



**Westcoast Connector
Gas Transmission**

Westcoast Connector Gas Transmission Project

Access Management Plan
Condition 22

Detailed Outline - Revision 1

January 2022

Prepared for:

Westcoast Connector Gas Transmission Ltd.

Prepared by:

Jacobs Consultancy Canada Inc.

Jacobs



Westcoast Connector Gas Transmission Project

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Land Acknowledgement

We acknowledge that the Westcoast Connector Gas Transmission project (WCGT Project) area is in the Traditional and Ancestral Territory of many Indigenous Peoples, presently subject to the Nisga'a Treaty, Treaty 8, and vast areas of unceded Indigenous Traditional lands. These Indigenous groups include the Nisga'a Nation, Prophet River First Nation, Blueberry River First Nations, Doig River First Nation, Gitanyow Hereditary Chiefs, Gitxsan Hereditary Wilp, Halfway River First Nation, Kitselas First Nation, Kitsumkalum First Nation, Lake Babine Nation, Lax Kw'alaams First Nation, Wilp Luuxhon, Metlakatla First Nation, Saulteau First Nation, Takla Lake First Nation, Tsay Keh Dene First Nation, West Moberly First Nations, Nak'azdli First Nation, McLeod Lake Band, Gitxaala Nation, and the Métis Nation British Columbia

We acknowledge the many Indigenous Peoples who live on care for these lands and have for generations. We are grateful for the traditional Knowledge Keepers and Elders who are still with us today and those who have gone before us. We make this acknowledgement as an act of reconciliation and gratitude to those whose territory we reside on or are visiting.

Executive Summary

The British Columbia Environmental Assessment Office (BC EAO) issued an Environmental Assessment Certificate (Certificate) to Westcoast Connector Gas Transmission Ltd. (WCGT Ltd.) for the WCGT Project on November 25, 2014, and later granted a 5-year extension to the Certificate on April 25, 2019. The Certificate expires on November 25, 2024.

The WCGT Project approved in the Certificate includes the potential to build two 48-inch diameter natural gas pipelines within the same right-of-way along with accompanying compressor stations that could potentially service multiple liquefied natural gas (LNG) terminal sites starting at Cypress in northeast British Columbia (BC) and ending at Ridley Island on the north coast. The Certificate provided the flexibility to choose one of two routes to the Prince Rupert area—either through the Nass Valley (Nasoga Route) or north towards Kitsault (Kitsault Route).

WCGT Ltd. is actively developing the WCGT Project to build one express, single-purpose natural gas pipeline from a compressor station near Willow Flats in northeast BC to a delivery point at Wil Milit on the north coast to supply natural gas to potential LNG terminal sites (Project).

The Certificate granted for the WCGT Project is subject to 43 Conditions. The purpose of the Access Management Plan (AMP or Plan) is to address the requirements of Certificate Condition 22.

WCGT Ltd. is engaging with Indigenous groups and relevant regulatory authorities (RRAs) in the development of this detailed outline to support the full build-out of the Plan. Through engagement, WCGT Ltd. is seeking collaboration in the development of the Plan and any information that can be shared to strengthen the Plan and the commitment to fulfilling Condition 22.

WCGT Ltd. acknowledges the inherent connection Indigenous People have with the land and that while the Plan will satisfy the regulatory requirement, the Plan is intended to minimize impacts to access by Indigenous groups and other resource users, as well as minimize impacts to wildlife and their habitats, by incorporating Indigenous Knowledge and ensuring concerns are addressed during mitigation development.

The scope of the Plan includes:

- A description of the types of access that will be required and how access will be prioritized to limit new access to the extent practicable (Section 1), and maps of preliminary proposed access (Appendix A);
- Linkages to other plans, purpose and objectives, roles and responsibilities, implementation schedule, and future updates (Section 2);
- Methods for engaging Indigenous groups, RRAs, and stakeholders, and a description of how engagement outcomes help shape the Plan (Section 3);
- Regulatory requirements related to Project access (Section 4);
- The types of access management measures to be implemented during construction and operation of the Project, including but not limited to measures to avoid or mitigate disruption to Indigenous groups, trapline holders, and guide outfitters (Section 5);
- A description of the monitoring program (Section 6), including aerial, ground, and remote camera monitoring;
- A description of the adaptive management program, including how the results of monitoring will inform adaptive management strategies (Section 7); and
- A plan for reporting on the implementation of the Plan including the schedule, content, and recipients of reports (Section 8).

Table of Concordance

Table 0-1 describes how this Plan addresses the applicable Certificate Conditions.

Table 0-1. Concordance with Certificate Condition 22: Access Management Plan

Certificate Condition	Section
<i>Condition 22- Access Management Plan</i>	
The Holder must develop and implement an Access Management Plan to meet the objectives stated in the Application Section 6.1, Appendix 3-A and the following additional objectives: <ul style="list-style-type: none"> ▪ Avoid or mitigate any disruption caused by the Holder to access for Aboriginal^a Groups to harvest medicinal and food source plants, or to carry out other traditional use activities identified in any TUS provided to the Holder prior to the commencement of Construction ▪ Avoid or mitigate any disruption caused by the Holder to access for Aboriginal Groups and non-aboriginal trap line holders and guide outfitters. 	Subsection 2.1
In addition, the Access Management Plan must include: <ul style="list-style-type: none"> i. Information (written and mapped), including a rationale to demonstrate that new access for Construction is limited to the extent practicable, and that describes the types of access that will be required, including new permanent access roads, temporary access roads and existing access road upgrades for Construction; 	Subsection 1.2 Section 5 Appendix A
ii. Information about the types of access management measures that will be implemented by the Holder during Construction;	Section 5
iii. Information about the types of access management measures that will be implemented by the Holder for access identified in (i) during Operations; and	Section 5
iv. Post-Construction monitoring that will be carried out by the Holder to evaluate the effectiveness of its access management measures.	Section 6
For the portions of the Certified Pipeline Corridor that cross the Nass Area, the Holder must develop (i), (ii), (iii), and (iv) above in consultation with Nisga'a Nation and Gitanyow Hereditary Chiefs (and <i>wilp</i> Luux Hon if the Kitsault Route is Constructed).	Section 3
The Access Management Plan must be developed in consultation with OGC, MFLNRORD and MOTI. In order to allow for a 60 day review and comment period the plan must be submitted to EAO no less than 90 days prior to the Holder's planned date to commence Construction.	Section 3

Notes:

^a "Aboriginal" was used at the time of the Certificate. The current preferred term is "Indigenous".

BC OGC = British Columbia Oil and Gas Commission

BC MFLNRORD = British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development

MOTI = British Columbia Ministry of Transportation and Infrastructure

BC EAO = British Columbia Environmental Assessment Office

Contents

Land Acknowledgement	i
Executive Summary.....	ii
Table of Concordance.....	iii
Acronyms and Abbreviations.....	vii
1. Introduction	1-1
1.1 Project Description	1-1
1.2 Project Access.....	1-4
1.2.1 Traditional Land Use and Other Resource Use	1-4
1.2.2 Existing Access	1-4
1.2.3 Deactivated/Overgrown Access.....	1-4
1.2.4 New Access Roads and Shooflies.....	1-5
2. Access Management Plan Overview.....	2-1
2.1 Purpose and Objectives	2-1
2.2 Linkages to Other Condition Plans.....	2-2
2.3 Implementation Schedule	2-3
2.4 Future Updates to the Access Management Plan	2-3
3. Engagement.....	3-1
4. Regulatory Framework	4-1
4.1 Indigenous Land Use Planning Documents.....	4-1
4.2 Regional and Municipal Land Management Plans	4-1
4.3 Provincial.....	4-2
5. Mitigation Program.....	5-1
5.1 Mitigation Hierarchy	5-1
5.1.1 Avoid and Minimize.....	5-1
5.1.2 Mitigate and Restore-On-site	5-1
6. Monitoring Program	6-3
6.1 Mitigation Compliance Monitoring	6-3
6.2 Mitigation Effectiveness Monitoring.....	6-3
6.3 Monitoring Timeframe.....	6-3
6.4 Monitoring Strategy	6-3
7. Adaptive Management	7-1
7.1 Adaptive Management Approach.....	7-1
7.2 Potential Corrective Measures	7-1
8. Reporting Requirements.....	8-1

Appendix

A Preliminary Project Access Maps

Tables

0-1	Concordance with Certificate Condition 22: Access Management Plan	iii
2-1	Linkages to Other Condition Plans	2-2

Figure

1	Regional Overview.....	1-3
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Acronyms and Abbreviations

AMP or Plan	Access Management Plan
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BC MOTI	British Columbia Ministry of Transportation and Infrastructure
BC MFLNRORD	British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development
BC OGC	British Columbia Oil and Gas Commission
Certificate	Environmental Assessment Certificate
CMMP	Caribou Mitigation and Monitoring Plan
CPC	Certified Pipeline Corridor
EI	Environmental Inspector
GBMMP	Grizzly Bear Mitigation and Monitoring Plan
HWCMP	Human-Wildlife Conflict Management Plan
LNG	liquified natural gas
LRMP	Land and Resource Management Plan
MMP	Moose Monitoring Plan
PCM	post-construction monitoring
Project	one express, single-purpose natural gas pipeline from a compressor station near Willow Flats in northeast British Columbia to a delivery point at Wil Milit on the north coast to supply natural gas to potential liquified natural gas terminal sites
RP	Restoration Plan
RRA	Relevant Regulatory Authority
SRMP	Sustainable Resource Management Plan
TCEMP	Terrestrial Construction Environmental Management Plan
TLU	Traditional Land Use
WCGT Ltd.	Westcoast Connector Gas Transmission Ltd.
WCGT Project	Westcoast Connector Gas Transmission Project
WWHMP	Wildlife and Wildlife Habitat Management Plan

1. Introduction

The British Columbia Environmental Assessment Office (BC EAO) issued an Environmental Assessment Certificate (Certificate) to Westcoast Connector Gas Transmission Ltd. (WCGT Ltd.) for the Westcoast Connector Gas Transmission Project (WCGT Project) on November 25, 2014, and later granted a 5-year extension to the Certificate on April 25, 2019. The Certificate expires on November 25, 2024. The Certificate granted for the WCGT Project is subject to 43 Conditions. The purpose of the Access Management Plan (AMP or Plan) is to address the requirements of Certificate Condition 22.

WCGT Ltd. is engaging with Indigenous groups and relevant regulatory authorities (RRAs) in the development of this detailed outline to support the full build-out of the Plan. Through engagement, WCGT Ltd. is seeking collaboration in the development of the Plan and any information that can be shared to strengthen the Plan and the commitment to fulfilling Condition 22.

WCGT Ltd. acknowledges the inherent connection Indigenous Peoples have with the land and that while the Plan will satisfy the regulatory requirement, the Plan is intended to minimize impacts to access by Indigenous Groups and other resource users by incorporating Indigenous Knowledge and ensuring concerns are addressed during mitigation development.

1.1 Project Description

The WCGT Project approved in the Certificate includes the potential to build two 48-inch diameter natural gas pipelines within the same right-of-way along with accompanying compressor stations that could potentially service multiple liquefied natural gas (LNG) terminal sites starting at Cypress in northeast British Columbia (BC) and ending at Ridley Island on the north coast. The Certificate provided the flexibility to choose one of two routes to the Prince Rupert area—either through the Nass Valley (Nasoga Route) or north towards Kitsault (Kitsault Route).

WCGT Ltd. is actively developing the WCGT Project to build one express, single-purpose natural gas pipeline from a compressor station near Willow Flats in northeast BC to a delivery point at Wil Milit on the north coast to supply natural gas to potential LNG terminal sites (the Project) (Figure 1).

The new compressor station at Willow Flats will have the potential to connect to Enbridge Inc.'s Westcoast Energy Inc. pipeline system near Compressor Station 2 or TC Energy's NGTL system, eliminating the need for the pipeline corridor from Cypress to Willow Flats and the compressor station at Cypress. WCGT Ltd. will apply to the BC EAO to amend its Certificate to:

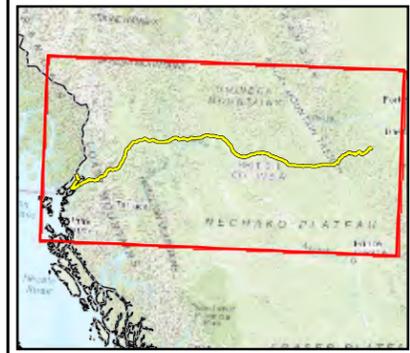
- 1) remove approximately 100 kilometres of the Certified Pipeline Corridor from Cypress to Willow Flats; and
- 2) change the location of the compressor station from Cypress to Willow Flats.

If WCGT Ltd. proceeds with construction of a second pipeline, it would also start near Willow Flats and would not use the corridor from Cypress to Willow Flats.

The new delivery point for the pipeline will be near Wil Milit. WCGT Ltd. will apply to the BC EAO to amend its Certificate to make routing changes along its approved Nasoga Route to end the first pipeline at Wil Milit. WCGT Ltd. will retain the option to expand the WCGT Project to the currently approved delivery point at Ridley Island at a later date.

1 WCGT Ltd. is developing condition plans for the Project with Indigenous groups, RRAs, and stakeholders
2 for submission to the BC EAO in accordance with its Certificate. The condition plans will address potential
3 impacts from the Project, which includes the first pipeline from Willow Flats to Wil Milit, one compressor
4 station at Willow Flats and the necessary meter stations.

5 WCGT Ltd. does not have plans to build the second pipeline at this time; however, should it decide to
6 construct a second pipeline, increase capacity by adding compressor stations or extend the first pipeline to
7 Ridley Island, WCGT Ltd. will submit revised or new condition plans to the BC EAO in accordance with
8 Condition 1 of its Certificate.



- Town/Village/Service Area
- Kilometre Marker
- WCGT Pipeline Route
- Railway
- Highway
- International Border
- Watercourse
- Water Body

ENBRIDGE
Westcoast Connector Gas Transmission

SCALE: 1:1,500,000

0 14,000 28,000 42,000 56,000 m
(All Locations Approximate)

FIGURE 1
REGIONAL OVERVIEW
WESTCOAST CONNECTOR GAS TRANSMISSION LTD.
WESTCOAST CONNECTOR GAS TRANSMISSION PROJECT

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NAD 1983 BC Environment Albers
Hillshade Background: TERA Environmental 2008;
Highways/Roads: NRCAN 2015; Railways: NRCAN 2012; Hydrology: BC FLNRO 2008; Reserves: Government of Canada 2018; Legal Grid: TERA Environmental Consultants 2010; Watercourse Crossings: Jacobs 2021; Project Components: Enbridge 2021.

January 2022 CE820100

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.

1 1.2 Project Access

2 Access roads and shooflies are essential for the safe and efficient movement of construction and safety
3 vehicles to and from the Project footprint. WCGT Ltd. will prioritize the use of existing roads and trails to
4 access the Project and limit new access construction where practical. However, much of the Project is
5 remote and new access will be required to allow heavy equipment, vehicles and emergency response
6 safely into areas where suitable access does not currently exist.

7 The frequency and spacing of access to the Project footprint is typically dictated by terrain,
8 environmentally sensitive features, and requests from Indigenous groups, RRAs, and stakeholders. New
9 permanent access will be determined by the need for ongoing operational access to Project facilities. In
10 order of decreasing priority, construction access for the Project will be identified as follows:

- 11 1) Use existing highways, roads, and trails
- 12 2) Improve or upgrade deactivated/overgrown roads or trails
- 13 3) Develop new access roads or shooflies

14 1.2.1 Traditional Land Use and Other Resource Use

15 Maintaining access for members of Indigenous groups carrying out Traditional Land Use (TLU) activities,
16 as well as trap line holders, guide outfitters, and industrial and recreational users, is as important for
17 access management as deterring unauthorized access or unwanted increases in access levels. WCGT Ltd.
18 will engage with Indigenous groups, RRAs, trap line holders, guide outfitters, and industrial and
19 recreational users to identify access needs, opportunities for shared access, and access concerns.

20 1.2.2 Existing Access

21 The Project will prioritize use of established public and industry (e.g., forestry, mining, or oil and gas)
22 roads. Minor improvements of existing roads may be needed to accommodate construction traffic and
23 equipment, such as: minor brushing of overhanging vegetation; surface levelling (grading); straightening
24 of tight corners to accommodate trailers; and widening in specific locations to provide space for pull-outs
25 and passing where two lanes of traffic are used.

26 Where necessary, WCGT Ltd. will ensure that permits and approvals for upgrades to existing roads or trails
27 are in place prior to commencing access road development activities. Temporary road use restrictions and
28 temporary road closures may be required at times to accommodate pipeline construction traffic or road
29 improvement activities, and will be communicated through engagement with potentially affected parties
30 prior to construction, and signage during construction. Existing access roads used by the Project will be
31 repaired, if needed, and returned to its former condition or better following construction.

32 1.2.3 Deactivated/Overgrown Access

33 Existing deactivated or overgrown roads and trails include access not currently used by industry or the
34 public, where the road surface has been deactivated to limit use. Re-establishing deactivated or overgrown
35 roads or trails to a condition suitable for Project requirements may involve brushing and clearing of
36 additional vegetation, grading and widening of travel surfaces, installation of temporary bridges and
37 culverts, rebuilding across slopes and areas that have been eroded or are unsafe to traverse, removing
38 access management barriers, and resurfacing.

39 Despite not being currently in use, some deactivated roads are owned by private entities or have active
40 permits issued by a provincial or municipal authority. Agreements will be required with landowners or

1 permit holders prior to Project use or any upgrading activities. WCGT Ltd. will apply for relevant permits to
2 upgrade deactivated or overgrown roads or trails on Crown land and not under permit to a third-party, and
3 to construct new temporary access roads.

4 1.2.4 New Access Roads and Shooflies

5 New temporary access will be constructed to facilitate access to the Project where existing or deactivated
6 roads, trails or rights-of-way cannot be used or are insufficient to facilitate construction. New temporary
7 access will typically require vegetation removal (i.e., tree clearing and grubbing), grading, ditching,
8 surfacing, and installation of water crossing structures such as bridges and culverts. New temporary access
9 roads are only constructed where access to an area is deemed crucial in the absence of existing roads or
10 trails, or existing deactivated or overgrown access.

11 A shoofly is a type of temporary access that leaves the pipeline construction right-of-way and then returns
12 to it, usually within a relatively short distance. Shooflies may be needed to avoid a geophysical feature
13 such as a wetland, steep incised creek or steep side slope, or to provide alternate construction access
14 around a section of the Project footprint for the safety of the construction personnel, maintaining schedule
15 or minimizing the environmental footprint in a sensitive feature.

16 Facilities such as compressor stations, metering stations, and block valve sites will require permanent
17 roads for ongoing operational access. WCGT Ltd. will use existing access to Project facilities, where
18 feasible.

2. Access Management Plan Overview

The AMP is being developed to meet the requirements of the BC EAO for Certificate Condition 22. The AMP will be developed in collaboration with Indigenous Groups and RRAs.

The scope of the AMP includes:

- A description of the types of access that will be required and how access will be prioritized to limit new access to the extent practicable (Section 1), and maps of preliminary proposed access (Appendix A);
- Linkages to other plans, purpose and objectives, roles and responsibilities, implementation schedule, and future updates (Section 2);
- Methods for engaging Indigenous groups, RRAs, and stakeholders, and a description of how engagement outcomes help shape the Plan (Section 3);
- Regulatory requirements related to Project access (Section 4);
- The types of access management measures to be implemented during construction and operation of the Project, including but not limited to measures to avoid or mitigate disruption to Indigenous groups, trapline holders, and guide outfitters (Section 5);
- A description of the monitoring program (Section 6), including aerial, ground, and remote camera monitoring;
- A description of the adaptive management program, including how the results of monitoring will inform adaptive management strategies (Section 7); and
- A plan for reporting on the implementation of the AMP including the schedule, content, and recipients of reports (Section 8).

2.1 Purpose and Objectives

The purpose of the AMP is to satisfy the applicable Certificate Conditions, specifically Condition 22. The objectives of the AMP include the following:

- Avoid or mitigate disruption to access for Indigenous groups to harvest resources or to carry out other identified Traditional Use activities
- Avoid or mitigate disruption to access for Indigenous and non-Indigenous trapline holders and guide outfitters
- Control public access along the pipeline right-of-way, especially where new access is created, or existing access is improved
- Reduce line-of-sight and ease of access along the right-of-way for natural predators (e.g., wolves), hunters and anglers
- Reduce disturbance to high quality, sensitive wildlife habitat

To determine whether the AMP meets the objectives, the AMP identifies performance indicators. The performance indicators and targets that will be monitored and measured to evaluate the effectiveness of access mitigation measures in achieving the goals of the AMP will be described in Section 6.

Plans to address occurrences of inadequate mitigation or unanticipated Project effects are discussed (Section 7).

1 2.2 Linkages to Other Condition Plans

2 Information on other condition plans prepared for the Project have been considered in this AMP. The links
3 between this AMP and other Project condition plans are provided in Table 2-1.

Table 2-1. Linkages to Other Condition Plans

Plan	Description of the Plan	Linkages to this Plan
Condition 05 - Marine Access Traffic Management Plan	To be added when marine plans are developed in 2022	The Marine Access Traffic Management Plan contains access management measures for marine navigation and navigational routes to reduce disruption to marine uses.
Condition 13 - Grizzly Bear Mitigation and Monitoring Plan (GBMMP)	The GBMMP outlines strategies to avoid sensory disturbance and incremental mortality risk to grizzly bears during construction and operations. It also provides a plan for monitoring the success strategies, and reporting requirements.	The GBMMP outlines measures to avoid or mitigate impacts to grizzly bear and their habitat during construction and operation of the Project. The GBMMP shares mitigation measures with the AMP addressing access management mitigation.
Condition 15 - Human-Wildlife Conflict Management Plan (HWCMP)	The HWCMP recommends mitigation measures for avoiding wildlife mortalities during construction and operations.	The HWCMP provides measures to avoid or minimize human-wildlife conflicts. The HWCMP shares mitigation measures with the AMP addressing access management mitigation.
Condition 16 - Caribou Mitigation and Monitoring Plan (CMMP)	The CMMP outlines strategies to avoid displacement and sensory disturbance to caribou, avoid increased predation, and target objectives of no net loss of habitat. It also provides a plan for monitoring the success of the strategies, reporting requirements, and offsetting plans in the event the strategies are unsuccessful.	The CMMP outlines measures to avoid or mitigate impacts to caribou and their habitat during construction and operation of the Project. The CMMP shares mitigation measures with the AMP addressing access management mitigation.
Condition 18 - Moose Monitoring Plan (MMP)	The MMP recommends mitigation measures to reduce moose mortality risk during construction and operations in the Nass Wildlife Area. It also includes reporting requirements.	The MMP outlines measures to avoid or mitigate impacts to moose and their habitat within the Nass Wildlife Area during construction and operation of the Project. The MMP shares mitigation measures with the AMP addressing access management mitigation.

Table 2-1. Linkages to Other Condition Plans

Plan	Description of the Plan	Linkages to this Plan
Condition 19 - Wildlife and Wildlife Habitat Management Plan (WWHMP)	<p>The WWHMP consolidates all relevant wildlife mitigation into one document. It includes survey results for <i>Species at Risk Act</i> Schedule 1 species, mitigation for habitat features, a monitoring program for moose populations during construction and operations (outside the Nass Wildlife Area), outlines reporting requirements, and provides plans for post-construction monitoring.</p> <p>The WWHMP also includes consideration of additional Conditions:</p> <ul style="list-style-type: none"> ▪ Condition 20 – flying over Ungulate Winter Ranges and Wildlife Habitat Areas ▪ Condition 21 – mitigation and monitoring for Marbled Murrelet Critical Habitat 	<p>The WWHMP outlines measures to avoid or mitigate impacts to wildlife and wildlife habitat during construction and operation of the Project. The WWHMP shares mitigation measures with the AMP addressing access management mitigation.</p>
Condition 25 - Restoration Plan (RP)	<p>The RP provides recommendations for soil handling, construction clean-up, erosion control measures, revegetation plans, and life of Project vegetation management.</p>	<p>The RP includes measures to re-establish woody vegetation, which blocks line-of-sight and impedes access.</p>
Condition 35 – Terrestrial Construction Environmental Management Plan (TCEMP)	<p>The TCEMP describes WCGT Ltd. environmental procedures and mitigation measures to field and construction personnel. These environmental procedures and mitigation measures will be implemented during construction of the Project to mitigate, avoid, or reduce potential adverse environmental effects. The TCEMP serves as reference information for construction and inspection personnel to support decision-making and to provide direction to more detailed information (i.e., resource-specific mitigation, management, and contingency plans).</p>	<p>The TCEMP includes measures to limit habitat disturbance, avoid human-wildlife encounters or conflict, maintain wildlife movement, and reclaim disturbed habitats upon completion of construction. The TCEMP shares mitigation measures with the AMP addressing access management mitigation.</p>

1 2.3 Implementation Schedule

- 2 The AMP will be submitted to the BC EAO at least 90 days before the commencement of construction.
- 3 Project planning continues prior to the start of clearing and construction as per the latest Project schedule.
- 4 The Plan will be implemented throughout construction, and as described throughout the TCEMP.

5 2.4 Future Updates to the Access Management Plan

- 6 WCGT Ltd. is engaging on the detailed outline and the Plan. Once the Plan is submitted to the BC EAO,
- 7 future revisions could occur as a result of:

-
- 1 ▪ Engagement programs with Indigenous groups
2 ▪ Additional information becoming available
3 ▪ Changes to Project planning (e.g., engineering changes)
4 ▪ Commitments made during the regulatory review process
5 ▪ Regulatory permits and authorization conditions
- 6 WCGT Ltd. will not inform Indigenous groups and RRAs when minor revisions are made to the Plan (i.e.,
7 small changes that would not affect the scope and objectives of the Plan).
- 8 Indigenous groups, RRAs, and stakeholders will be provided an opportunity to review and provide
9 comment on material revisions to the Plan (i.e., changes to the scope or mitigation and monitoring
10 requirements). A Document History table listing version, date, and distribution will be provided in this
11 document.

1 3. Engagement

2 The AMP is being developed through engagement with Indigenous groups, the BC Ministry of Forests,
3 Lands, Natural Resource Operations and Rural Development (BC MFLNRORD), BC Oil and Gas Commission
4 (BC OGC), and BC Ministry of Transportation and Infrastructure (BC MOTI). The Plan will be provided to the
5 BC EAO for review and comment at least 90 days prior to construction.

6 Throughout the development of the detailed outline, WCGT Ltd. is engaging to ensure the Plan meets the
7 intent of the Certificate Condition, is reflective of Indigenous interests and concerns, and aligns with
8 regulatory requirements as informed by RRA reviewers.

9 WCGT Ltd. is engaging on the content and approach outlined in this detailed outline. Through this review,
10 WCGT Ltd. wants to ensure a collaborative approach at this early stage and that the outline captures, at a
11 high level, the intent and expectation of the Certificate Condition, as well as interests and concerns raised
12 by Indigenous groups and RRAs. The information that WCGT Ltd receives will inform the drafting of the full
13 Plan. WCGT Ltd. will document and track all comments and recommendations received, and provide a
14 description on how this information has been considered and incorporated into the Plan.

1 4. Regulatory Framework

2 The legislation, regulatory guidelines, best management practices, and policy documents that were used
3 to develop mitigation measures in the Plan are summarized in this section.

4 4.1 Indigenous Land Use Planning Documents

5 Indigenous Land Use planning documents provide strategic direction for resource management activities.
6 These plans provide direction for areas with general and specific resource values that are managed to
7 sustain environmental, social, economic, or cultural values.

8 Indigenous Land Use planning documents applicable to the Plan include:

- 9 ▪ Kitselas Land Use Plan
- 10 ▪ Metlakatla Land Use Plan
- 11 ▪ A Land Use Plan for Nisga'a Lands

12 4.2 Regional and Municipal Land Management Plans

13 Land and Resource Management Plans (LRMPs) and Sustainable Resource Management Plans (SRMPs)
14 provide strategic direction for resource management activities. These documents provide guidance for
15 areas with general and specific resource values that are managed to sustain environmental, social, or
16 economic values.

17 Resource management planning documents applicable to the Plan include:

- 18 ▪ Dawson Creek LRMP
- 19 ▪ Dunlevy Creek Management Plan
- 20 ▪ Fort St. John LRMP
- 21 ▪ Fort St. James LRMP
- 22 ▪ Mackenzie LRMP
- 23 ▪ Mugaha Marsh Order
- 24 ▪ Prince George LRMP
- 25 ▪ Vanderhoof Access Management Plan
- 26 ▪ Vanderhoof LRMP
- 27 ▪ Babine River Interim Local Resource Use Plan
- 28 ▪ Bulkley LRMP
- 29 ▪ Bulkley SRMP
- 30 ▪ Central Coast LRMP
- 31 ▪ Cranberry SRMP
- 32 ▪ Kalum LRMP
- 33 ▪ Kalum SRMP
- 34 ▪ Kispiox LRMP
- 35 ▪ Kispiox Higher Level Plan Objectives
- 36 ▪ Lakes District LRMP
- 37 ▪ North Lakes LRMP
- 38 ▪ North Lakes SRMP
- 39 ▪ Mill Creek Sensitive Area Plan
- 40 ▪ Morice LRMP
- 41 ▪ Nass South SRMP

- 1 ▪ Nisga'a Memorial Lava Bed Park Master Plan
- 2 ▪ Kitselas Land Use Plan (LUP)
- 3 ▪ Metlakatla LUP

4 4.3 Provincial

5 Provincial permitting requirements applicable to the Plan include:

- 6 ▪ BC OGC (Road Permits)
- 7 ▪ BC MFLNRORD (Forest Service Use Permits, Road Junction Permits, and Works Permits)
- 8 ▪ BC Ministry of Transportation and Infrastructure

1 5. Mitigation Program

2 This section will outline WCGT Ltd.'s approach for identifying and applying access management measures
3 that can be feasibly and effectively implemented to avoid, minimize, and mitigate potential adverse
4 effects of the Project on human and predator access, following a standard mitigation hierarchy process.

5 5.1 Mitigation Hierarchy

6 The AMP will apply the mitigation hierarchy of avoid, minimize and mitigate, or restore-on-site as
7 described in the Policy and Procedures for Mitigating Impacts on Environmental Values (BC MOE 2014a,
8 b). Following this hierarchy, WCGT Ltd. will first implement measures to avoid or minimize creating new
9 access or upgrading existing access where site conditions and construction constraints allow. Then
10 appropriate access control measures will be implemented to minimize and mitigate potential adverse
11 effects of the Project on human and predator access during construction and operations.

12 5.1.1 Avoid and Minimize

13 This section will describe the actions WCGT Ltd. will take to prioritize the use of existing roads and trails to
14 access the Project and limit new access construction where practical.

15 An explanation of how TLU sites, trapline access, and guide outfitter access will be facilitated or
16 maintained, as appropriate, will be provided in this section. In addition to locations identified through
17 Traditional Use Studies and engagement, pre-construction site visits with Indigenous groups to new
18 temporary or permanent accesses will be proposed to identify TLU sites and develop site-specific
19 avoidance or mitigation plans.

20 WCGT Ltd. will strive to avoid and minimize impacts to TLU sites from roads where feasible and will engage
21 with Indigenous groups to develop mitigation. This section will describe WCGT Ltd.'s communication and
22 notification protocol for temporary road closures.

23 5.1.2 Mitigate and Restore-On-site

24 This section of the AMP will describe WCGT Ltd.'s approach for identifying access management locations
25 and measures using decision frameworks. Determination of final access management locations and
26 measures requires flexibility to address site-specific conditions and construction constraints at the time of
27 implementation, such as the availability of material and storage space, the construction techniques used
28 and other factors such as third-party agreements, regulatory permits and authorizations, detailed
29 construction planning including contractor and equipment availability, and information received from
30 ongoing engagement.

1 6. Monitoring Program

2 To meet Condition 22 of the Certificate, WCGT Ltd. will design and implement a monitoring program to
3 assess the effectiveness of mitigation implemented to manage access. The monitoring timeframe will be
4 described in the following subsections. Reporting on mitigation effectiveness and compliance will be
5 described in Section 8. Should monitoring programs indicate that the measures implemented were not
6 adequate or were ineffective at avoiding or reducing potential residual effects on access management,
7 follow-up measures will be implemented as described in Section 7.

8 6.1 Mitigation Compliance Monitoring

9 Monitoring during the construction period will focus on observations by Indigenous monitors, construction
10 staff and Environmental Inspectors (EIs), and review of compliance and communication documentation.
11 During the construction period, Indigenous monitors, construction staff, and EIs will monitor unauthorized
12 access on the Project footprint and construction access.

13 6.2 Mitigation Effectiveness Monitoring

14 To satisfy Condition 22 of the Certificate, WCGT Ltd. will design and implement a mitigation effectiveness
15 monitoring program for access management measures. Mitigation monitoring involves measuring the
16 mitigation actions against targets to determine effectiveness.

17 6.3 Monitoring Timeframe

18 The Post-Construction Monitoring (PCM) Program begins following the first full growing season after final
19 clean-up of the Project footprint and the implementation of access management measures. Monitoring
20 will occur in the first, third, and fifth years of the PCM Program. The Plan will also outline the strategy for
21 ongoing monitoring of access management over the operations phase.

22 6.4 Monitoring Strategy

23 The monitoring strategy, including performance indicators and targets, will be designed to collect
24 information that can feasibly determine the success of access management measures and inform the need
25 for adaptive measures within the 5-year PCM period for the Project. The targets will act as triggers for
26 implementation of corrective measures if the mitigation measures are found to be underperforming.

27 Access management monitoring typically involves a combination of methods, such as aerial overview
28 surveys and ground-based point surveys to assess whether access management measures are intact and
29 working, in addition to deployment of remote cameras to assess non-project motorized vehicle access.

1 7. Adaptive Management

2 This section will outline how mitigation measures will be re-evaluated should monitoring programs
3 indicate that the measures implemented were not effective or need to be supplemented. Examples of the
4 types of corrective measures that may be implemented are provided below.

5 7.1 Adaptive Management Approach

6 The results of monitoring will inform the need for corrective measures.

7 7.2 Potential Corrective Measures

8 Corrective measures will be implemented as soon as practical. Corrective measures may involve implementing
9 modified, alternate, or additional mitigation or remedial measures that may include, but are not limited to:

- 10 ▪ repairing or modifying an access management measure
- 11 ▪ replacing or supplementing existing access management measure with alternate measure(s)
- 12 ▪ implementing access management measures at different locations

1 8. Reporting Requirements

2 During the PCM Program, WCGT Ltd. will prepare reports following completion of PCM during the growing
3 season of each PCM year (i.e., first, third, and fifth growing season following final clean-up). Reporting will
4 include detail on the implementation of site-specific mitigation and habitat restoration measures,
5 information on the indicators measured and their performance in reaching the monitoring target, the
6 monitoring methods used, details of corrective actions taken (if any), as well as an updated engagement
7 record.

8 The environmental monitoring report filed after the fifth PCM year will include information on the
9 effectiveness of mitigation and corrective actions and will identify any goals that have not been achieved
10 and the need for any further corrective actions and monitoring. The need for additional reporting will be
11 determined through engagement with the BC EAO.

Appendix A

Preliminary Project Access Maps

(Provided in full version)