



Six Nations of the Grand River Development Corporation

Lake Erie Connector

Community Investment Review Outreach Final Report

May 2022

This page is left intentionally blank.

Executive Summary

Six Nations of the Grand River Development Corporation (SNGRDC) is reviewing a community investment opportunity for the Lake Erie Connector (LEC) project with ITC Holdings Corp (ITC), a subsidiary of Fortis Inc. The purpose of the Community Investment Review is to explore the level of Six Nations' participation in the project and to harness feedback on the project. The goal of the Community Investment Review is to bridge the gap between the project information and community understanding of the investment options by enlisting as many viewpoints as possible from community members within the given engagement timeframe. The following report will provide an overview of outreach findings and an understanding of the community's level of participation in the project.

Dillon Consulting Limited was engaged by SNGRDC to facilitate community outreach sessions and collate comments received throughout the review period, and provide an unbiased, independent review of the feedback received on the options for participation in the LEC project. The following options for participation being examined are:

- Option 1: Equity Ownership
- Option 2: Participation Payments
- Option 3: No Participation

The investment review process spanned 60 days from March 2022 to April 2022 and consisted of a number of outreach activities to the Six Nations community that are outlined in Section 2.0, including through webinars, social media, and communications with Friendship Centres and Six Nations organizations. In addition, outreach was separately conducted to Six Nations of the Grand River (SNGR) Elected Council and to the Haudenosaunee Confederacy Chiefs Council (HCCC) offering to host a special virtual session at their convenience.

The outreach results did not indicate a majority preference for any of the three participation options. Rather, the core themes of the discussions focused on *community benefits, funding structure, land claim impacts, environmental and archaeological impacts, and access to jobs* (see Section 3.0 for more detail). There was some opposition to the project noted in the written comments received (attached as **Appendix D**), while some participants expressed support for the equity investment (7.5% ownership) through polling during the webinar sessions. However, it was communicated that the polling questions were being deemed a “temperature check” on how the community was receiving the information and which option participants were considering. There were no responding communications or feedback received from SNGR Elected Council or the HCCC.

A set of recommendations for future Community Investment Review processes is provided in Section 4 of this report, highlighting the need for specific indicators and metrics to be developed to track project performance relative to the core values of Six Nations community members.

Table of Contents

Executive Summary	i
1.0 Project Background	1
2.0 Overview of Outreach Approach	3
1.1 Project Team	3
1.2 Key Messages	4
1.3 Tools and Tactics	4
1.3.1 Round 1: Project Awareness, Outreach.....	4
1.3.2 Round 2: Post Community Investment Review	6
3.0 Communications Summary	7
4.0 Outreach Results	10
Community Benefits	10
Access to Jobs	10
Funding Structure	10
Land Claim Impacts	11
Environmental Impacts	11
1.4 Webinar Polling Results	11
1.4.1 Poll 1.....	12
1.4.3 Poll 2.....	13
1.5 Written Comments	14
1.6 Next Steps	14
1.7 Conclusion	14
5.0 Recommendations for Future Outreach/Engagement	16

Table of Contents

Appendices

Appendix A - Communications and Engagement Strategy

Appendix B - Communication Materials

Appendix C - Summary of Individual Webinar Sessions

Appendix D - Written Comments Received

Appendix E – Correspondence

Appendix F – Neegan Burnside Memo: Amendment to Risk Assessment

1.0 Project Background

SNGRDC is reviewing a community investment opportunity for the LEC project with ITC, a subsidiary of Fortis Inc. In 2014, ITC acquired the rights to develop the LEC project from Lake Erie Power Corp. The LEC is a bi-directional 1,000 MW high voltage direct current underwater transmission line that will provide a direct connection between the Ontario power grid (via the Independent Electricity System Operator, IESO) and PJM which is a regional transmission organization in Pennsylvania, USA. The LEC project has a number of significant benefits including, but not limited to system reliability improvements, reduction in greenhouse gas emissions, and significant ratepayer savings. It is important to note that the project has regulatory approval to be built with or without Six Nations participation.

The community investment review process aligns with the economic development function of SNGRDC, who has sought a mandate from Six Nations of the Grand River (SNGR) Elected Council to complete the investment review to explore Six Nations options in the LEC. SNGRDC has entered into a Mutual Confidentiality Agreement (MCA) with the ITC to discuss the terms for the potential direct or indirect economic participation of Six Nations.

In order to explore the participation of Six Nations, the ITC committed to fund SNGRDC's due diligence costs, and a Capacity Funding Agreement (CFA) was executed to capture this commitment. These funds are to be used to complete SNGRDC's due diligence on the project while assessing the business viability (legal, environmental review, financial analysis, community outreach, etc.). In addition to legal counsel review, the due diligence review included an review of environmental reports; conducted by Neegan Burnside; and a financial review; conducted by First Canadian Property Investments Ltd. The outreach conducted as part of the Community Investment Review was funded by the Capacity Funding Agreement.

The three options for Six Nations participation in the LEC include:

Option 1 Equity Ownership

The LEC project includes an opportunity for Six Nations, via SNGRDC, to secure a 7.5% equity (ownership) position in the asset at a cost of ~\$26 million. The LEC project is being developed using an Ontario Energy Board regulated rate base revenue and financing (60/40 debt to equity) model.

In exchange for this investment, Six Nations will hold a 7.5% ownership in the LEC project for the entire life of the asset which conceivably can be 55+ years with proper maintenance and upkeep. Although the rate of return is regulated to <10%, the ownership of transmission assets is one of most coveted investments available on the market because the rate of return is essentially underwritten by a contract with the Independent Electricity System Operator (IESO).

Based on preliminary financial analysis prepared by SNGRDC's financial advisor, First Canadian Property Investments Ltd., the equity option has the potential of generating ~\$44M in ownership distributions over the next 40 years with the possibility of generating up to ~\$90M if

Project Background

the contract is extended to 55 years (which is the goal). The potential value of equity ownership over 55 years, not including any terminal value, is therefore ~\$90M.

Option 2 Participation Payments

An alternative option is to receive annual “participation payments”, without securing an ownership position in the LEC asset. Participation payments are significantly less and are expected to yield between \$30M - \$40M over 40 and up to ~\$58M over 55 years. \$31M less than the equity option. The participation payment option does not provide any ownership interest in the asset, now or in the future.

Option 3 No Participation

Six Nations has the option not to participate – in this case there will be no participation payments or equity distributions.

Community Benefit Payments

If Option 1 or 2 is selected, ITC is prepared to enter into a Community Benefit Agreement directly with Six Nations of the Grand River Elected Council (SNGR), which in exchange for securing project support, will provide the following financial benefits paid directly to SNGR:

1. **Initial Payment:** An initial payment of \$100,000 CAD to be paid within 10 business days of signing of the Community Benefit Agreement;
2. **Annual Payment prior to COD:** A payment of \$225,000 CAD to be paid on the Financial Close Date of the Project and annually for three subsequent years (totalling \$900,000 CAD); and
3. **Annual Payment commencing at COD:** A payment of approximately \$118,000 CAD per year. This payment is an annual Project cost which would continue until the Project is abandoned or decommissioned.

If SNGR chooses not to participate, there will be no Community Benefits Payments.

2.0 Overview of Outreach Approach

Community outreach for the Investment Review was designed to gather feedback and hear concerns, understand the community's perspective and answer any questions on the participation of Six Nations in the LEC project. The community outreach was also designed to present information on the project to help people understand all the aspects of the project including the project history and background, the technical aspects of how the project will work, the options for Six Nations participation, local employment benefits, technical studies, impacts, process for decommissioning the Lake Erie Connector project, and the next steps for the project. This approach was intended to ensure that Six Nations community members could offer informed feedback on the direction they thought would be most beneficial to the community with respect to investing in the LEC project.

At the outset of the project, Dillon Consulting, in collaboration with SNGRDC, created a Communications and Engagement Strategy (see **Appendix A**) to outline the approach to capturing feedback from the Six Nations community on the three (3) options for participation. As part of the development of this process, SNGRDC recommended that Dillon conduct the engagement process in line with previous community engagement processes developed from past project investment reviews.

The Communications and Engagement Strategy includes a range of activities to bring the voices of Six Nations community members into the review process, as well as an overview of the project key messages, and implementation plan. Given the context of the COVID-19 pandemic and public health precautions related to social gathering, the engagement tactics identified were online/virtual, with only one in-person held in the community.

1.1 Project Team

The Project Team consisted of SNGRDC Staff along with project team members from Dillon Consulting Limited, as follows:

Six Nations of the Grand River Development Corporation

- Nicole Kohoko, Director of Corporate Affairs
- Alysha Filer, Communications Coordinator

Dillon Consulting Limited

- Stephanie Burnham, Project Manager/ Facilitator
- Zahra Jaffer, Engagement Lead
- Nicole Beuglet, Engagement Specialist
- Faith Oloruntoba, Engagement Specialist
- Ying Ye, Engagement Specialist

Overview of Outreach Approach

- Karla Kolli, Engagement Advisor

For purposes of the webinars and community meetings, a team of Panelists was assembled to help answer questions and provide context and information on the LEC project, as follows:

- Matt Jamieson, SNGRDC, President/CEO;
- R. Darryl Hill, SNGRDC, Special Projects Manager;
- Doug Motley, ITC, Director Grid Solutions;
- Cherie Brant, BLG, Partner;
- Janine Ralph, HDR, Environmental Sciences and Planning Lead; and
- Lonny Bomberry, Six Nations Lands and Resources

1.2 Key Messages

The community outreach was designed to communicate the following key messages about the project:

- Engagement is a critical and important component of the community investment review;
- There is a meaningful opportunity for input and we want to hear from a broad audience;
- The purpose of this review is to determine how or if the community wants to be a part of the project; and
- This project has been granted approval from a regulatory perspective.

Outreach and dialogue were conducted in two rounds as outlined in the following section.

1.3 Tools and Tactics

1.3.1 Round I: Project Awareness, Outreach

In Round 1, the outreach approach was designed to provide both on- and off-reserve members with the opportunity to ask questions about the project and provide feedback.

SNGRDC was responsible for promoting and advertising the webinars, which were promoted through radio, newspaper ads (both print and online), direct mail, social media and a collateral campaign from March through April. More information on the communications is provided in Section 3.0.

The following digital media and print advertisements and communications were conducted:

- CKRZ Radio Interview with the SNGRDC team on March 1, 2022.
- Facebook ads run from March 1 to April 20, 2022;
- Turtle Island News website ran from March 1 to April 20, 2022;
- Turtle Island News print ran on March 2, March 9, March 16, March 30, April 6, April 13, and April 20, 2022;
- Turtle Island News online ran March 3 to April 30, 2022;
- Two Row Times website ran from March 1 to April 20, 2022;
- Two Row Times print ran on March 2, March 9, March 16, March 30, April 6, April 13, and April 20, 2022;
- Two Row Times online ran March 3 to April 30, 2022; and

Overview of Outreach Approach

- CKRZ Radio ads from February 22 to February 26, 2022 and March 1, 2022.

In addition, the following outreach efforts were conducted to broaden awareness of the process and opportunities to participate:

- Calls to surrounding Friendship Centers and follow-up emails conducted April 5 and April 19, 2022.
- Letters to Six Nations organizations sent out on February 14, 2022.
- Letters to past EDT recipients sent out on February 15, 2022.
- Email correspondence to Six Nations Organizations on April 19, 2022.

During this Round, Dillon Consulting worked with SNGRDC to facilitate the nine webinars and one in-person session. The webinars were hosted on Zoom, and starting from March 21, the sessions were also live-streamed on the SNGRDC Facebook page. A summary of the webinars and attendance at each is provided in the table below.

Table 1 Summary of Webinar Attendance

WEBINAR DATE	NUMBER OF ATTENDEES
March 8, 2:00 PM	10
March 11, 10:00 AM	7
March 21, 7:00 PM	5
March 23, 6:00 PM	3
March 30, 2:00 PM	1
April 5, 10:00 AM	16
April 11, 6:00 PM	1
April 19, 10:00 AM	2
April 20, 6:00 PM	4
TOTAL	49

One session was held in-person on April 14, 2022 from 6:00pm-7:30pm at SNGRDC Head Office, attended by four participants.

All webinars as well as the in-person session were conducted in a similar fashion which included a video presentation that outlined the project background, the economic participation options, and the technical aspects of the study. There were breaks in the presentation to hear comments and questions from participants. Project team members from SNGRDC, ITC, Borden Ladner Gervais LLP (BLG), and HDR Inc. were present at the webinars to answer questions and listen to feedback. Questions and comments were received through the chat, and participants could submit oral comments on Zoom. Facebook was monitored during the live-stream, and comments and questions were posed to the project team members and recorded as part of the feedback collected. During the webinars, Zoom Polling was also used to gather input from participants on the participation options and the engagement approach. Participants watching via Facebook were invited to participate in the comments sections.

Overview of Outreach Approach

In addition to the webinars, community members were invited to provide feedback and comments on the project to SNGRDC directly through email, available at www.snfuture.com/contact/. Participants were also invited to provide comments on the project at any time during the Investment Review via the project website: www.snfuture.com/projects/lec/. The comments and questions received during the webinars and polling results are summarized in Section 3.0 of this report, and a full copy of the individual webinar summaries are attached in **Appendix C**.

1.3.2 Round 2: Post Community Investment Review

In Round 2 we will share what we have heard to date, as summarized in this Report, and provide the community with the opportunity to ask questions regarding the outreach process. Round 2 will be completed by May 30, 2022, and will include:

- A Community Meeting to present what we heard in Round 1
- Social media and communications about the project; and
- Reporting to SNGR Council

This Outreach Report provides input towards informing the decision that SNGR Council will take on which option related to the LEC Project to select. This will be decided at a Council meeting by May 30, 2022.

3.0 Communications Summary

The following section of the report covers the communications summary of methods to raise awareness and share information related to the LEC Community Investment Review. SNGRDC led all delivery of communications, coordination of advertising, notifications and website management. Dillon Consulting led the creation of the promotion video, outreach to organization and friendship centres, facilitation of webinars, and synthesis of feedback received from the community.

The LEC Investment Review was promoted through radio, newspaper ad (both print and online), email, direct mail, and a collateral campaign from April to March. Summary of the Communications and Engagement Strategy is included in Appendix A and the communications materials is included in **Appendix B**.

SNGRDC took the lead on the following communications tools and tactics:

- Project website <https://www.snfuture.com/projects/lec/>;
- Radio Interview on CKRZ 100.3FM on March 1, 2022, 2pm-3pm;
- Social Media Content (Facebook);
- Recorded Presentation to be played as part of the webinars;
- LEC Information Brochure;
- Media Press Release;
- Correspondence with Haudenosaunee Confederacy Chiefs Council (HCCC) sent on February 9, 2022 and March 24, 2022;
- Correspondence with Six Nations of the Grand River Elected Council sent on February 9, 2022 and March 24, 2022; and
- Six Nations of the Grand River Community Organization Invitation to Participate sent on February 14, 2022.
- SNGR Economic Development Trust past recipients invitation to participate sent on February 15, 2022.

In addition to webinar facilitation, Dillon provided support through the following communications components:

- Engagement Strategy & Implementation Plan;
- Linktree Page setup for the LEC Project: <https://linktr.ee/LakeErieConnector>;
- Eventbrite Webinar Registration page;
- Promotional Video;
- Outreach to Organizations and Friendship Centres;
- Feedback collection and analysis; and
- Compilation of this Outreach Summary Report.

Additional information on the communications tactics is provided in the following sections.

Linktree Page

The Linktree Page was set up to coincide with the launch of the Outreach effort on March 1. Links to the Eventbrite page as well as the SN Future website and direct links to subscribe for updates and contact SNGRDC were included.

Communications Summary

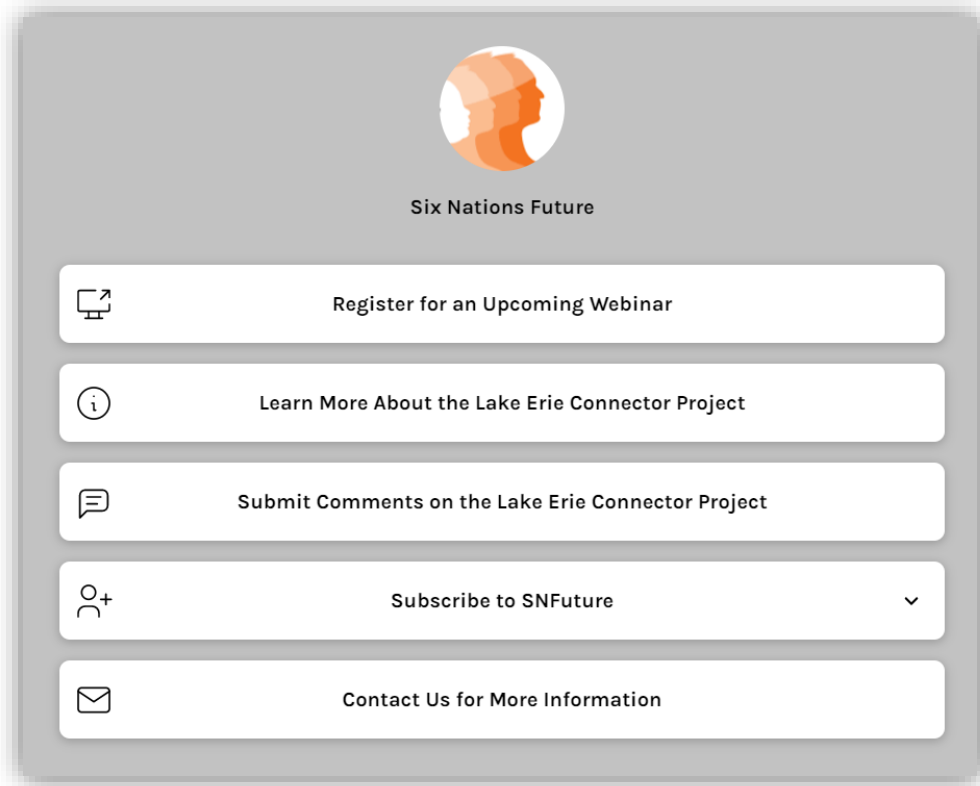


Figure 3-1 Screenshot of the LEC project Linktree page

Over the course of the review period, the page received 238 views and 115 clicks on links, with a click through rate of 48%. The Linktree Page Analytics are summarized in the figure below, indicating the majority of visitors to the page were guided there either from Facebook or by direct link to the page:

- Facebook 92
- Direct 92
- theturtleislandnews.com 24
- tworowtimes.com 22
- Google 5
- on.ca 1



Figure 3-2 LEC Project Linktree Page Views

Eventbrite Registration Page

Communications Summary

An Eventbrite registration page (<https://www.eventbrite.ca/e/lake-erie-connector-community-investment-review-tickets-277223050607>) was set up in time for the launch of the Outreach effort on March 1. The page received 92 views, with 54 tickets “sold” over the Investment Review period for the nine webinars and one in-person event held. Automated emails were sent to registrants with the Zoom link for the webinar, and reminders were scheduled for one hour before each event to go out to ticket holders.



Figure 3-3 Screenshot of the banner of the Eventbrite registration page

Outreach to Off-Reserve Organizations and Friendship Centres

Phone calls were made to each of the following Friendship Centres on April 4 and April 19, 2022, requesting assistance to promote opportunities to participate in the Community Investment Review:

- Brantford Regional Indigenous Support Centre
- Hamilton Regional Indian Centre
- The Healing of the Seven Generations
- N’Amerind Friendship Centre (London)
- The Indigenous Network
- Niagara Regional Native Centre
- Native Canadian Centre of Toronto
- Fort Erie Friendship Centre

The N’Amerind Friendship Centre (London) and the Fort Erie Friendship Centre offered to share information out to members, and the LEC project brochure and a short background email were sent to these organizations. Follow-up emails were also sent to Grand River Employment and Training (GREAT) and to the Grand River Post Secondary Education Office (GRPSEO) with offers for targeted engagement with interested participants as well as a reminder for the final Webinar on April 20th.

4.0 Outreach Results

Nine (9) online Zoom webinars were held with one (1) in-person session during the months of March and April. Six (6) of the webinars were streamed on Facebook. A total of 49 participants attended the 9 webinars with a total of 1,860 Facebook accumulated views. A total of 4 participants attended the in-person session. The summary of Individual Webinar Sessions is included in **Appendix C**.

Generally, community members were interested in the project, sought further information, and were curious about the options and potential benefits and impacts to the community. Many participants asked thoughtful questions throughout the LEC Project. There were many comments about the community benefits and environmental impacts of the project. The following are the key discussion themes that highlighted community concerns and comments:

- Community benefits;
- Funding structure;
- Land claim impacts;
- Environmental and archaeological impacts; and
- Access to jobs.

It is important to note that questions and comments arising from the themes were addressed throughout the webinars.

Community Benefits

Participants were interested in the community benefits that the project would provide, and some participants were also curious about individual benefits, speaking to the need for a transparent approach to how the funds received would be utilized and how the benefit to the community would be realized. The project team explained that there is no individual distribution of revenue from the project. However, there will be slight Hydro Ratepayer Savings from the project. The *equity participation* would bring in up to \$90 million dollars to the community after loan repayments. The *participation payments* would bring in up to \$58 million. Option 1 and 2 involve a community benefits agreement. The surplus revenue would be allocated to the Six Nations of the Grand River Economic Development Trust to fund a range of projects, from housing, fire, and water maintenance, to more grassroots projects.

Access to Jobs

Many participants were interested in the job opportunities from the project, specifically jobs for targeting Six Nations peoples. The project team explained that ITC will work with Six Nations organizations to hire local people. It is important to note that there will not be hundreds of jobs like other large infrastructure projects. Once the transmission cable is in operation, there will be about a dozen people working on-site. These jobs could also act as stepping stone for those employed to other projects in the energy sector

Funding Structure

There was interest in how the project will be funded. The project team noted that the funding would be different depending on the chosen option. In order to fund the due diligence of the

Outreach Results

project, SNGRDC entered into a capacity funding agreement with ITC to provide a maximum funding of \$250,000. The agreement helps SNGRDC explore the opportunities of the project at no cost to the community. In terms of funding the investment for Option 1, ITC will facilitate an equity loan to SNGRDC on non-recourse terms. There is no need to raise capital for Option 2.

Land Claim Impacts

Participants raised some concerns about how the project will impact Six Nations' land claims. It is important to emphasize that the project is without prejudice to Six Nations' land claims. The community will not give up any rights or interests by participating in the project.

Environmental Impacts

Many participants were interested in the environmental impacts and raised concerns about environmental disruptions. There was also opposition for the project because of environmental concerns and protection of Mother Earth from development impacts. The project team noted that the project would positively impact the environment through better utilization of existing infrastructure and renewable energy and through a reduction in greenhouse gas emissions. There is minimal risk from the project, as also determined by the independent review of the risks completed by Neegan Burnside (Appendix F). A risk that was identified is the potential disturbance at the lake bottom. There is a possibility that there could be artifacts and land use buried under the sediment. However, it was noted that the risk of materials being in the path of the transmission cable is low. There are mitigation measures to address this risk that have been identified by Neegan, which will be implemented as the LEC project moves forward. More information on the mitigation measures can be found in **Appendix F**.

1.4 Webinar Polling Results

During the webinars, two (2) polls were launched to gauge:

- The initial impressions of participants related to the three options for participation based on the information that was shared; and
- Participants' thoughts on the outreach approach.

The polls did not receive full participation from all the webinar participants. Limited participation could be the result of technical difficulties from virtual events, engagement fatigue from participants, or the general refusal to participate to refrain from voting as a community custom. Facebook users were not able to participate in the Zoom poll. Approximately 13 out of 49 webinar attendees responded to the polls.

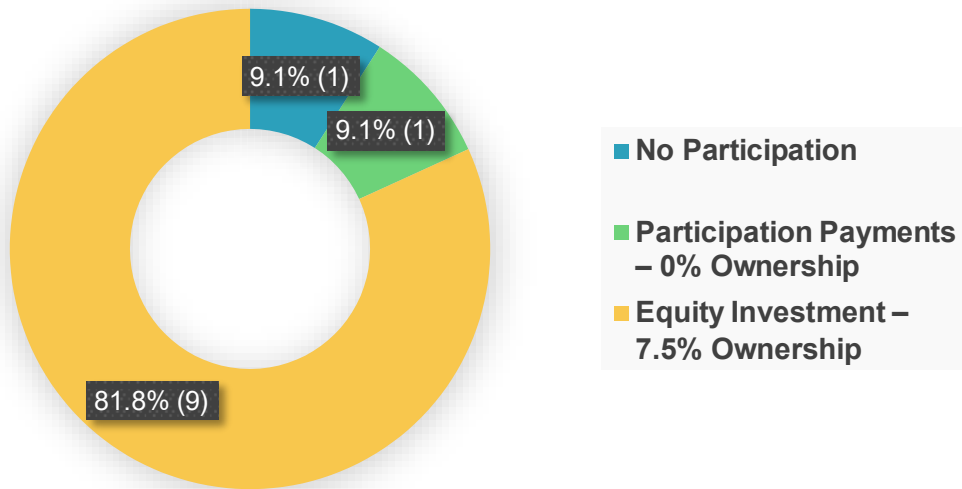
The results of the polls are shown on the following page. As the number of respondents is quite low, it would be challenging to draw any meaningful conclusions from the responses.

The purpose of the polling is to check if the information is being received well and determine if the participants are leaning toward a certain option. The poll result does not indicate a final decision.

Outreach Results

I.4.I Poll I

1. **Based on your current understanding of the Lake Erie Connector project, which of the three options under review would you most support?** 11 responses

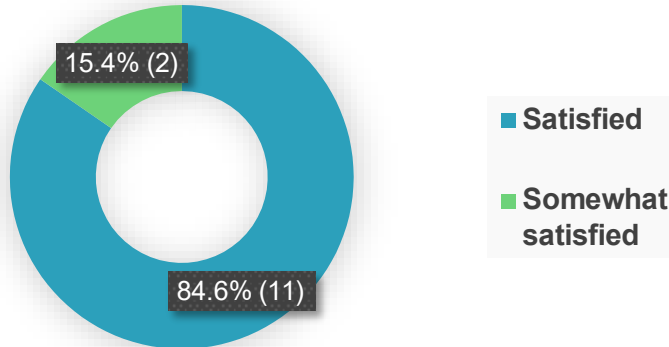


2. **Are there any comments you would like to share on the option you currently favour?** 1 response
 - This is going to happen with or without us. Equity investment would be dollars coming to the community.

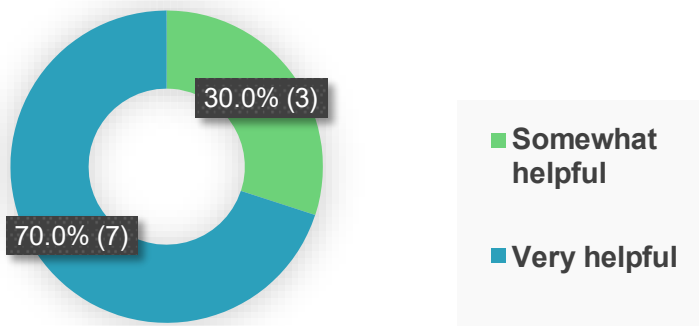
Outreach Results

I.4.3 Poll 2

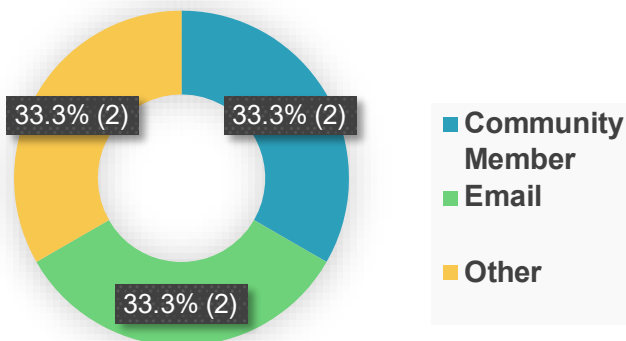
1. How satisfied are you with the information provided on the Lake Erie Connector project? 13 responses



2. How helpful did you find the webinar? 10 responses



3. How did you hear about the Community Investment Review? 6 responses



Outreach Results

4. **Please share any comments you have to expand on your responses above or suggestions for the engagement process.** 2 responses
 - Pace was far too fast to comprehend.
 - Well done.

1.5 Written Comments

A total of four (4) written comments were received through SN Future Website. The written comments received by the project team are included in **Appendix D**. Names on comments have been redacted.

The following is a summary of comments received:

- Request for information on the project's timeline, career opportunities for members, impacts on lands, environment and waterways;
- Request for information on why Six Nations was asked to participate in the project;
- Concern about the project's impact on land claims, the integrity of land claims and destruction of Indigenous lands; and
- Opposition to the project from Indigenous ecological knowledge holders because of concerns about degradation, drilling and development on Mother Earth and the Indigenous responsibility to protect Mother Earth.

The comments received were responded to by the SNGRDC project team through email, directing community members to the SN Future website, as well as being discussed during the webinars by way of the panelist responses to questions on the common concerns raised by community members.

1.6 Next Steps

As the Community Investment Review period has closed, feedback received through the process will be used to form a recommendation on participate by SNGRDC to Six Nations Elected Council.

1.7 Conclusion

The purpose of the outreach was to facilitate an open discussion on the LEC project, provide the community with information on the project, and to inform community members that their comments will help inform the final decision of participation made by the Six Nations of the Grand River Elected Council.

The common questions and concerns heard throughout the community investment review process included:

- Community benefits of each option and how the benefits will be distributed to the community;
- Funding structure of each option and how the investment will be funded;
- Land claim impacts from the project;
- Environmental and archaeological impacts from the transmission cable;

Outreach Results

- Direct access to jobs and opportunities for the community; and
- Transparency in decision-making and aspects of trust and reliability of the project performance compared against the early commitments, directed towards both SNGRDC and the project proponents.

Overall, the community did not provide any preference towards any one of the three participation options, through the comments received. Rather, questions and general comments on the process and options were provided at the sessions. Participants that completed the polls indicated support for equity investment with 7.5% ownership; however, as noted the participation in the polls was limited.

There were limitations to the outreach based on the timeline, requirement to focus on virtual engagement given ongoing COVID-19 restrictions and community history. These limitations included:

- Ability to engage through in-person sessions instead of webinars;
- Opportunities to engage family-centered via kitchen-table format dialogue;
- Opportunities to hold 'pop-up' format engagement, such as going out with information on the project to high pedestrian traffic areas or community gathering spaces;
- Overcoming inherent distrust of economic ventures and past engagement processes in order to encourage participation in LEC Community Investment Review; and
- Community skepticism of proponent intentions and potential acknowledgement of community concerns, in part linked to misunderstanding of the project and resulting predisposed opinion of participants and community members prior to the launch of the outreach effort.

5.0 Recommendations for Future Outreach/Engagement

The SNGRDC understood that a number of key concerns would arise through the community investment review. These key concerns include:

- Clarity on the community benefits and how these would be distributed, and the decision-making process for how the funds are utilized;
- Project partners to identify specific employment opportunities with an understanding of how these would support skill development;
- Transparency and commitments on monitoring of the environmental, archaeological, and cultural impacts both during construction and over the life of the project; and
- Clear communication on the potential impacts to existing and future land claims in the area.

The following recommendations highlight ways that SNGR and SNGRDC could continue to address these key concerns, and improve the outreach / engagement processes;

Broad, Representative Engagement

Further to the key themes above, some community members expressed the desire to see more outreach completed as part of the review, along with more interactive, or dialogue based sessions that dig deeper into the issues and concerns. Dillon recommended a number of potential approaches that could be used if additional outreach was conducted. These methods are outlined in the Communications and Engagement Strategy attached in Appendix A.

Additional strategies for engagement beyond what is included in the Communications and Engagement Plan include pop-up booths at community events or in public spaces, online surveys, small-groups discussions, and additional online sessions with interactive components to gather feedback.

One of the key considerations for fulsome engagement is the ability to track participants and to hear from a representative cross-section of the community, such as age, gender and other defining characteristics to enhance the outreach approach. This approach would be hinged on broader communications through social media, for example through Facebook ads, and the development of a more comprehensive database of community members' contact information, in order to support telephone or online surveys supported by door-to-door tactics for collecting input. Understanding the demographic spread of participants would allow for gaps to be identified in the reach of the project communications, and used to guide the design of specific tactics to reach community members whose voices have not been captured through more traditional approaches.

Monitoring and Reporting on Project Performance

The Decision Assessment completed for the LEC project at the outset of the Community Investment Review could be updated to reflect more specific indicators to track project

Recommendations for Future Outreach/Engagement

performance, founded in the community values identified through the feedback received. A project scorecard could then be developed to be shared on an intermittent schedule through the construction and operational phases of the project, to show how the project commitments were met and if there were reasons why changes were made or certain commitments were not ultimately fulfilled. In particular, the aspects of environmental impacts, employment opportunities for Six Nations community members, revenues, impacts to land claims, and how the revenue was allocated for community benefits would be key aspects to assign specific measurable metrics in order to be transparent about the project performance.

Index of Appendices

Appendix A - Communications and Engagement Strategy

Appendix B - Communication Materials

Appendix C - Summary of Individual Webinar Sessions

Appendix D - Written Comments Received

Appendix E - Correspondence

Appendix F - Neegan Burnside Memo: Amendment to Risk
Assessment Table