



**Westcoast Connector
Gas Transmission**

Westcoast Connector Gas Transmission Project

Old Growth Area Replacement or Recruitment Proposal
Condition 29

Revision 1

January 2022

Prepared for:

Westcoast Connector Gas Transmission Ltd.

Prepared by:

GeoVerra Inc.



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 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. WCGT Ltd. is developing both the Old Growth Area (OGA) Replacement or Recruitment Proposal (ORPP or Proposal) and the OGA Incursion Report (OIR or Report) to address the requirements of Certificate Condition 29.

WCGT Ltd. is engaging with Indigenous groups, and relevant regulatory authorities (RRAs) in the development of this detailed outline to support the Proposal Through engagement, WCGT Ltd. is seeking collaboration in the development of the Proposal and OIR and any information that can be shared to strengthen the Proposal and OIR and the commitment to fulfilling Condition 29.

The scope of the Proposal includes:

- Provide an implementation schedule;
- Deliver methods for engaging Indigenous groups, RRAs, and stakeholders, and a description of how engagement outcomes are reflected in the Proposal;
- Identify applicable OGA incursion thresholds;
- Summarize all Project incursions of legal and non-legal Old Growth Management Areas (OGMAs) and non-spatial OGAs;
- Outline regulatory requirements related to pre-construction, construction, and post-construction activities of the Project; and
- A plan for reporting on the implementation of the OGMA replacement plan including the schedule, content, and recipients of reports.

Table of Concordance

Table 0-1. Concordance with Certificate Condition 29: OGA

Certificate Condition ^a	Section
<i>Condition 29 – Old Growth Area</i>	
When establishing final pipeline(s) routing within the Certified Pipeline Corridor, the Holder must, to the extent practicable, avoid incursions into Old Growth Areas (OGA).	
Where it is not practicable to avoid an incursion into an OGA, the Holder must: <ul style="list-style-type: none"> Adhere to any Orders under Provincial legislation which apply to the OGA 	Section 3
<ul style="list-style-type: none"> Prepare a report in consultation with FLNRORD, identifying all such incursions, and submit the report to FLNRORD; and 	See Old Growth Area Incursion Report (OIR)
Where the area of the incursion exceeds a threshold set out in an applicable Order or FLNRORD policy or process, prepare a proposal for replacement or recruitment of that area, consistent with the applicable order, policy or process for such replacements. <ul style="list-style-type: none"> Applicable OGA Incursion Thresholds 	Subsection 5.5
<ul style="list-style-type: none"> Applicable Order or FLNRORD policy or process 	Subsection 3.4
A Proposal for replacement or recruitment must: <ul style="list-style-type: none"> Be prepared by a Qualified Professional in consultation with FLNRORD; 	Section 7
<ul style="list-style-type: none"> Describe the Holder's efforts to consult with timber tenure holders, Aboriginal Groups and Nisga'a Nation affected by the replacement 	Section 4
<ul style="list-style-type: none"> Be submitted to FLNRORD for review and comment no later than 90 days before the Holder's planned date to commence Construction in OGAs. 	Subsection 2.3
The Holder must provide replacement or recruitment proposal(s) to EAO no less than 60 days before the Holder's planned date to commence Construction in affected OGAs. The Holder must not start construction in affected OGAs until the proposal(s) have been approved by the EAO, unless otherwise authorized by EAO. The Holder must implement a proposal(s), once approved.	Subsection 2.3

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

BC EAO = British Columbia Environmental Assessment Office

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

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Acronyms and Abbreviations

BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BC MFLNRORD	British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development
BC OGC	British Columbia Oil and Gas Commission
BMP	Best Management Practice
CPC	Certified Pipeline Corridor
Certificate	Environmental Assessment Certificate
FPC	Forest Practices Code
<i>FRPA</i>	<i>Forest and Range Practices Act</i>
FSP	Forest Stewardship Plan
GIS	Geographic Information System
ha	hectare(s)
km	kilometre(s)
LNG	liquified natural gas
LRMP	Land Resource Management Plan
OGA	Old Growth Area
<i>OGAA</i>	<i>Oil and Gas Activities Act</i>
OGMA	Old Growth Management Area
ORRP or Proposal	OGA Replacement or Recruitment Proposal
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 Millit on the north coast to supply natural gas to potential liquified natural gas terminal sites
QP	Qualified Professional
RRA	Replacement or Recruitment Area
SRMP	Sustainable Resource Management Plan
TCEMP	Terrestrial Construction Environmental Management Plan
TSA	Timber Supply Area
RRA	Relevant Regulatory Authority
WCGT Ltd.	Westcoast Connector Gas Transmission Ltd.
WCGT Project	Westcoast Connector Gas Transmission Project

1. Introduction

The British Columbia (BC) 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 Certificate granted for the WCGT Project is subject to 43 Conditions. The purpose of the ORRP is, along with the OIR to address the requirements of Certificate Condition 29.

WCGT Ltd. is engaging with Indigenous groups, and Relevant Regulatory Authorities (RRAs) in the development of this detailed outline to support the full Proposal. Through engagement, WCGT Ltd. is seeking collaboration in the development of the Proposal and Report and any information that can be shared to strengthen the Proposal and OIR and the commitment to fulfilling Condition 29.

Along with the OIR, this ORRP fulfills the Certificate Condition 29 requirements for the WCGT Project. The Proposal should be read in conjunction with the Terrestrial Construction Environmental Management Plan (TCEMP), Environmental Alignment Sheets, WCGT Project commitments, and all applicable regulatory approvals and permits.

This Proposal summarizes the replacement and recruitment proposed areas to amend spatial Old Growth Management Areas (OGMAs) identified in the OIR.

Replacement and recruitment areas have been proposed for all incursion areas along the Project footprint, inclusive of size or OGA legal status. Mitigation for management of non-spatial old growth objectives are also presented in this document. Each proposed replacement and recruitment area will be presented for consideration to affected timber tenure holders. Proposed replacement and recruitment areas are comparable to the area of incursion for each OGA in forest composition, size, and percentage of old forest.

OGMAs are established by a ministerial order in BC, originating under the Forest Practices Code (FPC) of BC (1995). The intent of an OGMA is to preserve representative areas of old growth forest at the landscape level. Their purpose was intended to be for biodiversity planning. They are now managed under the *Forest and Range Practices Act (FRPA)* with orders established under the *Lands Act*.

OGMAs were designated during the development of land use plans under the guidance of the Landscape Unit Planning Guide and the Biodiversity Guidebook. Land and Resource Management Plans (LRMPs) and Sustainable Resource Management Plans (SRMPs) developed during land use planning in BC set the amount and characteristics for retention of old growth forest to be incorporated into OGAs. A table will be provided to summarize these characteristics that WCGT Ltd. will consider during the recruitment process.

OGMAs are only legally binding on forest licensees in BC that are required to develop a Forest Stewardship Plan (FSP). Non-forest tenure holders (e.g., pipelines) are exempt from needing an FSP, and therefore, the OGMA requirement. However, the BC Oil and Gas Commission (BC OGC) anticipates that the regulatory framework is likely to change in the future. WCGT Ltd. is committed to incorporating best management practices (BMPs) into their environmental mandate. This Proposal contains impact mitigation and monitoring practices wherever incursions into existing OGAs occur.

There are two categories for OGA incursions. If the incursion is below certain threshold levels, it is classified as a Minor Intrusion. For Minor Incursions, the only condition placed on WCGT Ltd. is to notify the Planning Team Leader at the Integrated Land Management Bureau, in the BC Ministry of Agriculture and Lands.

If the incursion exceeds the Minor threshold levels, it is considered a Significant Incursion. WCGT Ltd. will be responsible for submitting candidate replacement areas to the local BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development (BC MFLNRORD) office for approval. WCGT Ltd. Intends to conduct office reviews of resources available to identify subject forests. A Geographic Information System (GIS) exercise will rely on the spatial OGMAs, Visual Resources Inventory, and other available spatial datasets. Efforts will be made to minimize indirect impacts such as blowdown along newly created right-of-way, edges of OGAs, and isolation effects caused by selecting small, non-contiguous forest stands that create fragments across the landscape. Wherever possible, candidate replacement areas with similar attributes, as specified in Section 5, to those being impacted by the corridor will be either connected to the impacted OGA or to an adjacent OGA with similar forest type and attributes.

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 compressor stations that could potentially service multiple liquefied natural gas (LNG) terminal sites starting at Cypress in northeast 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) (Figure 1).

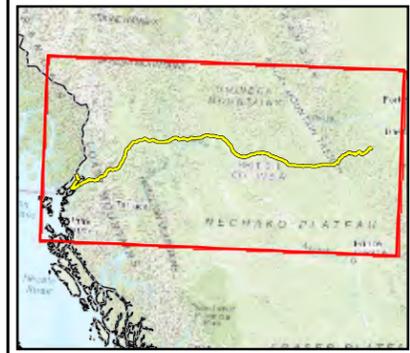
The new compressor station at Willow Flats will have the potential to connect to Enbridge Inc.'s Westcoast Energy Inc. pipeline system near Compressor Station 2 or TC Energy's NGTL system, eliminating the need for the pipeline corridor from Cypress to Willow Flats and the compressor station at Cypress.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

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.

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

WCGT Ltd. does not have plans to build the second pipeline at this time; however, should it decide to construct a second pipeline, increase capacity by adding compressor stations or extend the first pipeline to Ridley Island, WCGT Ltd. will submit revised or new management plans to the BC EAO in accordance with 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

Jacobs

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.

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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.

2. Old Growth Area Replacement or Recruitment Proposal Overview

The Certificate is subject to 43 Conditions. The Proposal is being developed, along with the OIR, to meet the requirements of Certificate Condition 29. The Proposal will be developed in collaboration with Indigenous groups, RRAs, and stakeholders.

The scope of the ORRP includes:

- Purpose, objectives and implementation schedule (Section 2);
- Identify the regulatory context surrounding OGAs and OGMA's (Section 3);
- Regulatory framework relating to OGAs and OGMA's (Section 3);
- Methods for engaging Indigenous Groups, RRAs, and stakeholders, and a description of how engagement outcomes are reflected in the Proposal (Sections 4 and 5);
- A plan for reporting on the implementation of the OGA replacement plan including the schedule, content, and recipients of reports (Sections 5);
- An outline of Minor and Significant OGMA amendments (Section 6); and
- Professional Authentication of the Proposal (Section 7).

2.1 Purpose

The purpose of the ORRP is to partially fulfill Condition 29. The overall desired outcomes of the ORRP include the following:

- Adhere to any orders under Provincial legislation which apply to the OGA
- Describe WCGT's engagement with Indigenous groups who may be potentially affected by the replacement.
- Be prepared by a Qualified Professional (QP) in consultation with BC MFLNRORD.
- Ensure replacement OGAs provide equivalent biogeoclimatic representation to the subzone level as the original OGA.

In this ORRP, replacement and recruitment areas are proposed for all Project incursions into spatial OGMA's. The information presented for each replacement and recruitment area is consistent with and, in most cases, provides information above what is expected by the applicable order, policy, or process. Proposed replacement and recruitment areas and their associated data presented in this Proposal are intended to support the future selection and public review process to be undertaken by BC MFLNRORD for final OGA amendments per the applicable regional policies.

The method, mechanisms, and requirements for proposed replacement and recruitment areas have been discussed in several consultation meetings with BC MFLNRORD to align expectations. Key process discussions and outcomes were recorded in meeting memos approved and distributed to all meeting participants.

2.2 Objectives

The objectives of this ORRP are to present:

- a summary of Project incursions into spatial and non-spatial OGAs
- engagement efforts by WCGT Ltd. with BC MFLNRORD
- engagement efforts by WCGT Ltd. with timber tenure holders
- recommended proposed replacement and recruitment areas for the OGAs
- summary statistics for the proposed replacement and recruitment areas

WCGT Ltd. intends to support the future selection and public review process to be undertaken by BC MFLNRORD for final OGA amendments per the applicable regional policies.

2.3 Implementation Schedule

This ORRP will be submitted to the BC EAO at least 60 days before the commencement of construction. Also, this ORRP will be submitted to BC MFLNRORD no later than 90 days before the commencement of construction. Project planning continues prior to the start of clearing and construction as per the latest Project schedule. The Proposal will be implemented throughout construction under the supervision of a QP, and as described throughout the TCEMP.

3. Regulatory Framework

3.1 Indigenous Land Use Planning Documents

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

There are no Indigenous Land Use planning documents identified that include specific OGA or OGMA objectives at this time.

3.2 Regional and Municipal Land Management Plans

3.2.1 Land and Resource Management Plans and Sustainable Resource Management Plans

LRMPs and SRMPs provide strategic direction for resource management activities. These documents provide guidance for areas with general and specific resource values that are managed to sustain environmental, social, or economic values.

OGMAs were designated during the development of land use plans under the guidance of the Landscape Unit Planning Guide and the Biodiversity Guidebook. LRMPs and SRMPs developed during land use planning in BC set the amount and characteristics for retention of old growth forest to be incorporated into OGAs.

LRMP: Through a public collaboration process, all stakeholders reach a consensus on the sustainable management of land, resources, water and ecosystems within the planning area.

SRMP: Sustainable Resource Management Plans implement the objectives and strategies of LRMPs through Ministerial Orders.

These plans provide:

- Certainty, by providing clear management direction to resource users;
- Efficiency in the allocation, development and use of natural resources, by clarifying the timing and nature of activities that can occur in the area;
- Flexibility, by presenting results-based standards that will allow resource users to use their innovation and professional skills in developing implementation strategies;
- Transparency, by creating the plan in a spirit of openness of information and in engagement with Indigenous Groups (including Nisga'a Nation), stakeholders, and the general public; and
- Accountability, by setting measurable objectives that can be tracked over time.

3.3 Provincial

OGMAs are established by a ministerial order in BC, originating under the FPC of BC (1995). The intent of an OGA is to preserve representative areas of old growth forest at the landscape level. Their purpose was intended to be for biodiversity planning. They are now managed under the *FRPA* with orders established under the *Lands Act*.

OGMAs were designated during the development of land use plans under the guidance of the Landscape Unit Planning Guide and the Biodiversity Guidebook. LRMPs and SRMPs developed during land use planning in BC set the amount and characteristics for retention of old growth forest to be incorporated into OGMAs. A table will be provided that summarizes these characteristics that WCGT Ltd. will consider during the recruitment process.

OGMAs are only legally binding on forest licensees in BC that are required to develop a FSP. Non-forest tenure holders (e.g., pipelines) are exempt from needing an FSP, and therefore, the OGMA requirement. However, the BC OGC anticipates that the regulatory framework is likely to change in the future. WCGT Ltd. is committed to incorporating BMPs into their environmental mandate.

3.4 Natural Resource District Legislation and Regulations and Orders

Provincial policy relevant to old growth forest is guided by the *FRPA* and the legal planning objectives established in land use planning processes under the *Lands Act*. Regional amendment policies or guidance documents are in place to guide OGMA amendment in the areas relevant to the Project footprint. Applicable policies and guidance documents are described below.

Old Growth Management Area Amendment Policy—Skeena Region— August (2010)

The OGMA Amendment Policy—Skeena Region states that there are two tiers of OGMA amendments: Minor and Significant Incursions. Minor incursions are defined as incursions that are no greater than 10 percent of an OGMA or 10 hectares (ha) (whichever is less) in OGMAs from 1 to 200 ha; up to 5 percent or 25 ha (whichever is less) in OGMAs from 201 to 1,000 ha; and up to 2.5 percent of OGMAs that are greater than 1,000 ha. Incursions that are greater than those thresholds are considered Significant. All incursions require amendments, but Significant Incursions require a period of public collaboration during the engagement process.

Dawson Creek Timber Supply Area Old Growth Management Area Amendment Process (2010).

The Dawson Creek Timber Supply Area (TSA) OGMA Amendment process states that operational flexibility in harvesting activities within OGMAs is set at 10 percent of the OGMA for OGMAs less than 50 ha; and 5 percent or 40 ha (whichever is less) for OGMAs greater than 50 ha. For the purpose of this Proposal, exceedances of these criteria are considered Significant Incursions and incursions below these thresholds are considered Minor.

Mackenzie Natural Resource District Old Growth Management Area Amendment Policy (2015).

The Mackenzie Natural Resource District OGMA Amendment policy utilizes the same OGMA significance criteria as the Dawson Creek TSA Policy (10 percent of the OGMA for OGMAs less than 50 ha; and 5 percent or 40 ha (whichever is less) for OGMAs greater than 50 ha).

For Mackenzie (DMK) and Stuart-Nechako (DVA), the Omineca Region, there is currently no regional-specific policy. As with the other policies, amendments are required for all incursions, and in the case of Significant Incursions, engagement effort is required.

Key components of the amendment process in each of these regions and districts include presenting the rationale for OGMA incursion, demonstrating the equivalency of the proposed replacement area and conducting engagement with affected stakeholders.

Guidance described in a BC MFLNRORD document, *Impact Assessment Guidance for Incursions into Old Growth Management Areas and Landscape Biodiversity Areas: Omineca Region, September 2016 DRAFT*, defines expectations for incursions into existing recruitment areas within the region.

3.4.1 Old Growth Forest Management Objectives Under Legal Orders

Section 93.4 of the *Lands Act* and the *Land Use Objectives Regulation*, gives BC MFLNRORD the authority to make OGMA orders for the purposes of the *FRPA*. BC MFLNRORD may exercise its authority in the future to designate OGMAs under the *Environmental Protection and Management Regulation* of the *Oil and Gas Activity Act (OGAA)*. In the interim, the BC OGC, in its *Environmental Protection and Management Guideline*, expects permit applicants to identify measures that will be implemented during route selection, pipeline construction and post-construction to reduce effects on OGMAs.

3.4.2 Old Growth Forest Management Objectives Under Legal Orders Impacting the Project

- Dawson Creek LRMP
- Mackenzie LRMP
- Fort St. James LRMP
- Bulkley SRMP
- West Babine SRMP
- Kalum SRMP
- Kispiox SRMP
- Cranberry SRMP
- Great Bear Rainforest (GBR) North SRMP

4. Engagement

This ORRP is being developed through engagement with Indigenous groups (including Nisga'a Nation), the BC MFLNRORD and the BC OGC, and will be provided to those groups for final review at least 180 days (6 months) prior to the planned commencement of construction. In addition, the Final Report will be provided to the BC EAO for review at least 180 days prior to Construction. The Final ORRP will incorporate comments and direction received from all engaged parties.

Throughout the development of the detailed outline, WCGT Ltd. is engaging to ensure the plans meet the intent of the Certificate Condition, are reflective of Indigenous interests and concerns, and align with regulatory requirements as informed by RRA reviewers.

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

5. Old Growth Management Area Replacement Plan

5.1 Old Growth Management Area Replacement Criteria

Considerations for establishing OGMA replacement criteria are as follows.

- Size, shape, age, connectivity, and interior habitat should approximate or be an improvement upon the original OGMA
- Replacement OGMAs should provide equivalent biogeoclimatic representation to the subzone level as the original OGMA
- The moisture regime, mesoslope position, aspect, and tree species should approximate the original OGMA
- Avoid areas where there is a potential for future forest health risks
- Minimize the distance the replacement OGMA is from the original area

The primary requirement for OGMA replacement areas is that they provide similar or better stand level attributes and old growth characteristics than the original OGMA. The first preference with respect to location is to append the replacement area to the original OGMA, then refer to OGMAs in the same location.

Following confirmation in the field that replacement areas meet or exceed the above criteria, the maps and attribute summaries are made available for consultation and review by BC MFLNRORD staff. Recommendations made during this process will be considered and incorporated into the final replacement plan.

An OGMA replacement plan will also be provided to BC MFLNRORD at least 90 days before any construction starts in any OGMA, and BC EAO will receive the plan at least 60 days prior to construction.

5.2 Old Growth Management Area Replacement Attributes

The following key attributes could be collected during the field data collections required for the OGMAs impacted by the Project route above the Minor Intrusion Thresholds. This field data collection system is based on procedures used for site unit identification of zones within the Biogeoclimatic Ecosystem Classification system as well as BC MFLNRORD guidance for describing old growth and biodiversity attributes. The key attributes are as follows:

- GPS coordinates of the plot
- Elevation, aspect, slope percent, and position on the mesoslope
- Biogeoclimatic zone, subzone, variant, and site series as per the Land Management Handbooks
- Dominant layer species composition
- Average stand height, estimated age, and diameter at breast height
- Crown closure estimates
- Stocking density
- Vertical structure
- Structural stage (i.e., sapling/ poles, mature or veterans)
- Wildlife tree occurrence
- Dead and down occurrence
- Forest health issues

Some OGMA are not actually old growth forests. They may be delineated primarily for other resource users and may actually just be mature forests or as recruitment for future old growth stands.

5.3 Methodology

Identification of candidate areas for OGMA replacement requires several steps, starting with a GIS analysis, followed up with field reconnaissance of potential sites, then a review by BC MFLNRORD staff at each District office. There is a high likelihood that BC MFLNRORD staff may recommend areas they prefer for inclusion. Subsequent steps would be to engage with the potentially affected Indigenous groups (including Nisga'a Nation) and refer the approved sites to forest tenure holders, the public, and stakeholders.

5.4 Old Growth Area Replacement Areas

A summary of OGMA replacement areas will be provided including the forest district, landscape unit, OGMA ID and Impacted Area, and name and area of proposed replacement area.

5.5 Incursion Thresholds for Natural Resource District Legislation and Regulations and Orders

5.5.1 Natural Resource District Legislative Thresholds

This subsection will provide an OGA incursion threshold summary for each applicable Natural Resource District within the Project area.

5.5.2 Legal Order Thresholds

This subsection will provide OGA incursion thresholds for applicable legal orders.

5.6 Old Growth Area Recruitment or Replacement Rationale

This section will include general descriptions of the rationale used to identify and propose recruited or replaced OGAs.

A summary for each OGMA proposed replacement and recruitment area and rationale for the chosen proposed replacement and recruitment area will be presented in a table. Proposed replacement and recruitment areas and their associated constraints will be presented spatially in document appendices.

6. Old Growth Management Area Amendment

There are two types of amendments (Minor Amendments and Significant Amendments) available to amend an OGMA. Each amendment type has unique criteria that may be applied and specific approval mechanisms.

6.1 Minor Amendments

The following are the requirements for Minor Amendments:

- No other Significant resource values have been identified within the OGMA to be amended (e.g., Indigenous values, wildlife habitat for Red- or Blue-listed species, rare ecosystems, etc.)
- Minor amendments do not materially change the original Order or its effect on forest and range tenure holders.
- As per Section 93(6) of the *Lands Act* public review is not required because the proposed amendment is “Not Significant”.
- Information sharing with Indigenous groups is not required although it may be undertaken at the discretion of the proponent of the amendment.
- Approval authority is delegated to the BC MFLNRORD District Manager.
- Area of the amendment is consistent with the area or percentage limits defined in the LRMP or SRMP.
- A Minor amendment can be submitted to the BC MFLNRORD District Manager in advance of, or in conjunction with, the submission of a Cutting Permit and/or Road Permit application.

6.2 Significant Amendments

The following are the requirements for Significant Amendments:

- Size of amendment exceeds the limits defined for a Minor amendment (as defined in a legal Order or, where no legal Order is in effect or is silent on this subject, as per the area or percentage listed in the SRMP)
- A concern or value from an Indigenous group (including Nisga’a Nation) associated with a specific OGMA is known
- The OGMA to be amended overlaps with other important values such as wildlife habitat, rare ecosystems, cultural and heritage, and recreation
- As per Section 93(6) of the *Lands Act* public review is required
- Information sharing with Indigenous groups (including Nisga’a Nation) is required
- Approval authority is delegated to the BC MFLNRORD District Manager
- Amendment to be submitted at the proponent’s discretion to the BC MFLNRORD District Manager, with a 90 day approval time frame to facilitate the 60 day engagement period.

A key component of a Significant OGMA amendment plan is a comparison of the features of the original OGMA impact area under the Project footprint, and the proposed replacement areas. The intent is to maintain or improve the biodiversity contained in the new areas.

An amendment plan will be sent to each Forest District Manager for the OGMA's incurring a Significant Incursion prior to any construction activities. The plan will contain:

- Map with OGMA Number on a label
- Map with the replacement OGMA size and location on a label
- Rationale for the replacement amendment
- Explanation of the how the replacement area meets or exceeds conditions in the original OGMA using key criteria (will be presented in a table) and the location of the replacement area in relation to the original OGMA.
- Other digital and hardcopy maps showing overlap with other resource values as appropriate (wildlife habitat, visuals, etc.).
- A written record of information sharing efforts with Indigenous groups (including Nisga'a Nation), and potentially affected stakeholders (where required)
- Digital maps and data are to conform to the digital data standards.

An OGMA amendment requires approval by a statutory decision maker, typically the District Manager at the local BC MFLNRORD office. They must be approved prior to construction of the pipeline. The amendment documents are typically submitted along with the OGMA replacement plan.

6.2.1 Indigenous Groups Information Sharing

Information sharing with Indigenous groups (including Nisga'a Nation) must be undertaken when a proponent proposes a Significant amendment to an OGMA.

WCGT Ltd. will be required to share information on the proposed amendment with Indigenous group(s) who have claimed or established rights or title on territory containing the OGMA to be amended and/or the replacement OGMA area. Information sharing is to focus on providing Indigenous groups with the information necessary to assess the proposed amendment. Proponents are to use this information sharing as a means to understand and mitigate any spatial and/or temporal issues or concerns Indigenous groups may have with the proposed amendment as well as the replacement area or replacement OGMA.

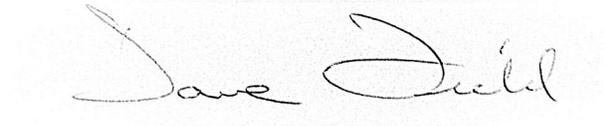
6.2.2 Public Review and Comment

WCGT Ltd. will be responsible for notifying and addressing any comments or issues that arise from engagements with potentially affected public and/or stakeholders (other forest licensees, tenure holders, etc.). In addition, significant amendments require a minimum of a 30 day public review period to allow the general public to identify any interests and/or issues they have with the proposed amendment. The agency responsible for the OGMA amendment will initiate the public review process, commencing with a one-week advertisement in the local newspaper. As a minimum, the advertisement will briefly describe:

- The OGMA or portion of an OGMA being amended;
- The replacement OGMA or replacement area being proposed;
- The process that individuals can follow to obtain more information about the proposed OGMA amendment;
- The process that individuals are to follow to submit comments or concerns about the proposed amendment;
- OGMA's that overlap with other legal objectives; and
- OGMA's may overlap with other legal objectives that must be considered and addressed by the proponent of an amendment to an OGMA.

7. Professional Authentication

The ORRP is being developed and signed by the QP listed as follows. This individual will be directly responsible for providing professional services and submitting accurate work as directed by WCGT Ltd. in support of the submission as required by the BC EAO.



Dave Field, RPF 1199

Date: 11/05/2021