

## 11.14 Snuneymuxw First Nation

Snuneymuxw First Nation are descendants of the Sarlequun Tribe, who signed the Snuneymuxw Sarlequun Treaty of 1854 on December 23, 1854, at Xwsol'lexwel (Nanaimo harbour). The Snuneymuxw Sarlequun Treaty of 1854 is a pre-confederate trade and commerce treaty that protects Snuneymuxw First Nation's cultivated fields, sacred villages, marine areas, harvesting and gathering, and rights to hunt and fish as formerly. Snuneymuxw First Nation are a central Coast Salish Indigenous group, whose traditional territory is located in the mid-Island and Gulf Island regions on the southern East coast of Vancouver Island. Snuneymuxw's traditional marine areas include the southern east coast of Vancouver Island, and extend through the Salish Sea, the Gulf Islands, and into the Fraser River (Snuneymuxw First Nation 2023). Snuneymuxw First Nation's traditional territory includes productive and resource-rich areas at the heart of the Salish Sea.<sup>1</sup> Traditionally, Snuneymuxw villages were located over their entire traditional territory, including Vancouver Island, the Gulf Islands, and the Fraser Valley. Snuneymuxw society, way of life, culture, and economy extended throughout the territory that was governed by Snuneymuxw according to snuw'uyulh ("teachings"). Snuneymuxw means "the great people." Today, Snuneymuxw First Nation Peoples live by the Nanaimo River and the Pacific Ocean, and use the land where their ancestors fished, dug for clams, hunted for deer, elk, and ducks, and harvested coastal plants and trees (Voices of the Snuneymuxw First Nation n.d.).

### 11.14.1 Methods

This subsection describes the proposed Tilbury Phase 2 LNG Expansion project (proposed Project) updates resulting from engagement and an overview of methodology used for assessment of effects of the proposed Project on Indigenous interests.

#### 11.14.1.1 Proposed Project Updates Resulting from Engagement

FortisBC Holdings Inc. with its regulated natural gas subsidiary FortisBC Energy Inc. (collectively defined as FortisBC) has chosen to adopt the avoidance technique of "Removal of Waterborne Deliveries" to mitigate potential effects on valued components, such as Fish and Fish Habitat, and Indigenous Interests that were raised by some Indigenous nations during engagement on the proposed Project.

FortisBC will no longer use or have proposed Project modular components delivered by 6 to 8 project cargo vessels. No construction materials, equipment, or other deliveries will be transported to the proposed Project Site by barge or water. All deliveries will be by road freight on existing roads and highways. With no waterborne deliveries, the Material Offloading Facility (MOF) is no longer required, and will not be constructed, upgraded, or used by the proposed Project. Further details regarding the background and rationale for the mitigation are provided below.

In January 2022, FortisBC submitted a Detailed Project Description (DPD) for the Tilbury Phase 2 LNG Expansion project (the Project) to the Environmental Assessment Office (EAO). The DPD described the need for 6 to 8 cargo vessels and the use of barges to deliver proposed Project modular components and other construction materials to the Project site for construction. The DPD conservatively included the construction of a MOF for delivery of these construction materials and prefabricated modules. The DPD also outlined that existing roadways would be used to deliver construction materials to the proposed Project Site.

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<sup>1</sup> The Salish Sea is an inland sea that encompasses Puget Sound, the San Juan Islands, and the waters offshore from Vancouver, B.C. The sea stretches from the channels of the Discovery Islands north of the Strait of Georgia to Budd Inlet at the south end of Puget Sound.

During engagement for the Readiness Decision and on the draft AIR, feedback was received about potential effects due to increased truck traffic to the proposed Project Site during construction. In response, measurable parameters related to traffic were included in the AIR.

During Application Development guided by the AIR, FortisBC conducted an analysis of the transportation methods available to bring materials to site. Findings were reported in the Construction Logistics Update and Alternative Means memo (the memo) issued in March 2023. The number of barges that would be brought to site for the prefabricated modules was clarified and the option of using additional barges to transport bulk construction materials was investigated as an alternative to trucks.

Concurrent to FortisBC's engagement on the memo, the B.C. EAO conducted an additional round of consensus-seeking with Indigenous nations regarding the memo. During the consensus-seeking process, concerns were raised about a number of potential negative effects resulting from the proposed cargo vessel and barge traffic on Indigenous rights, such as fishing, as well as negative cumulative effects on the Fraser River, the Salish Sea, and the endangered Southern Resident Killer Whale population.

The Application has been prepared in accordance with the AIR in which potential effects were identified from waterborne delivery (that is, by cargo vessels and barge deliveries) and the use of the MOF associated with the proposed Project. In response to the concerns raised, FortisBC committed to no in water works, including no cargo vessels or barge deliveries, as an avoidance mitigation measure to address concerns about effects to the Fraser River, the Salish Sea, Burrard Inlet, and the Southern Resident Killer Whale population, described in the bullets above. FortisBC has rescinded the Construction Logistics Update and Alternative Means memo. A MOF will not be constructed, upgraded, or utilized by the proposed Project during any phase.

Potential residual effects to linked valued components with this avoidance mitigation measure are described in this subsection below. Implementation of this avoidance mitigation measure has subsequently been incorporated into the determination of potential residual effects of the proposed Project on Indigenous interests.

### **11.14.1.2 Methodology Overview**

The assessment of potential effects of the proposed Project on the Indigenous interests of Snuneymuxw First Nation follows the methodology outlined in subsection 11.1. FortisBC sought input from Indigenous nations with potential interests in the proposed Project on how these interests may be potentially affected by the proposed Project. FortisBC considered issues raised during the Application by Snuneymuxw First Nation in relation to their Indigenous interests including Snuneymuxw First Nation's rights as recognized and affirmed by Section 35 of the *Constitution Act, 1982*, Snuneymuxw Sarlequun Treaty of 1854 Rights, and Aboriginal rights and title, when determining potential effects of the proposed Project on their interests.

This subsection identifies sources of all information used to prepare the assessment of potential effects of the proposed Project on Snuneymuxw First Nation, and clearly notes when information represents the views of Snuneymuxw First Nation. Input and perspectives of Snuneymuxw First Nation will be described, including any new issues raised by Snuneymuxw First Nation, mitigation measures proposed by Snuneymuxw First Nation, major points of disagreement between FortisBC and Snuneymuxw First Nation, and efforts taken by FortisBC to address points of disagreement. Information considered in this subsection with respect to Snuneymuxw First Nation's Indigenous interests is described in subsection 11.14.4, Information Sources.

FortisBC sought input from Snuneymuxw First Nation on information to understand Snuneymuxw First Nation's use of the proposed Project Footprint, LAAs, and RAAs. Due to capacity barriers, Snuneymuxw First Nation was limited in its ability to contribute to the understanding of the Nation's use of the proposed Project Footprint, LAAs and RAAs. Furthermore, Snuneymuxw First Nation informed FortisBC that ongoing capacity constraints as a result of inadequate funding for Indigenous land and resource offices in Canada from regulators have impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has in turn limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For example, Snuneymuxw First Nation had limited capacity to respond to FortisBC's requests for Indigenous Knowledge and sources; therefore, FortisBC has relied on secondary data and sources external to Snuneymuxw First Nation for the drafting of subsection 11.14. Data limitations are captured in subsection 11.14.5.1, Assessment Boundaries (Technical Boundaries subsection). To gather more information regarding Snuneymuxw First Nation's Indigenous interests, FortisBC has engaged and will continue to engage Snuneymuxw First Nation during the Application Review phase when determining potential effects of the proposed Project on their Indigenous interests. A summary of engagement is described in subsection 11.14.3, Summary of Engagement.

As indicated in subsection 11.1.7.4, certain information must be disaggregated to address section 25(2)(d) of the 2018 B.C. *Environmental Assessment Act*, when feasible, to identify and highlight existing conditions pertaining to the exercise of Indigenous interests, which may differ for Indigenous nations in comparison to the wider population. In addition, as described in subsection 11.1.3, the B.C. EAO AIR provide guidelines on the assessment of potential disproportionate effects on distinct human populations who may be more vulnerable to potential proposed Project effects. Where available, information has been disaggregated for each Indigenous nation's contextual information and existing conditions to reflect a GBA+<sup>2</sup> approach. The context, existing condition, or Indigenous interest(s) for which data and information have been disaggregated, the type of GBA+ data and information disaggregated, and the location of that data and information are outlined in Table 11.14-1.

**Table 11.14-1. Snuneymuxw First Nation Gender Based Analysis Plus Disaggregation Table**

Context, Existing Condition, or Indigenous Interest	Type of GBA+ Disaggregated Data and Information	Location
Population Demographics	Age Binary gender (male/female)	Subsection 11.14.2.6
Community Health and Wellness	Age-health services Binary gender-health services	Subsection 11.14.2.7
Housing Characteristics	Binary gender	Subsection 11.14.2.9
Education	Binary gender	N/A
Labour Force Indicators	Binary gender	Subsection 11.14.2.12
Employment by Industry	Binary gender	Subsection 11.14.2.12
Employment by Occupation	Binary gender	Subsection 11.14.2.12
Harvesting and Subsistence Activities	N/A	N/A

<sup>2</sup> GBA+ provides a framework to describe the full scope of potential adverse and positive effects. GBA+ is an analytical framework that guides practitioners, proponents, and participants to ask important questions about how designated projects may affect diverse, distinct, or potentially vulnerable population groups (IAAC 2021.).

**Table 11.14-1. Snuneymuxw First Nation Gender Based Analysis Plus Disaggregation Table**

Context, Existing Condition, or Indigenous Interest	Type of GBA+ Disaggregated Data and Information	Location
Cultural Use Sites and Areas	N/A	N/A
Social and Economic Conditions	GBA+ disaggregated data identified in Population Demographics, Housing Characteristics, Employment, and Income	Subsections 11.14.2.6, 11.14.2.9, and 11.14.2.121
Indigenous Health and Well-being	GBA+ disaggregated information identified in Community Health and Wellness	Subsection 11.14.2.66
Cultural Continuation	N/A	N/A
Indigenous Governance Systems	N/A	N/A

Note: N/A indicates that no disaggregated data are available.

## 1 11.14.2 Context

2 This subsection describes background information on Snuneymuxw First Nation, including existing  
3 cultural, health, social, and economic contextual frameworks. The context also includes an overview of  
4 FortisBC's understanding of Snuneymuxw First Nation's Indigenous interests in the area that could be  
5 potentially affected by the proposed Project, including the environmental and socio-economic conditions  
6 that support Snuneymuxw First Nation's meaningful exercise of their Aboriginal and Snuneymuxw  
7 Sarlequun Treaty of 1854 Rights<sup>3</sup>.

### 8 11.14.2.1 Coast Salish Kinship

9 Snuneymuxw First Nation are one of the Central Coast Salish Peoples, who together inhabit the Gulf of  
10 Georgia region. The Coast Salish peoples comprise 57 Indigenous nations. Snuneymuxw First Nation is a  
11 distinct Coast Salish Nation. Coast Salish territory includes the area along the south and southeastern  
12 coast of Vancouver Island from Sheringham Point to Qualicum, B.C., the Gulf and San Juan Islands, the  
13 mainland from Deception Pass to Burrard Inlet, and the lower Fraser Valley as far east as Yale, B.C.,  
14 including the state of Washington and northern Oregon (Morin et al. 2018). Coast Salish Peoples share a  
15 common base language (with various dialects), customs, and interests with other Indigenous nations and  
16 tribes around the Salish Sea (Morin et al. 2018). Halq'emeylem is a Salishan language spoken along the  
17 Fraser River and its tributaries from Yale to Vancouver, B.C., across to Vancouver Island from Malahat to  
18 Nanoose Bay and along the Cowichan River, and into Washington State. There are approximately 17  
19 dialects of Halq'emeylem that fall within 3 major groups: Upriver dialects; Downriver dialects; and Island  
20 dialects (FirstVoices n.d.). Hul'q'umin'um' is the island dialect spoken by Snuneymuxw First Nation.

21 The Coast Salish have described an obligation to their ancestors and their future generations to protect  
22 and care for their water, land, air, and resources and to fulfill their stewardship responsibilities (Morin et al.  
23 2018). The Coast Salish describe a sacred duty to ensure the health of the Coast Salish territory (Morin et  
24 al. 2018). Coast Salish Peoples share that there are clear concepts of water, land, and resource ownership,

<sup>3</sup> Aboriginal Rights is the term used in section 35 of the Canadian Constitution and section 25 of the Charter of Rights and Freedoms. As this is a legally defined term many Indigenous nations prefer the use of the term over Indigenous rights, although the two terms are often used interchangeably.

governance, and stewardship (Morin et al. 2018; Suttles 1987). According to Coast Salish land tenure and territoriality, the water, land, air, and resources are by birthright (Morin et al. 2018).

Historically, the Coast Salish maintained social organization (family, household, local group, and winter village) and economic and social cooperation. The basic residential units of Coast Salish society were the family, household, local group, winter village, and tribe. One or more households comprised a local group, which often consisted of an elite household, together with some dependent ones. In some villages, low-status people would live separately or in places where they would be first exposed to potential attacks. At the core of the local group was a descent group referred to by a term that roughly translates as "one family" or "one blood". This core group was believed to have descended from a common ancestor and shared inherited rights to resources, names, and ceremonial activities. Family heads managed the groups property, including both tangible and intangible assets, such as rights to resources and names passed down through the generations. Most people lived in the village where they were born or married into, and travel was restricted to the geographical area where kinship ties existed (Kennedy 2007).

Intervillage marriages were common, even between families that spoke different languages. This created a larger network within the territory and helped to ensure survival through access to resources and labour, if needed. Because of intervillage marriage, a person could be a member of more than one group or could activate membership based on kinship connections. However, full membership in a village required kinship, part-time residency, the contribution of labour, and a name given at a publicly witnessed ceremony (Kennedy 2007). Suttles (1992) therefore claimed that ideology linked people to place, while the social system permitted the movement of people, information, and goods across a vast landscape (referenced in Kennedy 2007). The concept of kinship, shared values, and cooperative stewardship in traditional Coast Salish culture guides the ongoing management and protection of the Coast Salish Nations' territories.

#### **11.14.2.2 Ethnographic Information**

Snuneymuxw First Nation are descendants of the signatories of the Snuneymuxw Sarlequun Treaty of 1854 and have lived on the traditional territory for thousands of years (Snuneymuxw First Nation 2023). Snuneymuxw First Nation culture has been founded on a deep connection to the land, water, and all living things (Snuneymuxw First Nation n.d.). A sacred relationship with all things in the natural world (land, water, air, plants, and animals), respect for the spirit and life in each of these, and the intricate relationships and interconnectedness of all living things underpin the nation's cultural values and principles. Snuw'uyulh, or sacred teachings, guide the continuing relationship to each other and to the lands and waters within the traditional territory.

Through sharing Snuneymuxw stories, traditional knowledge, language, and ceremony, present and future generations benefit from the wisdom and teachings of Elders and ancestors while carving a new path of possibilities and opportunities for the people (Snuneymuxw First Nation n.d.).

#### **11.14.2.3 Traditional Territory**

The main community of Snuneymuxw First Nation is located in Nanaimo, B.C., on Vancouver Island (Figure 11.14-1). Snuneymuxw First Nation also resides on other reserves on Vancouver Island. Snuneymuxw First Nation are a central Coast Salish Indigenous group, whose traditional territory is located in the mid-Island and Gulf Island regions on the southern East coast of Vancouver Island. Snuneymuxw's traditional marine areas include the southern east coast of Vancouver Island and extend through the Salish Sea, the Gulf Islands and into the Fraser River (Snuneymuxw First Nation 2023). Snuneymuxw First Nation members followed seasonal rounds, travelling to the Fraser River in August for the salmon runs and returning to Nanaimo, B.C., in fall for the chum salmon. Snuneymuxw First Nation also had a

fishing village site located on the south bank of the Fraser River, upriver from the east end of Barnston Island (B.C. EAO 2022b). Snuneymuxw First Nation traditional territory is presented on Figure 11.14-1.

#### 11.14.2.4 Language

The traditional language of Snuneymuxw First Nation is Hul'q'umin'um' (Snuneymuxw First Nation n.d.). There were 70 Indigenous language speakers in the community in 2016 (CIRNAC n.d.). Fluency in the traditional language has been eroded over time due to colonialism; however, Snuneymuxw First Nation is creating and expanding opportunities for youth and children to learn the language.

Language is believed to express the worldview and way of life, and connects youth to the wisdom and knowledge of ancestors. Hul'q'umin'um' is taught in the community school and is part of the ethic of lifelong learning. The Hul'q'umin'um' language dictionary and resources like the Voices of Snuneymuxw project are among some of the ways the nation continues to educate its members in the traditional language (Voices of Snuneymuxw First Nation n.d.). The Snuneymuxw Snu'uyulh Lelum (House of Learning) program, designed to help adult students learn the traditional Hul'q'umin'um' language and upgrade their learning achievements, is another avenue for learning the language (Snuneymuxw First Nation n.d.).

#### 11.14.2.5 Reserves and Registered Population

Snuneymuxw First Nation has six reserves located on Vancouver Island and the Gulf Islands, totalling 266 ha (Table 11.14-2; Figure 11.14-1), including the following:

- Gabriola Island 5
- Ma-Guala 6
- Nanaimo River 2
- Nanaimo River 3
- Nanaimo River 4
- Nanaimo Town 1

**Table 11.14-2. Snuneymuxw First Nation Reserves**

Number	Name	Location	Area (ha)
648/06819	Gabriola Island 5	Nanaimo District, part of Sect. 1, on the west point at the mouth of Degnen Bay, south of Gabriola Island	1.0
648/06820	Ma-Guala 6	Nanaimo District, a small island in Degnen Bay, on the south shore of Gabriola Island	0.4
648/06816	Nanaimo River 2	Cranberry District, on the left bank of the Nanaimo River, near its mouth	53.8
648/06817	Nanaimo River 3	Cranberry District, part of Sect. 21, R. 1, and Sect. 19 and 21, R. 7, near the mouth of the Nanaimo River, Vancouver Island	108.3
648/06818	Nanaimo River 4	Cranberry District, Sect. 18 and 19, R. 8, 5 km southwest of Nanaimo, B.C., on the east coast of Vancouver Island	80.10
648/06815	Nanaimo Town 1	Nanaimo District, on Nanaimo Harbour, adjacent to the Nanaimo, B.C., south of Vancouver Island	22.40

Source: CIRNAC n.d.



The registered population of Snuneymuxw First Nation as of December 2022 was recorded as 1,920 members (CIRNAC n.d.). Approximately 38.0 percent of the population lived on their own reserve or another reserve, whereas approximately 62.0 percent lived off reserve<sup>4</sup> (CIRNAC n.d.).

#### 11.14.2.6 Population Demographics

Population demographics as of 2021 have been recorded for the Nanaimo Town 1 and Nanaimo Rivers (Nanaimo River 2, 3, and 4 combined) reserves (Table 11.14-3). The on-reserve population for Snuneymuxw First Nation is evenly distributed between Nanaimo Town 1 and Nanaimo Rivers. The total population of Nanaimo Town 1 was recorded as 386 in the 2021 Canada Census, increasing slightly from 360 in 2016. The total population of Nanaimo Rivers was recorded as 323 in the 2021 Canada Census, decreasing slightly from 371 in 2016. As of 2021, 48.7 percent of the population of Nanaimo Town 1 was recorded as male and 51.3 percent was recorded as female (Statistics Canada 2023b, 2023c).

The population of Nanaimo Rivers was recorded as evenly distributed with 50 percent male and 50 percent female (Statistics Canada 2023b). The median age of the population of Nanaimo Town 1 was 32.0 years, with 17.9 percent of the population under the age of 15 (compared to 14.2 percent for Nanaimo, B.C., overall [Statistics Canada 2023a]), and 14.1 percent of the population age 65 and over (compared to 24.6 percent for Nanaimo, B.C., overall [Statistics Canada 2023a]) (Statistics Canada 2023c). The median age of the population of Nanaimo Rivers was 34.4 years, with 21.5 percent of the population under the age of 15 and 13.8 percent of the population age 65 and over (Statistics Canada 2023b).

These statistics reflect the larger trend of Indigenous populations in Canada, where youth make up a larger proportion of the Indigenous population compared to the non-Indigenous population (Indigenous Services Canada 2021). Given this demographic trend, Indigenous youth have the potential represent an important and increasing role in the labour force, as the non-Indigenous population is trending toward an aging population.

**Table 11.14-3. Snuneymuxw First Nation Age Characteristics in 2021**

Age Characteristics	Men+	Women+	Total
Total all persons	345	360	715 <sup>b</sup>
Age 0 to 14	65	75	140
Age 15 to 64	225	250	470
Age 65 and over	50	40	100
Median age	32.8	33.8	33.2

Source: Statistics Canada 2023b, 2023c.

<sup>a</sup> Census information for 2021 for "Age Characteristics" was available for Nanaimo Town 1 and Nanaimo Rivers and combined in Table 11.14-3.

<sup>b</sup> Total represents the total number of respondents to the 2021 Census survey and does not necessarily reflect the actual total of Snuneymuxw First Nation population.

Note: Male+/female+ have been defined by Statistics Canada as referring to men, boys, and some nonbinary persons and women, girls, and some nonbinary persons (Statistics Canada 2023b, 2023c). Numbers by gender may be rounded by Statistics Canada for confidentiality and data quality reasons, and therefore may not match totals (refer to data limitations in subsections 11.1 and 11.14.1).

<sup>4</sup> This does not necessarily indicate that off-reserve members are residing nearby on Vancouver Island, in Metro Vancouver, or in the Fraser Valley, as information regarding where they reside is not accessible.

### 11.14.2.7 Community Health and Wellness

The following subsections present information about Snuneymuxw First Nation's health and wellness, including emergency services, education, housing, infrastructure, employment, and economic development. The statistics provided need to be viewed in context, in particular when there are comparisons made between Snuneymuxw First Nation and the non-Indigenous population. Across Canada, Indigenous populations have experienced, and continue to experience, the severe and detrimental effects of Colonialism, which have impacted their social and economic well-being, as well as their health. Indigenous Peoples face pervasive and persistent adverse social and economic conditions relative to non-Indigenous Canadians due to a system that has discriminated against and oppressed them (Reading and Wien 2009). These socio-economic conditions, or social determinants of health, shape health outcomes, and emphasize the importance of supporting Nation-run health care services for Indigenous communities.

Health disparities between the Indigenous and non-Indigenous populations in Canada are readily apparent. Indigenous Peoples in Canada have shorter life expectancies, higher rates of chronic disease and communicative illness, higher rates of addiction, and higher infant mortality rates than non-Indigenous Canadians (Hajizadeh et al. 2018; Office of the Auditor General of Canada 2018).

The specific reasons for these disparities are multifold and systemic in nature, and can comprise (alone or in combination) the effects of intergenerational trauma, racism, lone-parent households, childcare responsibilities, limited education, and high rates of poverty, which is a barrier to educational and employment opportunities (MLA Committee on the First Nations, Métis, and Inuit Workforce Planning Initiative 2010). Indigenous Peoples also experience health inequalities because of physical and geographic barriers, racial discrimination, negligence, and cultural insensitivities within the health care system (Barbo et al. 2021). Snuneymuxw First Nation notes that racism within the health care system has contributed to negative health outcomes of Snuneymuxw First Nation members. Racial stereotypes and assumptions by health care authorities continue to create barriers to effective and timely care for Indigenous peoples, and experience with these stereotypes and assumptions has impacted Snuneymuxw First Nation members' approach to and use of the current health care system (Paige, pers. comm. 2024a).

From 1981 to 2016, the well-being of First Nation communities has steadily increased, measured by four indicators of education, labour force activity, income, and housing using the Community Well-being Index<sup>5</sup>. The scores range from 0 to 100, with a higher score indicating a higher level of well-being. The gap between average Community Well-being Index scores of First Nations and non-Indigenous Canadians over that 35-year period has remained (Indigenous Services Canada 2019b).

The Community Well-being Index scores for Nanaimo Town 1 and Nanaimo Rivers<sup>6</sup> in 2016 were 63 and 60 respectively, combining for an overall score of 61.5 for Snuneymuxw First Nation, which compares to a score of 63 for B.C. First Nations and is significantly lower than the score of 75.5 for non-Indigenous B.C. communities (Indigenous Services Canada 2019a). Regional data for non-Indigenous communities are not available for housing, education, labour force activity, and income; however, all scores for Snuneymuxw First Nation were substantially lower than the national scores for non-Indigenous communities that included housing (95), education (56), labour force activity (84), and income (75) (Indigenous Services Canada 2019b).

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<sup>5</sup> The Community Well-being Index is a measure for community socio-economic well-being using Census data available from 1981 to 2016. It is measured at the reserve scale and does not present a complete picture of well-being, as those indicators are wide and varied (Indigenous Services Canada 2020b), as well as dependent on community understandings of what well-being constitutes.

<sup>6</sup> Community Well-being Index scores are available for Nanaimo Town 1 and Nanaimo Rivers; however, no score is available for Gabriola Island or Ma-Guala since there are no residences on these lands.



Access to health services is only one aspect of health, but is still an important component of community health and well-being. Snuneymuxw First Nation is located within the service area of the Island Health Authority. The Island Health Authority delivers mental health services, reproductive health services, adult community support, childcare support, assisted living facilities, and other services, and has 45 hospitals and health centres that provide urgent and nonurgent medical care. Other public health services in the Island Health Region include home and specialty care (Island Health Authority n.d.). In addition, Indigenous Child and Mental Health Services provides free mental health and wellness services for Indigenous children, youth, and their families (Province of B.C. n.d.d).

The First Nations Health Authority, a province-wide HA, funds, plans, and provides health service delivery and health governance to Indigenous communities and nations; collaborates with health programs and services; and advocates for Indigenous health and well-being (First Nations Health Authority n.d.). The First Nations Health Authority provides community-based services with a focus on health promotion and disease prevention (First Nations Health Authority n.d.).

Snuneymuxw First Nation works cooperatively with all levels of Provincial and Federal governments to provide a wide range of health services to the community. Snuneymuxw First Nation's Health Department delivers on-reserve health programs, including programs focused on children and youth, mental health and addictions, primary health care, chronic illness prevention, communicable disease control, and environmental health and management (Snuneymuxw First Nation n.d.). These programs support adults, Elders, children, and families who live on reserve by providing information, community workshops and group activities, preventive services, and advocacy. For example, the mental health team provides social and emotional skill building groups after school for 11- to 13-year-olds. The children and youth program provides educational materials on diet, prenatal health, and breastfeeding; ensures that children are immunized; supports parents with information on child development; and provides young people with opportunities for peer interaction. Fact sheets are prepared and available to community members on subjects including fentanyl use, childhood trauma, mental health, and addictions (Snuneymuxw First Nation n.d.).

In addition, Snuneymuxw First Nation operates the Snuneymuxw Traditional Medicines Clinic. The clinic blends Snuneymuxw ancestral knowledge and Chinese traditional medicine to offer holistic treatments to community members (Snuneymuxw First Nation n.d.).

#### **11.14.2.8 Emergency Services**

BCAS delivers ambulance transportation services and pre-hospital emergency care in B.C. (B.C. EHS n.d.). Police services in B.C. may be provided by the RCMP, by provincial (also the RCMP) or municipal forces, or by a First Nation-administered police force. Municipalities with populations of 5,000 people and over are required by the *Police Act* to provide their own police force (Province of B.C. n.d.b). The Provincial Police Service Agreement between the Province of B.C. and Canada establishes the RCMP as B.C.'s provincial police force, called E Division (Province of B.C. n.d.b). The Municipal Police Service Agreement between the Province of B.C. and Canada allows the Province of B.C. to subcontract the RCMP provincial force to municipalities. The RCMP operates detachments that serve 63 municipalities in B.C. (RCMP 2019). The Province of B.C. provides policing services in Indigenous communities with populations of up to 5,000 people, whereas municipalities with populations of more than 5,000 people provide policing to Indigenous nations within their boundaries (Province of B.C. n.d.b). The RCMP's First Nations Policing Program provides a dedicated program to support culturally responsive policing in Indigenous communities (RCMP n.d.a).

The City of Nanaimo (Nanaimo) detachment of the RCMP provides police services to Snuneymuxw First Nation, Nanaimo, Snaw-naw-as First Nation, the District of Lantzville, and the Regional District of Nanaimo Electoral Areas A and C (RCMP n.d.b). With a focus on increased community safety and crime prevention, the Nanaimo detachment of the RCMP has developed a close relationship with a number of community partners, including mental health agencies. Policing priorities include crime reduction and community safety, inclusion and reconciliation, and community consultation (Nanaimo n.d.). Snuneymuxw First Nation supports police services and community protection with their Safety First Program, which requests that community members report any break ins or suspicious behaviour, and provides contact information for police services (Snuneymuxw First Nation n.d.).

The Province of B.C. provides emergency tools and resources for Indigenous communities and local governments, including guides on how to make and maintain emergency plans, guides for emergency operations, and financial support programs for community-level mitigation, response, and recovery (Province of B.C. n.d.a). The Province of B.C. also has an Emergency Support Services program, to help build and train local teams. The Province of B.C. works with Indigenous communities to build resiliency through disaster preparedness via the Indigenous Emergency Management Partnership Tables, which aim to acknowledge Indigenous ways of knowing (Province of B.C. n.d.a).

Additional emergency services are provided by both the Government of B.C. and the Government of Canada. Provincial emergency services include EmergencyInfoBC, which provides information during active emergencies; Prepared BC guides, which are guides that are available online to help individuals prepare for emergencies; and DriveBC, BC Wildfire Service, and the River Forecast Centre, which all provide warning notifications for the province (Province of B.C. n.d.a). Federal emergency services include resources on the Get Prepared website, such as the Emergency Preparedness Guide for Canadians, and Earthquakes Canada.

Snuneymuxw First Nation has its own Emergency Response Management team and has prepared a Snuneymuxw Community Disaster Operations Plan that identifies specific disaster response functions, assigns personnel, and alternates and provides training opportunities for community members. A Home Guide for community members was prepared with assistance from the Canadian Red Cross, the Emergency Management Division of the Justice Institute of B.C., the B.C. Ministry of Emergency Management and Climate Readiness, and the First Nations' Emergency Services Society of B.C. The Home Guide provides a simplified list of responses and actions to address specific emergencies, including earthquakes, floods, wildfires, severe weather, hazardous materials management, and pandemics (Snuneymuxw First Nation n.d.). The Emergency Response Management team organizes disaster simulation exercises for the community, and the community participated in the annual provincial ShakeOut earthquake drill.

On reserves, Indigenous governments are generally the first line of response in the case of emergency, implementing community ERPs (Indigenous Services Canada 2020a). In the event that Indigenous nations require more support, they typically contact either an Indigenous Services Canada Regional Office or provincial emergency response offices, depending on the emergency management agreements that are in place.

### **11.14.2.9 Housing**

On reserve, Snuneymuxw First Nation's Housing Department strives to maintain a housing program for members. It assists in providing suitable housing for community members, including Canada Mortgage and Housing Corporation (CMHC) social housing, repairs and maintenance for CMHC housing and Elder housing, home renovations, quality control assurance in residential construction, and educational programs for issues such as mould mitigation, energy conservation, and fire safety (Snuneymuxw First Nation n.d.). In June 2021, Snuneymuxw First Nation signed a memorandum of understanding with BC

Housing to create new culturally appropriate, affordable housing for community members, including the construction of two on-reserve, four-plex housing developments (Watson 2021). In September 2024 Snuneyuxw First Nation entered into another partnership with BC Housing to build 58 housing units on IR 4 to help bring members home to Snuneymuxw territory (Paige, pers. Comm. 2024b)

The Community Well-being Index scores for housing were 77 (Nanaimo Town 1) and 79 (Nanaimo Rivers), which are slightly lower in comparison to B.C. First Nations (80) (Indigenous Services Canada 2019b). Refer to subsection 11.14.2.6 for context regarding these statistics.

In 2016, Snuneymuxw First Nation members occupied 215 dwellings. Information on the state of the dwellings for 2021 is not available; however, in 2016, 28 percent of members required minor repairs and 35 percent required major repairs (CIRNAC n.d.). Census data for 2021 indicate that —lone parent families comprised 42.5 percent of all Snuneymuxw First Nation private households. There were over three times as many lone parent families in which the parent was female as there were lone parent families in which the parent was male (Statistics Canada 2023b,c). Snuneymuxw First Nation had 25 (11.6 percent) multifamily households (CIRNAC n.d.).

#### **11.14.2.10 Education**

Snuneymuxw First Nation's Education Department provides educational, financial, and other support services for Snuneymuxw First Nation members. Community programs and activities are offered for all ages (pre-school, youth, and adult programs), including daycare, a literacy group for young parents, occupational skills and training for adults, adult employment assessment and training, and Qwam Qwum youth groups.

Snuneymuxw First Nation is a part of School District 68 (Nanaimo-Ladysmith). The district serves approximately 14,000 students in the communities of Nanaimo, Ladysmith, Lantzville, Gabriola Island, and Cedar, B.C., and surrounding rural areas, and most Snuneymuxw First Nation students attend schools in this district (Snuneymuxw First Nation n.d.). Truth and Reconciliation is a central goal of the Nanaimo-Ladysmith School District, and policies are guided by the Syeyutsus Reconciliation Policy & Framework (Nanaimo Ladysmith Public Schools n.d.). Syeyutsus (walking together) is a Hul'q'umi'num expression for "walking in two worlds:" living and honouring the teachings of the land and first peoples, while navigating the ever-changing complexities of today's world and society. In today's context, Syeyutsus suggests that we strive to find balance between the traditional way of living and the contemporary lifestyle, and this is embedded in the philosophy of the school district (Nanaimo Ladysmith Public Schools n.d.).

Snuneymuxw First Nation students may choose to attend Qwam Qwum Stuwixwulh Community School for their elementary years. In September 2019, the new campus of Qwam Qwum Stuwixwulh Community School opened for pre-school to Grade 7 students on Snuneymuxw lands. The community school is jointly cogoverned by Nanaimo-Ladysmith School District and Snuneymuxw First Nation, and is open to all students within the school district. The school blends traditional Indigenous teachings with the latest technology and aims to teach students to "walk in two worlds," restoring a sense of place in Snuneymuxw youth and connecting them to the knowledge and language that is rooted in the sacred lands of Snuneymuxw First Nation traditional territory. Indigenous language immersion is offered by the school (Qwam Qwum Stuwixwulh n.d.).

Of Snuneymuxw First Nation members who are 15 years and older, approximately 24.3 percent had a high school diploma or equivalent as their highest level of educational attainment in 2016 (slightly lower than 29.9 percent in Nanaimo District overall), 25.2 percent of members held a trades certificate (compared to

11.14 percent in the Nanaimo District overall), and 5.4 percent had a university diploma at the bachelor level or above (compared to 19.2 percent in the Nanaimo District overall) (CIRNAC n.d.).

The Community Well-being Index scores for education were 54 (Nanaimo Town 1) and 41 (Nanaimo Rivers) compared to the B.C. First Nations score of 46. Although Nanaimo Town 1 scored higher than the B.C. First Nation score, Nanaimo Rivers scored substantially lower (Indigenous Services Canada 2019b). Refer to subsection 11.14.2.6 for context regarding these statistics.

Snuneymuxw First Nation notes that First Nations may have reduced educational success rates due to the legacy of colonialism and generational trauma that exists within today's colonial education system. Impacts felt from Canada's residential schools and the failure of Eurocentric governments to recognize Indigenous education systems contributes to these educational outcomes for Indigenous peoples, and to racist perceptions within the general public about Indigenous educational success.

### **11.14.2.11 Community Infrastructure**

Snuneymuxw First Nation's Community Infrastructure and Housing Department operates and maintains Snuneymuxw First Nation's infrastructure, including buildings, roads, water, and sewer lines, and manages services such as recycling and garbage pickup (Snuneymuxw First Nation n.d.). The department works with Chief and Council, Snuneymuxw First Nation membership, external Governmental agencies, businesses, and private enterprises to continue to improve and develop capital infrastructure interests. A 5-year capital plan is submitted to CIRNAC each year, focusing on operational concerns and future capital development. The 5-year capital plan serves as a planning tool, which identifies community short-term and long-term needs and construction projects for Snuneymuxw, including projects such as water and wastewater systems, storm systems, road works, foreshore works, new housing, and housing renovations and future building developments. Planned future projects include improvements to environmental concerns, community health, future growth, feasibility, and sustainability.

### **11.14.2.12 Employment and Income**

The employment rate for Snuneymuxw First Nation members aged 15 and over was 37.8 percent in 2016. At the time, there were more male than female Snuneymuxw First Nation members employed (41.4 percent versus 31.5 percent). The unemployment rate for Snuneymuxw First Nation members was 21.2 percent. Male Snuneymuxw First Nation members had a lower unemployment rate compared to female Snuneymuxw First Nation members (20.0 percent versus 22.7 percent, as reported) (CIRNAC n.d.).

The Community Well-being Index scores for labour force activity were 63 (Nanaimo Town 1) and 60 (Nanaimo Rivers), which is comparable to the B.C. First Nations score of 63. The Community Well-being Index scores for income were 53 (Nanaimo Town 1) and 54 (Nanaimo Rivers), lower than the B.C. First Nations score of 60 (Indigenous Services Canada 2019b). Refer to subsection 11.14.2.6 for context regarding these statistics.

The largest area of employment for Snuneymuxw First Nation members (14.3 percent of people aged 15 and over) was "other services," which includes public administration and administrative services. Snuneymuxw First Nation members were employed in all industries except finance and real estate, with health and education, and manufacturing and construction being the next largest areas of employment. The 2016 Census data, as reported by CIRNAC, also demonstrates that the largest employment industries for males was manufacturing and construction, and the largest for females was health and education (CIRNAC n.d.).

Approximately 10.7 percent of Snuneymuxw First Nation members over the age of 15 were employed in sales and service occupations in 2016, followed by 9.8 percent employed in management, and 7.1 percent employed in trades-related occupations, social sciences, and government (CIRNAC n.d.). Females were equally employed in sales and service occupations and occupations in education, law, social, community, and government services (36.4 percent in each), whereas the greatest number of occupations for males was in sales trades, transport, equipment operators, and related occupations (30.0 percent) (Statistics Canada 2023c).

In 2016, the average annual total income for Snuneymuxw First Nation members was similar to the annual average in B.C. overall. Snuneymuxw First Nation females earned 13.3 percent less than Snuneymuxw First Nation males (CIRNAC n.d.).

#### **11.14.2.13 Employment Services**

Snuneymuxw First Nation supports employment and job training for community members, and provides funding and opportunities to participate in training programs such as employability and life skills-related workshops in group settings or one on one, supported employment searches, personalized goal setting and action plans, resume development, cover letters and online application support, employment readiness assessments, short-term training certification, and personal growth workshops (Snuneymuxw First Nation n.d.). Snuneymuxw First Nation works with CSETS to provide workshops and employment support to community members. The CSETS program offers childcare, employment assistance, and language assistance to Indigenous communities and provides on-the-job training and placement opportunities through the Bladerunners Program.

Snuneymuxw First Nation's Social Development Department administers income and social support services to support self-sufficient lives for members (Snuneymuxw First Nation n.d.).

#### **11.14.2.14 Economic Development**

Snuneymuxw First Nation engages in a range of economic development initiatives designed to contribute to the health and wellness of citizens, create opportunities for Snuneymuxw citizens, and build sustainable economic foundations for future generations (B.C. Assembly of First Nations n.d.). Currently, Snuneymuxw First Nation is engaged in a number of economic development initiatives that range from co-management of Satsutshun (Newcastle Island), partnerships in projects, such as Sandstone, commercial fisheries operations, and the Tuytaxun community store (B.C. Assembly of First Nations n.d.).

Petroglyph Development Group (PDG) is a wholly owned corporation of Snuneymuxw First Nation delegated to managing business and economic development for Snuneymuxw First Nation (PDG n.d.; Snuneymuxw First Nation n.d.). PDG strives to realize the economic potential of Snuneymuxw First Nation while aligning with Snuneymuxw Snu'uyulh, the teachings passed down from ancestors and Elders (PDG n.d.). Guided by the Corporate Strategic Plan: A Vision for Sustainable Economic Development (PDG n.d.), PDG invests in opportunities that balance profit optimization with sustainability. PDG strives to decrease unemployment rates and invest in job creation and skill development so that Snuneymuxw First Nation citizens can realize their personal and professional potential. At the same time, PDG tries to build wealth for the community, contributing to the health and wellness of citizens, creating opportunities for all community members, and building urban and sustainable economic foundations for future generations. Objectives laid out in the Corporate Strategic Plan are to build and sustain wealth, strengthen the Snuneymuxw economy, reinvest in the community, build relationships, and identify priorities for economic development.

Currently, PDG acts as the parent company overseeing the following subsidiaries and economic development activities:

- Petroglyph Forestry (the subsidiary that oversees and manages 1065.65 ha of forested Mount Benson land, and 30 ha of Yellow Point land). One value-added operation of Petroglyph Forestry is the new firewood program. Approximately 100 loads of firewood have been delivered to Snuneymuxw Elders, and wholesale supply of firewood is purchased by interested vendors. Operations include silviculture, firewood, fire suppression, and land management. Snuneymuxw First Nation has noted that further forestry transfers of Mount Benson land are expected in the near future (Paige. Pers. Comm. 2024c).
- Saysutshun (Newcastle Island): Saysutshun is a sacred village site and home of the Snuneymuxw First Nation Peoples. Saysutshun is now the name of the marine Provincial Park previously known as Newcastle Island Provincial Park, and is highly valued as a place of transformation, healing, and preparation. To share the history and culture of the island, and to educate the public about Snuneymuxw traditional way of life and worldview, Saysutshun offers tourism products, such as an interpretive walking tour (learning about traditions and medicines while observing historical and sacred sites) and a traditional salmon barbeque. Sayshutshun also has a contract with BC Parks to manage Newcastle Island Marine Provincial Park services and offerings, including camping, boating, outdoor trails, beaches, tidal pools, and playgrounds. Running park operations collaboratively is a small stepping stone to the nation's vision for the future of Newcastle.
- Casino Nanaimo and Elements Casino Victoria.
- Saysutshun Ferry Service: Saysutshun Ferry Service offers a ferry service to Saysutshan from the Maffeo Sutton Dock.
- Petroglyph Properties: Petroglyph Properties manage four fee-simple private properties.
- Saysutshun Concession: Saysutshun Concession offers rustic and traditional menu choices.
- Snuneymuxw Market Gas Bar: a fuel service station and convenience store on the reserve at Cedar, B.C.
- Coast Salish Canna: PDG has entered a partnership with Encompass Capital Corporation to become active participants in the cannabis market.

PDG has also partnered with Nanaimo Youth Services Association to implement a 22-week long employment and training program to promote skill development and create jobs.

### **11.14.2.15 Snuneymuxw First Nation Government and Administration**

Snuneymuxw First Nation has a custom electoral system (CIRNAC n.d.). The Snuneymuxw First Nation Chief and Council consists of a Chief and 10 Councillors who are elected for up to a 4-year term (B.C. Assembly of First Nations n.d.). The Snuneymuxw First Nation Chief and Council receives administrative support from the Snuneymuxw First Nation Administration Department (Snuneymuxw First Nation n.d.).

Snuneymuxw First Nation's Lands services is responsible for advancing and protecting the interest of Snuneymuxw First Nation's Sarlequun Treaty of 1854 Rights and Aboriginal Title and Rights over lands and resources throughout Snuneymuxw territory. Snuneymuxw First Nation's Referrals team reviews regulatory tenures, applications for proponent-driven projects and other commercial activity taking place on traditional Snuneymuxw lands. The directive of the Referrals team is to protect the hunting and fishing rights through implementation of the Snuneymuxw Sarlequun Treaty of 1854 with the Province of B.C. (Snuneymuxw First Nation 2023).



### 11.14.2.16 Plans and Agreements

Snuneymuxw First Nation members are descendants of signatories of the Snuneymuxw Sarlequun Treaty of 1854 (Snuneymuxw First Nation 2023). Table 11.14-4 summarizes some of the additional agreements with other governments to which Snuneymuxw First Nation is a signatory. At the time of writing, Snuneymuxw First Nation is not participating in the BCTC process and is focused on the implementation of the Snuneymuxw Sarlequun Treaty of 1854 (Paige, pers. comm. 2024a).

**Table 11.14-4. Snuneymuxw First Nation Plans and Agreements**

Plan or Agreement	Date	Parties	Title	Details
Agreement	2021	Snuneymuxw First Nation Canada Province of B.C.	Snuneymuxw Tripartite Memorandum of Understanding	Establishes a framework and process for completing additional agreements and understandings that will significantly advance reconciliation on the topics of treaty implementation, Snuneymuxw First Nation's traditional lands and resources, and recognition and affirmation of political structures and renewed relationships, among other matters.
Agreement	2020	Snuneymuxw First Nation Canada	Framework Agreement on First Nations Land Management	This agreement establishes nation governance under the <i>First Nations Land Management Act</i> , under which Snuneymuxw First Nation developed their land code.
Agreement	2020	Snuneymuxw First Nation Province of B.C.	Snuneymuxw First Nation Reconciliation Agreement	Sets out to advance reconciliation between Snuneymuxw First Nation and the Province of B.C.
Agreement	2020	Snuneymuxw First Nation Province of B.C.	Snuneymuxw First Nation Land Transfer Agreement	Transfers ownership of the Mount McKay land parcel to Snuneymuxw First Nation.
Agreement	2019	Snuneymuxw First Nation Nanaimo Ladysmith Public Schools	Memorandum of Agreement	Allows for cogovernance of the Qwam Qwum Stuwixwulh Community School.
Agreement	2019	Snuneymuxw First Nation Nanaimo	Protocol Agreement	Establishes terms for collaborative decision-making based on a government-to-government relationship.

**Table 11.14-4. Snuneymuxw First Nation Plans and Agreements**

Plan or Agreement	Date	Parties	Title	Details
Agreement	2013	Snuneymuxw First Nation Province of B.C.	Reconciliation Agreement	Transfer of lands to Snuneymuxw First Nation as a reconciliation benefit.
Agreement	2009	Snuneymuxw First Nation Province of B.C.	Interim Measures Agreement	Increases the participation of Snuneymuxw First Nation in the forestry sector and provides economic opportunities through a forest tender to Snuneymuxw First Nation.
Agreement	2007	Snuneymuxw First Nation Province of B.C. Nanaimo	No specific title	Collaborative management of Newcastle Island Marine Provincial Park.
Agreement	2002	Snuneymuxw First Nation Province of B.C.	Memorandum of Agreement	Economic measure to support current and future interest in shellfish harvesting.

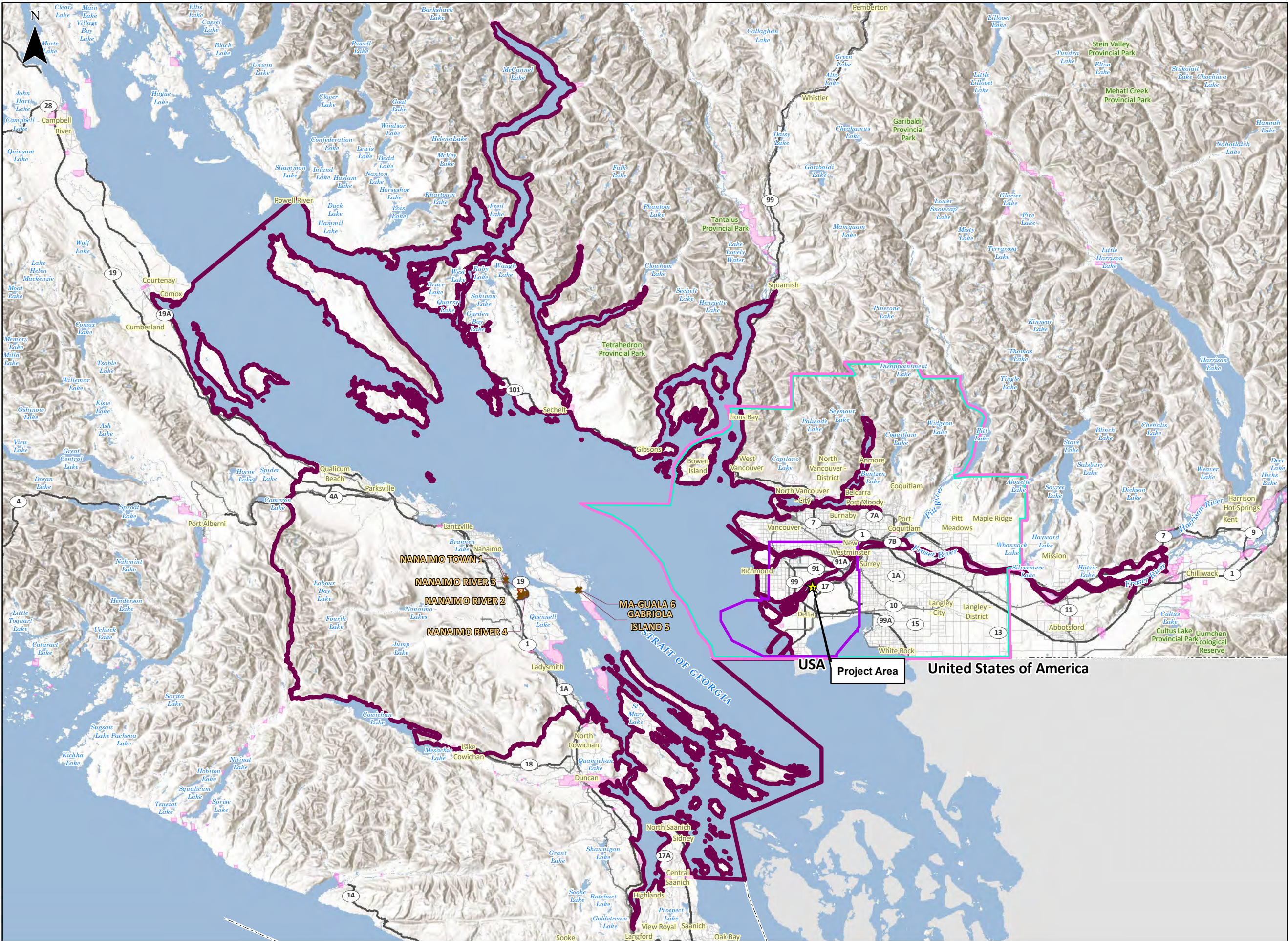
Sources: Snuneymuxw First Nation, n.d.; Province of B.C., 2002, n.d.b, n.d.c; Nanaimo, n.d.; Lands Advisory Board, 2020; B.C. Ministry of Indigenous Relations and Reconciliation, n.d.

#### 1 11.14.2.17 Land Use Plans

2 Snuneymuxw First Nation is developing a formal land code under the *First Nations Land Management Act*  
3 that will define and promote long-term goals for Snuneymuxw First Nation lands, provide guidelines for  
4 future community development, and aim to implement regulations related to land use and development  
5 (Paige, pers. Comm. 2024a).

6





September 2024

FIGURE 11.14-1  
SNUNEYMUXW FIRST NATION  
INDIGENOUS INTERESTS

TILBURY PHASE 2 LNG  
EXPANSION PROJECT

- ★ Project Area
- ✱ Snuneymuxw First Nation Reserve <100 ha
- Snuneymuxw First Nation Reserve
- Other First Nation Reserve
- International Border
- Railway
- Highway
- Road
- Green Park/Protected Area
- Blue Waterbody
- Snuneymuxw First Nation Territory
- Local Assessment Area:
  - Cultural Use Sites and Areas
  - Harvesting and Subsistence Activities
- Local Assessment Area:
  - Indigenous Health and Well-being
  - Social and Economic Conditions
  - Cultural Continuation
  - Indigenous Governance Systems
- Regional Assessment Area:
  - Cultural Use Sites and Areas
  - Harvesting and Subsistence Activities
  - Indigenous Health and Well-being
  - Social and Economic Conditions
  - Cultural Continuation
  - Indigenous Governance Systems

Note:  
Cultural Use Sites and Areas and Harvesting and Subsistence Activities includes the following local assessment areas: air quality, acoustic, archaeological and heritage resources, culture, surface water, ground water, soil, vegetation, wildlife and wildlife habitat, fish and fish habitat, and land and resource use.

Indigenous Health and Well-being and Social and Economic Conditions includes the following local assessment areas: culture, employment and economy, human health, infrastructure and services, and land and resource use.

Cultural Use Sites and Areas, Harvesting and Subsistence Activities, Indigenous Health and Well-being, and Social and Economic Conditions includes the following regional assessment areas: air quality, acoustic, archaeological and heritage resources, culture, employment and economy, human health, infrastructure and services, surface water, ground water, vegetation, wild and wildlife habitat, fish and fish habitat, and land and resource use.

Not to be used to limit or deny any Indigenous Rights or Title.

Project Site at NTS Grid: 092G03  
49° 8' 27.4" N 123° 2' 4.8" W

Scale: 1:785,000  
0 8 16 24 32 km  
(All Locations Approximate)

Jacobs

Project Number CE778100

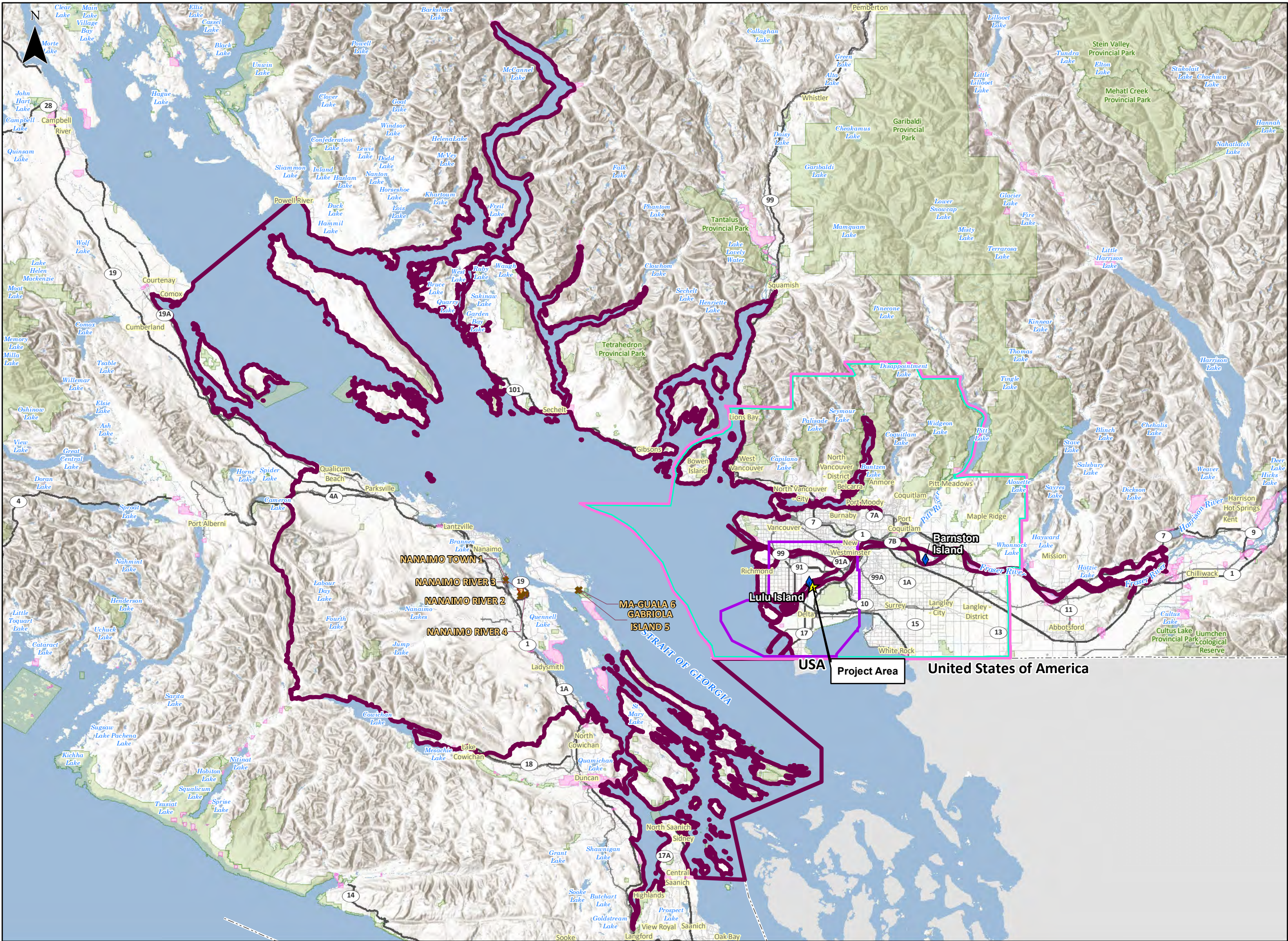
BC Albers Projection, NAD83: UTM Zone 10 North.  
Project Area: Jacobs (05-09-2022); Traditional Territory: Snuneymuxw First Nation, 2024; First Nation Reserves: Government of Canada 2018; LAA/RAA Boundaries: Jacobs, August 19, 2022; International Boundary: ESR 2005; Roads: NRCAN 2015; Hydrography: BC Forests, Lands and Natural Resource Operations 2011; Municipal Boundaries: BC MFLNRO 2016; Railway: BC MFLNRO 2015; Parks: NRCAN 2017; Metro Vancouver 2020; BC MFLNRO 2008; Service Layer Credits: Sources: Esri, Airbus DS, USGS, NGA, NASA, CIA, N Robinson, NCEAS, NLS, OS, NMA, Geodastysreien, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

Although there is no reason to believe that there are any errors associated with the data used to generate this product or in the product itself, users of these data are advised that errors in the data may be present.

Mapped By: SB

Checked By: DN





September 2024

FIGURE 11.14-2  
SNUNEYMUXW FIRST NATION  
INDIGENOUS INTERESTS

TILBURY PHASE 2 LNG  
EXPANSION PROJECT

- ★ Project Area
- ◆ Use Location
- ✱ Snuneymuxw First Nation Reserve <100 ha
- Snuneymuxw First Nation Reserve
- Other First Nation Reserve
- International Border
- Railway
- Highway
- Road
- Park/Protected Area
- Waterbody
- Snuneymuxw First Nation Territory
- Local Assessment Area:
  - Cultural Use Sites and Areas
  - Harvesting and Subsistence Activities
- Local Assessment Area:
  - Indigenous Health and Well-being
  - Social and Economic Conditions
  - Cultural Continuation
  - Indigenous Governance Systems
- Regional Assessment Area:
  - Cultural Use Sites and Areas
  - Harvesting and Subsistence Activities
  - Indigenous Health and Well-being
  - Social and Economic Conditions
  - Cultural Continuation
  - Indigenous Governance Systems

Note:  
Cultural Use Sites and Areas and Harvesting and Subsistence Activities includes the following local assessment areas: air quality, acoustic, archaeological and heritage resources, culture, surface water, ground water, soil, vegetation, wildlife and wildlife habitat, fish and fish habitat, and land and resource use.

Indigenous Health and Well-being and Social and Economic Conditions includes the following local assessment areas: culture, employment and economy, human health, infrastructure and services, and land and resource use.

Cultural Use Sites and Areas, Harvesting and Subsistence Activities, Indigenous Health and Well-being, and Social and Economic Conditions includes the following regional assessment areas: air quality, acoustic, archaeological and heritage resources, culture, employment and economy, human health, infrastructure and services, surface water, ground water, vegetation, wild and wildlife habitat, fish and fish habitat, and land and resource use.

Not to be used to limit or deny any Indigenous Rights or Title.

Project Site at NTS Grid: 092G03  
49° 8' 27.4" N 123° 2' 4.8" W

Scale: 1:785,000  
0 8 16 24 32 km  
(All Locations Approximate)

Jacobs

Project Number CE778100

BC Albers Projection, NAD83: UTM Zone 10 North.  
Project Area: Jacobs (05-09-2022); Traditional Territory: Snuneymuxw First Nation, 2020; First Nation Reserves: Government of Canada 2018; LAA/RAA Boundaries: Jacobs, August 19, 2022; International Boundary: ESHI 2005; Roads: NRCAN 2015; Hydrography: BC Forests, Lands and Natural Resource Operations 2011; Municipal Boundaries: BC MFLNRO 2016; Railway: BC MFLNRO 2015; Parks: NRCAN 2017; Metro Vancouver 2020; BC MFLNRO 2008; Service Layer Credits: Sources: Esri, Airbus DS, USGS, NGA, NASA, CGIAR, N Robinson, NCEAS, NLS, OS, NMA, Geodastystyren, Rijkswaterstaat, GSA, Geoland, FEMA, Intermap and the GIS user community

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Mapped By: SB

Checked By: DN



**11.14.2.18 Snuneymuxw First Nation Context Within the Proposed Project Area**

The proposed Project is located on Tilbury Island, B.C., which has been zoned for industrial use.<sup>7</sup> Adjacent areas along the south arm of the Fraser River in Delta, B.C., and across the river in Richmond, B.C., have been regionally designated for light and heavy industrial and commercial uses (Metro Vancouver n.d.)

The proposed Project Area overlaps with Snuneymuxw First Nation traditional territory, including Snuneymuxw fisheries and historic fishing villages. Snuneymuxw First Nation traditional territory extends up the Fraser River to Chilliwack, B.C. Snuneymuxw First Nation members followed seasonal rounds, which included travelling to the Fraser River for the salmon runs. Snuneymuxw First Nation also had a fishing village site located on the south bank of the Fraser River, upriver from the east end of Barnston Island (B.C. EAO 2022a), approximately 30 km upstream of the proposed Project.

Snuneymuxw First Nation reported that it has important territorial, marine, cultural, and spiritual connections to the lower Fraser River, where the Nation has had multiple historic fishing villages with fields, fishing stations, and accessed marine resources (Wyse, pers. comm. 2021).

Snuneymuxw First Nation informed FortisBC that ongoing capacity constraints as a result of inadequate funding for Indigenous land and resource offices in Canada from regulators have impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For these reasons, Snuneymuxw First Nation was not able to provide FortisBC with its views on how any Indigenous laws, governance, philosophies, or customs have historically applied and currently apply in relation to the proposed Project.

The proposed Project Footprint was previously cleared of natural forest resulting in little to no native soils remaining in place, but is vegetated and has been heavily disturbed, with the majority of the proposed Project Footprint being used for industrial purposes. The riparian area along the north portion of the proposed Project Footprint has been previously disturbed. Public access to the proposed Project Site is limited, although there is currently public use of the dike to the north of the proposed Project Site along the Fraser River.

A portion of the proposed Project Footprint is located on the Fraser River in Provincial Crown land at the location of an existing dock (legacy) where the MOF was to be constructed for the proposed Project. The piles and dock will be removed by a predecessor project (either the T1B or the TMJ project); however, the earthworks will remain. As stated above, in response to the concerns raised during engagement, FortisBC committed to no barge deliveries as an avoidance mitigation measure to address concerns about effects to the Fraser River, the Salish Sea, and the Southern Resident Killer Whale population, A MOF will not be required by the proposed Project during any phase.

**11.14.2.19 Snuneymuxw First Nation Indigenous Interests**

FortisBC has been engaging with Snuneymuxw First Nation regarding the proposed Project (subsection 11.14.3, Summary of Engagement) since 2021. Indigenous interests identified by Snuneymuxw First Nation through its Notice of Intent to Participate as a participating Indigenous nation, to develop this subsection, included the following:

- Potential effects to fisheries and historic fishing villages, land, and waters

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<sup>7</sup> Tilbury Island, B.C., is anticipated to remain an industrial zoned area; however, Delta's OCP also considers re-use or redevelopment and remediation of older industrial buildings and sites (Delta 2022).

- 1     ▪ Potential effects on cultural activities, traditional uses, and access to water-based activities on the  
2       lower Fraser River
- 3     The preliminary list of Indigenous interests, as documented in the B.C. EAO Schedule C – AIR, Table 6  
4     (B.C. EAO 2022a) continue to be the interests that FortisBC and Snuneymuxw First Nation have discussed  
5     in relation to the proposed Project. In addition, during Snuneymuxw First Nation and FortisBC's review of  
6     Rev D of subsection 11.14, Snuneymuxw First Nation identified additional interests which are included in  
7     Table 11.14-5, as well as the addition of Cultural Continuation and Aboriginal and Snuneymuxw  
8     Sarlequun Treaty of 1854 Rights. Snuneymuxw First Nation also informed FortisBC that it is continuing to  
9     gather information about its use of the Project area.

**Table 11.14-5. Snuneymuxw First Nation's Indigenous Interests Related to the Proposed Project**

Indigenous Interest	Topics/Potential Effects to Be Included <sup>a</sup>
Harvesting and Subsistence Activities	<ul style="list-style-type: none"> <li>▪ Changes to the experience and preferences around the practice of harvesting rights and effects on the quality, quantity, and availability of resources</li> <li>▪ Effects to Snuneymuxw First Nation hunting, fishing, trapping, marine harvesting, and gathering rights in the proposed Project Area</li> <li>▪ Effects to Snuneymuxw First Nation harvesting rights as a result of Project-related changes in fish, wildlife, and vegetation<sup>a</sup></li> <li>▪ Effects to the accessibility and availability of traditional lands and resources</li> <li>▪ Effects to the Snuneymuxw Sarlequun Treaty of 1854 right, defined in the treaty as "fisheries as formerly"</li> </ul>
Cultural Use Sites and Areas	<ul style="list-style-type: none"> <li>▪ Effects on cultural heritage, and structures, sites or things of historical, archaeological, paleontological, or architectural value</li> <li>▪ Loss of access to and disenfranchisement from cultural sites</li> <li>▪ Effects to cultural and spiritual practices caused by damage or loss of access to cultural sites and areas</li> <li>▪ Effects to Snuneymuxw First Nation fisheries, historic fishing villages, and fishing rights related to proposed Project-related changes to fishing</li> </ul>
Social and Economic Conditions	<ul style="list-style-type: none"> <li>▪ Effects on Snuneymuxw First Nation's ability to improve social and economic conditions</li> <li>▪ Effects on Snuneymuxw First Nation's future aspirations for sites or area surrounding the proposed Project</li> <li>▪ Changes to employment opportunities, Indigenous businesses, procurement opportunities, and Snuneymuxw First Nation's Government's revenue</li> <li>▪ Effect on intercommunity relations and trade</li> <li>▪ Effects on commercial and non-commercial fishing, hunting, trapping, and gathering and cultural or ceremonial activities and practices</li> <li>▪ Effects on infrastructure and services</li> </ul>
Indigenous Health and Well-being	<ul style="list-style-type: none"> <li>▪ Effects on the quality, quantity, and availability of harvested country foods</li> <li>▪ Effects on the value and perceived quality of country foods</li> <li>▪ Effects on air quality, noise, water quality</li> <li>▪ Effects on health and well-being from the effects to traditional ways of life and to cultural sites</li> </ul>



**Table 11.14-5. Snuneymuxw First Nation's Indigenous Interests Related to the Proposed Project**

Indigenous Interest	Topics/Potential Effects to Be Included <sup>a</sup>
Cultural Continuation	<ul style="list-style-type: none"> <li>▪ Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to the experiences of being on the land (such as changes in air quality, noise exposure, and effects of vibrations from blasting or other activities)</li> <li>▪ Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to current and future availability and quality of country foods (traditional foods)</li> <li>▪ Disconnection from cultural heritage due to changes to sense of place and identity due to changes in accessibility and real and perceived disturbance of the environment</li> <li>▪ Disconnection from cultural heritage due to interruption of the use of travelways, navigable waterways, and water bodies</li> </ul>
Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights	<ul style="list-style-type: none"> <li>▪ Changes to Snuneymuxw First Nation's cultural traditions, laws, and governance systems that inform how they exercise their Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights</li> <li>▪ Effects on the ability to use, develop, and control traditional land, territories, and resources</li> <li>▪ Effects on the ability to implement Indigenous laws, customs, and protocols</li> <li>▪ Changes to participation in decision making in matters that affect Snuneymuxw First Nation's Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights in the proposed Project Site</li> <li>▪ Changes to ongoing conservation efforts to restore important fish species and habitat</li> <li>▪ Changes in the ability to engage in the stewardship of lands and resources</li> </ul>

These Indigenous interests were developed prior to FortisBC's commitment to not deliver proposed Project modules or materials to the proposed Project Site. The Application has been prepared in accordance with the AIR in which potential effects were identified from waterborne delivery (that is, barge deliveries) and the use of the MOF associated with the proposed Project. FortisBC made this commitment to address concerns about effects to the Fraser River, the Salish Sea, and the Southern Resident Killer Whale population. Potential residual effects to linked valued components with this avoidance mitigation measure are described in this subsection below. Implementation of this avoidance mitigation measure has subsequently been incorporated into the determination of potential residual effects of the proposed Project on Indigenous interests.

### **11.14.3 Summary of Engagement**

#### **11.14.3.1 Engagement Overview**

Subsection 11.1.4, Summary of Engagement, provides an overview of FortisBC's Indigenous engagement principles and objectives for the proposed Project.

As previously noted, FortisBC has been engaging with Snuneymuxw First Nation regarding the proposed Project, proposed Project activities, and the proposed Project Area since the nation submitted its notice to engage as a participating Indigenous nation in 2021 (Wyse, pers. comm. 2021). FortisBC and Snuneymuxw First Nation have a Capacity Funding Agreement and Snuneymuxw-led Assessment Agreement. On January 27, 2023, Snuneymuxw First Nation and FortisBC signed the Tilbury Projects Agreement. As of September 2024, Snuneymuxw has concluded that because it has a project benefits agreement in place with FortisBC, a Snuneymuxw-led assessment is no longer necessary. Accordingly, Snuneymuxw believes that participating as a participating Indigenous Nation for the remainder of the BC

- 1 EAO process, including working collaboratively with FortisBC to undertake the co-authorship of subsection
- 2 11.14, is the most effective use of its human and financial resources.
- 3 Tables 11.14-6 and 11.14-7 include more details on past and proposed engagement activities with
- 4 Snuneymuxw First Nation. Table 11.14-6 describes key engagement activities that have taken place from
- 5 the start of early engagement until October 2024. Table 11.14-7 provides a summary of proposed future
- 6 engagement activities.

**Table 11.14-6. Summary of Past Engagement with Snuneymuxw First Nation**

Dates	Key Engagement Activity	Description	Status
December 2021 to present	Project information and updates	FortisBC provided regular proposed Project updates, information on regulatory processes, schedule extensions, and comment periods to Snuneymuxw First Nation.  FortisBC met with Snuneymuxw First Nation on February 1, 2022, to introduce the proposed Project. Meeting information included the Tilbury Overview Slides and the Tilbury History Presentation.	Ongoing
December 2021 to Present	Indigenous Knowledge and secondary sources	FortisBC provided Snuneymuxw First Nation with a list of secondary sources it had prepared to use in the Application. Snuneymuxw First Nation provided a report on a village and fishing that FortisBC incorporated into Revisions (Rev) B and D of subsection 11.14.  FortisBC invited Snuneymuxw First Nation to two Indigenous Knowledge workshops being held for participating Indigenous nations on March 29, 2022, and April 22, 2022.  FortisBC provided Snuneymuxw First Nation with Rev A (~50 percent complete) and B drafts of subsection 11.14 to identify how Indigenous Knowledge has been captured in subsection 11.14 and requested feedback on that Indigenous Knowledge.	Ongoing
December 2021	DPD	The draft DPD was submitted to Snuneymuxw First Nation by email, and input was requested. B.C. EAO sent a letter to FortisBC on behalf of Snuneymuxw First Nation, providing information for inclusion in the DPD. FortisBC incorporated the information into the final version of the DPD.	Complete
January to Present	Proposed Project Site tours	FortisBC invited Snuneymuxw First Nation to participate in virtual or in-person proposed Project Site tours. Snuneymuxw First Nation attended an in-person proposed Project Site tour on June 15, 2022. As a follow-up to the June tour, FortisBC provided the Archaeological Chance Find Management Guidelines and stated that there are no registered sites in the proposed Project Area.  In March 2024, FortisBC invited new Snuneymuxw First Nation staff to attend a site tour at their convenience.	Ongoing

**Table 11.14-6. Summary of Past Engagement with Snuneymuxw First Nation**

<b>Dates</b>	<b>Key Engagement Activity</b>	<b>Description</b>	<b>Status</b>
February 2022	Draft AIR	FortisBC notified Snuneymuxw First Nation that the draft AIR was available for review, and requested meetings to discuss the documents. FortisBC incorporated the nation's comments into the final AIR.	Complete
February 2022 to March 2023	B.C. EAO workshops	FortisBC invited Snuneymuxw First Nation to participate in the following B.C. EAO workshops: <ul style="list-style-type: none"> <li>▪ January 26, 2022: Terrestrial and Aquatics</li> <li>▪ February 23, 2022: Cumulative Effects Assessment</li> <li>▪ March 8, 2022: Air Quality and Human Health</li> <li>▪ April 5, 2022: Greenhouse Gas Emissions</li> <li>▪ April 26, 2022: Public Safety, Accidents, and Malfunctions</li> <li>▪ March 23, 2023: Proposed Project Changes</li> </ul> Snuneymuxw First Nation attended all workshops except the Greenhouse Gas Emissions workshop on April 5, 2022.	Complete
March 2022 to October 2022	Capacity Funding Agreement	FortisBC and Snuneymuxw First Nation have executed a Capacity Funding Agreement for Snuneymuxw First Nation's participation in engagement activities related to the proposed Project.	Complete
May 2022	Fieldwork studies	FortisBC invited Snuneymuxw First Nation to participate in fieldwork studies virtually via summary calls or in person. Snuneymuxw First Nation attended the May 12, 2022 summary call and FortisBC submitted a summary report for the completed field study to Snuneymuxw First Nation.	Complete
October 2022 to May 2023	Subsection 11.14	FortisBC provided Snuneymuxw with Revs A and B of subsection 11.14 to: <ul style="list-style-type: none"> <li>▪ Describe the proposed review and development process for subsection 11.14</li> <li>▪ Request Snuneymuxw First Nation's input in the identification and understanding of Snuneymuxw First Nation's Indigenous interests regarding the proposed Project</li> <li>▪ Seek input on the information included in the draft and encourage collaboration on the completion of subsection 11.14</li> </ul> FortisBC met with Snuneymuxw First Nation on October 27, 2022, to provide a high level overview of subsection 11.1 and requested feedback by November 7, 2022. FortisBC followed up with a request for comments in November 2022 and January 2023 to February. Snuneymuxw First Nation provided comments in February 2023 which FortisBC incorporated into Rev B. was	Complete

**Table 11.14-6. Summary of Past Engagement with Snuneymuxw First Nation**

Dates	Key Engagement Activity	Description	Status
January 2023	Tilbury Projects Agreement	FortisBC and Snuneymuxw First Nation signed an agreement in January 2023 that outlines a process to work in close collaboration as FortisBC's Tilbury projects are developed, including the TMJ project and this proposed Project. The agreement is a framework to allow for shared benefits in relation to the proposed Project and the TMJ project.	
March 2024 to Present	Remove all waterborne activities and components associated with the proposed Project	FortisBC met with Snuneymuxw First Nation on March 26, 2024 to discuss the avoidance technique of "Removal of Waterborne Deliveries" to mitigate potential impacts on Fish, Fish Habitat and Indigenous Interests that were raised by some Indigenous nations during engagement on the proposed Project.	Ongoing
July 2024 to October 2024	Subsection 11.14	FortisBC and Snuneymuxw First Nation held a series of virtual review sessions of Rev D between July and October, 2024. Comments provided by Snuneymuxw First Nation during these sessions were incorporated into subsection 11.14 prior to Application submission.	Ongoing

Tables 11.14-6 and 11.14-7 describe engagement activities by FortisBC that supported Snuneymuxw First Nation's understanding of the proposed Project and its potential effects on Snuneymuxw First Nation and its Indigenous interests. These included the following:

- Providing written summaries describing the proposed Project
- Offering virtual or in-person tours of the proposed Project Site
- Offering opportunities to participate in virtual meetings and workshops
- Inviting participation in ongoing fieldwork studies, virtually or in person
- Offering opportunities to review draft Application TDRs and this Section 11 subsection

Reviewing Draft Application TDRs and Application subsections, including this Section 11 subsection.

Table 11.14-7 describes planned engagement activities that are proposed to take place after October, 2024.

**Table 11.14-7. Summary of Planned Engagement with Snuneymuxw First Nation**

Subject/Topics for Future Engagement	Goals and Objectives for Engagement
Proposed Project updates/proposed Project review	<ul style="list-style-type: none"> <li>▪ Provide regular proposed Project updates to Snuneymuxw First Nation</li> <li>▪ Collaborate on the development of the Snuneymuxw First Nation 11.14 subsection and draft Application by inviting Snuneymuxw First Nation to review: <ul style="list-style-type: none"> <li>– Complete draft of the Snuneymuxw First Nation Section 11 subsection</li> </ul> </li> </ul>

**Table 11.14-7. Summary of Planned Engagement with Snuneymuxw First Nation**

Subject/Topics for Future Engagement	Goals and Objectives for Engagement
	<ul style="list-style-type: none"> <li>Ensure that Snuneymuxw First Nation Indigenous Knowledge is appropriately reflected in the Snuneymuxw First Nation subsection and other draft Application sections</li> <li>Invite Snuneymuxw First Nation to suggest approaches to avoid, reduce, mitigate, or otherwise accommodate potential adverse effects to Snuneymuxw First Nation interests</li> <li>Identify a long-term interest to participate in economic, employment, training, and other capacity-building opportunities</li> <li>Meet to resolve issues and concerns that have been raised</li> </ul>
Proposed Project Site tours	<ul style="list-style-type: none"> <li>Conduct additional in-person proposed Project Site tours to inform Snuneymuxw First Nation about the proposed Project</li> </ul>
Open houses/community presentations	<ul style="list-style-type: none"> <li>Present a summary of the proposed Project and Application findings</li> <li>Seek feedback from Snuneymuxw First Nation community members and discuss issues that have been raised</li> </ul>

### 1 11.14.3.2 Input Received and Issues Raised

2 Snuneymuxw First Nation expressed preliminary concerns to the B.C. EAO regarding potential effects from  
3 the proposed Project to its Indigenous interests through its Notice of Intent to Participate as a participating  
4 Indigenous nation. Table 11.14-8 summarizes the key issues raised by Snuneymuxw First Nation at the  
5 time of writing, and FortisBC's response. Snuneymuxw First Nation has not provided feedback on  
6 FortisBC's responses to issues raised.

**Table 11.14-8. Summary of Key Issues Raised by Snuneymuxw First Nation**

Summary of Issues Raised	FortisBC's Response	Snuneymuxw First Nation's Perspectives on the Resolution of Issues	Status/Addressing Unresolved Input
Assessment of potential effects to Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights and interests, and indicate whether these effects could be more or less adverse.	<p>This topic has been included in subsection 11.14 and will be based on the effects assessment of various VC subsections, including but limited to, the following:</p> <p>Subsection 7.8 – Wildlife and Wildlife Habitat</p> <p>Subsection 7.9 – Fish and Fish Habitat</p> <p>Section 9 – Accidents and Malfunctions</p> <p>Section 12 – Biophysical Factors that Support Ecosystem Function</p>	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going

**Table 11.14-8. Summary of Key Issues Raised by Snuneymuxw First Nation**

Summary of Issues Raised	FortisBC's Response	Snuneymuxw First Nation's Perspectives on the Resolution of Issues	Status/Addressing Unresolved Input
The inclusion of the Reconciliation Implementation Framework Agreement and Land Transfer Agreement between the Province of B.C and Snuneymuxw First Nation.	This topic has been included in subsection 11.14.2.15 (Plans and Agreements).	FortisBC did not receive further comments on this issue.	Resolved
VCs to include Indigenous Knowledge.	FortisBC has included available Indigenous Knowledge in the VC subsections of the Application, as well as throughout subsection 11.14. FortisBC will continue to add Indigenous Knowledge to the draft and final Application as it becomes available to FortisBC, provided the information is received within the identified timeframes.	Snuneymuxw First Nation is continuing to gather information and will provide Indigenous Knowledge to FortisBC when it becomes available.	On-going
Air Quality and Acoustic assessments to include human receptors.	FortisBC has included human receptors and Indigenous receptors in the Acoustic (subsection 7.3) and Human Health (subsection 7.15) VC subsections of the Application.	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going
Including Indigenous nations in vegetation mitigation measures and restoration.	Snuneymuxw First Nation will have the opportunity to review the Vegetation assessment (subsection 7.7), including mitigation measures. FortisBC would be pleased to discuss mitigation measures with Snuneymuxw First Nation.	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going



**Table 11.14-8. Summary of Key Issues Raised by Snuneymuxw First Nation**

<b>Summary of Issues Raised</b>	<b>FortisBC's Response</b>	<b>Snuneymuxw First Nation's Perspectives on the Resolution of Issues</b>	<b>Status/Addressing Unresolved Input</b>
Wildlife assessment to include potential effects on birds and SRKW.	Potential effects to migratory birds have been included in subsection 7.8 of the Application.  With the avoidance mitigation, the proposed Project will not have any interactions with SRKW. This species is discussed in the Surface Water (subsection 7.4) and Fish and Fish Habitat (subsection 7.9) VCs of the Application.	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application.	On-going
The Fish and Fish Habitat assessment to include potential effects to species of significance to Indigenous groups. Snuneymuxw First Nation harvests fish species for economic purposes and self-sufficiency. This includes effects of vessel "wake."	With the avoidance mitigation there are no effects of vessel wake.	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going
The Fish and Fish Habitat assessment to include marine and freshwater fish.	These topics have been included in the Fish and Fish Habitat VC (subsection 7.9).	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going
The assessment of economic rights held by Indigenous nations. In addition, employment, training, and scholarship opportunities to Indigenous nations.	These topics have been included in subsection 11.14 and the Employment and Economy VC (subsection 7.10) in the Application.	Snuneymuxw First Nation is unable to comment on the resolution of this issue before reviewing the appropriate sections in the Project Application and will discuss any issues with FortisBC.	On-going

**Table 11.14-8. Summary of Key Issues Raised by Snuneymuxw First Nation**

Summary of Issues Raised	FortisBC's Response	Snuneymuxw First Nation's Perspectives on the Resolution of Issues	Status/Addressing Unresolved Input
Indigenous nations should be consulted and engaged in the development of mitigation measures for effects to Aboriginal and Sarlequun Treaty of 1854 Rights and interests related to changes in Archaeological and Heritage Resource sites.	FortisBC agrees to engage with Snuneymuxw First Nation on mitigation measures. FortisBC provided the Archaeological Chance Find Management Guidelines to Snuneymuxw First Nation and informed the nation that there are no registered sites in the proposed Project Area.	Snuneymuxw notes that registered sites may not be inclusive of all culturally significant archaeological sites for Indigenous groups.	On-going
Human Health assessment to include links to other VCs. The assessment of potential effects to Snuneymuxw First Nations community health must specifically include the assessment of real or perceived changes to linked effect pathways that will influence human health.	The Human Health assessment includes links to a number of VCs, including Culture, Employment and Economy, Air Quality, Acoustic, Surface and Groundwater, Soil, Vegetation, Wildlife, Fish and Fish Habitat, Infrastructure, and Land and Resource Use.  Subsection 11.14 includes the Indigenous Health and Well-being Indigenous interest.	Snuneymuxw First Nation is continuing to gather information and will provide it to FortisBC when it becomes available.	On-going
Accidents and Malfunctions section to include consultation with Indigenous nations to understand potential for malfunctions and accidents to have potential effect to Snuneymuxw First Nation. FortisBC to engage them in the development of ERPs to ensure that the safety needs of Indigenous harvesters are being met in the plans.	FortisBC has an existing ERP for the Tilbury LNG facility, which has been reviewed and approved by various levels of government. This plan will be updated, as appropriate, to consider the proposed Project Site changes before commissioning of the new proposed Project components. FortisBC would be pleased to discuss the ERP to determine how it addresses Snuneymuxw First Nation's interests.	Snuneymuxw First Nation reiterates that existing ERPs that meet the requirements of government and regulators do not always consider the specific safety needs of Indigenous harvesters. Snuneymuxw First Nation is continuing to gather information and welcomes further discussion on FortisBC's existing ERP.	On-going

**Table 11.14-8. Summary of Key Issues Raised by Snuneymuxw First Nation**

Summary of Issues Raised	FortisBC's Response	Snuneymuxw First Nation's Perspectives on the Resolution of Issues	Status/Addressing Unresolved Input
<p>Indigenous interests must be developed with Snuneymuxw First Nation. FortisBC must consider:</p> <ul style="list-style-type: none"> <li>▪ Harvesters as contextual population information while collecting background information on Indigenous nations</li> <li>▪ Sensory disturbance around cultural sites</li> <li>▪ Effects on noncommercial fishing, hunting, and gathering</li> <li>▪ Effects on health and well-being</li> </ul>	FortisBC provided the initial Rev A of subsection 11.14 to Snuneymuxw First Nation for feedback incorporated input into Rev B.	Snuneymuxw First Nation understands not all information relating to these factors may be available at this time.. However, these are factors that can still be considered by FortisBC when considering impact pathways and linked VCs.	Sensory disturbance around cultural sites, effects on noncommercial fishing, hunting, and gathering, and effects on health and well-being are included in Subsection 11.14.

### 1 11.14.3.3 Integration of Snuneymuxw First Nation Feedback and Perspectives

2 FortisBC provided opportunity for Snuneymuxw First Nation to provide feedback on Rev A and Rev B of  
3 subsection 11.14. Table 11.14-9 summarizes where and how feedback and perspectives of Snuneymuxw  
4 First Nation were integrated into, or contributed to, decisions regarding the proposed Project.

**Table 11.14-9. Integration of Snuneymuxw First Nation Feedback into the Assessment**

Feedback	Integration of Feedback into the Assessment
The inclusion of potential effects related to biophysical and socio-economic VCs as well as Indigenous interests outlined in Table 11.14-8.	Table 11.14-8 summaries the ESA sections where these potential effects were considered.

### 5 11.14.3.4 Snuneymuxw First Nation Views on Engagement Approach

6 FortisBC provided opportunity for Snuneymuxw First Nation to provide feedback on Rev A and Rev B of  
7 subsection 11.14. FortisBC received feedback on Snuneymuxw First Nation in regard to the responses in  
8 Table 11-14-8. Snuneymuxw First Nation informed FortisBC that inadequate funding for Indigenous land  
9 and resource offices in Canada have impacted Snuneymuxw First Nation's ability to hire additional  
10 permanent full-time staff. As a result of this staffing issue, FortisBC did not receive feedback on Rev B of  
11 subsection 11.14. FortisBC engaged Snuneymuxw First Nation on Rev D of Subsection 11.14 through regular  
12 review meetings, typically held weekly.

Snuneymuxw First Nation has stated that although it was difficult to understand the technical aspects of the proposed Project to the extent required to assess potential effects on Snuneymuxw First Nation's Indigenous interests, a positive working relationship has been established with FortisBC throughout the engagement process. This relationship and the formation of the Implementation Committee has created a positive experience for Snuneymuxw First Nation and increased the Nation's understanding of the proposed Project and potential effects (Paige, pers. Comm. 2024a).

### **11.14.4 Assessing Potential Effects on Indigenous Interests**

This subsection provides FortisBC's assessment of potential effects of the proposed Project on Snuneymuxw First Nation's Indigenous interests. The following subsections include a description of the following:

- Assessment boundaries
- Existing conditions
- Interactions between the proposed Project and Snuneymuxw First Nation Indigenous interests
- Potential effects to Snuneymuxw First Nation Indigenous interests due to the proposed Project
- Proposed mitigation measures
- Characterization of any residual effects and cumulative effects, if applicable

Indigenous interests are not mutually exclusive, and this subsection may not reflect the overlap of interests outlined in Table 11.14-5. In addition to the interests described in Snuneymuxw First Nation's Notice of Intent to Participate as a participating Indigenous nation, FortisBC has made efforts to engage with Snuneymuxw First Nation to determine the alignment of Snuneymuxw First Nation's Indigenous interests with the preliminary Indigenous interests and potential effects outlined in the draft AIR.

FortisBC has included the list of Indigenous interests, as documented in the B.C. EAO Schedule C— AIR, Table 6 (B.C. EAO 2022a), in addition to the Indigenous interests identified by Snuneymuxw First Nation in the B.C. EAO Schedule C Table 20 (B.C. EAO 2022a) (Table 11.14-5). In accordance with subsection 11.14.2.19, potential effects of the proposed Project on Snuneymuxw First Nation Indigenous interests have been assessed as follows:

- Harvesting and Subsistence Activities
- Cultural Use Sites and Areas
- Social and Economic Conditions
- Indigenous Health and Well-being
- Cultural Continuation

### **Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights**

The Snuneymuxw First Nation Indigenous interest effects assessment draws forward the results (predicted residual effects) of the effects assessments for the following VCs:

- Subsection 7.2, Air Quality
- Subsection 7.3, Acoustic
- Subsection 7.4, Surface Water
- Subsection 7.5, Groundwater
- Subsection 7.6, Soil
- Subsection 7.7, Vegetation
- Subsection 7.8, Wildlife and Wildlife Habitat
- Subsection 7.9, Fish and Fish Habitat
- Subsection 7.10, Employment and Economy
- Subsection 7.11, Land and Resource Use

- Subsection 7.12, Infrastructure and Services
- Subsection 7.13, Archaeological and Heritage Resources
- Subsection 7.14, Culture
- Subsection 7.15, Human Health

Subsection 11.1.3, Summary of Valued Components Linked to Indigenous Interests, presents a summary of existing conditions and residual effects assessment conclusions for linked VCs used in the assessment of potential effects on Indigenous interests.

#### **11.14.4.1 Assessment Boundaries**

The boundaries of the Indigenous interests assessment have been based on the potential for the proposed Project to interact with, and result in, an effect on the Indigenous interests of Snuneymuxw First Nation.

#### **Spatial Boundaries**

The spatial assessment boundaries for each Indigenous interest were identified based on the overlap of LAAs and the combined RAAs identified for linked VCs, in accordance with Table 11.14-11 (Figure 11.14-1). The LAA of each Indigenous interest consists of the combined LAAs of VCs that are linked to the Indigenous interest, whereas the RAA of each Indigenous interest consists of the combined RAAs of VCs that are linked to the Indigenous interest.

The assessment of potential effects of the proposed Project on Indigenous interests applies to all members of Snuneymuxw First Nation living, working, or exercising Indigenous interests within the LAA of the Indigenous interests.

#### **Temporal Boundaries**

The potential effects specific to the proposed Project have been based on the following three main phases:

- Construction phase – Estimated 3- to 6-year duration
- Operation phase – Estimated 40-plus year duration
- Decommissioning phase – Estimated 2-year duration

Construction is planned to commence as early as 2027, with an anticipated proposed Project in-service date of 2031-plus. A detailed proposed Project schedule is outlined in subsection 1.5.1 (Schedule).

#### **Administrative Boundaries**

No administrative boundaries are known to limit the assessment of potential effects to the Indigenous interests of Snuneymuxw First Nation.

#### **Technical Boundaries**

Technical boundaries, including data limitations, associated with Snuneymuxw First Nation include the following:

- Discrepancies between Statistics Canada data, CIRNAC data, and Snuneymuxw First Nation data.
- Secondary data and information that has limited disaggregation, including the 2016 and 2021 Census categories which conflate sex with gender and presents on binary categories of male and female.
- Disaggregated data are also not available for sexual orientation, such as those who are two-spirited.
- In addition, CIRNC First Nation Profiles also have limited disaggregation by age group.

- Limited input from Snuneymuxw First Nation on the identification of interactions of the proposed Project with its Indigenous interests or potential effects of the proposed Project on its Indigenous interests.

Snuneymuxw First Nation has chosen to provide FortisBC with information that it deems appropriate. Due to the limited primary data available to FortisBC, the Application relied on secondary sources, as outlined in subsection 11.1.4. These secondary sources may also have limited reliability due to variations in the statistical data.

The Application has also been informed by recent EAs and regulatory reviews of projects along the Fraser River. Sources of information include proponent EAC applications, draft and final B.C. EAO assessment reports, Federal Review Panel EISs and final review panel reports, associated project Provincial and Federal conditions, and VFPA PER permits. These sources of information have been used to reduce some uncertainty in assessment conclusions due to the previously described Technical Boundaries.

### **11.14.4.2 Existing Conditions**

This subsection describes the existing conditions in the proposed Project Footprint and Indigenous interest-specific LAAs and RAAs within which potential effects of the proposed Project and/or cumulative effects on Snuneymuxw First Nation and its interests may occur. This subsection also describes historic and current use of the proposed Project Area by Indigenous Peoples over time, and practices in the proposed Project Footprint and Indigenous interest-specific LAAs and RAAs regarding Indigenous interests, including a description of how existing conditions of Indigenous interests have been affected by past projects and activities.

### **Historical Context**

In accordance with AIR subsection 11.1.2, this subsection summarizes historic use of the proposed Project Area and past use of the proposed Project Area<sup>8</sup> by Snuneymuxw First Nation over time.

Traditionally, Snuneymuxw First Nation occupied and used areas of the land and coastal waters on the east coast of Vancouver Island, from Courtenay, B.C., in the north to Sidney, B.C., and the Gulf Islands to the south. Snuneymuxw First Nation members followed seasonal rounds, travelling to the Fraser River in summer and fall for salmon runs. Snuneymuxw First Nation had a fishing village site located on the south bank of the Fraser River, upriver from the east end of Barnston Island just downstream of Fort Langley (B.C. EAO 2022b; Vogt 2020), approximately 30 km upstream of the proposed Project Site. Snuneymuxw First Nation habitation and use of the Fraser River included the fishing village and a root-gathering site at the mouth of Pitt River, approximately 25 km upstream of the proposed Project Site. Snuneymuxw First Nation members also traditionally camped on Lulu Island to fish for sturgeon and sockeye salmon, and to bargain for dried clams. Lulu Island is opposite the Fraser River from the proposed Project Site (Figure 11.14-2). Snuneymuxw First Nation continued to travel seasonally to the lower Fraser River after Colonial settlement began, particularly to work in salmon canneries (Vogt 2020).

Europeans began exploring the B.C. coast in the mid- to late 18th century. These explorers included Russian fur traders and British and Spanish explorers, followed by the Simon Fraser expedition that arrived at the mouth of the Fraser River in 1808 (Vancouver Public Library n.d.). Early European exploitation of resources in the region began with pre-industrial whaling and sealing. The pelagic sealing fleet was based in Fort Victoria, on Vancouver Island (Pendergast n.d.), and whaling occurred on a large scale in the Strait of Georgia from the late 19th century into the 1960s (Ocean Wise 2024). The arrival of Europeans in the

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<sup>8</sup> The proposed Project Area is the general area within and adjacent to the proposed Project Footprint.



region resulted in multiple smallpox epidemics that devastated Indigenous communities, facilitating the large-scale land expropriation by settlers under the new authority of the Colony of B.C., founded in 1858 (Joseph 2017; Vancouver Public Library n.d.). In the early 1850s, the authorities of the Colony of Vancouver Island were making plans to build an economy based on mining, and turned their attention to the coal deposits that existed in Snuneymuxw territory in the Nanaimo region. To access the coal deposits, the Colonial authorities negotiated a treaty with the Sarlequun Peoples, the ancestors of Snuneymuxw First Nation members. The Snuneymuxw descendants of the Snuneymuxw Sarlequun Treaty of 1854 state that the Colonial authorities, and later the governments of Canada and B.C., have denied the Snuneymuxw Sarlequun Treaty of 1854 and/or ignored the terms of the treaty since shortly after it was signed (Snuneymuxw First Nation n.d.).

Snuneymuxw First Nation shared information regarding the Snuneymuxw Sarlequun Treaty of 1854, which included commitments to identify and protect Snuneymuxw historic villages, cultivated fields, waterways, harvesting, and gathering from settlement and encroachment. The Notice of Intent to Participate as a participating Indigenous nation indicates that the Snunemuxw Sarlequun Treaty of 1854 was not implemented and villages, fields, and harvesting areas were not surveyed. Despite the efforts of Snuneymuxw First Nation to address the failure to survey these areas, much of their traditional territory and marine areas were alienated to settlers by the Crown. Snuneymuxw First Nation states that the proposed Project Area falls within their traditional territory, including Snuneymuxw fisheries and historic fishing villages, and "has the potential to affect these sites along with cultural activities, traditional uses, and access to water-based activities along the lower Fraser River" (Wyse, pers. comm. 2021).

The first permanent European settlement in the region was Fort Langley, which was established by the Hudson's Bay Company in 1827, and was originally located near the mouth of the Fraser River. The fort was a trading post for furs, lumber, salmon, and other resources, and trading was extensively carried out with Indigenous Peoples in the region (Parks Canada n.d.). An 1849 chart of the Fraser River indicates a Snuneymuxw First Nation village adjacent to Barnston Island (Vogt 2020) near Fort Langley.

In the 1860s, early settlers began to arrive from Europe and Asia in the Fraser River delta. Settler communities, including Ladner and Steveston, grew with farming and fishing activities (Delta Farmland & Wildlife Trust n.d.; Richmond and Ross 2009). At the same time, Indigenous nations were alienated from and deprived of their lands and faced limited fresh water supplies, overcrowded housing, and inadequate sanitation systems when they were forced on to reserves (Royal Commission on Indian Affairs for the Province of B.C. 1912-1915 n.d.; Ruttly and Sullivan 2010). The Fraser River delta agricultural areas were continually expanded, exacerbating the encroachment on Indigenous lands by extensive diking, draining of lands, and construction of irrigation ditches.

The effects of these historical resource and industrial developments, including the conversion of Indigenous common property to non-Indigenous private property, has been profound and far-reaching for Indigenous Peoples in the proposed Project Area. Importantly, the loss of and alienation from land is considered to be among the most important factors affecting cultural stress within Indigenous communities (Bartlett 2003). European colonialization resulted in environmental dispossession through resource and industrial developments and led to loss of land and access to life-sustaining resources for Indigenous Peoples, and is one of the central reasons for the decline in Indigenous well-being (Richmond and Ross 2009).

An overview of past and present project activities that have affected existing conditions of Snuneymuxw First Nation's ability to exercise Indigenous interests include the following (FortisBC 2022):

- Settlement and urban development reducing lands available for harvesting and gathering
- Railway developments and expansions that have had adverse effects to Fraser River fish and fish habitat, and that have increased the loss of territory and access to cultural use areas because of associated tenures and land ownership
- Industrial accidents resulting in adverse effects on fish and fish habitat, wildlife and wildlife habitat, water quality and quantity, settlements and travelways, plants, and plant species
- Growth of the Port of Vancouver and ongoing development along the Fraser River and in the Salish Sea adversely affecting marine and aquatic life and habitat, and wildlife and wildlife habitat that used and migrated through these riparian areas
- Pollution and contamination of air, water, and land due to industrial, commercial, and residential development and increased population
- Depletion of resources by industry, including forestry, commercial fisheries, mining, and other resource extraction
- Government policies and regulations, such as DFO fishing management regulations and restrictions

### **Snuneymuxw First Nation Use of Proposed Project Area**

This section summarizes present use of the proposed Project Area by Snuneymuxw First Nation and practices related to the proposed Project.

Snuneymuxw First Nation traditionally camped on Lulu Island (across the Fraser River from the proposed Project) to fish, harvest berries, and trade, and currently conducts fisheries for sockeye, with licenses in the Fraser River within Fisheries Management Area 29 (Paige, pers. comm. 2024c). FortisBC understands that Snuneymuxw First Nation currently uses the proposed Project Footprint and LAA for additional cultural purposes, though Snuneymuxw First Nation has not identified cultural sites or areas that its members are currently using in these areas. Snuneymuxw First Nation intends to provide further information to FortisBC on these sites and areas when such information becomes available

The proposed Project Footprint is located predominately on private property owned by FortisBC within an existing Tilbury LNG facility on Tilbury Island in the Tilbury Industrial Park adjacent to the Fraser River in Delta, B.C. (Figure 11.14-1). Snuneymuxw First Nation has noted that it was not consulted on the previous development on Tilbury Island as it occurred during historic decision-making processes that did not consider Aboriginal and pre-confederate treaty rights, territories, and connections to the land. Adjacent areas along the southern arm of the Fraser River in Delta, B.C., and across the river in Richmond, B.C., are regionally designated for light and heavy industrial and commercial uses (Metro Vancouver 2011). The proposed Project Footprint was previously cleared of natural forest resulting in little to no native soils remaining in place, but is vegetated and has been heavily disturbed, with the majority of the proposed Project Footprint being used for industrial purposes. The existing Tilbury LNG facility consists of gravel (60 percent) and paved (40 percent) areas, existing infrastructure, and equipment laydown areas supporting little plant life with very little to no habitat value for wildlife. The vegetation within the proposed Project Footprint is mostly limited to ditch lines and spoil piles and is dominated by non-native and invasive plant species. Public access to the proposed Project Site is limited, although there is currently public use of the dike to the north of the proposed Project Site along the Fraser River.

A portion of the proposed Project Footprint is located on the Fraser River in Provincial Crown land at the location of an existing dock (legacy) where the MOF was to be constructed for the proposed Project.

The piles and dock will be removed by a predecessor project (either the T1B or the TMJ project); however, the earthworks will remain. As stated above, in response to the concerns raised during engagement, FortisBC committed to no barge deliveries as an avoidance mitigation measure to address concerns about effects to the Fraser River, the Salish Sea, and the Southern Resident Killer Whale population, A MOF will not be required by the proposed Project during any phase.

The following subsections describe the existing conditions for Snuneymuxw First Nation's Indigenous interests according to information available to FortisBC at the time of writing. These existing conditions are informed by the existing conditions for linked VCs summarized in subsection 11.1.13.

## Harvesting and Subsistence Activities

The following subsections describe the existing conditions for Snuneymuxw First Nation's Indigenous interests related to harvesting and subsistence activities.

### *Fishing*

Snuneymuxw First Nation has relied on the marine resources of their territory since time immemorial, harvesting salmon of all species, as well as halibut, rockfish, herring, and groundfish throughout the Salish Sea and in the Nanaimo River. Snuneymuxw First Nation members travelled across the Salish Sea, including to and from their fishing grounds in the Fraser River, where they harvested salmon and engaged in economic activities through trade and commerce. The Fraser River fisheries were a critical component of the traditional Snuneymuxw First Nation seasonal round during the 19th century (Vogt 2020).

Snuneymuxw First Nation descended from five house groups, members of which resided on the Fraser River, at the fishing village near Barnston Island (near present-day Fort Langley). Snuneymuxw First Nation also had a salmon fishing site upstream of Fort Langley. Snuneymuxw First Nation travelled to the Fraser River between June and October for sockeye salmon fishing. From the fishing village site on the Fraser River, Snuneymuxw First Nation moved to the Nanaimo River on Vancouver Island in autumn for the chum salmon run and then wintered near Departure Bay; spent the spring on Gabriola Island and in False Narrows, harvesting clams and camas, fishing, and hunting marine mammals; and then returned to the Fraser to meet the next sockeye run. Snuneymuxw First Nation members also traditionally used a camp on Lulu Island to fish for sturgeon and sockeye salmon, and to trade for dried clams. Lulu Island is opposite the Fraser River from the proposed Project Site (Vogt 2020).

Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed Project Area falls within their traditional territory, including Snuneymuxw fisheries and "has the potential to affect these sites" (Wyse, pers. comm. 2021). Snuneymuxw First Nation continues to depend on marine ecosystems for physical sustenance and actively practise their Snuneymuxw Sarlequun Treaty of 1854 Rights to hunt and fish. Snuneymuxw First Nation currently conducts fisheries for sockeye for FSC purposes, under licenses in Fisheries Management Area 29, located within the proposed Project Area and Harvesting and Subsistence LAA and RAA (Paige, pers. comm. 2024c; Snuneymuxw First Nation 2018).

Existing conditions at and directly adjacent to the proposed Project Footprint will likely be altered by work occurring outside the scope of the proposed Project. Prior to the commencement of construction of the proposed Project, existing conditions along the foreshore of Tilbury Island will likely be altered by construction activities associated with two separate projects. These projects, which are anticipated to be constructed and in operation prior to the proposed Project and that may cause foreshore alteration in the foreshore area adjacent to the existing facility site, as follows:

1     ▪ T1B expansion project has been authorized by the Province of B.C. through B.C. Order-In-Council  
2       (749/2014) Direction No. 5 to the BCUC under the B.C. *Utilities Commission Act* and will involve  
3       increasing LNG production capacity and power supply.. T1B facilities are currently in the early design and  
4       engineering stages, with the earliest in-service date planned for 2027 to 2028. Prior to the  
5       commencement of construction of the proposed Project, vegetation within the existing facility site will  
6       be removed by construction activities associated with the existing Tilbury facility and the Tilbury Phase  
7       1B expansion (T1B) project.

8     ▪ The Tilbury Jetty Limited Partnership's TMJ project may require development of the area to provide  
9       temporary bunkering capacity and a construction dock. The proposed TMJ-related developments  
10      along the foreshore area are described in the TMJ project EA Application materials and include a dock  
11      at the T1B project.

12    The T1B project, the TMJ project, and the proposed Project are undergoing or will undergo independent  
13    authorizations or regulatory reviews of proposed infrastructure and activities.

14    The Harvesting and Subsistence Activities LAA boundary is near the Pattullo Bridge over the Fraser River,  
15    located approximately 12 km upstream of the proposed Project. According to the DFO (n.d.), Indigenous  
16    fisheries occur in three sections of the lower Fraser River: below Port Mann Bridge; from Port Mann Bridge  
17    to Mission, B.C.; and from Mission, B.C., to Sawmill Creek. A Snuneymuxw First Nation traditional fishing  
18    village is located near Barnston Island, between the Port Mann Bridge and Mission, B.C. Current and past  
19    DFO harvest reports do not indicate that Snuneymuxw First Nation fishes between the Port Mann Bridge  
20    and Mission, B.C., or the other two sections of the lower Fraser River. Snuneymuxw First Nation notes that  
21    alienation from the area due to colonialism has likely contributed to DFO's data set, and notes that  
22    Snuneymuxw First Nation currently conducts fisheries for sockeye in Fisheries Management Area 29, which  
23    is located along the Fraser River within the proposed Project Area and Harvesting and Subsistence LAA  
24    and RAA (Paige, pers. comm. 2024a; 2024c).

25    Snuneymuxw First Nation intends to provide further information to FortisBC regarding current fishing sites  
26    in the proposed Project Area when the information becomes available.

### 27    ***Plant Gathering***

28    Historically, Snuneymuxw First Nation members harvested wapato (Indian potato, a root plant) at a  
29    gathering site at the mouth of Pitt River, approximately 25 km upstream of the proposed Project.  
30    The wapato harvest would mark the close of the resource-harvesting season on the Fraser River.  
31    Snuneymuxw First Nation also harvested blueberries and cranberries on Lulu Island (Vogt 2020).  
32    Snuneymuxw First Nation continues to gather seaweed, plants, and medicines from coastal and intertidal  
33    areas (Snuneymuxw First Nation 2018).

34    The proposed Project Footprint was previously cleared of natural forest and has been heavily disturbed,  
35    with the majority of the proposed Project Footprint being used for industrial purposes. The proposed  
36    Project Footprint is predominately located on a brownfield site on the Property for the existing Tilbury  
37    LNG facility on Tilbury Island, within the Tilbury Industrial Park, adjacent to the Fraser River in Delta, B.C.  
38    The existing Tilbury LNG facility consists of gravel (60 percent) and paved (40 percent) areas, existing  
39    infrastructure, and equipment laydown areas that support little plant life. Vegetation within the proposed  
40    Project Footprint is mostly limited to ditch lines and spoil piles, and is dominated by non-native and  
41    invasive plant species. As stated above, this vegetation will be removed at the existing facility site by  
42    existing projects and will not be present prior to construction of the proposed Project.

43    Public access to the proposed Project Site is limited; although, currently, there is public use of the dike to  
44    the north of the proposed Project Site along the Fraser River. North of the existing FortisBC facility and

within the proposed footprint of the MOF, there is an existing dock that extends out into the Fraser River. The piles and dock will be removed before commencement of the T1B project expansion; however, the earthworks will remain.

Vegetation desktop reviews were conducted to characterize existing conditions within the LAA and RAA, including the incorporation of Indigenous Knowledge and Traditional Use Knowledge that Indigenous nations have provided to FortisBC or have granted permission for FortisBC to use existing information sources. Indigenous Knowledge and Traditional Use Knowledge provide context of historical conditions of the terrestrial biophysical VCs on Tilbury Island and the surrounding area, and identify existing culturally important vegetation and wildlife species used in traditional practices. In addition, vegetation and wetland field studies were conducted by FortisBC in 2021, both inside and outside the proposed Project Footprint. Subsection 11.13 provides a summary of results.

Vegetated areas within the proposed Project Footprint include the riparian area on the banks of Tilbury Slough along the southeast perimeter of the proposed Project Footprint. Culturally important plant species were observed within the proposed Project Footprint during field studies conducted by FortisBC. In addition to the previously listed culturally important plant species observed within the proposed Project Footprint, culturally important plant species were observed within the Vegetation LAA outside of the proposed Project Footprint (see subsection 11.1.13 for a list of species).

Snuneymuxw First Nation has identified an interest in vegetation mitigation measures and restoration (Table 11.14-8). Snuneymuxw First Nation will have the opportunity to review the assessment of potential proposed Project effects on Vegetation (subsection 7.7) in the Application, including mitigation measures. Snuneymuxw First Nation has noted that European colonialization resulted in environmental dispossession through resource and industrial developments and led to loss of land and access to life-sustaining resources for Indigenous Peoples. This is one of the central reasons for the decline in Indigenous well-being, and likely contributed to Snuneymuxw First Nation's current use of the area (Richmond and Ross 2009; Paige, pers. comm. 2024a). Although FortisBC understands that Snuneymuxw has gathering sites in the Project Area, FortisBC does not have information regarding specific Snuneymuxw First Nation current gathering sites and areas in the proposed Project Footprint or within the Harvesting and Subsistence Activities LAA (B.C. EAO 2022b).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current gathering sites and areas in the proposed Project Area when the information becomes available.

### ***Hunting***

The proposed Project Footprint was previously cleared of natural forest and has been heavily disturbed, with the majority of the proposed Project Footprint being used for industrial purposes. The proposed Project Footprint is predominately located on the Property for the existing Tilbury LNG facility on Tilbury Island, within the Tilbury Industrial Park, adjacent to the Fraser River in Delta, B.C. The existing Tilbury LNG facility consists of gravel (60 percent) and paved (40 percent) areas, existing infrastructure, and equipment laydown areas with very little to no habitat value for wildlife. Public access to the proposed Project Site is limited; although, currently, there is public use of the dike to the north of the proposed Project Site along the Fraser River.

Wildlife and Wildlife Habitat desktop reviews were conducted to characterize existing conditions within the LAA and RAA, including the incorporation of Indigenous Knowledge and Traditional Use Knowledge that Indigenous nations have provided to FortisBC or have granted permission for FortisBC to use existing information sources. Indigenous Knowledge and Traditional Use Knowledge provide context of historical conditions of the terrestrial biophysical VCs on Tilbury Island and the surrounding area, and identify



existing culturally important wildlife species used in traditional practices. In addition, Wildlife and Wildlife Habitat field studies were conducted by FortisBC in 2021, in the Wildlife and Wildlife Habitat LAA, and included a Wildlife and Wildlife Habitat assessment, a breeding bird survey, an amphibian survey, incidental wildlife observations, and barn owl surveys. Subsection 11.13 provides a summary of results.

The majority of wildlife habitat within the proposed Project Wildlife and Wildlife Habitat LAA has been altered by development, as it is situated within the Tilbury Industrial Park, an industrialized portion of the Fraser River. Upland habitat is predominately covered by hard, anthropogenic surfaces (that is, paved and gravel areas currently used for industrial purposes). Due to the existing industrial developments on Tilbury Island, the Wildlife and Wildlife Habitat LAA lacks high-quality foraging and nesting habitat for migratory and resident bird species, such as passerines, raptors, shorebirds, seabirds, and waterfowl or waterbirds. Wildlife use is primarily limited to the small, fragmented riparian areas on the banks of Tilbury Slough that provide habitat for a variety of wildlife species adapted to urban environments (such as, coyotes, raccoons, skunks, rabbits, waterfowl, and songbirds). Current conditions within and adjacent to the proposed Project Site are more suitable to species that are very tolerant of industrial development (FortisBC 2022). Culturally important species observed during the wildlife field surveys included green-winged teal, lesser scaup, Canada goose, mallard, bald eagle, and beaver (evidence of activity).

Potential effects to hunting due to the proposed Project have not been expressed as an issue of key concern by Snuneymuxw First Nation (Table 11.14-8). Furthermore, the discharge of firearms is not permitted on Tilbury Island, therefore hunting cannot occur within or adjacent to the proposed Project Footprint (B.C. MFLNRO 2015). Snuneymuxw First Nation has noted that European colonialization resulted in environmental dispossession through resource and industrial developments and led to loss of land and access to life-sustaining resources for Indigenous Peoples. This is one of the central reasons for the decline in Indigenous well-being, and has likely contributed to Snuneymuxw First Nation's current use of the area (Richmond and Ross 2009; Paige, pers. comm. 2024a). Although FortisBC understands that Snuneymuxw First Nation has hunting sites in the Project Area, FortisBC does not have information regarding specific Snuneymuxw First Nation current hunting sites and areas in the proposed Project Footprint or within the Harvesting and Subsistence Activities LAA (B.C. EAO 2022b).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting sites and areas in the proposed Project Area when the information becomes available.

### **Cultural Use Sites and Areas**

Snuneymuxw First Nation has stated that the relationship to its land and waters goes far beyond economic and physical reliance; the very identity of Snuneymuxw as a people is intimately connected to the health and integrity of its territory and resources. For example, the killer whales, in particular SRKW, that inhabit the Salish Sea have a special place in Snuneymuxw culture. They are considered by Snuneymuxw First Nation Peoples to be relatives, and they play an important role as intermediaries between the living and spirit worlds (Snuneymuxw First Nation 2018).

Snuneymuxw First Nation continues to depend on marine ecosystems for spiritual sustenance. As indicated above in the Fishing subsection, Snuneymuxw First Nation conducts fisheries for sockeye under licences for social and ceremonial purposes, including along the Fraser River within the Project Area (Snuneymuxw First Nation 2018; Paige, pers. comm. 2024c).

The proposed Project Footprint is predominately located on the Property for the existing Tilbury LNG facility on Tilbury Island, within the Tilbury Industrial Park, adjacent to the Fraser River in Delta, B.C. Snuneymuxw First Nation has indicated to FortisBC that it uses the proposed Project Footprint and the LAA for spiritual and ceremonial activities, though the Nation notes that alienation from the area due to



colonialism has adversely impacted this use (Paige, pers. comm. 2024a). Potential effects to spiritual and ceremonial activities due to the proposed Project have not been expressed as an issue of key concern by Snuneymuxw First Nation (Table 11.14-8).

Snuneymuxw First Nation indicated in its Notice of Intent to participate in the proposed Project Application that the proposed Project Area falls within Snuneymuxw First Nation traditional territory, including the former historic village site on the south bank adjacent to Barnston Island (approximately 30 km upstream of the proposed Project). Snuneymuxw First Nation stated concern that the proposed Project has the potential to affect this site, along with cultural activities and traditional uses (Wyse, pers. comm. 2021).

Records from the early 1800s document the presence of Snuneymuxw First Nation members on the Fraser River. This includes the permanent village site described above, a salmon fishing site upriver of the post, and a root (wapato) gathering site at the mouth of the Pitt River (Vogt 2020). Though the village was eventually granted to other Indigenous nations in the 1860s by the mainland Colony of B.C., members of Snuneymuxw First Nation continued to travel to the Fraser River during the Colonial and post-Confederation period in connection with work at the salmon canneries (Vogt 2020).

The proposed Project Footprint is predominately located on the Property within an existing Tilbury LNG facility on Tilbury Island, in the Tilbury Industrial Park, adjacent to the Fraser River in Delta, B.C. Through its Notice of Intent to Participate, Snuneymuxw First Nation identified potential effects to cultural activities and traditional uses (Wyse, pers. comm. 2021). Although FortisBC understands that Snuneymuxw has cultural use sites in the Project Area, FortisBC does not have information regarding specific Snuneymuxw First Nation current cultural use sites and areas in the proposed Project Footprint or within the Cultural Use Sites and Areas LAA (B.C. EAO 2022a). Snuneymuxw First Nation has noted that European colonialization resulted in environmental dispossession through resource and industrial developments and led to loss of land and access to life-sustaining resources for Indigenous Peoples. This is one of the central reasons for the decline in Indigenous well-being, and has likely contributed to Snuneymuxw First Nation's current use of the area (Richmond and Ross 2009; Paige, pers. comm. 2024a).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current cultural use sites and areas in the proposed Project Area when the information becomes available.

Subsection 11.1.13 provides more information about the existing conditions of the VCs linked to the Cultural Use Sites and Areas in the proposed Project Footprint and the Cultural Use Sites and Areas LAA and RAA.

## **Social and Economic Conditions**

Snuneymuxw First Nation relies on the Salish Sea and marine ecosystems for economic well-being. Snuneymuxw First Nation members are involved in shellfish aquaculture and harvest, and have licenses for herring, crab, manilla clam, butterneck clam, and littleneck clam, extending from Neck Point on Vancouver Island, B.C., to Gower Point near Gibsons, B.C. (Paige, pers. comm. 2024c). Snuneymuxw First Nation also participates in dungeness crab and prawn fisheries, which provide economic development opportunities for the nation and are an important source of work and income for members (Snuneymuxw First Nation 2018). The 2002 Memorandum of Agreement supports shellfish tenures for Snuneymuxw First Nation (Province of B.C. 2002). The tenures are located around Gabriola Island, outside of the Fraser River approximately 40 km across the Salish Sea from the proposed Project and outside of the LAA and RAA assessment boundaries. FortisBC is not aware of tenures that include the Lower Mainland extending up the Fraser River to Chilliwack, B.C., as part of Snuneymuxw First Nation traditional territory.

Subsection 11.14.2.1.5 provides detailed information on Snuneymuxw First Nation population, age characteristics, and marital status. Subsection 11.14.2.1.6 focuses on social conditions of Snuneymuxw First Nation, including detailed information on emergency services, housing, education, and community infrastructure. Subsection 11.14.2.1.7 provides an overview of Snuneymuxw First Nation employment characteristics, education, income comparisons, and employment services. Subsection 11.14.2.1.8 provides a summary of Snuneymuxw First Nation economic characteristics, including employment by industry and type of work.

Employment, training, and scholarship opportunities to Indigenous nations was expressed as an issue of concern by Snuneymuxw First Nation (Table 11.14-8).

### **Indigenous Health and Well-being**

Snuneymuxw First Nation members have stated that cultural healing comes from different Elders who are "uy' shqwalawun," which means to have a "good mind and good heart." Cultural healing suggests that, by providing healing to others, positive energy is dependent on one's 'uy' shqwalawun and may also lead to helping oneself. Cultural healing reflects Snuneymuxw First Nation values of harmony, healing, and balance (Carey 1996). Carey conducted a study on alternatives to the Canadian Justice System whereby healing would reflect Snuneymuxw cultural values and teachings. The healing process would be inclusive of values of harmony and balance.

Snuneymuxw First Nation have stated that the presence of large vessels in their traditional territory can have socio-cultural impacts, including noise and light pollution. (Snuneymuxw First Nation 2018).

Potential effects to Snuneymuxw First Nation health and well-being because of the proposed Project has been expressed as an issue of concern by Snuneymuxw First Nation (Table 11.14-5).

Subsection 11.1.13 provides summaries of the existing conditions for VCs linked to the Indigenous Health and Well-being Indigenous interest.

### **11.14.4.3 Potential Effects on Indigenous Interests**

The intent of this subsection is to provide a holistic understanding of the potential effects of the proposed Project on the Indigenous interests of Snuneymuxw First Nation.

The Application has been prepared in accordance with the AIR in which potential effects were identified from waterborne delivery (that is, barge deliveries) associated with the proposed Project and construction and of the MOF. As described in Section 1.5.5, as a result of concerns received during the Application Development phase engagement activities that occurred after the development of the AIR, the proposed Project will no longer utilize any waterborne delivery of modular components and bulk construction materials to the proposed Project Site during construction as an avoidance mitigation measure. As a result, no MOF is required for any phase of the proposed Project. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects on linked VCs.

To inform the holistic discussion of the effects assessment, this subsection provides the following:

- Identification of potential interactions of the proposed Project with Indigenous interests
- The VCs and indicators used to assess the potential effects
- Potential pathways by which the proposed Project activities could affect Indigenous interests
- Effects determined to be consequential or requiring mitigation

Anticipated interactions between proposed Project activities and Snuneymuxw First Nation Indigenous interests during construction, operation and decommissioning are shown in Table 11.14-10. Based on information shared by Snuneymuxw First Nation related to current use of the proposed Project Area (refer to discussions in subsection 11.14.5.2), and the residual effects of the proposed Project on related VCs (refer to subsection 11.1.13 for a summary and Appendix A of the Application for a list of proposed measures to mitigate effects to VCs), FortisBC anticipates that there will be some Indigenous interests or aspects of Indigenous interests that do not interact with the proposed Project activities and some Indigenous interests that will be affected during specific proposed Project phases.

Potential effect pathways by which the proposed Project activities could affect Indigenous interests are shown in Table 11.14-11. Effect pathways identify potential interactions between proposed Project activities, the relevant indicators, and potentially linked VCs, allowing for the nature of the potential effect to be assessed (that is positive versus negative and direct versus indirect). Direct effects are a result of a cause and effect relationship between the proposed Project and an Indigenous interest, whereas indirect effects result from a change that the proposed Project may cause that is one step removed from the proposed Project's activities due to complex relationships among VCs and Indigenous interests (B.C. EAO 2021). Indicators are one of the methodological tools used to identify and assess effects on Indigenous interests and are applied holistically when evaluating potential proposed Project effects. It is acknowledged that Indigenous interests are multifaceted, interrelated, and potential changes to the exercise of these interests cannot be comprehensively represented through a list of indicators. As the Indigenous interests are interrelated, some indicators listed in Table 11.14-11 are repeated for multiple effect pathways.

**Table 11.14-10. Potential Proposed Project Interactions with Snuneymuxw First Nation Indigenous Interests**

Project Phase and Activities	Interaction	Nature of Interaction and Rationale for Interaction Rating
<b>CONSTRUCTION - Water-based</b>		
Construction of the MOF Waterborne deliveries	<i>No interaction</i>	In response to engagement, the proposed Project will no longer utilize any waterborne delivery of modular components and bulk construction materials to the proposed Project Site as an avoidance mitigation measure. Therefore, a MOF will not be constructed or utilized during construction, operation, or decommissioning by the proposed Project. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.
<b>CONSTRUCTION – Land-based</b>		
Land-based ground stabilization and piling works Construction of Onshore Facilities Road transportation of construction materials and equipment	<i>Negligible interaction</i>	Negligible effect on dust (as identified in subsection 7.6), low magnitude effect on air quality along truck routes (as identified in subsection 7.2), negligible magnitude effect on atmospheric noise (as identified in subsection 7.3) during site preparations and truck transportation and low magnitude effect during construction of onshore facilities, and low residual effect to visual quality (as identified in subsection 7.11) from construction-related features, equipment, and activities are anticipated to result in a negligible effect to Indigenous interests compared to existing conditions.  Negligible to low effect on Wildlife and Wildlife Habitat (as identified in subsection 7.8) and Vegetation (as identified in subsection 7.7) are anticipated to result in no effects on availability and presence of resources for harvesting compared to existing conditions.

**Table 11.14-10. Potential Proposed Project Interactions with Snuneymuxw First Nation Indigenous Interests**

Project Phase and Activities	Interaction	Nature of Interaction and Rationale for Interaction Rating
<b>OPERATION – Land-based</b>		
Natural gas processing and liquefaction	<i>Negligible interaction</i>	<p>Negligible effects on air quality from increases in NO<sub>2</sub>, CO, PM<sub>2.5</sub>, PM<sub>10</sub>, and VOCs and low magnitude effects on air quality from SO<sub>2</sub> are anticipated to result in a negligible effect to Indigenous interests compared to existing conditions.</p> <p>Low magnitude effect on atmospheric noise (as identified in subsection 7.3) is not anticipated to be detectable to Indigenous users compared to existing conditions.</p> <p>Low effect to visual quality (as identified in subsection 7.11) from construction-related features, equipment, and activities is anticipated to result in a negligible effect to Indigenous interests compared to existing conditions.</p>
Malfunctions and Accidents during operation	<i>Potential interaction</i>	Refer to Section 9 (Malfunctions and Accidents)
<b>DECOMMISSIONING – Land-based</b>		
Removal of Onshore Facilities	<i>Negligible interaction</i>	<p>Negligible effects on dust (as identified in subsection 7.6) air quality (as identified in subsection 7.2), and atmospheric noise (as identified in subsection 7.3) during site decommissioning and truck transportation, and low magnitude residual effect to visual quality (as identified in subsection 7.11) from decommissioning-related features, equipment, and activities are anticipated to result in a negligible effect to Indigenous interests compared to existing conditions.</p> <p>Negligible to low magnitude effects on Wildlife and Wildlife Habitat (as identified in subsection 7.8) and Vegetation (as identified in subsection 7.7) are anticipated to result in no effects on availability and presence of resources for harvesting compared to existing conditions.</p>

Table 11.14-11. Snuneymuxw First Nation’s Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Harvesting and Subsistence Activities	Changes to the experience and preferences around the practice of harvesting rights <ul style="list-style-type: none"><li>Loss or alteration of habitat supporting harvested wildlife, fish, bird, or plant species including species of cultural and medicinal importance</li><li>Change in surface water quality or quantity (turbidity, hydraulic changes)</li><li>Sensory disturbances (such as, noise, odour, dust, visual landscape)</li><li>Effects to Snuneymuxw First Nation harvesting rights as a result of Project-related changes in fish, wildlife, and vegetation</li></ul>	<ul style="list-style-type: none"><li>Quality and quantity of habitat for harvested species</li><li>Availability, distribution, and abundance of harvested species</li><li>Quality of harvested species</li><li>Surface water quality and quantity</li><li>Qualitative changes in the experience of exercising Indigenous interests, associated with changes to the following:<ul style="list-style-type: none"><li>Noise and vibration</li><li>Air Quality</li><li>Odour</li><li>Visual resources</li><li>Dust</li></ul></li></ul>	<ul style="list-style-type: none"><li>Air Quality</li><li>Acoustics</li><li>Surface Water</li><li>Ground Water</li><li>Soil</li><li>Vegetation</li><li>Wildlife and Wildlife Habitat</li><li>Fish and Fish Habitat</li><li>Land and Resource Use</li></ul>	Proposed mitigation measures to reduce or eliminate potential effects to VCs identified in subsections 7.2 Air Quality, 7.3 Acoustic, 7.4 Surface Water, 7.5 Groundwater, 7.6 Soil, 7.7 Vegetation, 7.8 Wildlife and Wildlife Habitat, 7.9 Fish and Fish Habitat, 7.11 Land and Resource Use.	No interaction	N/A
	Effects to Snuneymuxw First Nation hunting, fishing, trapping, marine harvesting, and gathering rights in the proposed Project Area <ul style="list-style-type: none"><li>Changes to harvesting methods and practices (such as timing and seasonality)</li><li>Changes to the current use of lands and resources for traditional purposes</li><li>Alteration of harvesting-based livelihoods</li></ul>	<ul style="list-style-type: none"><li>Change in harvesting effort (reported time, expense, and level of difficulty required to travel for harvesting purposes)</li><li>Change in harvesting success (frequency of successful harvest, quantity of harvested species or materials available for FSC purpose)</li><li>Areas with access restrictions</li><li>Quality and quantity of habitat for harvested species</li><li>Availability, distribution, and abundance of harvested species</li><li>Quality of harvested species</li><li>Timing or seasonal round</li></ul>			No interaction	N/A
	Effects to the accessibility and availability of traditional lands and resources <ul style="list-style-type: none"><li>Changes in the ability to travel to or through current use areas</li></ul>	<ul style="list-style-type: none"><li>Areas with access restrictions</li><li>Accessible travelways</li><li>Use of the Fraser River and marine environment for navigation</li></ul>			No interaction	N/A
	Effects to the Snuneymuxw Sarlequun Treaty of 1854 right, defined in the treaty as “fisheries as formerly” <ul style="list-style-type: none"><li>Changes to harvesting methods and practices (such as timing and seasonality)</li><li>Changes to the current use of lands and resources for traditional purposes</li><li>Alteration of harvesting-based livelihoods</li></ul>	<ul style="list-style-type: none"><li>Change in harvesting effort (reported time, expense, and level of difficulty required to travel for harvesting purposes)</li><li>Change in harvesting success (frequency of successful harvest, quantity of harvested species or materials available for FSC purpose)</li><li>Areas with access restrictions</li><li>Quality and quantity of habitat for harvested species</li><li>Availability, distribution, and abundance of harvested species</li><li>Quality of harvested species</li><li>Timing or seasonal round</li></ul>			No interaction	N/A

Table 11.14-11. Snuneymuxw First Nation’s Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Cultural Use Sites and Areas	Effects on cultural heritage and structures, sites, or things of historical, archaeological, paleontological, or architectural value <ul style="list-style-type: none"><li>Effects to cultural sites including Storied Places, habitation sites, Place Names, and archaeological sites along the south arm of the Fraser River, Tilbury Island, and Lulu Island.</li><li>Effects of proposed Project activities on cultural/archaeological resources.</li><li>Changes to the experience of using cultural sites and areas.</li></ul>	Disturbance or alteration of sites and areas of cultural use, including sites of historical importance and archaeological importance, such as: <ul style="list-style-type: none"><li>Use of sites and areas of cultural use</li><li>Participation in communal activities</li><li>Cultural practices, customs, beliefs, and values associated with cultural sites</li><li>Qualitative changes in the experience of exercising Indigenous interest, associated with changes to the following:<ul style="list-style-type: none"><li>Noise and vibration</li><li>Air Quality</li><li>Acoustics</li><li>Odour</li><li>Visual resources</li><li>Dust</li></ul></li><li>Accessible travelways</li><li>Use of the Fraser River and marine environment for navigation</li><li>Areas with access restrictions</li></ul>	<ul style="list-style-type: none"><li>Land and Resource Use</li><li>Archaeological and Heritage Resources</li><li>Culture</li><li>Air Quality</li><li>Acoustics</li></ul>	Proposed mitigation measures to reduce or eliminate potential effects to VCs identified in subsections 7.2 Air Quality, 7.3 Acoustic, 7.11 Land and Resource Use, 7.13 Archaeological and Heritage Resources, and 7.14 Culture.	No interaction	N/A
	Loss of access to, and disenfranchisement from, cultural sites <ul style="list-style-type: none"><li>Effects to Snuneymuxw First Nation fisheries and historic fishing villages</li><li>Changes to physical and cultural or spiritual sites or areas</li><li>Disruption or alteration of trails, travelways, navigable waterways and water bodies</li><li>Sensory disturbance (such as, noise, odour, dust, visual landscape)</li></ul>	<ul style="list-style-type: none"><li>Areas with access restrictions</li><li>Accessible travelways</li><li>Use of the Fraser River and marine environment for navigation</li><li>Disturbance or alteration of sites and areas of cultural use, including sites of historical importance and archaeological importance</li><li>Participation in communal activities</li><li>Cultural practices, customs, beliefs, and values associated with cultural sites</li></ul>			No interaction	N/A



Table 11.14-11. Snuneymuxw First Nation's Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Cultural Use Sites and Areas (continued)	Effects to cultural and spiritual practices caused by damage, or loss of, access to cultural sites and areas	<ul style="list-style-type: none"><li>▪ Qualitative changes in the experience of exercising Indigenous interest, including the following:<ul style="list-style-type: none"><li>– Noise and vibration</li><li>– Odour</li><li>– Air quality</li><li>– Visual resources</li><li>– Dust</li></ul></li><li>▪ Participation in communal activities</li><li>▪ Cultural practices, customs, beliefs, and values associated with cultural sites</li><li>▪ Participation in harvesting and subsistence activities practices, and cultural and spiritual practices</li></ul>	See previous page	See previous page	No interaction	N/A
	Effects to fisheries, historic fishing villages, and fishing rights related to proposed Project-related changes to fishing	<ul style="list-style-type: none"><li>▪ Disturbance or alteration of sites and areas of cultural use, including sites of historical importance and archaeological importance</li><li>▪ Areas with access restrictions</li><li>▪ Change in harvesting effort (reported time, expense, and level of difficulty required to travel for harvesting purposes)</li><li>▪ Change in harvesting success (frequency of successful harvest, quantity of harvested species or materials available for FSC purpose)</li><li>▪ Quality and quantity of habitat for harvested species</li><li>▪ Availability, distribution, and abundance of harvested species</li><li>▪ Quality of harvested species</li><li>▪ Timing or seasonal round</li></ul>			No interaction	N/A
Social and Economic Conditions	Changes to employment opportunities, Indigenous businesses, procurement opportunities, and Snuneymuxw First Nation Government revenue	<ul style="list-style-type: none"><li>▪ Access to proposed Project-related economic opportunities and economic equity</li><li>▪ Employment income</li><li>▪ Unemployment rate and labour force participation rate</li><li>▪ Job market and skills</li><li>▪ Type or level of education</li></ul>	<ul style="list-style-type: none"><li>▪ Culture</li><li>▪ Employment and Economy</li><li>▪ Infrastructure and Services</li><li>▪ Land and Resource Use</li><li>▪ Fish and Fish Habitat</li><li>▪ Wildlife and Wildlife Habitat</li><li>▪ Vegetation</li></ul>	Proposed mitigation measures to reduce or eliminate potential effects to VCs identified in subsections 7.7 Vegetation, 7.8 Wildlife and Wildlife Habitat, 7.9 Fish and Fish Habitat, 7.10 Employment and Economy, 7.11 Land and Resource Use, 7.12 Infrastructure and Services, and 7.14 Culture.	Positive	Direct
	Effects on Snuneymuxw First Nation's future aspirations for sites or areas surrounding the proposed Project	<ul style="list-style-type: none"><li>▪ Proposed Project effects align or conflict with Indigenous nation plans, such as economic development, land use, language and culture, and reclamation</li></ul>			No interaction	N/A
	Effects on Snuneymuxw First Nation's ability to improve social and economic conditions	<ul style="list-style-type: none"><li>▪ Proposed Project effects align or conflict with Indigenous nation plans, such as economic development, land use, language and culture, and reclamation</li></ul>			Positive	Direct

Table 11.14-11. Snuneymuxw First Nation’s Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Social and Economic Conditions (continued)	Effects on commercial and noncommercial fishing, hunting, trapping, and gathering, and cultural or ceremonial activities and practices, including the following: <ul style="list-style-type: none"><li>▪ Effects to Snuneymuxw First Nation fishing rights as a result of proposed Project-related changes to fishing</li><li>▪ Effects on intercommunity relations and trade</li></ul>	<ul style="list-style-type: none"><li>▪ Harvesting effort (reported time, expense, and level of difficulty required to travel for harvesting purposes)</li><li>▪ Harvesting success (frequency of successful harvest and quantity of harvested species or materials available for FSC purpose)</li><li>▪ Individual, household, or communal income or financial value of noncommercial harvest</li><li>▪ Participation in intercommunity activities</li><li>▪ Amount, type, or frequency of harvested materials traded between communities</li></ul>	See previous page	See previous page	No interaction	N/A
	Effects on infrastructure and services	<ul style="list-style-type: none"><li>▪ Access to, as well as quality and availability of, the following:<ul style="list-style-type: none"><li>– Health care and social services facilities</li><li>– Emergency response services</li><li>– Community recreational facilities</li><li>– Educational services and facilities</li><li>– Transportation infrastructure</li></ul></li></ul>			No interaction	N/A
Indigenous Health and Well-being	Effects on the quality, quantity, and availability of harvested country foods Effects on the value and perceived quality of country foods	<ul style="list-style-type: none"><li>▪ Participation in harvesting and subsistence activities practices, and cultural and spiritual practices</li><li>▪ Participation in communal activities</li><li>▪ Cultural practices, customs, beliefs, and values associated with cultural sites</li><li>▪ Well-being indices</li><li>▪ Qualitative changes in the experience of exercising Indigenous interest, including the following:<ul style="list-style-type: none"><li>– Noise and vibration</li><li>– Odour</li><li>– Air quality</li><li>– Visual resources</li><li>– Dust</li></ul></li></ul>	<ul style="list-style-type: none"><li>▪ Harvesting and Subsistence Activities</li><li>▪ Cultural Use Sites and Areas</li><li>▪ Human Health</li><li>▪ Air Quality</li><li>▪ Acoustics</li><li>▪ Surface Water</li><li>▪ Groundwater</li><li>▪ Fish and Fish Habitat</li></ul>	Proposed mitigation measures to reduce or eliminate potential effects to VCs identified in subsections 7.2 Air Quality, 7.3 Acoustic, 7.4 Surface Water, 7.5 Groundwater, 7.9 Fish and Fish Habitat, 7.15 Human Health.	No interaction	N/A
	Effects on air quality, noise, and water quality	<ul style="list-style-type: none"><li>▪ Air quality</li><li>▪ Drinking water quality</li><li>▪ Recreational water quality</li><li>▪ Noise</li></ul>			No interaction	N/A

Table 11.14-11. Snuneymuxw First Nation’s Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Indigenous Health and Well-being (continued)	Effects on health and well-being from the effects to traditional ways of life and to cultural sites	<ul style="list-style-type: none"><li>▪ Participation in harvesting and subsistence activities practices, and cultural and spiritual practices</li><li>▪ Participation in communal activities</li><li>▪ Cultural practices, customs, beliefs, and values associated with cultural sites</li><li>▪ Well-being indices</li><li>▪ Qualitative changes in the experience of exercising Indigenous interest, including the following:<ul style="list-style-type: none"><li>– Noise and vibration</li><li>– Odour</li><li>– Air quality</li><li>– Visual resources</li><li>– Dust</li></ul></li><li>▪ Accessible travelways</li><li>▪ Use of the Fraser River and marine environment for navigation</li><li>▪ Areas with access restrictions</li></ul>	See previous page	See previous page	No interaction	N/A
Cultural Continuation	Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to the experiences of being on the land (such as changes in air quality, noise exposure, and effects of vibrations from blasting or other activities)	<ul style="list-style-type: none"><li>▪ Qualitative changes in the experience of exercising Indigenous interests, associated with changes to the following:<ul style="list-style-type: none"><li>– Noise and vibration</li><li>– Odour</li><li>– Visual resources</li><li>– Dust</li></ul></li></ul>	<ul style="list-style-type: none"><li>▪ Harvesting and Subsistence Activities</li><li>▪ Cultural Use Sites and Areas</li><li>▪ Indigenous Health and Well-being</li><li>▪ Social and Economic Conditions</li></ul>	Proposed mitigation measures identified in subsections 7.2, Air Quality; 7.3, Acoustic; 7.4, Surface Water; 7.5, Groundwater; 7.11, Land and Resource Use; 7.7, Vegetation; 7.8, Wildlife and Wildlife Habitat; and 7.9, Fish and Fish Habitat; Archaeological and Heritage Resources; and 7.14, Culture.	No interaction	N/A
	Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to current and future availability and quality of country foods (traditional foods)	<ul style="list-style-type: none"><li>▪ Participation in harvesting and subsistence activities, and cultural and spiritual practices</li><li>▪ Quality, quantity, and availability of country foods</li><li>▪ Accessible travelways</li><li>▪ Use of the Fraser River and marine environment for navigation</li><li>▪ Areas with access restrictions</li></ul>	<ul style="list-style-type: none"><li>▪ Air Quality</li><li>▪ Acoustics</li><li>▪ Wildlife and Wildlife Habitat</li><li>▪ Fish and Fish Habitat</li><li>▪ Vegetation</li><li>▪ Land and Resource Use</li></ul>		No interaction	N/A
	Disconnection from cultural heritage due to changes to sense of place and identity due to changes in accessibility and real and perceived disturbance of the environment.	<ul style="list-style-type: none"><li>▪ Participation in communal activities</li><li>▪ Cultural practices, customs, beliefs, and values associated with cultural sites</li><li>▪ Well-being indices</li></ul>			No interaction	N/A

Table 11.14-11. Snuneymuxw First Nation's Indigenous Interests – Potential Proposed Project Effect Pathways and Identified Interactions

Indigenous Interests	Potential Effect Pathways	Indicators	Linkages to other VCs or Indigenous Interests	Proposed Mitigation Measures to Reduce or Eliminate Potential Effects to VCs (see Appendix A for full list)	Nature of Interaction and Potential Effect	
					No interaction, Negligible interaction, Potential Interaction (Negative or Positive)	Direct or Indirect
Cultural Continuation (continued)	Disconnection from cultural heritage due to interruption of the use of travelways, navigable waterways, and water bodies	<ul style="list-style-type: none"><li>▪ Participation in harvesting and subsistence activities, and cultural and spiritual practices</li><li>▪ Accessible travelways</li><li>▪ Use of the Fraser River and marine environment for navigation</li><li>▪ Areas with access restrictions</li></ul>	See previous page	See previous page	No interaction	N/A
Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights	<ul style="list-style-type: none"><li>▪ Changes to Snuneymuxw First Nation's cultural traditions, laws, and governance systems that inform how they exercise their Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights</li><li>▪ Effects on the ability to use, develop, and control traditional land, territories, and resources</li><li>▪ Effects on the ability to implement Indigenous laws, customs, and protocols</li><li>▪ Changes to participation in decision making in matters that affect Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights in the proposed Project Site</li><li>▪ Changes to ongoing conservation efforts to restore important fish species and habitat</li><li>▪ Changes in the ability to engage in the stewardship of lands and resources</li></ul>	<ul style="list-style-type: none"><li>▪ Alignment or conflict of proposed Project effects with Indigenous nation laws, customs, protocols, conservation, and stewardship activities</li><li>▪ Alignment or conflict of proposed Project effects with Indigenous nation plans, such as economic development, land use, language and culture, and reclamation</li></ul>	<ul style="list-style-type: none"><li>▪ Harvesting and Subsistence Activities</li><li>▪ Cultural Use Sites and Areas</li><li>▪ Indigenous Health and Well-being</li><li>▪ Social and Economic Conditions</li><li>▪ Cultural Continuation</li></ul>	Proposed mitigation measures identified in subsections 7.2, Air Quality; 7.3, Acoustic; 7.4 Surface Water; 7.5, Groundwater; 7.6, Soil; 7.7 Vegetation; 7.8, Wildlife and Wildlife Habitat; 7.9, Fish and Fish Habitat; 7.11, Land and Resource Use; 7.14, Culture; and 7.15, Human Health	No interaction	N/A

The following subsections provide a rationale when an interaction was not identified between the proposed Project and Snuneymuxw First Nation Indigenous interests. When an interaction was not identified, a rationale is provided, including information regarding known use of the proposed Project Footprint and Indigenous interest-specific LAA by Snuneymuxw First Nation and anticipated residual effects to linked VCs (including relevant proposed mitigation measures for linked VCs).

For a summary of existing conditions and the residual effect conclusions of linked VCs, please refer to subsection 11.1.13. References to linked VC subsections (including TDRs) have been provided, where applicable, and further detail is available in these subsections. Proposed mitigation measures from linked VCs and the resulting potential residual effects are listed in Appendix A of the Application.

### ***Effects to Harvesting and Subsistence Activities***

The following subsections provide rationale for a lack of interaction between the proposed Project activities and Snuneymuxw First Nation harvesting and subsistence activities, including reference to available information specific to Snuneymuxw First Nation and to predicted residual effects on linked VCs, including Air Quality (subsection 7.2), Acoustic (subsection 7.3), Surface Water (subsection 7.4), Groundwater (subsection 7.5), Soil (subsection 7.6), Vegetation (subsection 7.7), Wildlife and Wildlife Habitat (subsection 7.8), Fish and Fish Habitat (subsection 7.9), and Land and Resource Use (subsection 7.11)<sup>9</sup>.

For a summary of the existing conditions and residual effects assessment conclusions of linked VCs, please refer to subsection 11.1.13. References to linked VC subsections are provided where applicable. Further detail is available in these subsections, including references to applicable TDRs. Based on the rationale provided, the potential effects of the proposed Project on Snuneymuxw First Nation harvesting and subsistence activities is not carried forward into a residual effects assessment.

Subsequent sections will provide rationale for a lack of interaction between the proposed Project and Harvesting and Subsistence activities related to potential effects on the following:

- Experience of practising harvesting rights associated with effects on the quality, quantity, and availability of resources (that is, fish, wildlife, and vegetation)
- Hunting, fishing, trapping, marine harvesting, and gathering rights in the proposed Project Area
- Accessibility and availability of traditional lands and resources

### **Changes to Experience of practising harvesting rights associated with effects on the quality, quantity, and availability of resources (that is, fish, wildlife, and vegetation)**

#### ***Experience and Preferences around the Practice of Harvesting***

The proposed Project has the potential to affect the quality of experience for people engaged in activities on public lands and waters through sensory effects from proposed Project emissions, noise, and visual changes. As described in subsection 7.11, Land and Resource Use, with the exception of a contribution to a potential perceived effect on recreational quality, no adverse effects on the daytime or nighttime visual landscape are expected as a result of the proposed Project. As described in subsection 7.11, Land and Resource Use, after the implementation of mitigation measures, changes to visual quality of the landscape could result in low-magnitude residual effects in the Land and Resource LAA or the Harvesting and

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<sup>9</sup> As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

Subsistence Activities LAA to Indigenous nation members' experience due to construction and operation of the proposed Project.

However, proposed Project activities are not expected to interact with Snuneymuxw First Nation experience and preferences around the practice of harvesting rights, including fishing, gathering, or hunting. FortisBC understands that Snuneymuxw First Nation conducts fisheries for sockeye in the Project Area under licences for social and ceremonial purposes. FortisBC also understands that Snuneymuxw First Nation has hunting and gathering sites in the Project Area and Harvesting and Subsistence LAA, though FortisBC does not have information regarding specific Snuneymuxw First Nation hunting and plant harvesting sites and areas within the proposed Project Footprint or the Snuneymuxw First Nation Harvesting and Subsistence Activities LAA. Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's current use of the area for hunting, fishing, and gathering activities (Paige, pers. comm. 2024a).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting, fishing, and gathering sites and areas in the proposed Project Area when the information becomes available.

### *Quality, Quantity, and Availability of Resources*

The following subsections provide a rationale for a lack of interaction between proposed Project activities and the quality, quantity, and availability of resources (fish, plants, wildlife).

### **Fishing**

As previously stated, Snuneymuxw First Nation has identified fishing licenses for sockeye along the Fraser River, within the Project Area and Harvesting and Subsistence LAA. Snuneymuxw First Nation has indicated that the project has the potential to interact with Snuneymuxw First Nation's fishing sites.

The proposed Project Footprint is predominately located on private property owned by FortisBC within an existing Tilbury LNG facility on Tilbury Island.

As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs including fish and fish habitat. After the implementation of mitigation measures, effects to fish and fish habitat are avoided.

The proposed Project is not expected to interact with Tilbury Slough, avoiding direct disturbance of that habitat. Proposed Project interaction with the slough will be limited to contributing stormwater drainage from the proposed Project Footprint and adjacent properties via Delta stormwater outlets.

Potential indirect effects from changes in Surface Water (subsection 7.4) to Fish and Fish Habitat during proposed Project operation have been assessed. The potential for acidification and eutrophication of fish habitat during proposed Project operation due to changes in air quality from SO<sub>x</sub> and oxides of nitrogen NO<sub>x</sub> emissions operation have been assessed (subsection 7.2).

FortisBC considered the following key factors in predicting residual effects on Fish and Fish Habitat:<sup>10</sup>

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<sup>10</sup> Refer to subsection 11.1.13 for a summary of the Fish and Fish Habitat existing conditions and the results of the Fish and Fish Habitat residual effects assessment, including a discussion of any VCs linked to the Fish and Fish Habitat assessment and applicable proposed mitigation measures.

- Subsection 7.9, Fish and Fish Habitat, has considered Indigenous nation concerns with the effects of Project-related changes in Air Quality on fish and fish habitat. Based on the results of subsection 7.2, Air Quality, the Fish and Fish Habitat assessment concluded that there are no proposed Project-related Air Quality interactions with Fish and Fish Habitat. The results of the Air Quality assessment demonstrate that the lower Fraser River within the RAA at Tilbury Island is not sensitive to acid deposition, and deposition from the proposed Project sources during operation are not predicted to result in acid exceedances in the RAA. In addition, eutrophication in the lower Fraser River is not nutrient-limited and other physical constraints limit the growth of algae; therefore, the trophic status of the river is not expected to change as a result of the nitrogen deposition from proposed Project emissions during operation.
- In addition, FortisBC does not anticipate that exceedances of NO<sub>2</sub> or SO<sub>2</sub> air quality criteria established by municipal, provincial and federal environmental and health authorities will occur during proposed Project operation (under steady state operation). With the installation of air emissions control technologies as part of the proposed Project design, residual air quality effects during steady state operation are anticipated to be negligible for NO<sub>2</sub> (maximum concentrations due to the proposed Project are expected to be less than 5 percent of the air quality standards/objectives) and low magnitude for SO<sub>2</sub> (maximum concentrations to be less than 10 percent of their respective ambient air quality standards/objectives). The specific technology will be determined during detailed design following certification of the proposed Project by the BC EAO. Detailed modelling will be conducted post-approval for air permitting requirements and to inform final proposed Project design when emission control mitigation options are selected. Changes to air quality associated with proposed Project operation are therefore expected to present a negligible incremental change to the experience of Indigenous Peoples engaged in land- and water-based cultural practices. This effect is not carried forward for further analysis. Section 7.2 provides further detail on air quality effects of the proposed Project.
- As assessed in subsection 7.9, Fish and Fish Habitat, and previously stated, residual adverse effects to Fish and Fish Habitat are not anticipated after the implementation of proposed mitigation measures. A combination of avoidance and reduction measures will be incorporated into the CEMP (also summarized in Appendix A of the Application). As previously mentioned the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials or require the MOF. Previously identified predicted residual effects for fish and fish habitat are avoided due to the implementation of the proposed mitigation measure to avoid use of waterborne deliveries and the requirement for a MOF (that is, no in-river works). This avoidance measure has been included in the determination of residual effects to the Fish and Fish Habitat VC.

Proposed Project residual effects to Fish and Fish Habitat are avoided and are not expected to interact with the known location of Snuneymuxw First Nation FSC fisheries upstream of the Port Mann Bridge or in the Project Area (DFO n.d.). Furthermore, the proposed Project is not expected to interact with Snuneymuxw First Nation hunting, trapping, marine harvesting, and gathering rights in the Harvesting and Subsistence Activities LAA.

## Hunting

Snuneymuxw First Nation indicated that fisheries could be potentially affected by the proposed Project. Snuneymuxw First Nation has not indicated to FortisBC that hunting, trapping, marine harvesting, and gathering rights could be potentially affected by the proposed Project (Table 11.14-5). Although FortisBC understands that Snuneymuxw First Nation has hunting and gathering sites in the Project Area, FortisBC does not have information regarding specific Snuneymuxw First Nation current hunting and gathering sites and areas in the proposed Project Footprint, the Harvesting and Subsistence Activities LAA, or the Harvesting and Subsistence Activities RAA (Vogt 2020; DFO n.d.; B.C. EAO 2022b). Snuneymuxw First



1 Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw  
2 First Nation's use of the Project Footprint and surrounding areas for hunting purposes (Paige, pers. comm.  
3 2024a).

4 Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting and  
5 gathering sites and areas in the proposed Project when the information becomes available.

6 As previously described, in response to engagement activities during the Application Development phase,  
7 the proposed Project will no longer utilize the waterborne delivery of modular components and  
8 construction materials and does not require the MOF. Implementation of this avoidance mitigation  
9 measure has been incorporated into the determination of potential residual effects of linked VCs including  
10 wildlife and wildlife habitat.

11 Previously identified predicted residual effects for wildlife and wildlife habitat directly related to the MOF  
12 are avoided due to the implementation of the proposed mitigation measure to avoid the use of the MOF.  
13 These previously identified predicted residual effects include:

- 14 ▪ Loss or alteration of wildlife habitat attributed to the construction, operation and decommissioning of  
15 the MOF
- 16 ▪ Increased mortality risk attributed to the construction, operation and decommissioning of the MOF  
17 (including use of barges to bring construction modules to site)

18 There is little to no wildlife habitat within the proposed Project Footprint. The available potentially suitable  
19 wildlife habitat within the Wildlife and Wildlife Habitat LAA is limited and has been substantially degraded  
20 by past and existing disturbances.

21 Potential direct adverse effects from proposed Project construction and operation include loss or  
22 alteration of wildlife habitat, and wildlife health and mortality risk. Potential indirect effects from changes  
23 in Surface Water (subsection 7.4) to Wildlife and Wildlife Habitat during proposed Project operation have  
24 been assessed. The potential for acidification and eutrophication of wildlife habitat during proposed  
25 Project operation due to changes in air quality from SO<sub>x</sub> and NO<sub>x</sub> emissions was also assessed  
26 (subsection 7.2).

27 FortisBC does not anticipate that exceedances of NO<sub>2</sub> or SO<sub>2</sub> air quality criteria established by municipal,  
28 provincial, and federal environmental and health authorities will occur during proposed Project operation  
29 (steady state). With the installation of air emissions control technologies as part of the proposed Project  
30 design, residual air quality effects during operation are anticipated to be negligible for NO<sub>2</sub> (maximum  
31 concentrations due to the proposed Project are expected to be less than 5 percent of the air quality  
32 standards/objectives) and low magnitude for SO<sub>2</sub> (maximum concentrations to be less than 10 percent of  
33 their respective ambient air quality standards/objectives). The specific technology will be determined  
34 during detailed design following certification of the proposed Project by the BC EAO. Detailed modelling  
35 will be conducted post-approval for air permitting requirements and to inform final proposed Project  
36 design when emission control mitigation options are selected. Changes to air quality associated with  
37 proposed Project operation are therefore expected to present a negligible incremental change to the  
38 experience of Indigenous Peoples engaged in land- and water-based cultural practices.

39 After the implementation of proposed mitigation measures, FortisBC predicts a negligible to low  
40 magnitude localized residual effect to wildlife habitat and wildlife health and mortality risk due to the  
41 proposed Project that is not expected to result in measurable effects to wildlife populations, including  
42 species at risk. Wildlife that remain in the proposed Project Area have been assumed to be habituated to  
43 an urbanized, industrial environment with existing light, noise, and vibration. Riparian habitat may provide

cover and forage for small mammals associated with urban environments, such as rats, raccoons, rabbits, mink, and bats. FortisBC considered the following key factors in assessing the potential effect of the proposed Project on Wildlife and Wildlife Habitat:<sup>11</sup>

- Subsection 7.4, Surface Water, and subsection 7.8, Wildlife and Wildlife Habitat, have considered concerns expressed by Indigenous nations regarding the potential for changes in water quality to affect wildlife habitat or wildlife health and mortality risk.
- Subsection 7.8, Wildlife and Wildlife Habitat has considered Indigenous nation concerns with the effects of proposed Project-related changes in Air Quality on Wildlife and Wildlife habitat. Based on the results of subsection 7.2, Air Quality, the Wildlife and Wildlife Habitat assessment concluded that there are no proposed Project-related Air Quality interactions with Wildlife and Wildlife Habitat. The results of the Air Quality assessment demonstrate that nearby receiving aquatic and terrestrial environments for both surface water and soil within the Air Quality VC RAA are not susceptible to acidification, nitrogen loading, or eutrophication from the proposed Project emissions. As such, there are no anticipated interactions with wildlife health risk from emissions generated by the proposed Project, and this effect pathway has not been carried through to the residual effect assessment in subsection 7.8.
- Subsection 7.8, Wildlife and Wildlife Habitat, identifies a combination of avoidance and reduction along with monitoring, will be incorporated into the CEMP (also summarized in Appendix A of the Application). With the implementation of proposed mitigation measures, potential changes to wildlife movement will be reduced to negligible levels. Proposed mitigation measures are generally considered by FortisBC as having high effectiveness with BMPs and technologies that are widely and successfully used in various industries in B.C. and worldwide.
- As assessed in subsection 7.8, Wildlife and Wildlife Habitat, some residual adverse effects are expected after the implementation of proposed mitigation measures, including loss or alteration of wildlife habitat and increased wildlife health and mortality risk. Wildlife habitat within a zone of influence from the proposed Project Footprint may be altered by noise, vibration, light, and activity associated with the proposed Project construction, operation, and decommissioning activities. Sensory disturbance has potential to temporarily displace resident and migratory birds and other wildlife species from the proposed Project Footprint. The magnitude of these residual effects to Wildlife and Wildlife Habitat are predicted to be negligible to low given the minor incremental contribution of the proposed Project. The magnitude is negligible for most wildlife species; however, the resilience of species at risk is lower, therefore, a precautionary rating of low is used to capture potential residual effects to species at risk. No measurable effects to wildlife populations, including species at risk populations are anticipated.

Proposed Project activities adjacent to the proposed Project Footprint are therefore not expected to interact with Snuneymuxw First Nation hunting, trapping or harvesting activities. Furthermore, predicted residual effects to Wildlife and Wildlife Habitat due to the proposed Project are expected to be site-specific (proposed Project Footprint) and negligible to low in magnitude, and are not expected to interact with Snuneymuxw First Nation's Sarlequun Treaty of 1854 right to fish, hunt, trap or harvest in the Harvesting and Subsistence Activities LAA.

<sup>11</sup> Refer to subsection 11.1.13 for a summary of the Wildlife and Wildlife Habitat existing conditions and the results of the Wildlife and Wildlife Habitat residual effects assessment, including a discussion of any VCs linked to the Wildlife and Wildlife Habitat assessment and applicable proposed mitigation measures.

### 1 Plant Gathering

2 As previously described, in response to engagement activities during the Application Development phase,  
3 the proposed Project will no longer utilize the waterborne delivery of modular components and  
4 construction materials and does not require the MOF. Implementation of this avoidance mitigation  
5 measure has been incorporated into the determination of potential residual effects of linked VCs including  
6 vegetation.

7 Previously identified predicted residual effects for vegetation related to the loss of plant species of  
8 conservation concern, loss of ecological communities of conservation concern, loss of culturally important  
9 traditional use species and alteration or loss of riparian ecosystem are avoided due to the implementation  
10 of the proposed mitigation measure to avoid the use of the MOF.

11 The proposed Project Footprint is not currently accessible for plant harvesting and will remain restricted  
12 for the life of the proposed Project. Prior to the commencement of construction of the proposed Project,  
13 vegetation within the existing facility site will be removed by construction activities associated with the  
14 existing Tilbury facility and the Tilbury Phase 1B expansion (T1B) project. Maintenance of existing  
15 landscaping and vegetation along existing fence lines are part of the existing facility and not part of the  
16 scope of the proposed Project.

17 The proposed Project Footprint is predominantly covered by anthropogenic surfaces, including paved  
18 areas and built-up fill and gravel existing infrastructure, and equipment laydown areas that support little  
19 plant life. Over 98 percent of the proposed Project Footprint is industrial land use that is unvegetated.  
20 Vegetation within the proposed Project Footprint is limited to Tilbury Slough and has been substantially  
21 degraded by past and existing disturbances. The Vegetation LAA is also predominantly covered in  
22 anthropogenic surfaces, similar to the proposed Project Footprint.

23 Potential direct adverse effects from proposed Project construction and operation on Vegetation include  
24 the introduction or spread of invasive plant species. Potential indirect effects from changes in Surface  
25 Water (subsection 7.4) on Vegetation during proposed Project construction have been assessed. Potential  
26 indirect effects from changes in Air Quality (subsection 7.2) on Vegetation during proposed Project  
27 operation have also been assessed, including the potential for acidification and eutrophication of  
28 vegetation during proposed Project operation due to changes in Air Quality from SO<sub>x</sub> and NO<sub>x</sub> emissions.

29 With the implementation of proposed mitigation measures, FortisBC predicts that residual effects to  
30 Vegetation (spread of invasive species) to be negligible to low in magnitude, considering the small  
31 predicted incremental residual effect of the proposed Project compared to an already disturbed  
32 environment.

33 FortisBC considered the following key factors in assessing the potential effect of the proposed Project on  
34 Vegetation:<sup>12</sup>

- 35 ▪ Subsection 7.4, Surface Water, and subsection 7.7, Vegetation, has assessed the potential for changes  
36 in hydrological or drainage patterns to affect Vegetation as a result of the proposed Project.
- 37 ▪ As assessed in subsection 7.6, Soil, the proposed Project Footprint has been previously disturbed and  
38 has little topsoil remaining. The proposed Project is not expected to result in negative changes to soil  
39 quality or quantity that could negatively affect Vegetation.

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<sup>12</sup> Refer to subsection 11.1.13 for a summary of the Vegetation existing conditions and the results of the Vegetation residual effects assessment, including a discussion of any VCs linked to the Vegetation assessment and applicable proposed mitigation measures.

- 1     ▪ Subsection 7.7, Vegetation, has considered potential effects of proposed Project-related changes in  
2     Air Quality and Surface Water on Vegetation. Based on the results of subsection 7.2, Air Quality, the  
3     Vegetation assessment concluded that there are no proposed Project-related Air Quality interactions  
4     with Vegetation. Furthermore, the results of the Air Quality assessment demonstrate that nearby  
5     receiving terrestrial environments for both Surface Water and Soil within the Air Quality VC RAA are  
6     not susceptible to acidification, nitrogen loading, or eutrophication from the proposed Project  
7     emissions. As such, there are no anticipated interactions with Vegetation, including wetlands, from  
8     emissions generated by the proposed Project, and this effect pathway has not been carried through to  
9     a residual effect assessment.
- 10    ▪ Subsection 7.7, Vegetation, identifies a combination of avoidance and reduction measures that, along  
11    with monitoring, will be incorporated into the CEMP (also summarized in Appendix A of the  
12    Application). Proposed mitigation measures are generally considered by FortisBC as having high  
13    effectiveness with BMPs and technologies that are widely and successfully used in various industries in  
14    B.C. and worldwide.
- 15    ▪ As assessed in subsection 7.7, Vegetation, the residual adverse effect (introduction or spread of  
16    invasive plant species) remains. With the implementation of proposed mitigation measures, residual  
17    effects to Vegetation are expected to be negligible to low in magnitude and restricted to the  
18    proposed Project Footprint.

19    Snuneymuxw First Nation has not indicated to FortisBC that its Aboriginal and Snuneymuxw Sarlequun  
20    Treaty of 1854 Right to gather could be potentially affected by the proposed Project (Table 11.14-5).  
21    Although FortisBC understands that Snuneymuxw First Nation has plant gathering sites in the Project  
22    Area, FortisBC does not have information regarding specific Snuneymuxw First Nation current plant  
23    gathering sites and areas along the south arm of the lower Fraser River within the proposed Project  
24    Footprint or the Harvesting and Subsistence Activities LAA (B.C. EAO 2022a). Snuneymuxw First Nation  
25    has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First  
26    Nation's use of the Project Footprint and surrounding areas for these purposes (Paige, pers. comm.  
27    2024a).

28    Snuneymuxw First Nation intends to provide further information to FortisBC regarding current plant  
29    gathering sites and areas in the proposed Project Area when the information becomes available.

30    Proposed Project activities adjacent to the proposed Project Footprint are not anticipated to interact with  
31    Snuneymuxw First Nation FSC plant gathering. Furthermore, predicted residual effects to Vegetation due  
32    to the proposed Project are anticipated to be site-specific (proposed Project Footprint) and negligible to  
33    low in magnitude, and are not anticipated to interact with Snuneymuxw First Nation's Snuneymuxw  
34    Sarlequun Treaty of 1854 Right to gather in the Harvesting and Subsistence Activities LAA.

### 35    ***Effects to Hunting, Fishing, Trapping, Marine Harvesting, and Gathering Rights in the Proposed Project*** 36    ***Area***

37    Snuneymuxw First Nation has indicated that its Indigenous interests could be potentially affected by the  
38    proposed Project, particularly hunting, fishing, trapping, marine harvesting, and gathering rights in the  
39    proposed Project Area (Table 11.14-5). Snuneymuxw First Nation reported traditional fishing and  
40    harvesting near Lulu Island (across the Fraser River from the proposed Project) and near Barnston Island,  
41    upstream of the Port Mann Bridge, approximately 25 to 30 km upstream of the proposed Project  
42    Footprint. Snuneymuxw First Nation also currently conducts fisheries for sockeye for FSC purposes, under  
43    licenses in Fisheries Management Area 29, located within the proposed Project Area and Harvesting and  
44    Subsistence LAA and RAA (Paige, pers. comm. 2024c; Snuneymuxw First Nation 2018). Snuneymuxw First

Nation has indicated that the project has the potential to interact with Snuneymuxw First Nation's fishing sites.

As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

Although FortisBC understands that Snuneymuxw First Nation has additional hunting and gathering sites in the Project Area, FortisBC does not have information regarding these Snuneymuxw First Nation current hunting and gathering sites and areas along the south arm of the lower Fraser River within the proposed Project Footprint or the Snuneymuxw First Nation Harvesting and Subsistence Activities LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas for these purposes (Paige, pers. comm. 2024a).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting, fishing, and gathering sites and areas in the proposed Project Area when the information becomes available.

As stated in the previous subsection, predicted residual effects to Wildlife and Wildlife Habitat, and Vegetation due to the proposed Project are anticipated to be site-specific (proposed Project Footprint) and negligible to low in magnitude after the implementation of mitigation measures. As previously identified, predicted residual effects for fish and fish habitat are avoided due to the implementation of the proposed mitigation measure to avoid use of waterborne deliveries and the requirement for use of the MOF (that is, no in-river works). Therefore, proposed Project activities are not expected to interact with Snuneymuxw First Nation Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights to fish, harvest, or hunt for FSC Purposes the Harvesting and Subsistence Activities LAA.

### ***Effects to the Accessibility and Availability of Traditional Lands and Resources***

The proposed Project Footprint is located predominately on private property owned by FortisBC (the Property) within an existing Tilbury LNG facility on Tilbury Island, in the Tilbury Industrial Park adjacent to the Fraser River in Delta, B.C. The proposed Project Footprint is not accessible by foot.

Based on information available to FortisBC at the time of writing, no interaction with the accessibility and availability of Snuneymuxw First Nation traditional lands and resources along the Fraser River in the Harvesting and Subsistence Activities LAA is anticipated from the proposed Project.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding the accessibility and availability of traditional lands and resources within the proposed Project Area when the information becomes available.

### ***Effects to the Snuneymuxw Sarlequun Treaty of 1854 Right, Defined in the Treaty as "Fisheries as Formerly"***

Snuneymuxw First Nation has indicated that its Indigenous interests could be potentially affected by the proposed Project, particularly its Snuneymuxw Sarlequun Treaty of 1854 right to fisheries as formerly in the proposed Project Area (Table 11.14-5). Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed Project Area falls within their traditional territory, including Snuneymuxw fisheries and historic fishing villages, and "has the potential to affect these sites"

(Wyse, pers. comm. 2021). FortisBC does not expect interaction between the proposed Project and the historic fishing village sites.

Snuneymuxw First Nation also reported traditional fishing and harvesting near Lulu Island (across the Fraser River from the proposed Project) and near Barnston Island, upstream of the Port Mann Bridge, approximately 25 to 30 km upstream of the proposed Project Footprint, and current fisheries conducted for sockeye along the Fraser River in the Project Area.

As previously identified, predicted residual effects for fish and fish habitat are avoided due to the implementation of the proposed mitigation measure to avoid use of waterborne deliveries and the requirement for use of the MOF (that is, no in-river works). Therefore, proposed Project activities are not expected to interact with Snuneymuxw First Nation Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 right to fisheries as formerly in the Harvesting and Subsistence Activities LAA.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding fisheries within the proposed Project Area when the information becomes available.

#### ***Effects on Cultural Use Sites and Areas***

The following subsections provide rationale for a lack of interaction between the proposed Project activities and Snuneymuxw First Nation cultural use sites and areas, including reference to available information specific to Snuneymuxw First Nation and to predicted residual effects on linked VCs, including Land and Resource Use (subsection 7.11), Archaeological and Heritage Resources (subsection 7.13), and Culture (subsection 7.14)<sup>13</sup>.

For a summary of the existing conditions and residual effects assessment conclusions of linked VCs, please refer to subsection 11.1.13. References to linked VC subsections are provided where applicable. Further detail is available in these subsections, including references to applicable TDRs. Based on the rationale provided, the potential effects of the proposed Project on Snuneymuxw First Nation cultural use sites and areas is not carried forward into a residual effects assessment.

Subsequent sections will provide rationale for a lack of interaction between the proposed Project and Snuneymuxw First Nation cultural use sites and areas related to potential effects on the following:

- Cultural heritage and structures, sites, or things of historical, archaeological, paleontological, or architectural significance
- Access to, and disenfranchisement from, cultural sites
- Cultural and spiritual practices caused by damage or loss of access to cultural sites and areas
- Fisheries, historic fishing villages, and fishing rights related to proposed Project related changes to fishing

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<sup>13</sup> As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.



***Effects on Cultural heritage, and structures, sites, or things of historical, archaeological, paleontological, or architectural significance***

Cultural Use Sites and Areas may include physical landmarks and sacred places in the Cultural Use Sites and Areas LAA and RAA (Figure 11.14-1). Potential effects of the proposed Project on Cultural Use Sites and Areas may include potential direct effects of the proposed Project (such as ground-altering activities that may include excavating, backfilling, grading, and recontouring; and vehicle use and subsidence during construction and decommissioning) to Storied Places, habitation sites, Place Names, and archaeological sites, as well as cultural and archaeological resources (subsection 7.6).

As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

No archaeological or heritage resources were identified during the Archaeological Impact assessments that took place in 2013 and 2020 in the proposed Project Footprint (subsection 7.13). Snuneymuxw First Nation has not identified known cultural heritage and structures, sites, or things of historical, archaeological, paleontological, or architectural significance within the proposed Project Footprint or Cultural Use Sites and Areas LAA. Through review of Rev A and Rev B, FortisBC sought input from Snuneymuxw First Nation regarding archaeological and heritage resources in relation to the proposed Project. Due to current Snuneymuxw First Nation capacity constraints, FortisBC did not receive input on this topic. If archaeological, heritage, and paleontological resources are encountered in the proposed Project Footprint, contingency measures described in subsection 7.13 would be implemented.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding archaeological and heritage resources in relation to the proposed Project within the proposed Project Area when the information becomes available.

***Loss of Access to, and Disenfranchisement From, Cultural Sites***

Snuneymuxw First Nation has noted a village near Barnston Island, upstream of the Port Mann Bridge, approximately 25 to 30 km upstream of the proposed Project Footprint. Snuneymuxw First Nation has also noted historic camping harvesting near Lulu Island (across the Fraser River from the proposed Project) (Vogt 2020).

Changes to access to harvesting and subsistence activity cultural sites on the Fraser River in the Harvesting and Subsistence Activities LAA are not expected due to the proposed Project. As previously stated, changes in the quality, quantity, and availability of resources (that is, plants, and wildlife) due to the proposed Project are not expected to result in loss of access or disenfranchisement from cultural sites in the Harvesting and Subsistence Activities LAA. As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

As previously stated, the proposed Project has the potential to affect the quality of experience for people engaged in activities on public lands and waters through sensory effects from proposed Project emissions, noise, and visual changes. As described in subsection 7.11, Land and Resource Use, with the exception of a contribution to a potential perceived effect on recreational quality, no adverse effects on the daytime or nighttime visual landscape are expected as a result of the proposed Project. As described in subsection 7.11, Land and Resource Use, after the implementation of mitigation measures, changes to

visual quality of the landscape could result in low-magnitude residual effects in the Land and Resource LAA to Indigenous nation members' experience of cultural sites due to construction and operation of the proposed Project.

However, proposed Project activities are not expected to interact with Snuneymuxw First Nation experience and preferences around the practice of harvesting rights, including fishing, gathering, or hunting. FortisBC understands that Snuneymuxw First Nation conducts fisheries in the Project Area for social and ceremonial purposes, and canoeing areas along the Fraser River. Although FortisBC understands that Snuneymuxw First Nation has additional cultural use sites and areas in the Project Area, FortisBC does not have information regarding these additional Snuneymuxw First Nation current use sites and areas within the proposed Project Footprint or the Snuneymuxw First Nation Cultural Use Sites and Areas LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas for these purposes (Paige, pers. comm. 2024a).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current cultural use sites and areas in the proposed Project Area when the information becomes available.

#### ***Effects to Cultural and Spiritual Practices Caused by Damage or Loss of Access to Cultural Sites and Areas***

As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

As previously noted, access to Indigenous nation cultural sites in the LAA is not anticipated to be materially affected by the proposed Project compared to existing conditions. However, the indicators for Culture (subsection 7.14) for potential interactions include whether there are real or perceived adverse effects that could influence Wildlife and Wildlife Habitat, Fish and Fish Habitat, and Vegetation VCs that could influence Indigenous Peoples' ability and desire to access cultural sites and areas.

However, no interaction is anticipated between the Snuneymuxw First Nation and the proposed Project Footprint. The proposed Project Footprint is predominately located on the Property within an existing Tilbury LNG facility on Tilbury Island. As stated previously, FortisBC understands that Snuneymuxw First Nation conducts fisheries in the Project Area for social and ceremonial purposes, and has canoeing areas along the Fraser River. Although FortisBC understands that Snuneymuxw First Nation has additional cultural use sites and areas in the Project Area, FortisBC does not have information regarding these additional Snuneymuxw First Nation current use sites and areas within the proposed Project Footprint or the Snuneymuxw First Nation Cultural Use Sites and Areas LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas for these purposes (Paige, pers. comm. 2024a).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current cultural use sites and areas in the proposed Project Area when the information becomes available.

#### ***Effects to Fisheries, Historic Fishing Villages and Fishing Rights Related to Proposed Project Related Changes to Fishing***

Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed Project Area falls within their traditional territory, including Snuneymuxw fisheries and historic fishing

villages, and “has the potential to affect these sites” (Wyse, pers. comm. 2021). FortisBC does not expect interaction between the proposed Project and the historic fishing village sites.

Snuneymuxw First Nation also reported traditional fishing and harvesting near Lulu Island (across the Fraser River from the proposed Project) and near Barnston Island, upstream of the Port Mann Bridge, approximately 25 to 30 km upstream of the proposed Project Footprint, and current fisheries conducted for sockeye along the Fraser River in the Project Area within Fisheries Management Area 29 (Paige, pers. comm. 2024c).

Snuneymuxw First Nation intends to provide further information to FortisBC regarding fisheries, historic fishing villages, and fishing rights in the proposed Project Area when the information becomes available.

As stated under the Harvesting and Subsistence Activities subsection, proposed Project residual effects to Fish and Fish Habitat are not expected to interact with Snuneymuxw First Nation FSC fishing rights in the Harvesting and Subsistence Activities LAA.

### Effects on Social and Economic Conditions

The following sections provide rationale for a lack of interaction or an identified interaction/potential effect between the proposed Project activities and Snuneymuxw First Nation social and economic conditions, including reference to available information specific to Snuneymuxw First Nation and to predicted residual effects on linked VCs. Refer to subsection 11.1.13 for a summary of the results of the Culture (subsection 7.14), Employment and Economy (subsection 7.10), Infrastructure and Services (subsection 7.12), and Land and Resources Use (subsection 7.11) assessments, including any applicable proposed mitigation measures.<sup>14</sup> Based on the rationale provided, the potential effects of the proposed Project on Snuneymuxw First Nation social and economic conditions is not carried forward into a residual effects assessment.

Subsequent sections will provide rationale for the interaction between the proposed Project and Snuneymuxw First Nation social and economic conditions related to the following:

- Employment opportunities, Indigenous businesses, procurement opportunities, and Indigenous Government revenue
- Indigenous nations' future aspirations for sites or areas surrounding the proposed Project
- Indigenous nations' ability to improve social and economic conditions
- Commercial and noncommercial fishing, hunting, trapping, and gathering and cultural or ceremonial activities and practices
- Intercommunity relations and trade
- Infrastructure and services

### ***Changes to Employment Opportunities, Indigenous Businesses, Procurement Opportunities, and Indigenous Government Revenue***

FortisBC anticipates that the proposed Project will have a direct positive effect on employment through job opportunities, particularly during the 3-to-6-year construction phase, which will have the greatest demand for skilled and semiskilled workers. Snuneymuxw First Nation members with a trades certificate

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<sup>14</sup> As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

and experience in the construction sector will be most likely to benefit from direct employment with the proposed Project. Over a quarter (25.2 percent) of Snuneymuxw First Nation members held a trades certificate in 2016, whereas only 7.1 percent of the workforce 15 years and older were employed in trades and related occupations (CIRNAC n.d.). The proposed Project may therefore offer trades certificate holders an opportunity to enter the workforce in construction-related occupations. The opportunity may provide a positive effect on Snuneymuxw First Nation's employment and procurement opportunities, depending largely on whether Snuneymuxw First Nation members are directly or indirectly employed by the proposed Project and whether Snuneymuxw First Nation businesses can access contracting and procurement opportunities for the proposed Project (subsection 7.10).

Local and regional Indigenous businesses in the Social and Economic Conditions LAA and RAA, including businesses associated with Snuneymuxw First Nation, could benefit from opportunities for contracting and procurement associated with the construction phase of the proposed Project. However, Indigenous businesses with similar workforce requirements (such as, construction trades) could experience direct adverse effects by the proposed Project's demand for a large construction workforce. The proposed Project's anticipated regional labour market effects may disproportionately affect smaller businesses in the Social and Economic Conditions LAA and RAA that may already be struggling to find and retain workers, that cannot compete financially with wages and benefits of large projects (Neustaeter 2021). Smaller companies, including companies associated with Snuneymuxw First Nation, could also experience barriers to participation in the proposed Project associated with inadequate capacity to deliver services for large projects (subsection 7.10).

An interaction between employment opportunities, Indigenous businesses, procurement opportunities, and Snuneymuxw First Nation government revenue is anticipated with the proposed Project. This potential positive effect was assessed in the Potential Proposed Project Potential Residual Effects to Indigenous Interests subsection. Through review of Rev A and Rev B of subsection 11.14, FortisBC sought input from Snuneymuxw First Nation regarding Snuneymuxw First Nation's employment opportunities, Indigenous businesses, procurement opportunities, and government revenue in relation to the proposed Project. Snuneymuxw First Nation is currently discussing these opportunities through FortisBC's Implementation Committee and will continue to explore options through this committee.

#### ***Effects on Indigenous Nations' Future Aspirations for Sites or Areas Surrounding the Proposed Project***

The proposed Project is expected to have a positive effect on identified plans or agreements about economic development, and Snuneymuxw First Nation economic development planning (Table 11.14-4). Snuneymuxw First Nation would like as many members to benefit from development that is taking place in Snuneymuxw First Nation's Traditional Territory, to the fullest extent possible. Recognizing that some Snuneymuxw First Nation members live in Lower Mainland B.C., Snuneymuxw First Nation views this Project as an opportunity to strategize employment and procurement for these members, which has a positive overall effect on the Nation's economic development planning (Paige, pers. comm. 2024a).

#### ***Effects on Indigenous Nations' Ability to Improve Social and Economic Conditions***

As previously noted, the proposed Project may have a positive effect on Snuneymuxw First Nation's ability to improve social and economic conditions, depending largely on whether Snuneymuxw First Nation members are directly or indirectly employed by the proposed Project and Snuneymuxw First Nation businesses can access contracting and procurement opportunities for the proposed Project (subsection 7.10).

FortisBC identified an interaction between the proposed Project and Snuneymuxw First Nation's ability to improve social and economic conditions. This potential positive effect is assessed under the Potential Proposed Project Effects to Indigenous Interests subsection.

***Effects on Commercial and Non-commercial Fishing, Hunting, Trapping, and Gathering and Cultural or Ceremonial Activities and Practices***

As stated under the Harvesting and Subsistence Activities subsection, predicted residual effects to Vegetation, and Wildlife and Wildlife Habitat due to the proposed Project are expected to be site-specific (proposed Project Footprint), negligible to low magnitude, and not expected to interact with Snuneymuxw First Nation's Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 right to gather in the Harvesting and Subsistence Activities LAA. As previously identified predicted residual effects for fish and fish habitat are avoided due to the implementation of the proposed mitigation measure to avoid use of waterborne deliveries and the requirement for use of the MOF (that is, no in-river works). FortisBC understands that Snuneymuxw First Nation conducts fisheries in the Project Area for sockeye and has additional hunting, gathering, and cultural sites in the Project Area, though FortisBC does not have information regarding these additional Snuneymuxw First Nation current hunting, gathering, and cultural sites and areas within the proposed Project Footprint or the Snuneymuxw First Nation Harvesting and Subsistence Activities LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). Snuneymuxw First Nation has indicated that the Project has the potential to interact with current fisheries sites (Paige, pers. comm. 2024a), though the Nation has also noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas.

As stated under the Cultural Use Sites and Areas subsection, no interaction is anticipated between the Snuneymuxw First Nation and the proposed Project Footprint. The proposed Project Footprint is located predominately on the Property within an existing Tilbury LNG facility on Tilbury Island. Therefore, no interaction is expected between the proposed Project and Snuneymuxw First Nation's commercial and noncommercial fishing, hunting, and gathering and cultural or ceremonial activities and practices in the proposed Project Footprint, Harvesting and Subsistence Activities LAA, or the Cultural Sites and Areas LAA. Through review of Rev A and Rev B, FortisBC sought input from Snuneymuxw First Nation regarding Snuneymuxw First Nation's commercial and noncommercial activities and cultural or ceremonial activities in relation to the proposed Project. Snuneymuxw First Nation has noted that inadequate funding for Indigenous land and resource offices in Canada has impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For this reason, Snuneymuxw First Nation was unable to provide detailed input on this topic to FortisBC.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current fishing, hunting, and gathering sites and cultural use sites and areas in the proposed Project Area when the information becomes available.

***Effects on Intercommunity Relations and Trade***

Through review of Rev A and Rev B of subsection 11.14, FortisBC sought input from Snuneymuxw First Nation regarding Snuneymuxw First Nation's intercommunity relations and trade in relation to the proposed Project. Snuneymuxw First Nation has noted that inadequate funding for Indigenous land and resource offices in Canada has impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For this reason, Snuneymuxw First Nation was unable to provide input on this topic to FortisBC.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding Snuneymuxw First Nation's intercommunity relations and trade in relation to the proposed Project when the information becomes available.

## Effects on Infrastructure and Services

Through review of Rev A and Rev B of subsection 11.14, FortisBC sought input from Snuneymuxw First Nation regarding Snuneymuxw First Nation's infrastructure and services in relation to the proposed Project. Snuneymuxw First Nation has noted that inadequate funding for Indigenous land and resource offices in Canada has impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For this reason, Snuneymuxw First Nation was unable to provide input on this topic to FortisBC.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding Snuneymuxw First Nation's infrastructure and services in relation to the proposed Project when the information becomes available.

## Effects on Indigenous Health and Well-being

The following sections provide rationale for a negligible interaction or an identified interaction/potential effect between the proposed Project activities and Snuneymuxw First Nation Indigenous health and well-being, including reference to available information specific to Snuneymuxw First Nation and to predicted residual effects on linked VCs. Refer to subsection 11.1.13 for a summary of the results of the Human Health (subsection 7.15), Air Quality (subsection 7.3), Land and Resource Use (subsection 7.11), Vegetation (subsection 7.7), Wildlife and Wildlife Habitat (subsection 7.8), Fish and Fish Habitat (subsection 7.9), Soil (subsection 7.6), Surface Water (subsection 7.4), Groundwater (subsection 7.5), Acoustic (subsection 7.3), and other Indigenous interests (Harvesting and Subsistence Activities and Cultural Use).<sup>15</sup> To support the Human Health VC, an HHRA<sup>16</sup> was conducted to predict potential effects to human health due to the proposed Project. Based on the rationale provided, the potential effects of the proposed Project on Snuneymuxw First Nation Indigenous health and well-being is not carried forward into a residual effects assessment.

Subsequent sections will provide rationale for a lack of interaction between the proposed Project and Snuneymuxw First Nation health and well-being:

- Quality, quantity, and availability of harvested country foods
- Effects on Value and perceived quality of country foods
- Effects on Air quality, noise, water quality
- Effects on Health and well-being from the effects to traditional ways of life and to cultural sites

## *Effects on Quality, Quantity, and Availability of Harvested Country Foods*

Interactions between the quality, quantity, and availability of harvested country foods (that is fish, plants, and wildlife) and the proposed Project are not expected as predicted residual effects to Fish and Fish Habitat, Wildlife and Wildlife Habitat, and Vegetation due to the proposed Project are expected to be site-specific (proposed Project Footprint) and negligible to low in magnitude after the implementation of mitigation measures. As previously identified, predicted residual effects for fish and fish habitat are avoided due to the implementation of the proposed mitigation measure to avoid use of waterborne deliveries and the requirement for use of the MOF (that is, no in-river works).

<sup>15</sup> As previously described, in response to engagement activities during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not require the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

<sup>16</sup> The HHRA was completed prior to FortisBC's commitment to no use barges to deliver modules or materials to the proposed Project Site and contains analysis of construction of the MOF and barge deliveries. Therefore, conclusions of the HHRA should be considered a conservative prediction of potential effects to human health due to the proposed Project.



The HHRA has examined the potential for the proposed Project to contaminate country foods (such as berries, fish, and game) via potential changes in Soil, Air Quality, Groundwater, and Surface Water.

### ***Effects on Value and Perceived Quality of Country Foods***

As stated above, FortisBC predicts there would not be a measurable effect on the value (quality, quantity, or availability) of plants or wildlife due to the proposed Project. FortisBC does not anticipate any adverse effects to Snuneymuxw First Nation fish harvesting as no effects to fish habitat are anticipated within the proposed Project Footprint or Harvesting and Subsistence Activities LAA. As stated above, FortisBC predicts that there are no potential effects of the proposed Project on the quality of country foods due to contamination.

Community perceptions with respect to the quality of country foods have the potential to interact with Snuneymuxw First Nation members' participation in harvesting and subsistence activities and cultural and spiritual practices even in the absence of identified adverse effects to the Land and Resource Use and Culture VCs (subsection 7.14). However, due to the lack of or negligible effect to the quantity, quality, and abundance of fish and wildlife for harvesting and subsistence purposes, the industrialized nature of the area, likely existing perceived effects regarding the quality of country foods, FortisBC predicts a negligible interaction between the proposed Project and perceived effects on the quality of country foods from existing conditions.

### **Effects on Air Quality, Noise, and Water Quality**

As described, as a result of concerns received from Indigenous Nations during the Application Development phase that occurred after the development of the AIR, the proposed Project will no longer utilize any waterborne delivery of modular components and bulk construction materials to the proposed Project Site during construction. Avoidance of waterborne deliveries are included in the assessment as an avoidance mitigation measure. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

Proposed Project activities have the potential to contribute contaminants of concern to air and water, and increase noise levels in proximity to the proposed Project Footprint. As stated previously, FortisBC does not anticipate that community members will be adversely affected by changes to water quality or increased noise levels during all proposed Project phases. Surface and groundwater quality are not anticipated to be affected by contaminants of concern from proposed Project activities. Noise levels are anticipated to increase due to proposed Project activities during all Project phases but increases in land-based noise are anticipated to be similar to existing levels (approximately 1 dB increase at times) and not anticipated to be above noise levels exceeding the %HA threshold or harmful to human health.

The HHRA conducted for the proposed Project considered pathways for exposure to air contaminants, water contaminants, and noise due to the proposed Project and concluded that there is minimal risk of exposure to contaminants of concern in the air or water beyond the Tilbury Island site since contaminants of concern are not present onsite.

FortisBC does not anticipate that the proposed Project will cause exceedances of CAC air quality standards. The incremental contribution of the proposed Project is predicted to have a negligible (NO<sub>2</sub>, PM<sub>2.5</sub>, PM<sub>10</sub>, VOCs) to low-magnitude (SO<sub>2</sub>) residual effect on air quality compared to existing conditions. FortisBC anticipates a decrease in CAC levels, particularly existing ambient NO<sub>2</sub> levels that already exceed both the 1-hour and annual CAAQS 2025, by the time the proposed Project is operational. This decrease is due to government programs such as AirCare, CleanBC, and the implementation of low-sulphur fuel requirements for marine transportation. Furthermore, FortisBC is committed to installing air emissions

control technologies (the specific technology will be determined during detailed design following certification); as such, the modelled air quality effects presented in Air Quality TDR (Appendix B of the Application) materially overstates the actual anticipated effects. Detailed modelling will be conducted after approval for air permitting requirements and to inform final proposed Project design when emission control mitigation options are selected. While NO<sub>2</sub> and PM<sub>2.5</sub> are non-threshold contaminants, residual effects to Snuneymuxw First Nation members health are not anticipated due to the short-term potential exposures adjacent to the proposed Project Footprint for Indigenous use.

#### ***Effects on Health and Well-being from the Effects to Traditional Ways of Life and to Cultural Sites***

FortisBC does not anticipate effects on health and well-being related to effects to traditional ways of life and to cultural sites. As stated in previous sections, FortisBC anticipates a negligible interaction between the proposed Project and Harvesting and Subsistence Activities and Cultural Use Areas and Sites, including traditional ways of life. As previously described, as a result of concerns received from Indigenous Nations during the Application Development phase that occurred after the development of the AIR, the proposed Project will no longer utilize any waterborne delivery of modular components and bulk construction materials to the proposed Project Site during construction. Avoidance of waterborne deliveries are included in the assessment as an avoidance mitigation measure. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

The health and well-being of Snuneymuxw First Nation members may also be directly and indirectly positively affected by the proposed Project's positive effects on socio-economic determinants of health, including employment, education, income, socio-economic status, and other indicators (subsection 7.10). Snuneymuxw First Nation members and families benefiting from employment associated with the proposed Project may experience higher incomes, contributing to an increased quality of life. Potential direct adverse effects associated with socio-economic determinants of health, as noted for the discussion on Social and Economic Conditions, may include effects to health due to shift work, which could increase family stress and use of unhealthy practices and substance use (subsection 7.15.4); however as stated previously, this potential effect is considered negligible compared to existing conditions of employment and shift work.

#### **Effects on Cultural Continuation**

The following sections provide rationale for a lack of interaction between the proposed Project activities and Snuneymuxw First Nation cultural continuation, including reference to available information specific to Snuneymuxw First Nation and to potential effects on linked VCs. Refer to subsection 11.1.13 for a summary of the results of Air Quality (subsection 7.2), Acoustics (subsection 7.3), Vegetation (subsection 7.7), Wildlife and Wildlife Habitat (subsection 7.8), Fish and Fish Habitat (subsection 7.9); Land and Resource Use (subsection 7.11), and Culture (subsection 7.14). Based on the rationale provided, the potential effects of the proposed Project on Snuneymuxw First Nation cultural continuation are not carried forward into a residual effects assessment.

Subsequent sections will provide rationale for a lack of interaction between the proposed Project and Snuneymuxw First Nation Cultural Continuation related to the following:

- Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to experiences of being on the land (such as changes in air quality, noise exposure, and effects of vibrations during construction)
- Effects on the ability to revitalize, develop, and participate in intergenerational cultural transmission due to current and future availability and quality of country foods (traditional foods)

- Disconnection from cultural heritage due to changes to sense of place and identity due to changes in accessibility and real and perceived disturbance of the environment
- Disconnection from cultural heritage due to interruption of the use of travelways, navigable waterways, and water bodies

***Effects on the Ability to Revitalize, Develop, and Participate in Intergenerational Cultural Transmission Due to Experiences of Being on the Land (Such as Changes in Air Quality, Noise Exposure, and Effects of Vibrations During Construction)***

As discussed above for the potential effects to Cultural Use Sites and Areas and Indigenous Health and Well-being, activities associated with revitalizing, developing, and participating in intergenerational cultural transmission while being on the land are also connected to biophysical conditions, such as air quality, noise, vibrations, and visual changes in the landscape. Proposed Project activities are not anticipated to change biophysical conditions during construction, operation and decommissioning through increased noise levels, emissions, and alterations to the visual landscape that would result in a change in the experience by Snuneymuxw First Nation members or affect Snuneymuxw First Nation members' ability to engage in activities associated with revitalizing, developing, and participating in intergenerational cultural transmission while being on the land.

***Effects on the Ability to Revitalize, Develop, and Participate in Intergenerational Cultural Transmission Due to Current and Future Availability and Quality of Country Foods (Traditional Foods)***

A sacred relationship with all things in the natural world (land, water, air, plants, and animals), respect for the spirit and life in each of these, and the intricate relationships and interconnectedness of all living things underpin Snuneymuxw First Nation's cultural values and principles. Snuw'uyulh, or sacred teachings, guide the continuing relationship to each other and to the lands and waters within the traditional territory.

As indicated in Section 11.14.5.2, Snuneymuxw First Nation continues to depend on marine ecosystems for spiritual sustenance and conducts fisheries in the Project Area for sockeye under licences for social and ceremonial purposes (Snuneymuxw First Nation 2018). Snuneymuxw First Nation has indicated that the Project has the potential to interact with these fisheries (Paige, pers. comm. 2024c).

FortisBC predicts no interaction between the proposed Project and Snuneymuxw First Nation's ability to revitalize, develop, and participate in intergenerational cultural transmission due to changes in country foods. As stated previously under Indigenous Health and Well-being, FortisBC anticipates no changes to the quality, quantity, availability of harvested country foods due to the proposed Project.

As assessed in subsection 7.9, Fish and Fish Habitat, and as previously stated, residual adverse effects to Fish and Fish Habitat are not anticipated after the implementation of proposed mitigation measures. The Project is not expected to interact with Snuneymuxw First Nation fish harvesting.

Similarly, predicted residual effects to vegetation (spread of invasive plants) due to the proposed Project are anticipated to be site specific (proposed Project Footprint), negligible to low magnitude, and not anticipated to interact with Snuneymuxw First Nation's Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights to gather plants in the Harvesting and Subsistence Activities LAA. The proposed Project Footprint is not currently accessible for plant harvesting and will remain restricted for the life of the proposed Project. Prior to the commencement of construction of the proposed Project, vegetation within the existing facility site will be removed by construction activities associated with the existing Tilbury facility and the Tilbury Phase 1B expansion (T1B) project. Maintenance of existing landscaping and vegetation along existing fence lines are part of the existing facility and not part of the scope of the

proposed Project. Previously identified predicted residual effects for vegetation related to the loss of plant species of conservation concern, loss of ecological communities of conservation concern, loss of culturally important traditional use species and alteration or loss of riparian ecosystem are avoided due to the implementation of the proposed mitigation measure to avoid the use of the MOF.

Based on firearm restrictions adjacent to the proposed Project on Tilbury Island, lack of access to private industrial land on the proposed Project Footprint and the small spatial area over which the effects to wildlife are anticipated to be experienced, proposed Project activities adjacent to the proposed Project Footprint are not anticipated to interact with Snuneymuxw First Nation hunting activities (B.C. EAO 2022; DFO n.d.). Therefore, the proposed Project is not predicted to reduce Snuneymuxw First Nation members' opportunities for engaging in activities associated with revitalizing, developing, and participating in intergenerational cultural transmission due to the current and future availability and quality of country foods. In addition, opportunities to hunt or trap wildlife within the proposed Project Footprint and Harvesting and Subsistence Activities LAA are extremely limited.

***Disconnection from Cultural Heritage Due to Changes to Sense of Place and Identity Due to Changes in Accessibility and Real and Perceived Disturbance of the Environment.***

As discussed in Section 11.14.2.10, connection to language is important to Snuneymuxw First Nation, because of language's connection to knowledge, place, and culture. Through sharing Snuneymuxw stories, traditional knowledge, language, and ceremony, present and future generations benefit from the wisdom and teachings of Elders and ancestors while carving a new path of possibilities and opportunities for the people (Snuneymuxw First Nation n.d.).

Snuneymuxw First Nation has also noted that the identity of Snuneymuxw as a people is intimately connected to the health and integrity of its territory and resources. Killer whales, in particular SRKW, that inhabit the Salish Sea have a special place in Snuneymuxw culture. They are considered by Snuneymuxw First Nations Peoples to be relatives, and they play an important role as intermediaries between the living and spirit worlds (Snuneymuxw First Nation 2018).

FortisBC understands that Snuneymuxw First Nation conducts fisheries in the Project Area for sockeye under licences and has additional hunting and gathering sites in the Project Area. Due to capacity constraints, Snuneymuxw First Nation was unable to provide information on these additional areas to FortisBC. FortisBC notes that it does not have information regarding these additional Snuneymuxw First Nation current hunting and gathering sites and areas within the proposed Project Footprint, harvesting and subsistence LAA, or the Harvesting and Subsistence RAA.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting, fishing, and gathering sites and areas in the proposed Project Area when the information becomes available.

As discussed in preceding sections above, there are no residual effects on Fish and Fish Habitat in the proposed Project Footprint during construction (subsection 7.9, Fish and Fish Habitat). Considering this and the current industrialized nature of the area, FortisBC does not anticipate that perceived disturbance of the environment by Snuneymuxw First Nation members would differ substantively from such perception for existing conditions in the Cultural Continuity LAA.

As previously discussed in relation to potential effects to Cultural Use Sites and Areas, proposed Project activities are not anticipated to disrupt Snuneymuxw First Nation members' ability to access cultural use sites and areas. The proposed Project Footprint is predominately located on private property owned by FortisBC within an existing Tilbury LNG facility on Tilbury Island. Access to Tilbury and Lulu islands is currently highly restricted under existing conditions and further disenfranchisement from these cultural



1 areas is not anticipated due to the highly industrialized nature of the area and the location of the Project  
2 on private property.

3 ***Disconnection from Cultural Heritage Due to Interruption of the Use of Travelways, Navigable***  
4 ***Waterways, and Water Bodies***

5 Snuneymuxw First Nation has noted that canoeing occurs on the Fraser River within the Cultural Use Sites  
6 and Areas LAA and Cultural Use Sites and Areas RAA (Paige, pers. comm. 2024c). Furthermore, as  
7 indicated in Section 11.14.5.2, Snuneymuxw First Nation continues to depend on marine ecosystems for  
8 spiritual sustenance and conducts fisheries in the Project Area for sockeye under licences, for social and  
9 ceremonial purposes (Snuneymuxw First Nation 2018; Paige, pers. comm. 2024c).

10 As previously discussed in relation to potential effects to Cultural Use Sites and Areas, proposed Project  
11 activities are not anticipated to affect Snuneymuxw First Nation members' ability to physically access  
12 cultural use sites and areas. As previously described in response to engagement activities during the  
13 Application Development phase, the proposed Project will no longer utilize the waterborne delivery of  
14 modular components and construction materials.

15 ***Effects on Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights***

16 The following sections provide rationale for a lack of interaction between the proposed Project activities  
17 and Snuneymuxw First Nation Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights, including  
18 reference to available information specific to Snuneymuxw First Nation and to potential effects on linked  
19 VCs. Refer to subsection 11.1.13 for a summary of the results of Fish and Fish Habitat (subsection 7.9),  
20 Land and Resource Use (subsection 7.11), and Culture (Subsection 7.14). Based on the rationale provided,  
21 the potential effects of the proposed Project on Aboriginal and Snuneymuxw Sarlequun Treaty of 1854  
22 rights are not carried forward into a residual effects assessment.

23 Subsequent sections will provide rationale for a lack of interaction between the proposed Project and  
24 Snuneymuxw First Nation Aboriginal and Sarlequun Treaty of 1854 rights related to the following:

- 25 ▪ Changes to Snuneymuxw First Nation's cultural traditions, laws, and governance systems that inform  
26 how they exercise their Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights
- 27 ▪ Effects on the ability to use, develop, and control traditional land, territories, and resources
- 28 ▪ Effects on the ability to implement Indigenous laws, customs, and protocols
- 29 ▪ Changes to participation in decision making in matters that affect Aboriginal and Snuneymuxw  
30 Sarlequun Treaty of 1854 Rights in the proposed Project Site
- 31 ▪ Changes to ongoing conservation efforts to restore important fish species and habitat
- 32 ▪ Changes in the ability to engage in the stewardship of lands and resources

33 ***Changes to Snuneymuxw First Nation's Cultural Traditions, Laws, and Governance Systems that Inform***  
34 ***how they Exercise their Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 Rights***

35 As noted in Section 11.14.2.18, Snuneymuxw First Nation's ongoing capacity constraints have impacted  
36 the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for  
37 information from FortisBC. For these reasons, Snuneymuxw First Nation was not able to provide FortisBC  
38 with its views on how any Indigenous laws, governance, philosophies, or customs have historically applied  
39 and currently apply in relation to the proposed Project.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding Indigenous laws, governance, philosophies, or customs when the information becomes available.

As previously described, in response to engagement activities with Indigenous Nations during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not need the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

The proposed Project Footprint is located on private property with restricted public access in an industrialized area. These current conditions, along with other existing conditions (described in subsection 11.1.13, Summary of Valued Components Linked to Indigenous Interests) account for existing restrictions and barriers to Snuneymuxw First Nation's participation in decision-making and ability to implement laws, customs, and protocols within the proposed Project Footprint. The proposed Project is not anticipated to change Snuneymuxw First Nation's cultural traditions, laws or governance systems or existing restrictions or barriers, from existing conditions.

#### ***Effects on the ability to Use, Develop, and Control Traditional Land, Territories, and Resources***

As previously described, in response to engagement activities with Indigenous Nations during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not need the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed Project Area falls within their traditional territory, including Snuneymuxw fisheries and historic fishing villages, over which Snuneymuxw First Nation claims Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights and title (Wyse, pers. comm. 2021). Snuneymuxw First Nation also conducts fisheries for sockeye under licences in the Project Area for social and ceremonial purposes, and has indicated that the Project has the potential to interact with these sites (Snuneymuxw First Nation 2018; Paige, pers. comm. 2024c). As previously discussed, FortisBC does not expect interaction between the proposed Project and the historic fishing village sites, and there is no interaction between the proposed Project and Snuneymuxw First Nation's conservation and stewardship efforts through the lack of or negligible changes in Fish and Fish Habitat, Wildlife and Wildlife Habitat, and Vegetation. The proposed Project Footprint is located on private property with restricted public access in an industrialized area. These current conditions, along with other existing conditions (described in subsection 11.1.13, Summary of Valued Components Linked to Indigenous Interests) account for existing restrictions and barriers to Snuneymuxw First Nation's use of the lands and resources within the proposed Project Footprint. The proposed Project is not expected to effect Snuneymuxw First Nation's ability to use, develop, and control traditional land, territories, and resources.

#### ***Effects on the Ability to Implement Indigenous Laws, Customs, and Protocols***

As noted in Section 11.14.2.18, Snuneymuxw First Nation's ongoing capacity constraints have impacted the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC. For these reasons, Snuneymuxw First Nation was not able to provide FortisBC with its views on how any Indigenous laws, governance, philosophies, or customs have historically applied and currently apply in relation to the proposed Project.

As previously described, in response to engagement activities with Indigenous Nations during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of

1 modular components and construction materials and does not need the MOF. Implementation of this  
2 avoidance mitigation measure has been incorporated into the determination of potential residual effects  
3 of linked VCs.

4 The proposed Project Footprint is located on private property with restricted public access in an  
5 industrialized area. These current conditions, along with other existing conditions (described in  
6 subsection 11.1.13, Summary of Valued Components Linked to Indigenous Interests) account for existing  
7 restrictions and barriers to Snuneymuxw First Nation's participation in decision-making and ability to  
8 implement laws, customs, and protocols within the proposed Project Footprint. The proposed Project is  
9 not anticipated to change Snuneymuxw First Nation's cultural traditions, laws or governance systems or  
10 existing restrictions or barriers, from existing conditions. FortisBC expects no interaction between  
11 Snuneymuxw First Nation Indigenous interests and the proposed Project, and FortisBC is not aware of any  
12 current use sites identified by Snuneymuxw First Nation that will be affected by the proposed Project.

13 Snuneymuxw First Nation intends to provide further information to FortisBC regarding Indigenous laws,  
14 governance, philosophies, or customs, and current use sites in the Project Area when the information  
15 becomes available.

### 16 ***Changes to Participation in Decision Making in Matters that Affect Aboriginal and Snuneymuxw*** 17 ***Sarlequun Treaty of 1854 Rights in the Proposed Project Site***

18 As previously described, in response to engagement activities with Indigenous Nations during the  
19 Application Development phase, the proposed Project will no longer utilize the waterborne delivery of  
20 modular components and construction materials and does not need the MOF. Implementation of this  
21 avoidance mitigation measure has been incorporated into the determination of potential residual effects  
22 of linked VCs.

23 The proposed Project Footprint is located on private property with restricted public access in an  
24 industrialized area. These current conditions, along with other existing conditions (described in  
25 subsection 11.1.13, Summary of Valued Components Linked to Indigenous Interests) account for existing  
26 restrictions and barriers to Snuneymuxw First Nation's use of the lands and resources within the proposed  
27 Project Footprint. The proposed Project is not anticipated to change Snuneymuxw First Nation's  
28 participation in decision making in matters that affect Aboriginal and Snuneymuxw Sarlequun Treaty of  
29 1854 rights in the proposed Project Site from existing conditions.

### 30 ***Changes to Ongoing Conservation Efforts to Restore Important Fish Species and Habitat***

31 As previously described, in response to engagement activities with Indigenous Nations during the  
32 Application Development phase, the proposed Project will no longer utilize the waterborne delivery of  
33 modular components and construction materials and does not require the MOF. Implementation of this  
34 avoidance mitigation measure has been incorporated into the determination of potential residual effects  
35 of linked VCs.

36 Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed  
37 Project Area falls within their traditional territory, including Snuneymuxw fisheries and historic fishing  
38 villages (Wyse, pers. comm. 2021). Snuneymuxw First Nation also conducts fisheries for sockeye under  
39 licences in the Project Area for social and ceremonial purposes, and has indicated that the Project has the  
40 potential to interact with these sites (Snuneymuxw First Nation 2018; Paige, pers. comm. 2024c). As  
41 previously discussed, FortisBC does not expect interaction between the proposed Project and the historic  
42 fishing village sites, and there is no interaction between the proposed Project and Snuneymuxw First  
43 Nation's conservation and stewardship efforts through the lack of or negligible changes in Fish and Fish  
44 Habitat, Wildlife and Wildlife Habitat, and Vegetation. The proposed Project Footprint is located on private

property with restricted public access in an industrialized area. These current conditions, along with other existing conditions (described in subsection 11.1.13, Summary of Valued Components Linked to Indigenous Interests) account for existing restrictions and barriers to Snuneymuxw First Nation's use of the lands and resources within the proposed Project Footprint. The proposed Project is not anticipated to change Snuneymuxw First Nation's conservation efforts to restore important fish species and habitat.

#### ***Changes in the Ability to Engage in the Stewardship of lands and Resources***

As previously described, in response to engagement activities with Indigenous Nations during the Application Development phase, the proposed Project will no longer utilize the waterborne delivery of modular components and construction materials and does not need the MOF. Implementation of this avoidance mitigation measure has been incorporated into the determination of potential residual effects of linked VCs.

Snuneymuxw First Nation indicated through the Notice of Intent to participate in the EA that the proposed Project Area falls within their traditional territory, over which Snuneymuxw First Nation claims Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights and title and to which its stewardship responsibilities apply (Wyse, pers. comm. 2021). As previously discussed, there is no interaction between the proposed Project and Snuneymuxw First Nation's conservation and stewardship efforts through the lack of or negligible changes in Fish and Fish Habitat, Wildlife and Wildlife Habitat, and Vegetation. The proposed Project Footprint is not currently accessible for harvesting and will remain restricted for the life of the proposed Project, which will have a potential neutral effect on current ability for Snuneymuxw First Nation to engage in stewardship within the proposed Project Footprint.

#### ***Effects on Current Use of Land and Resources for Traditional Purposes***

In accordance with B.C. EAO Schedule C – AIR, Table 25 (B.C. EAO 2022), this subsection addresses effects within Federal Jurisdiction under Section 2 of the Impact Assessment Act. In particular, it combines information from the Harvesting and Subsistence Activities VC and Cultural Use Sites and Areas VC to demonstrate how FortisBC considered the effects of the proposed Project on current use of land and resources for traditional purposes by Snuneymuxw First Nation in the Application.

FortisBC understands that Snuneymuxw First Nation has fisheries licenses along the Fraser River, and canoes in areas within the Project Footprint and Harvesting and Subsistence LAA. Although FortisBC understands that Snuneymuxw First Nation has additional hunting and gathering sites in the Project Area, FortisBC does not have information regarding these Snuneymuxw First Nation current hunting and gathering sites and areas along the south arm of the lower Fraser River within the proposed Project Footprint or the Snuneymuxw First Nation Harvesting and Subsistence Activities LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas for these purposes.

As discussed, the proposed Project is located within a current brownfield and industrialized area and circumstances related to accessibility and availability of traditional lands and resources are anticipated to be comparable to existing conditions. There is little to no wildlife habitat within the proposed Project Footprint. With the implementation of proposed mitigation measures, potential changes to wildlife movement is reduced to negligible levels; therefore, proposed Project activities adjacent to the proposed Project Footprint are not anticipated to interact with Snuneymuxw First Nation hunting activities.

Over 98 percent of the proposed Project Footprint is industrial land use and is not vegetated. The proposed Project Footprint is not currently accessible for harvesting and will remain restricted for the life

of the proposed Project. Proposed Project activities within the proposed Project Footprint are not anticipated to interact with Snuneymuxw First Nation FSC plant gathering.

As discussed in detail in subsection 11.14.5.3, proposed Project activities during construction, operation, and decommissioning will have a negligible interaction with Snuneymuxw First Nation cultural use sites. While some change may be detectable to some Snuneymuxw First Nation members due to changes in visual landscape or the experience of fishing, these changes would not noticeably adversely affect Snuneymuxw First Nation cultural sites when compared to existing conditions. The proposed Project is not anticipated to interact with Snuneymuxw First Nation's Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 right to gather in the Harvesting and Subsistence Activities LAA or use cultural use sites in the Cultural Use Sites and Areas VC. Although FortisBC understands that Snuneymuxw has fishing, gathering, and hunting sites in the Project Area, FortisBC does not have information regarding specific Snuneymuxw First Nation hunting and gathering sites and areas within the proposed Project Footprint or the Snuneymuxw First Nation Cultural Use Sites and Areas LAA (WesPac 2019; B.C. EAO 2022a; B.C. EAO 2022a; DFO n.d.). No interaction with Snuneymuxw First Nation harvesting methods and practices, current use of lands and resources for traditional purposes, or alteration of harvesting based livelihoods are expected. Snuneymuxw First Nation has noted that alienation from the area due to colonialism has adversely impacted Snuneymuxw First Nation's use of the Project Footprint and surrounding areas for these purposes.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding current hunting, fishing, and gathering sites and areas in the proposed Project Area when the information becomes available.

#### **11.14.4.4 Effects Management**

Mitigation measures are identified in an attempt to avoid, reduce, offset, or otherwise address potential adverse effects, as well as measures to enhance potential benefits of the proposed Project on the interests of Snuneymuxw First Nation. Proposed measures from linked VCs are detailed in Appendix A of the Application. FortisBC provided opportunity for Snuneymuxw First Nation to provide feedback on Revs A, B, and D of subsection 11.14.

Snuneymuxw First Nation has entered into an agreement with FortisBC Holdings Inc. regarding the Tilbury LNG Projects, including the proposed Project. The agreement provides mutual benefits to the parties, which include, among other things, providing Snuneymuxw First Nation with options, subject to regulatory approval and certain conditions precedent as outlined in articles 2.7, 2.8, 2.9, 3.5, 3.6, 3.7, 4.5, 4.6 and 4.7 in the agreement, to acquire equity in the projects (including Phase 2).

FortisBC and Snuneymuxw First Nation will work collaboratively to implement a marine communications protocol consistent with the protocol agreed to between Snuneymuxw and the Tilbury Jetty Limited Partnership for the Tilbury Marine Jetty Project. The purpose of the marine communications protocol is to provide a mechanism to identify and communicate potential interactions between Snuneymuxw marine users and Project-related vessels travelling to and from the proposed Project, to mitigate or eliminate adverse impacts and maintain the safety of Snuneymuxw marine users.

Snuneymuxw First Nation and FortisBC have also committed to a process to address Snuneymuxw First Nation's concerns with respect to the proposed Project, including mitigating or eliminating potential adverse impacts from the proposed Project on Snuneymuxw First Nation's Aboriginal and Snuneymuxw Sarlequun Treaty of 1854 rights, title and interests. Snuneymuxw First Nation and FortisBC are working together to address Snuneymuxw First Nation's remaining concerns, to the extent they are within FortisBC's control, pursuant to that process.



The agreement recognizes Snuneymuxw First Nation's Indigenous rights and title and supports Snuneymuxw First Nation's governance and stewardship within its territory. Snuneymuxw First Nation and FortisBC are working in close collaboration and partnership with respect to the Tilbury LNG Projects to meet mutual objectives.

#### **Snuneymuxw First Nation-specific Mitigation Measures**

Table 11.14-12 provides a list of mitigation measures proposed by Snuneymuxw First Nation, and FortisBC's response.

**Table 11.14-12. Mitigation Proposed by Snuneymuxw First Nation and FortisBC's Response**

Indigenous Interest	Potential Effect	Proposed Mitigation	Response
No mitigation has been proposed by Snuneymuxw First Nation to date.			

#### **11.14.4.5 Proposed Project Residual Effects**

The potential effects related to proposed Project construction, operation, and decommissioning activities, along with technically and economically feasible mitigation measures (measures identified in an attempt to avoid, reduce, offset, or otherwise address potential adverse effects of the Project), and potential residual effects (those effects that are anticipated to remain once mitigation measures have been implemented) are:

- Social and Economic Conditions – Increased employment and economic opportunity

Refer to Table 11.14-13 for a summary of residual effects.

In January 2023, Snuneymuxw First Nation and FortisBC entered into the Tilbury Projects Agreement, which provides a framework for shared benefits in relation to the proposed Project and the TMJ project. Through this agreement, Snuneymuxw First Nation has committed to supporting the Tilbury Projects and participating in associated regulatory processes, and FortisBC has committed to supporting Snuneymuxw First Nation community members through education, training opportunities, and community investment. Positive residual effects are predicted for Snuneymuxw First Nation through increased employment, enhanced opportunities, and a potential improvement of social conditions. Income, employment, education, and skills for Indigenous Peoples; access to economic opportunities/economic equity; tax revenues; GDP contributions; business revenue; and cost of living are anticipated as positive effects (subsection 7.10, Employment and Economy) as a result of proposed enhancement measures outlined in Appendix A of the Application, and the terms as outlined in the Tilbury Projects Agreement.

Negligible or lack of interactions between the proposed Project and Indigenous interests (those effects determined to be effectively managed with the implementation of proposed mitigation measures for linked VCs), including potential positive residual effects are not carried through for further assessment. As no negative interactions were identified between the proposed Project and Snuneymuxw First Nation Indigenous interests, a residual effects assessment was not conducted.

**Table 11.14-13. Indigenous Interests – Potential Effects, Mitigation Measures, and Potential Residual Effects**

Indigenous Interest	Proposed Project Phase	Potential Effect	Spatial Boundary	Proposed Mitigation or Enhancement Measures to Reduce or Eliminate Potential Effects to Indigenous Interests	Mitigation Tier, Timeline and Effectiveness	Potential Residual Effect
Social and Economic Conditions	All proposed Project phases, with emphasis on the construction phase	<p>Potential positive effects on Social and Economic Conditions for Snuneymuxw First Nation, including the following:</p> <ul style="list-style-type: none"> <li>Increased employment opportunities, Indigenous business opportunities, procurement opportunities, and Indigenous Government Revenue</li> <li>Increased ability of Snuneymuxw First Nation to improve social and economic conditions</li> </ul>	Social and Economic Conditions LAA	<p>Enhancement measures identified in subsections 7.14 (Culture), 7.10 (Employment and Economy), 7.11 (Land and Resource Use), and 7.12 (Infrastructure and Services).</p> <p>Tilbury Projects Agreement identified in Table 11.14-6 (Summary of engagement with Snuneymuxw First Nation).</p> <p>FortisBC did not receive information on Snuneymuxw First Nation-specific mitigation measures</p>	Appendix A of the Application presents information on tier, timeline, and effectiveness available for enhancement measures identified in VCs linked to Indigenous interests	Potential positive residual effect-- Increased employment and economic opportunity

**11.14.4.6 Monitoring Project Effects on Indigenous Interests**

Monitoring will be developed by FortisBC in the CEMP prior to construction, through engagement with Indigenous nations. Monitoring will occur during construction to determine that the mitigation measures are effective at reducing potential effects. If a mitigation measure is found to be ineffective at reducing potential effects, corrective measures will be taken through adaptive management, as specified in management plans, as applicable, through engagement with applicable regulators and Indigenous nations.

**11.14.4.7 Cumulative Effects**

As no negative residual effects to Snuneymuxw First Nation were predicted by FortisBC due to the proposed Project, a cumulative effects assessment was not completed. Through review of Rev A and Rev B, FortisBC sought input from Snuneymuxw First Nation regarding Snuneymuxw First Nation's Indigenous interests in the proposed Project Footprint and Indigenous interests LAAs, which may in turn affect cumulative effects. Snuneymuxw First Nation informed FortisBC that ongoing capacity constraints as a result of inadequate funding for Indigenous land and resource offices in Canada have impacted Snuneymuxw First Nation's ability to hire additional permanent full-time staff. This staffing issue has limited the Nation's ability to contribute to earlier versions of Section 11.14 and respond to requests for information from FortisBC.

Snuneymuxw First Nation intends to provide further information to FortisBC regarding residual and cumulative effects when the information becomes available.

**11.14.4.8 Views of Snuneymuxw First Nation**

Section 11.14.3 provides a summary of input received and issues raised. FortisBC provided opportunity for Snuneymuxw First Nation to provide feedback on Rev A and Rev B of subsection 11.14. FortisBC received comments back on Rev A and incorporated relevant information into subsection 11.14. FortisBC and Snuneymuxw First Nation met virtually to conduct review sessions of Rev D, where Snuneymuxw First Nation provided feedback on subsection 11.14. FortisBC has incorporated this feedback and any edits brought forward by Snuneymuxw First Nation during these review sessions into subsection 11.14.

**11.14.5 Summary**

Given the scope of the proposed Project, FortisBC does not anticipate any adverse interaction between the proposed Project and Snuneymuxw First Nation Indigenous interests. Positive residual effects are predicted for Snuneymuxw First Nation through increased employment, enhanced opportunity, and a potential improvement of social conditions. Income, employment, education, and skills for Indigenous Peoples; access to economic opportunities/economic equity; tax revenues; GDP contributions; business revenue; and cost of living are anticipated as positive effects (subsection 7.10, Employment and Economy) as a result of proposed enhancement measures outlined in Appendix A of the Application and the terms as outlined in Snuneymuxw First Nation and FortisBC's Tilbury Projects Agreement.

Snuneymuxw First Nation intends to provide further information to FortisBC on potential effects to Snuneymuxw's Indigenous interests when the information becomes available.

### 11.14.6 References

- Barbo, Geneveave, Sharmin Alam, and Anita Kiafar. 2021. "Experiences of Indigenous Peoples in Canada with Primary Health Care Services: A Qualitative Systematic Review Protocol." *JB1 Evidence Synthesis*. Vol.19, No. 9. pp. 2398–2405.
- Bartlett, Judith G. 2003. "Involuntary Cultural Change, Stress Phenomenon and Aboriginal Health Status" *Canadian Journal of Public Health*. Vol. 94, No. 3. pp. 165–167.
- BC Emergency Health Services (EHS). n.d. "B.C. Ambulance Service." BC Emergency Health Services. <http://www.bcehs.ca/about/who-we-are/bc-ambulance-service>.
- British Columbia (B.C.) Assembly of First Nations. n.d. "Snuneymuxw First Nation." Accessed March 13, 2023. <https://www.bcafn.ca/first-nations-bc/vancouver-island-coast/snuneymuxw-first-nation>.
- British Columbia (B.C.) Ministry of Indigenous Relations and Reconciliation. n.d. *Snuneymuxw Nation Reconciliation Agreement Fact Sheet*. Accessed April 26, 2022. <https://engage.gov.bc.ca/app/uploads/sites/121/2021/03/Snuneymuxw-Reconciliation-Agreement-Fact-Sheet.pdf>.
- British Columbia Environmental Assessment Office (B.C. EAO). 2021. *EAO User Guide: Introduction to Environmental Assessment Under the Provincial Environmental Assessment Act (2018)*. Version 1.02. April 23. [https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/eao\\_user\\_guide\\_v102\\_april\\_2021.pdf](https://www2.gov.bc.ca/assets/gov/environment/natural-resource-stewardship/environmental-assessments/guidance-documents/2018-act/eao_user_guide_v102_april_2021.pdf).
- British Columbia Environmental Assessment Office (B.C. EAO). 2022a. *Schedule C – Application Information Requirements for the Tilbury Phase 2 LNG Expansion Project*. June 13. <https://www.projects.eao.gov.bc.ca/api/public/document/62a7c1f6db8ee200224970f2/download/Tilbury%20LNG%20Phase%20-%20Application%20Information%20Requirements%20-%20June%2013%202022%20%28EPIC%20Posting%29.pdf>.
- British Columbia Environmental Assessment Office (B.C. EAO). 2022b. Draft Assessment Report for Tilbury Marine Jetty Project. July 13. [https://projects.eao.gov.bc.ca/api/public/document/62cf429ddb4303002297c0d9/download/TMJ\\_Assessment%20Report\\_Draft\\_for\\_PCP\\_20220713.pdf](https://projects.eao.gov.bc.ca/api/public/document/62cf429ddb4303002297c0d9/download/TMJ_Assessment%20Report_Draft_for_PCP_20220713.pdf).
- Carey, Michael. 1996. *Snuneymuxw Justice as an Alternative to the Canadian Justice System*. Published Master of Arts thesis. Trent University. <https://dspace.library.uvic.ca/bitstream/handle/1828/1230/Mike%20Carey%20FINAL.pdf?sequence=1&isAllowed=y>.
- City of Delta (Delta). 2022. *The Corporation of Delta Official Community Plan*. February 8. <https://delta.civicweb.net/filepro/documents/37999>.
- City of Nanaimo (Nanaimo). n.d. "Police & Crime Prevention." Last updated April 5, 2023. <https://www.nanaimo.ca/city-services/emergency-services/police-crime-prevention>.
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). n.d. "First Nation Detail." Crown-Indigenous Relations and Northern Affairs Canada. Last modified December 7, 2021. [https://fnp-pnpn.aadnc-aandc.gc.ca/fnp/Main/Search/FNMain.aspx?BAND\\_NUMBER=648&lang=eng](https://fnp-pnpn.aadnc-aandc.gc.ca/fnp/Main/Search/FNMain.aspx?BAND_NUMBER=648&lang=eng).

- 1 Delta Farmland & Wildlife Trust. n.d. "History Of Farming In Delta." Accessed March 13, 2023.  
2 <https://deltafarmland.ca/resources/history-of-farming-in-delta/>.
- 3 First Nations Health Authority. n.d. "FNHA Overview." First Nations Health Authority. Accessed  
4 March 13, 2023. <https://www.fnha.ca:443/about/fnha-overview>.
- 5 FirstVoices. n.d. "Learn Halq'eméylem." FirstVoices. Accessed February 2023.  
6 [https://www.firstvoices.com/explore/FV/sections/Data/Salish/Halkomelem/Halq'em%C3%A9ylem/](https://www.firstvoices.com/explore/FV/sections/Data/Salish/Halkomelem/Halq'em%C3%A9ylem/learn)  
7 [learn](https://www.firstvoices.com/explore/FV/sections/Data/Salish/Halkomelem/Halq'em%C3%A9ylem/learn).
- 8 Fisheries and Oceans Canada (DFO). 2019. *Fish and Fish Habitat Protection Policy Statement*. August.  
9 <https://waves-vagues.dfo-mpo.gc.ca/Library/40971193.pdf>.
- 10 Fisheries and Oceans Canada (DFO). 2021. "Commercial Pacific salmon closures." Fisheries and Oceans  
11 Canada in the Pacific Region. Accessed November 25, 2022. [https://www.pac.dfo-mpo.gc.ca/fm-](https://www.pac.dfo-mpo.gc.ca/fm-gp/salmon-saumon/comm-closures-fermatures-eng.html#wb-auto-13)  
12 [gp/salmon-saumon/comm-closures-fermatures-eng.html#wb-auto-13](https://www.pac.dfo-mpo.gc.ca/fm-gp/salmon-saumon/comm-closures-fermatures-eng.html#wb-auto-13) (site discontinued).
- 13 Fisheries and Oceans Canada (DFO). n.d. "Fraser River Indigenous fisheries." Last modified  
14 October 27, 2021. <https://www.pac.dfo-mpo.gc.ca/fm-gp/fraser/abor-autoc-eng.html> (site discontinued).
- 15 FortisBC Energy Inc. (FortisBC). 2022. *Tilbury Phase 2 LNG Expansion Project: Detailed Project Description*.  
16 *January*. [https://www.projects.eao.gov.bc.ca/api/public/document/61d61dc5733ef50022683d05/](https://www.projects.eao.gov.bc.ca/api/public/document/61d61dc5733ef50022683d05/download/FortisBC_Tilbury_DPD_Final_Jan2022.pdf)  
17 [download/FortisBC\\_Tilbury\\_DPD\\_Final\\_Jan2022.pdf](https://www.projects.eao.gov.bc.ca/api/public/document/61d61dc5733ef50022683d05/download/FortisBC_Tilbury_DPD_Final_Jan2022.pdf).
- 18 Gillett, Nathan, Alex Cannon, Elizaveta Malinina, Markus Schnorbus, Faron Anslow, Qiaohong Sun, Megan  
19 Kirchmeier-Young, et al. "Human Influence on the 2021 British Columbia Floods." *Weather and Climate*.  
20 Vol. 36. June. <https://doi.org/10.1016/j.wace.2022.100441>.
- 21 Hajizadeh, Mohammad, Min Hu, Amy Bombay, and Yukiko Asada. 2018. "Socio-Economic Inequalities in  
22 Health among Indigenous Peoples Living off-Reserve in Canada: Trends and Determinants." *Health Policy*.  
23 Vol. 122, No. 8. pp. 854–865.
- 24 Impact Assessment Agency of Canada (IAAC). 2021. *Guidance: Gender-based Analysis Plus in Impact*  
25 *Assessment*. Last modified February 9, 2023. [https://www.canada.ca/en/impact-assessment-](https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html)  
26 [agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-](https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html)  
27 [analysis.html](https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/gender-based-analysis.html).
- 28 Indigenous Services Canada. 2019a. *Community Well-Being index graphs*. May 24.  
29 <https://open.canada.ca/data/en/dataset/56578f58-a775-44ea-9cc5-9bf7c78410e6>.
- 30 Indigenous Services Canada. 2019b. *Community Well-Being index map* [map]. May 24. 1:25,600,013.  
31 <https://www.sac-isc.gc.ca/SAC-ISC/CWB/index-map-en.html>.
- 32 Indigenous Services Canada. 2020a. Emergency response process during the COVID-19 pandemic.  
33 Accessed March 2023. <https://sac-isc.gc.ca/eng/1588704895842/1588705009996>.
- 34 Indigenous Services Canada. 2020b. *Report on trends in First Nations Communities, 1981 to 2016*.  
35 January 24. <https://www.sac-isc.gc.ca/eng/1345816651029/1557323327644>.
- 36 Island Health Authority. n.d. "Our Services". Accessed March 13, 2023. [https://www.islandhealth.ca/our-](https://www.islandhealth.ca/our-services)  
37 [services](https://www.islandhealth.ca/our-services).



- 1 Joseph, Bob. 2017. "The Impact of Smallpox on First Nations on the West Coast" *Working Effectively with*  
2 *Indigenous Peoples® Blog*. Last modified April 17. [https://www.ictinc.ca/blog/the-impact-of-smallpox-](https://www.ictinc.ca/blog/the-impact-of-smallpox-on-first-nations-on-the-west-coast)  
3 [on-first-nations-on-the-west-coast](https://www.ictinc.ca/blog/the-impact-of-smallpox-on-first-nations-on-the-west-coast).
- 4 Kennedy, D. 2007. "Quantifying 'Two Sides of a Coin:' A Statistical examination of the central Coast Salish  
5 social network." *BC Studies*. No. 154, Spring.
- 6 Labbe, Stefan. 2022. "Climate change made B.C.'s November floods 2 to 4 times more likely." *Business in*  
7 *Vancouver*. February 15. [https://biv.com/article/2022/02/climate-change-made-bcs-november-floods-](https://biv.com/article/2022/02/climate-change-made-bcs-november-floods-2-4-times-more-likely)  
8 [2-4-times-more-likely](https://biv.com/article/2022/02/climate-change-made-bcs-november-floods-2-4-times-more-likely).
- 9 Lands Advisory Board. 2020. *12 First Nations added to the Framework Agreement on First Nation Land*  
10 *Management*. November 19. [https://labrc.com/press-release/12-first-nations-added-to-the-framework-](https://labrc.com/press-release/12-first-nations-added-to-the-framework-agreement-on-first-nation-land-management/)  
11 [agreement-on-first-nation-land-management/](https://labrc.com/press-release/12-first-nations-added-to-the-framework-agreement-on-first-nation-land-management/).
- 12 Metro Vancouver. 2011. *Metro Vancouver 2040: Shaping Our Future*.  
13 <https://vancouver.ca/files/cov/metro-vancouver-regional-growth-strategy.pdf>
- 14 Metro Vancouver. 2016. *Climate Projections for Metro Vancouver*. June.  
15 [https://metrovancover.org/services/air-quality-climate-action/Documents/climate-projections-for-](https://metrovancover.org/services/air-quality-climate-action/Documents/climate-projections-for-metro-vancouver-2016.pdf)  
16 [metro-vancouver-2016.pdf](https://metrovancover.org/services/air-quality-climate-action/Documents/climate-projections-for-metro-vancouver-2016.pdf).
- 17 Metro Vancouver. n.d. "About Metro 2040." Accessed March 13, 2023.  
18 <http://www.metrovancover.org/metro2040/about> (site discontinued).
- 19 MLA Committee on the First Nations, Métis, and Inuit Workforce Planning Initiative. 2010. *Connecting the*  
20 *Dots: Aboriginal Workforce and Economic Development in Alberta*. Edmonton, Alberta: Government of  
21 Alberta.
- 22 Morin, Jesse, Dana Lepofsky, Patrick Ritchie, Marko Porcic, and Kevan Edinborough. 2018. "Assessing  
23 Continuity in the Ancestral Territory of the Tsleil-Waututh-Coast Salish, Southwest British Columbia,  
24 Canada." *Journal of Anthropological Archaeology*. Vol. 51.
- 25 Nanaimo Ladysmith Public Schools. n.d. "Syeyutsus Reconciliation Policy & Framework." Last updated  
26 March 9, 2023. <https://www.sd68.bc.ca/board/syeyutsus-reconciliation-framework/>.
- 27 Neustaeter, Brooklyn. 2021. "These Canadian industries are currently facing the biggest labour shortages."  
28 *CTV News*. October 5. [https://www.ctvnews.ca/canada/these-canadian-industries-are-currently-facing-](https://www.ctvnews.ca/canada/these-canadian-industries-are-currently-facing-the-biggest-labour-shortages-1.5612004)  
29 [the-biggest-labour-shortages-1.5612004](https://www.ctvnews.ca/canada/these-canadian-industries-are-currently-facing-the-biggest-labour-shortages-1.5612004).
- 30 Ocean Wise. 2024n.d. "Threats". Accessed November 25, 2022. <https://wildwhales.org/threats/whaling/>.
- 31 Office of the Auditor General of Canada. 2018. *Report 5—Socio-Economic Gaps on First Nations*  
32 *Reserves—Indigenous Services Canada*. May 29. [https://www.oag-](https://www.oag-bvg.gc.ca/internet/English/parl_oag_201805_05_e_43037.html)  
33 [bvg.gc.ca/internet/English/parl\\_oag\\_201805\\_05\\_e\\_43037.html](https://www.oag-bvg.gc.ca/internet/English/parl_oag_201805_05_e_43037.html).
- 34 Paige, Hilda, Senior Intergovernmental Relations Analyst, Snuneymuxw First Nation. 2024a.  
35 Personal communication (meeting) with Julie Swinscoe, Jacobs. July 18.
- 36 Paige, Hilda, Senior Intergovernmental Relations Analyst, Snuneymuxw First Nation. 2024b.  
37 Personal communication (meeting) with Julie Swinscoe, Jacobs. September 11.

- 1 Paige, Hilda, Senior Intergovernmental Relations Analyst, Snuneymuxw First Nation. 2024c. Personal  
2 communication (meeting) with Julie Swinscoe, Jacobs. September 5.
- 3 Parks Canada. n.d. "History - Fort Langley National Historic Site." Last modified November 19, 2022.  
4 <https://www.pc.gc.ca/en/lhn-nhs/bc/langley/culture/histoire-history>.
- 5 Pendergast, Denton. n.d. "Sealing: From Ancient Bounty to Industry." *Victoria Harbour History*.  
6 <https://www.victoriaharbourhistory.com/stories-from-around-the-harbour/harvesting/sealing/>  
7 (site discontinued).
- 8 Petroglyph Development Group (PDG). n.d. "Sustainable Economic Development." Last updated June 18,  
9 2020. <https://petroglyphdg.com/>.
- 10 Province of British Columbia (B.C.). 2002. *Memorandum of Agreement between the Province of British*  
11 *Columbia and the Snuneymuxw First Nation*. March 11. [https://www2.gov.bc.ca/assets/gov/farming-](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/coastal-marine/nanaimo-estuary-mp/moa_shellfish_harvesting.pdf)  
12 [natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/coastal-marine/nanaimo-estuary-mp/moa_shellfish_harvesting.pdf)  
13 [objectives/coastal-marine/nanaimo-estuary-mp/moa\\_shellfish\\_harvesting.pdf](https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/natural-resource-use/land-water-use/crown-land/land-use-plans-and-objectives/coastal-marine/nanaimo-estuary-mp/moa_shellfish_harvesting.pdf).
- 14 Province of British Columbia (B.C.). 2022. *Climate Preparedness and Adaptation Strategy: Actions for*  
15 *2022-2025*. June 22. [https://www2.gov.bc.ca/assets/gov/environment/climate-](https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/cpas.pdf)  
16 [change/adaptation/cpas.pdf](https://www2.gov.bc.ca/assets/gov/environment/climate-change/adaptation/cpas.pdf).
- 17 Province of British Columbia (B.C.). n.d.a. "Emergency management in B.C." Accessed November 16, 2023.  
18 <https://www2.gov.bc.ca/gov/content/safety/emergency-management>.
- 19 Province of British Columbia (B.C.). n.d.b. "First Nations policing." Accessed November 16, 2023.  
20 [https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/the-structure-of-police-](https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/the-structure-of-police-services-in-bc/first-nations#:~:text=The%20province%20provides%20policing%20services,Nations%20located%20in%20their%20boundaries)  
21 [services-in-bc/first-](https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/the-structure-of-police-services-in-bc/first-nations#:~:text=The%20province%20provides%20policing%20services,Nations%20located%20in%20their%20boundaries)  
22 [nations#:~:text=The%20province%20provides%20policing%20services,Nations%20located%20in%20th](https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/the-structure-of-police-services-in-bc/first-nations#:~:text=The%20province%20provides%20policing%20services,Nations%20located%20in%20their%20boundaries)  
23 [eir%20boundaries](https://www2.gov.bc.ca/gov/content/justice/criminal-justice/policing-in-bc/the-structure-of-police-services-in-bc/first-nations#:~:text=The%20province%20provides%20policing%20services,Nations%20located%20in%20their%20boundaries).
- 24 Province of British Columbia (B.C.). n.d.c. "Forest Consultation and Revenue Sharing Agreements."  
25 Accessed November 16, 2023. [https://www2.gov.bc.ca/gov/content/environment/natural-resource-](https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-nations/first-nations-negotiations/forest-consultation-and-revenue-sharing-agreements)  
26 [stewardship/consulting-with-first-nations/first-nations-negotiations/forest-consultation-and-revenue-](https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-nations/first-nations-negotiations/forest-consultation-and-revenue-sharing-agreements)  
27 [sharing-agreements](https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-nations/first-nations-negotiations/forest-consultation-and-revenue-sharing-agreements).
- 28 Province of British Columbia (B.C.). n.d.d. "Snuneymuxw First Nation." Accessed March 13, 2023.  
29 [https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-](https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-nations/first-nations-negotiations/first-nations-a-z-listing/snuneymuxw-first-nation)  
30 [nations/first-nations-negotiations/first-nations-a-z-listing/snuneymuxw-first-nation](https://www2.gov.bc.ca/gov/content/environment/natural-resource-stewardship/consulting-with-first-nations/first-nations-negotiations/first-nations-a-z-listing/snuneymuxw-first-nation).
- 31 Qwam Qwum Stuwixwulh. n.d. "Welcome to Qwam Qwum Stuwixwulh." Accessed March 13, 2023.  
32 <https://qq.schools.sd68.bc.ca/>.
- 33 Reading, Charlotte and Fred Wien. 2009. *Health Inequalities and Social Determinants of Aboriginal*  
34 *People's Health*. Prepared by the National Collaborating Centre for Aboriginal Health. [https://www.ccnsa-](https://www.ccnsa-nccah.ca/docs/determinants/RPT-HealthInequalities-Reading-Wien-EN.pdf)  
35 [nccah.ca/docs/determinants/RPT-HealthInequalities-Reading-Wien-EN.pdf](https://www.ccnsa-nccah.ca/docs/determinants/RPT-HealthInequalities-Reading-Wien-EN.pdf).
- 36 Richmond, Chantelle A. M. and Nancy A. Ross. 2009. "The Determinants of First Nation and Inuit Health:  
37 A Critical Population Health Approach" *Health & Place*. Vol.15, No. 2. pp. 403–411.
- 38 Royal Canadian Mounted Police (RCMP). n.d.a. "First Nations Policing Program." Last modified February 5,  
39 2020. <https://www.rcmp-grc.gc.ca/pubs/abo-aut/fncps-spcpn-eng.htm>.

- 1 Royal Canadian Mounted Police (RCMP). n.d.b. "RCMP in Nanaimo." Last modified March 13, 2023.  
2 <https://nanaimo.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=872>.
- 3 Royal Canadian Mounted Police (RCMP). 2019. *BC RCMP - 9-1-1 Police Dispatchers*. September 3.  
4 <https://bc-cb.rcmp-grc.gc.ca/ViewPage.action?siteNodeId=2234&languageId=1&contentId=-1>.
- 5 Royal Commission on Indian Affairs for the Province of British Columbia (B.C.) 1912-1915. n.d.  
6 *Proceedings*.
- 7 Rutt, Christopher, Sue C. Sullivan. 2010. *This Is Public Health: A Canadian History*. Ottawa, ON: Canadian  
8 Public Health Association. [https://cpha.ca/sites/default/files/assets/history/book/history-book-](https://cpha.ca/sites/default/files/assets/history/book/history-book-print_all_e.pdf)  
9 [print\\_all\\_e.pdf](https://cpha.ca/sites/default/files/assets/history/book/history-book-print_all_e.pdf).
- 10 Snuneymuxw First Nation. 2018. *Trans Mountain Expansion Project Reconsideration: Final Argument of*  
11 *Snuneymuxw First Nation*. Hearing Order MH-052-2018. January 22. [https://docs2.cer-rec.gc.ca/ll-](https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3615225/3634823/3747876/A97555-2_2019-01-22_Snuneymuxw_Final_Argument_%2801614482%29_-_A6R4C2.pdf?nodeid=3747354&vernum=-2)  
12 [eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3615225/3634823/3](https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3615225/3634823/3747876/A97555-2_2019-01-22_Snuneymuxw_Final_Argument_%2801614482%29_-_A6R4C2.pdf?nodeid=3747354&vernum=-2)  
13 [747876/A97555-2\\_2019-01-22\\_Snuneymuxw\\_Final\\_Argument\\_%2801614482%29\\_-](https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3615225/3634823/3747876/A97555-2_2019-01-22_Snuneymuxw_Final_Argument_%2801614482%29_-_A6R4C2.pdf?nodeid=3747354&vernum=-2)  
14 [\\_A6R4C2.pdf?nodeid=3747354&vernum=-2](https://docs2.cer-rec.gc.ca/ll-eng/llisapi.dll/fetch/2000/90464/90552/548311/956726/2392873/3614457/3615225/3634823/3747876/A97555-2_2019-01-22_Snuneymuxw_Final_Argument_%2801614482%29_-_A6R4C2.pdf?nodeid=3747354&vernum=-2).
- 15 Snuneymuxw First Nation. 2023. Snuneymuxw First Nation comments on Revision A.
- 16 Snuneymuxw First Nation. n.d. "Snuneymuxw First Nation". Accessed March 2023.  
17 <https://www.snuneymuxw.ca/>.
- 18 Statistics Canada. 2023a. *Census Profile, 2021 Census of Population*. Statistics Canada Catalogue no.  
19 98-316-X2021001. February 8. [https://www12.statcan.gc.ca/census-recensement/2021/dp-](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo&DGUIDlist=2021A00055921007&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
20 [pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo&DGUIDlist=2021A00055921007&GENDERlist=](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo&DGUIDlist=2021A00055921007&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
21 [1,2,3&STATISTIClist=1&HEADERlist=0](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo&DGUIDlist=2021A00055921007&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0).
- 22 Statistics Canada. 2023b. *Census Profile, 2021 Census of Population*. Statistics Canada Catalogue no.  
23 98-316-X2021001. February 8. [https://www12.statcan.gc.ca/census-recensement/2021/dp-](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20river&DGUIDlist=2021A00055921807&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
24 [pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20river&DGUIDlist=2021A00055921807&GE](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20river&DGUIDlist=2021A00055921807&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
25 [NDERlist=1,2,3&STATISTIClist=1&HEADERlist=0](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20river&DGUIDlist=2021A00055921807&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0).
- 26 Statistics Canada. 2023c. *Census Profile, 2021 Census of Population*. Statistics Canada Catalogue no. 98-  
27 316-X2021001. February 8. [https://www12.statcan.gc.ca/census-recensement/2021/dp-](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20town%201&DGUIDlist=2021A00055921804&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
28 [pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20town%201&DGUIDlist=2021A0005592180](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20town%201&DGUIDlist=2021A00055921804&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0)  
29 [4&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0](https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&SearchText=nanaimo%20town%201&DGUIDlist=2021A00055921804&GENDERlist=1,2,3&STATISTIClist=1&HEADERlist=0).
- 30 Suttles, Wayne. 1987. *Coast Salish Essays*. January 1. Talonbooks.
- 31 Suttles, Wayne. 1992. Transcript of Testimony Given on February 2, 1992 in Regina v. Fraser, Provincial  
32 Court of British Columbia, Hope Registry. File No. 828oc. Referenced in Kennedy, Dorothy. 2007.  
33 "Quantifying 'Two Sides of a Coin:' A Statistical examination of the central Coast Salish social network."  
34 *BC Studies*. No. 154, Spring.
- 35 Vancouver Public Library. n.d. "1700's - European Exploration and Contact." Accessed March 13, 2023.  
36 [https://www.vpl.ca/guide/british-columbia-history/1700s-european-exploration-and-](https://www.vpl.ca/guide/british-columbia-history/1700s-european-exploration-and-contact#:~:text=The%201700's%20marked%20a%20period,third%20expedition%20to%20the%20Paci)  
37 [contact#:~:text=The%201700's%20marked%20a%20period,third%20expedition%20to%20the%20Paci](https://www.vpl.ca/guide/british-columbia-history/1700s-european-exploration-and-contact#:~:text=The%201700's%20marked%20a%20period,third%20expedition%20to%20the%20Paci)  
38 [fic..](https://www.vpl.ca/guide/british-columbia-history/1700s-european-exploration-and-contact#:~:text=The%201700's%20marked%20a%20period,third%20expedition%20to%20the%20Paci)
- 39 Vogt, D. 2020. *Snuneymuxw First Nation's Village and Fishing on Fraser River: Preliminary Summary*  
40 *Report*.

- 1 Voices of the Snuneymuxw First Nation. n.d. "Snuneymuxw means 'The Great People.'" Accessed March 19,  
2 2023. <https://www.snuneymuxwvoices.ca/snuneymuxw-means-the-great-people/>.
- 3 Watson, Bridgette. 2021. "Snuneymuxw First Nation partnering with B.C. Housing to build affordable  
4 homes for its members." *CBC News*. June 22. [https://www.cbc.ca/news/canada/british-](https://www.cbc.ca/news/canada/british-columbia/snuneymuxw-housing-plans-1.6075671)  
5 [columbia/snuneymuxw-housing-plans-1.6075671](https://www.cbc.ca/news/canada/british-columbia/snuneymuxw-housing-plans-1.6075671).
- 6 WesPac Midstream-Vancouver LLC. (WesPac). 2019. *Environmental Assessment Certificate Application –*  
7 *WesPac Tilbury Marine Jetty Project*.  
8 [https://projects.eao.gov.bc.ca/p/58851208aaecd9001b829b58/project-](https://projects.eao.gov.bc.ca/p/58851208aaecd9001b829b58/project-details;currentPage=1;pageSize=10;sortBy=-dateAdded;ms=1581371449997)  
9 [details;currentPage=1;pageSize=10;sortBy=-dateAdded;ms=1581371449997](https://projects.eao.gov.bc.ca/p/58851208aaecd9001b829b58/project-details;currentPage=1;pageSize=10;sortBy=-dateAdded;ms=1581371449997).
- 10 Wyse, Mike, Chief, Snuneymuxw First Nation. 2021. Personal communication (letter) with Fern Stockman,  
11 Project Lead, Environmental Assessment Office. November 30.  
12 <https://www.projects.eao.gov.bc.ca/api/public/document/61ae476b751d220022f86f5c/download/SNU>  
13 [NEY~1.PDF](https://www.projects.eao.gov.bc.ca/api/public/document/61ae476b751d220022f86f5c/download/SNU).