout=default

Information Request(s):

- Please explain why all Aboriginal groups were lumped together in the aforementioned baseline and effects assessment chapters of the EIS, as well as technical reports.

MMF#: 4	Characterization of Manitoba Metis current use of land and resources for traditional purposes		
EIS Volume #: 2	Chapter #: 6.3.2.9	Page #(s):	6-190
EIS Scoping Document Reference:			
3.2 Factors to be considered in the environmental assessment and addressed in the EIS: <ul style="list-style-type: none">• Current use of lands and resources for traditional purposes by Aboriginal persons.			
7.4.3.1 Resource Use-The EIS will provide sufficient level of detail in order to predict, avoid and/or minimize any potential adverse effects of the Project on resource use, including <ul style="list-style-type: none">• Domestic use of resources by Aboriginal groups including fishing, hunting, trapping and gathering medicinal, and other plants and berries and fuel wood.			

Rationale:

The main body of the EIS fails to adequately describe Manitoba Metis current use of lands and resources for traditional purposes in a level of detail that allows the reader to appreciate the nature and extent of Manitoba Metis traditional use, culture and practices, and which forms the foundation for understanding the assessment of project effects and/or the utility of proposed mitigation.

Review Comments:

In recognition of the importance of the rights of Manitoba Metis, the MMF conducted a comprehensive study to document the nature of traditional use of lands and resources by Manitoba Metis within the Project Study Area. The overarching purpose of this research was to provide information to enable Manitoba Hydro (MH) to assess the potential effects of the BPIII project on Manitoba Metis rights and interests, including current use of lands and resources for traditional purposes, and to develop appropriate mitigation responses. MH included MMF's full report in electronic version appendix (i.e. not part of the printed EIS). However, covered in three short paragraphs in Volume 2 of the EIS, the baseline description of Manitoba Metis traditional use in the Project Study Area in general, and the HVdc ROW in particular, is considered woefully inadequate. The brief description fails to explain that Manitoba Metis engage in traditional use within and adjacent to the HVdc ROW and Keewatinow Converter. A critical factor not explained in the baseline description is that many Manitoba Metis travel great distances to engage in traditional activities in the Project Study Area, including areas that may be disturbed during the construction period and/or subject to temporary or permanent access management plans.

Information Request(s):

- Please provide detailed information concerning Manitoba Metis rights and interests in the Project Study Area and fully describe the nature and extent of Manitoba Metis use of land and resources in the Project Study Area and project component local study areas so that regulatory agencies charged with reviewing the BP3 application are fully apprised of the baseline conditions with respect to Manitoba Metis.

MMF#: 5	Effects on moose populations and project-related impacts on moose harvest opportunities by Manitoba Metis				
EIS Volume #: Appendix	Chapter #:	Mammals Technical Report	Page #(s):	45, 80	
EIS Scoping Document Reference:					
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:					
<ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 					

Rationale:

The recent provincial closure of Game Hunting Areas (GHA’s) to moose hunting combined with the potential for the HVdc ROW to increase hunter access in certain remaining GHA’s and/or increase opportunities for wolf predation on moose, has the potential to impact Manitoba Metis harvesting opportunities. In particular, the closure of GHA’S has the effect of concentrating harvesters into the remaining open GHA’s, a number of which are transected by the HVdc ROW. MH does not appear to have considered the potential effect of GHA closures on moose populations or Manitoba Metis harvesting opportunities in its environmental effects assessment nor under its cumulative effects assessment.

Review Comments:

MH reports that moose populations in the western part of the Project Study Area are in decline. The EIS further reports that in response to population declines, Manitoba has instituted a number of moose hunting closures in both the western and eastern parts of the province in order to allow populations to rehabilitate. Specifically, GHA’s 13, 13A, 14, 14A 18, 18A-C in the western part of the province and GHA 26 in the eastern part of the province have recently been closed. Additionally, portions of GHA’s 2A, 4 and 7A (western Manitoba) and GHA 17A (eastern Manitoba) have also recently been closed (see Figure 1 below).

In response to moose conservation concerns, a motion was passed at the 2011 MMF General Assembly, whereby Manitoba Metis harvesters agreed to curtail moose harvesting activity in GHA's where moose populations require time to reestablish.

Within the central western portion of the province, this leaves only GHA 19A and GHA's north of Red Deer Lake and south of Grass River Provincial Park, where moose populations exist, open to moose hunting. According to the MMF TLUKS, GHA's 13 and 14 (which are closed), as well as GHA's 11 and 12 (which are transected by the HVdc ROW) are important moose hunting areas. Voluntary cessation of moose hunting in major portions of western for conservation reasons may result in First Nation, Manitoba Metis and non-Aboriginal hunters concentrating in the remaining open GHA areas. MH reports that the primary potential effect on moose associated with the HVdc ROW is increased hunting and increased wolf predation. In the event that one or both of these outcomes results in threats to moose populations, MH indicates the effect will be mitigated through the development of Access Management Plans in consultation with Manitoba, Aboriginal communities, and other interested parties. Although not mentioned, there is also the potential that Manitoba would respond by closing additional GHA's to moose hunting.

Information Request(s):

- Please explain whether or not the effects assessment on moose populations and Aboriginal traditional use of moose, both related to increased harvester access in GHA's 6, 6A, 7, 8, 11, 12 and 19A was considered in light of the closure of many other GHA's to moose hunting in the central western and central eastern portions of the Province.
- If the above was not considered, please advise if the conclusion regarding residual effects would change if these factors were fully considered.

MMF#: 6	Locations and management plans for repeater stations				
EIS Volume #: 1	Chapter #:	3.4.1.3	Page #(s):	3-22	
EIS Scoping Document Reference:					
3.1 The EIS will describe the Project, augmented by appropriate figures, diagrams, drawings, maps, air photos and/or orthophotos, and, to the extent possible and practical, will include the following: Locations of lands to be cleared for the transmission rights-of-way and infrastructure.					
7.4.3.1 Resource Use-The EIS will provide sufficient level of detail in order to predict, avoid and/or minimize any potential adverse effects of the Project on resource use, including					
<ul style="list-style-type: none"> • Domestic use of resources by Aboriginal groups including fishing, hunting, trapping and gathering medicinal, and other plants and berries and fuel wood. 					
7.3.3 Construction-The EIS will provide descriptions of the timing and the methods proposed for the various activities related to the construction of the transmission lines, converter stations, ground electrodes and ancillary facilities including:					

- Measures proposed to protect the health and safety of workers and the general public in and around construction areas;

7.3.4 Operation and Maintenance-The description of the operation and maintenance of the Project will include:

- Measures that will be taken to protect the health and safety of workers and the general public around the transmission lines and other Project components...

3.2 Factors to be considered in the environmental assessment and addressed in the EIS:

- Current use of lands and resources for traditional purposes by Aboriginal persons.

Rationale:

The location of permanent repeater stations has the potential to adversely affect or otherwise interfere with MMF Citizen traditional use activities throughout the construction and operational phases.

MH indicates there will be four repeater [communications] stations along the length of the HVdc line, two of which will be located at existing transmissions stations in the vicinity of their existing rights-of-way, and two in yet to be developed or new stand-alone sites located within the BP3 HVdc right-of-way, and within 100 m of a transmission tower.

Of the latter two, one will be located in the southwest quarter of Section 3, Township 76, Range 1W [between the Keewatinoow converter station and the Pas-Ralls Island station, just southwest of Partridge Crop Lake]. The second repeater station is to be a stand-alone facility, located in the southwest quarter of Section 31, Township 30, Range 18W [between the Pas-Ralls Island site and Portage South transmission station, or about 5 km southwest of the community of Winnipegosis]. These repeater stations will require an all-weather access road or a helicopter pad, and a property sufficiently large to develop a graded and gravel-surfaced area, approximately 33 m x 40 m in dimension, to accommodate parking and building areas. The building area will require a chain link perimeter fence and will house two structures, a back-up diesel generator building and a communications building (for communications equipment, lead acid standby batteries, and an electric toilet). Although not stated, these two repeater stations will be permanent facilities.

MH indicates a Draft Access Management Plan⁵ will be prepared to control access to construction areas for the Project the scope of which, in part, will [emphasis added]:

- include security of construction sites and facilities, safety of construction workers and the general public, **respect for Aboriginal rights and resource users**, and protection of natural, cultural and heritage resources;
- ensure worker and public safety;
- provide for security of Manitoba Hydro properties and facilities, and safe access to or through construction areas for authorized employees, land and resource users, and research and monitoring personnel;

⁵ Bipole III Transmission Line Draft Environmental Protection Plan (November 30, 2011). Section 5.4.1, Page 72.

- **outline security requirements including terms and conditions for access, restrictions on firearms, hunting and fishing, and other resource use activities;**
- be provided for review by affected stakeholders including government departments, First Nations, **Aboriginal communities**, rural municipalities, environmental organizations and land owners.

MMF TLUKS indicates the area near the proposed repeater station situated within Section 31, Township 30, Range 18W (just southwest of the town of Winnipegosis) is utilized by MMF Citizens for small animal harvesting purposes. It also indicates the area of the proposed repeater station southwest of Partridge Crop Lake is utilized by Manitoba Metis for large animal harvesting purposes. Although occupying a small footprint, these are permanent structures. Access management plans during the construction period and long term hunting restrictions could alienate Manitoba Metis from engaging in harvesting activities involving firearms in the general vicinity of the stations if MH implements and/or requests Manitoba to impose hunting restrictions for health and safety reasons.

Review Comments:

1. The EIS does not provide any specific information as to whether or not there will be access and/or firearms restrictions in the vicinity of the proposed repeater stations during the construction and/or operational phases of the project, and thus it is not possible to discern if these measures will adversely impact on Manitoba Metis traditional use and rights.
2. MH indicates its intention to vet its Access Management Plans with Aboriginal communities. However, MH's definition of an Aboriginal Community suggests that many Manitoba Metis who utilize the project area for traditional purposes and expression of rights, but whom do not reside in an Aboriginal community as defined by MH, may not be involved in the review of Access Management Plans. The definition further suggests that MH may not involve the MMF in the review process.

Information Request(s):

- Please provide a map showing the proposed locations of the two repeater stations.
- Please provide information about MH and/or Manitoba restrictions, if any, concerning Access Management Plans and/or traditional use restrictions employed in the vicinity of existing repeater stations. If there are restrictions, please provide details concerning the geographic extent and nature of the restrictions.
- Please explain if MH and/or Manitoba anticipate employing similar management measures for the two new repeater stations.
- Please explain if MH intends to consult with Manitoba Metis and the MMF regarding access management plans during the construction phase and with respect to any restrictions during the operational phase.

MMF#: 7	Locations and management plans for marshalling yards		
EIS Volume #: 1	Chapter #: 3.4.8.2	Page #(s): 3-46	
EIS Scoping Document Reference:			
<p>3.1 The EIS will describe the Project, augmented by appropriate figures, diagrams, drawings, maps, air photos and/or orthophotos, and, to the extent possible and practical, will include the following: Locations of marshalling and worker accommodation areas.</p> <p>7.3.3 Construction-The EIS will provide descriptions of the timing and the methods proposed for the various activities related to the construction of the transmission lines, converter stations, ground electrodes and ancillary facilities including:</p> <ul style="list-style-type: none"> • Measures proposed to protect the health and safety of workers and the general public in and around construction areas; <p>7.4.3.1 Resource Use-The EIS will provide sufficient level of detail in order to predict, avoid and/or minimize any potential adverse effects of the Project on resource use, including</p> <ul style="list-style-type: none"> • Domestic use of resources by Aboriginal groups including fishing, hunting, trapping and gathering medicinal and other plants and berries and fuel wood. <p>7.3.3 Construction-The EIS will provide descriptions of the timing and the methods proposed for the various activities related to the construction of the transmission lines, converter stations, ground electrodes and ancillary facilities including:</p> <ul style="list-style-type: none"> • Measures proposed to protect the health and safety of workers and the general public in and around construction areas; <p>3.2 Factors to be considered in the environmental assessment and addressed in the EIS:</p> <ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 			

Rationale:

The location of construction phase marshalling yards has the potential to adversely affect or otherwise interfere with MMF Citizen traditional use activities on a temporary basis during the construction phase.

The EIS Scoping Document requires that to the extent possible and practical MH provide geographic information on the locations of marshalling yards.

Review Comments:

The EIS identifies the need for marshalling yards “near the transmission line route” for construction of materials and equipment” but states the exact number and locations will be determined at a later date during the course of developing detailed construction specifications and contract arrangements.

Information Request(s):

- Please provide a map showing the proposed or likely locations of marshalling yards. If this information is not available, please explain how MH will work with MMF to ensure that marshalling yards are situated in locations which minimize or eliminate the potential for adverse effects on Manitoba Metis traditional use.
- Please provide information on any MH and/or Manitoba restrictions, if any, concerning hunting that were implemented in the vicinity of other marshalling yards associated with other projects. If there were restrictions, please provide details concerning the geographic extent and nature of the restrictions.
- Please explain if MH and/or Manitoba anticipate employing similar management measures for the BP III marshalling yards.
- Please explain if MH intends to consult with Manitoba Metis and the MMF regarding access management plans during the construction phase.

MMF#: 8	Locations and management plans for borrow pits			
EIS Volume #: 1	Chapter #: 3.4.8.2	Page #(s): 3-46		
EIS Scoping Document Reference:				
3.1 The EIS will describe the Project, augmented by appropriate figures, diagrams, drawings, maps, air photos and/or orthophotos, and, to the extent possible and practical, will include the following: Borrow area details and locations				
3.2 Factors to be considered in the environmental assessment and addressed in the EIS: Current use of lands and resources for traditional purposes by Aboriginal persons.				

Rationale:

The location of construction phase borrow areas has the potential to adversely affect or otherwise interfere with MMF Citizen traditional use activities.

The EIS Scoping Document requires that to the extent possible and practical MH provide geographic information on the locations of borrow areas.

Review Comments:

The EIS states “Aggregates required for use in foundation construction will generally be transported from established and appropriately licensed sources off-site. Suitable material for backfill of excavated organic soils may be hauled from newly developed borrow areas along the right-of-way. **Potential borrow locations have not been specifically identified at this time. Typically, borrow pit locations will be located along the right-of-way** to minimize environmental disruption, haul distances and cost. **Where suitable sources are not available along or close to the right-of-way, nearby deposits may have to be identified and the surrounding brush cleared to gain access to the line.** Normally, rubber-tired dump trucks are used to transport gravel and fill materials. **Selection, development and reclamation of new borrow sites will be undertaken in accordance with provincial regulations and with the**

approval of the local Natural Resources Officer and local government authorities.”
 [emphasis added]

Information Request(s):

- Please provide a map showing the proposed or likely locations of new borrow areas. If this information is not available, please explain how MH will work with MMF to ensure that borrow areas are situated in locations which minimize or eliminate the potential for adverse effects on MMF Citizen traditional use.
- Please provide information on any MH and/or Manitoba restrictions, if any, concerning hunting that were implemented in the vicinity of other project borrow areas. If there were restrictions, please provide details concerning the geographic extent and nature of the restrictions.
- Please explain if MH and/or Manitoba anticipates employing similar management measures for the borrow pits associated with the BP III project.

MMF#: 9	Locations and management plans for worker accommodation areas				
EIS Volume #: 1	Chapter #: 3.4.8.3	Page #(s): 3-47			
EIS Scoping Document Reference:					
3.1 The EIS will describe the Project, augmented by appropriate figures, diagrams, drawings, maps, air photos and/or orthophotos, and, to the extent possible and practical, will include the following: Locations of marshalling and worker accommodation areas.					
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:					
<ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 					

Rationale:

The location of construction phase worker accommodation areas has the potential to adversely affect or otherwise interfere with MMF Citizen traditional use activities.

The EIS Scoping Document requires that to the extent possible and practical MH provide geographic information on the locations of worker accommodation areas.

Review Comments:

The EIS states; “Clearing and construction workers on the HVdc transmission line may be housed in mobile construction camps, or where feasible and practical, in suitable accommodations available in local communities. Where mobile construction camps are required, these will typically include sleeper units, a wash car, cooking and eating trailers, offices and a machine/parts shop. Mobile construction camps are generally relocated along the right-of-way as the various construction activities proceed. Camp size will be in the range of 10 to as many as 200 workers, but will vary according to the activity, contract size and labour force requirements.

Clearing camps are generally smaller and may be moved more frequently than construction camps. ... **Specific field camp locations will be determined after final project planning and design are completed.** [emphasis added]

Apart from indicating that mobile camps will generally be located in well-drained areas within the right-of-way, the EIS does not specify how locations will be chosen and to what extent, if any, MH will ensure that mobile camps are not situated in important traditional use areas of MMF Citizens. The EIS does not specify what safety measures (e.g. restricted hunting) may be temporarily implemented for mobile camps or how MH intends to communicate such measures, if any, to MMF and/or MMF Citizens.

Information Request(s):

- Please provide a map showing the proposed or likely locations of non-commercial accommodations and construction camps. If this information is not available, please explain how MH will work with MMF to ensure that accommodation camps are situated in locations which minimize or eliminate the potential for adverse effects on MMF Citizen traditional use.
- Please provide information on any MH and/or Manitoba restrictions, if any, concerning hunting implemented in the vicinity of other project construction phase camps. If there were restrictions, please provide details concerning the geographic extent and nature of the restrictions.
- Please explain if MH and/or Manitoba anticipate employing similar management measures for the temporary worker accommodation camps associated with the BP III project.

MMF#: 10	Access and hunting restrictions during construction of Keewatinow Converter Station				
EIS Volume #: 1	Chapter #: 3.5.4.12	Page #(s): 3-105, 3-128			
EIS Scoping Document Reference:					
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:					
<ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 					

Rationale:

The MMF TLUKS indicates that Manitoba Metis engage in traditional activities in the vicinity of the proposed Keewatinow converter station and access road, and areas north and south. Individuals who engage in traditional activities in this geographic area may reside in the vicinity of this component of the project (e.g. Gillam and Thompson), however the TLUKS also indicates that Manitoba Metis travel great distances from their place of residence to engage in traditional activities.

Review Comments:

MH indicates that during the construction phase for the Keewatinow converter station that the Conawapa access road will be closed to the general public for safety reasons and no hunting areas will be established within the vicinity of the converter station construction site and the access road right-of-way. MH also indicates that special arrangements will be made for resource users wanting to use the access road to gain access to harvesting areas beyond the no access-no hunting areas. Such arrangements are to be developed, prior to construction, in consultation with resource users and First Nations in the vicinity of the project and applicable Resource Management Boards.

Information Request(s):

- Please provide information about how MH will consult about access arrangements with Manitoba Metis who are not “in the vicinity of the project” but whom use the lands and resources for traditional purposes.
- Please provide information on any MH and/or Manitoba restrictions, if any, concerning hunting implemented in the vicinity of other project converter stations both during construction and operational phases. If there were restrictions, please provide details concerning the geographic extent and nature of the restrictions.
- Please explain if MH and/or Manitoba anticipates employing similar management measures for the converter stations associated with the BP III project.

MMF#: 11	Avoidance of gathering medicinal and food plants in ROW due to health concerns associated with herbicide use.		
EIS Volume #: 3	Chapter #: 8	Page #(s):	8-275
EIS Scoping Document Reference:			
3.2 Factors to be considered in the environmental assessment and addressed in the EIS: <ul style="list-style-type: none">• Current use of lands and resources for traditional purposes by Aboriginal persons.			

Rationale:

MH has documented that Aboriginal harvesters and consumers have concerns about consuming plants that have been subject to herbicide treatment. The general response amongst Aboriginal peoples to contaminant concerns is to avoid harvesting in areas in the vicinity of known chemical usage. Communications by scientists and government representatives regarding the safety of herbicides typically do not alleviate concerns held by Aboriginal people. Avoidance practices can result in increased costs associated with accessing alternative areas, and where this is not feasible for practical access and/or financial reasons, the result can be a decline in harvest levels and thus individual and family welfare.

The MMF TLUKS identified numerous plant harvesting areas which overlap with the HVdc ROW, these areas are predominantly in the central western portion of the route.

Review Comments:

In its environmental effects assessment on “Domestic Resource Use” MH acknowledges the potential that Aboriginal harvesters will avoid plant harvesting in the HVdc ROW due to herbicide contaminant concerns but offers no mitigation measure to address this issue.

Information Request(s):

- Has MH monitored impacts on plant gathering by Aboriginal harvesters within existing transmission line rights-of-way, and if so, how does this information inform the conclusions made about the significance of impacts on traditional plant gathering?
- Has MH investigated non-chemical options for ROW maintenance, and if so, what are these options? Has MH employed non-chemical options for ROW maintenance on other existing transmission lines as a means of mitigating impacts on traditional gathering activity?
- To what extent is MH willing to work with MMF and Manitoba Metis harvesters to identify ROW vegetation maintenance measures in important gathering areas that do not involve chemical management?

MMF#: 12	Cumulative Effects Assessment				
EIS Volume #:	1 3	Chapter #:	4.3 9.0	Page #(s):	4-37 to 4-38 9-1 to 9-28
EIS Scoping Document Reference:					
8.0 Cumulative Effects					
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:					
<ul style="list-style-type: none"> • Current use of lands and resources for traditional purposes by Aboriginal persons. 					

Rationale:

Meaningful expression of current and future Manitoba Metis rights and interests is dependent upon sufficient abundance and quality of, access to, and opportunity to harvest wildlife, fish, and plants resources.

Review Comments:

Section 8.0 of the Scoping Document states; “The cumulative effects assessment will consider the potential for the environmental effects of the proposed Project to act in combination with the effects of other past, present and/or reasonably foreseeable future projects in the defined regional or cumulative effects assessment area. The cumulative effects assessment framework will be defined in the EIS and will be based on CEAA guidance as well as best and current practices including the consideration of regional and strategic environmental assessment approaches.”

MH indicates (Chapter 4.3, pg. 4-37) its cumulative effects assessment is based on the Scoping Document, CEAA Guidance (Cumulative Effects Practitioners Guide, 1999) as well as current practices. MH further indicates that their approach was to restrict the cumulative effects assessment to VECs that were found to have no residual effect or a positive residual effect. Additionally, the assessment only addressed such VECs where other identified projects and human activities overlap both temporally and spatially [defined in Chapter 9.2 as the Project Study Area]. Finally, future projects or human activities included in the cumulative effects assessment were identified as those which “have already been approved and are being constructed or are planned to be constructed/carried out, or are in a planning and/or approval process to be constructed/carried out.” Past projects or activities were defined as ones where on-going effects are expected to “measurably change over time.” MH indicates that the cumulative effects assessment of past/existing other projects was considered in the baseline description of the VECs.

It is noted that the tables listing future and prospective projects considered for the cumulative effects assessment have the following shortcoming:

- Keyyask hydroelectric project and associated infrastructure components -
This MH project is located within the Project Study Area, has been in the planning process for several years, and recently entered the project approval phase. Table 9.2-2 (pg 9-8) indicates this project was included in the cumulative effects assessment because it was considered to have a temporal overlap of socio-economic effects. This project will spatially overlap with the BP3 Project Study Area over the long term.
- Conawapa hydroelectric project and associated infrastructure components -
This MH project is located within the Project Study Area has been in the planning process for several years. MH has included this project in a list of prospective future projects and activities (Table 9.2-3). It may be argued that the Conawapa project falls into the “reasonably foreseeable” category identified in the CEAA Cumulative Effects Practitioners Guide (1999) given the project has been subjected to a previous environmental assessment review process, is listed as a future project on MH Website⁶ and is identified on many of the maps included in the BP3 EIS document. MH states that the spatial extent of the Conawapa project effects are not well understood at this time and therefore this project was addressed only to a limited extent in the BP3 cumulative effects assessment (pg. 9-12).

⁶ <http://www.hydro.mb.ca/projects/conawapa.shtml>

- Victory Nickel Mine –
This open pit mine project received a Manitoba Environment Act license (#2981) on August 23, 2011 and shortly thereafter the company’s Board of Directors approved with proceeding with the project.⁷ The project is situated on the east side of Hwy #6, just south of where the highway crosses the Minago River. The project is located approximately 55 km. from the centre line of the BP3 HVdc and does not lie within the Project Study Area. However, the Victory Nickel mine, once operational, proposes to transport materials and ore along Hwy #6 north to the rail line at Ponton, Manitoba. A segment of the Hwy #6 transportation route falls within the Project Study Area and intersects the HVdc ROW. MH has not explicitly included the Victory Nickel project in its listing of projects considered in the cumulative effects assessment.

The CEAA Cumulative Effects Practitioners Guide, 1999 suggests that cumulative effects assessment should include all relevant ‘actions’ and categorizes ‘actions’ into projects, which are physical works, and activities, which are non physical works of human origin. The Guide notes that the *Canadian Environmental Assessment Act* does not provide a definition for “activity”; but states that “...it is commonly understood not to include a physical work. It is, therefore, considered in this Guide as any action that requires the presence, often temporary, of humans concentrated in a local area or dispersed over a large area.”⁸ On this point, it is proposed that governmental regulatory actions, such as restriction of hunting in certain areas through closure of GHA’s for species conservation/rehabilitation purposes, as well as Manitoba Metis harvester agreement to discontinue moose hunting in at risk locations, can be considered an ‘activity’ that should be included in cumulative effects assessment. That is to say, the closure of GHA’s/ has the potential to concentrate humans in a local area, in this case GHA’s that remain open to hunting [see MMF #5]. The concentration of First Nation, Manitoba Metis, other Aboriginal and non-Aboriginal harvesters, in combination with identified potential Project effects on moose populations, has the potential to cumulatively impact on Manitoba Metis traditional use and rights (as well as other Aboriginals).

It is further noted that the cumulative effects assessment has not explicitly considered the substantial coal exploration activities west of Red Deer Lake. Although outside the Project Development Area, this activity is occurring in one of the few central western Manitoba areas that remains open to moose hunting (GHA 12). The HVdc ROW runs the length of the eastern side of GHA 12. As well, Manitoba is currently considering creating a Red Deer Wildlife Management area under the *Wildlife Act*, Use of Wildlife Lands Regulation 77/99. These regulations permit restrictions on hunting of certain or all species and/or restrictions on modes of transportation within a specified Wildlife Management Area. Available information on Manitoba’s plans for the Red Deer Wildlife Management area does not indicate whether hunting and/or access restrictions will be included under the pending designation. However, the cumulative effects assessment could consider a scenario whereby this new management area is closed to hunting.

⁷ <http://www.winnipegfreepress.com/business/victory-nickel-mine-gets-go-ahead-130179238.html>

⁸ http://www.ceaa.gc.ca/43952694-0363-4B1E-B2B3-47365FAF1ED7/Cumulative_Effects_Assessment_Practitioners_Guide.pdf

Information Request(s):

- Please provide an explanation as to why only the socio-economic aspect of the Keeyask project was considered in the cumulative effects assessment;
- Please provide an explanation as to why the cumulative effects assessment only considered the Conawapa project to a limited extent;
- Please provide an explanation as to why the transportation component of the Victory Nickel Mine project, which overlaps the Project Study Area, was not included as a future project in the cumulative effects assessment;
- Please re-consider the findings of residual impact on moose populations and “Domestic Resource Use” in light of the evidence of GHA closures and the high potential for concentration of harvesters in the remaining GHAs that are transected by the HVdc.
- Please reassess the potential environmental effect on moose populations and habitat in GHA 12 by considering the cumulative effect of coal exploration, the pending designation of all or a portion of GHA 12 as a Wildlife Management Area, existing closure of various GHA’s in central western Manitoba to moose hunting, in combination with the potential for increased access by harvesters and/or wolf predation associated with the HVdc ROW.

MMF#: 13	Exclusion of Metis Communities from Community Development Initiatives			
EIS Volume #: 1	Chapter #: 3.4.7-3.4.7.1	Page #(s): 3-339-3-40		
EIS Scoping Document Reference:				
3.2 Scope of Assessment and Factors;				
<ul style="list-style-type: none"> • Opportunities to enhance beneficial effects 				
7.2 Environmental Assessment;				
<ul style="list-style-type: none"> • Identifying and optimizing Project opportunities and beneficial effects 				
7.4.3.5 Economy				
<ul style="list-style-type: none"> • Provincial, municipal and community economic agreements and development 				

Rationale:

Metis communities are in the vicinity of the Bipole III Project and have also not received benefits from transmission projects in the past, similar to First Nations and Northern Affairs Community Councils.

Review Comments:

The MMF and the Metis communities it represents are excluded from MH’s proposed Community Development Initiative, despite the fact that other Aboriginal communities (i.e. First Nations) are included. This exclusion is not explained in the EIS.

Information Request(s):

- What were the criteria used to determine the groups that are proposed to be eligible under the Community Development Initiative?

- Why are the MMF and the Metis communities it represents, excluded from MH's proposed Community Development Initiative?
- Please explain the basis or rationale for why First Nations who are similarly situated as Metis communities, are not included in the proposed Community Development Initiative?

MMF#: 14	Failure to consider Metis heritage and cultural resources				
EIS Volume #:	2 3	Chapter #:	6.3.7.2 8.3.6	Page #(s):	6-214 to 6-216 8-344 to 8-360
EIS Scoping Document Reference:					
7.4.3.6 Heritage Resources					
7.1 Site Selection:					
<ul style="list-style-type: none"> • Identifying regional and site-specific constraints and opportunities for transmission line routing, including sensitive biophysical, socio-economic and cultural features. 					
3.2 Factors to be considered in the environmental assessment and addressed in the EIS:					
<ul style="list-style-type: none"> • Heritage and cultural resources. 					

Rationale:

Metis are a distinct segment of the population with specific cultural resource concerns and archaeological heritage.

Review Comments:

The EIS acknowledges that there are distinct Aboriginal groups within the Project Study Area, identifying Metis as one of these distinct groups (Volume 2, pg. 6-213). Neither the main body of the EIS or the Heritage Resource Technical Report presents the cultural resources, heritage concerns, or archaeological sites, specific to Manitoba Metis. During the time period of greatest concern for the Manitoba Métis, the early historic period, two parallel paths are noted: Historic Aboriginal and European. This approach fails to identify differences and/or similarities between Metis and First Nations and Metis and other Aboriginal people or groups with respect to archaeological sites. It is unclear whether Metis specific sites, of which there is no mention, would be grouped with Historic Aboriginal or European sites from this time period. Over-wintering sites, as a specific form of Metis material patterning on the landscape, likely existed within the study area, but no reference is made to these important locations. In addition, the triangulation approach noted in the Heritage Resources Technical Report, where oral historical, archaeological, and historic/archival information are combined, does not take into account the Metis archival or archaeological records, as no literature on the Metis is cited or included in the working bibliography.

It does not appear that the project archaeologists are familiar with the extant literature on Metis archaeology. A number of publications regarding Metis-specific sites in Manitoba are available, including; McLeod 1985, Ens 1996, Brenner 1998, St. Onge 1985, 2004, Forsman 1977, Meyer

and Linnamae 1980, Lunn et al. 1980, and Kelly 1981. Additionally, there are several resources on Metis archaeological sites in other regions that would be helpful for defining Metis archaeological sites, including Doll et al. 1988, Burley 1989, 2000, and Burley et al. 1992 (reference list provided below). None of these are cited or appear in the working bibliography of the Heritage Resources Technical Report.

The maps produced, including Map 6-38, 6-39, 6-40, 6-4100, contain eight different forms of heritage sites: Cultural Paleo Sites, Cultural Archaic Sites, Cultural Woodland Sites, Provincial Heritage Sites, Plaques, Municipal Heritage Sites, and Centennial Farm Sites. None of these categories capture Metis archaeological sites within the Project Study Area. It is suggested MH provide a map that would include Metis archaeological resources in the Project Study Area, where possible. Many sites with Metis presence may overlap with fur trade sites and posts, so areas where these sites occur should also be noted.

The EIS Heritage Resources Technical Report outlines a predictive model methodology for distinguishing areas of high, medium, and low potential for archaeological sites. The criteria used in the construction of the predictive model fail to account for Metis landscape use and site selection. As constructed, the predictive model is biased toward First Nations settlement patterns and land use; therefore, areas with high potential for Metis sites are unlikely to be captured in the predictive model. The Heritage Resources Technical Report also notes that GIS data from self-directed ATK studies, including the MMF study, are not included and therefore heritage sites important to the MMF may have been omitted.

The EIS acknowledges the significance of burial sites, but fails to distinguish between First Nations and Metis burial practices. Metis historic burial sites are likely to have different configurations and markers than pre-contact First Nations burial sites and, as such, require due consideration.

Information Request(s):

- Please explain the rationale for lumping Metis archaeological resources under the broader category of Aboriginal heritage resources.
- Please provide detailed information concerning Manitoba Metis archaeological heritage and potential archaeological sites with Metis material culture in the study area, including areas where heritage resources may be impacted by project activity.
- Please provide a map showing known archaeological sites with actual or potential evidence for Metis artifacts and cultural heritage.
- Why was the predictive model not inclusive of Metis settlement patterns and landscape use?
- Please describe the process whereby the MMF will be consulted on unknown Metis heritage resources that may be discovered during the course of the project, including Metis burial sites.

Manitoba--Metis citations:

Brenner, Bonnie Lee A. 1998 Archival and archaeological perspectives on economic variability in the Red River Settlement, 1830-1870. Unpublished M.A. thesis, University of Manitoba. (Full access online—link to thesis in Zotero; PDF also saved to Dropbox and GIS computer.)

Ens, G. 1996. *Homeland to Hinterland: The Changing World of the Red River Métis in the Nineteenth Century* (Toronto: University of Toronto Press). (Can access eBook through U of A)

McLeod, K. D. 1985 [A study of Metis ethnicity in the Red River settlement : quantification and pattern recognition in Red River archaeology](#). Unpublished M.A. thesis, University of Manitoba.

St.-Onge, N.J.M. 1985. "The Dissolution of a Métis Community: Pointe à Grouette, 1860-1885," *Studies in Political Economy* 18 pp. 149-172.

St-Onge, N.J.M. 2004. *Saint-Laurent, Manitoba: evolving Métis identities, 1850-1914*. (Regina: University of Regina, Canadian Plains Research Center).

Forsman, Michael. "Archaeological Research at Riel House, Manitoba, 1976," Parks Canada National Historic Parks and Sites Branch Research Bulletins , no. 54, 1977.

Meyer, David and Urve Linnamae. "Churchill Archaeological Research, August 1978," Parks Canada National Historic Parks and Sites Branch Research Bulletins , no. 148, 1980.

Lunn, Kevin, Jennifer Hamilton and Peter J. Priess. "Archaeological Research at Riel House, St. Vital, Manitoba: A Reassessment of the Artifact Data," Parks Canada National Historic Parks and Sites Branch Manuscript Report Series, no. 406,1980.

Kelly, M. "An Introduction to the Archaeology of Sandhill Bay, Southern Indian Lake, Manitoba," Historic Resources Branch, Manitoba Culture, Heritage, and Recreation Archaeological Division: Preliminary Reports, no.8, 1981.

General--Metis citations:

Burley, D. 1989. "Function, Meaning and Context: Ambiguities in Ceramic Use by the "Hivernant" Métis of the Northwestern Plains," *Historical Archaeology* 23(1) pp. 97-106.

Burley, D. 2000. "Creolization and Late Nineteenth Century Métis Vernacular Log Architecture on the South Saskatchewan River," *Historical Archaeology* 34(3) pp. 49-56.

Burley, D.V., G. A. Horsfall, and J. D. Brandon. 1992. *Structural Considerations of Métis Ethnicity: An Archaeological , Architectural, and Historical Study* (Vermillion: University of South Dakota Press).