



**Westcoast Connector
Gas Transmission**

Westcoast Connector Gas Transmission Project

Caribou Mitigation and Monitoring Plan
Condition 16

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 Caribou Mitigation and Monitoring Plan (CMMP or the Plan) is to address the requirements of Certificate Condition 16.

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 16.

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

The scope of the CMMP includes:

- Linkages to other plans, purpose and objectives, roles and responsibilities, implementation schedule, and future updates (Section 2);
- Engagement methods that identify parties to be engaged, a plan for engaging Indigenous groups, RRAs and stakeholders, and a description of how engagement outcomes help shape the Plan (Section 3);
- Regulatory requirements related to construction and operation of the Project that may impact the CMMP (Section 4);
- A description of the CMMP mitigation measures that may be implemented during construction and operation of the Project (Section 5);
- A description of the monitoring program (Section 6), including monitoring timeframe, strategy, indicators, and targets;
- A description of the adaptive management program, including how the results of monitoring will inform adaptive management and potential offsets (Section 7);
- A plan for reporting on the implementation of the CMMP including the schedule, content, and recipients of reports (Section 8); and
- Professional Authentication of the CMMP (Section 9).

Table of Concordance

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

Table 0-1. Concordance with Certificate Condition 16: Caribou Mitigation and Monitoring Plan

Certificate Condition ¹	Section
<i>Condition 16 – Caribou Mitigation and Monitoring Plan</i>	
The Holder must develop in consultation with FLNR, EC and OGC and implement a Caribou Mitigation and Monitoring Plan (CMMP) in the areas identified by FLNR as the Graham, Moberly, Kennedy Siding, Scott and Wolverine caribou ranges (Caribou Ranges).	Section 3
A Qualified Professional must develop and supervise the implementation of the CMMP. The CMMP be consistent with BC's <i>Policy for Mitigating Impacts on Environmental Values</i> .	Section 9
The CMMP must address the following objectives (CMMP Objectives) respecting the Construction and Operation of the Project: <ul style="list-style-type: none"> ▪ Avoidance of displacement and sensory disturbance of caribou in the Caribou Ranges; ▪ No net loss of caribou habitat in the Caribou Ranges; and ▪ Avoidance of increased predation of caribou in the Caribou Ranges. 	Section 1
The CMMP must describe the Holder's: <ul style="list-style-type: none"> a) Strategies for achieving the CMMP Objectives, including, but not limited to: <ul style="list-style-type: none"> – Mitigation to avoid, minimize, or complete restoration in response to the adverse effects of the Project and the Project's contribution to cumulative adverse effects on caribou and caribou habitat (primary mitigation); and – Mitigation to offset residual adverse effects if the primary mitigation is not expected to achieve the objectives within five years (offset mitigation); 	Section 5
b) Plan to monitor and assess: <ul style="list-style-type: none"> – The effectiveness of primary and offset mitigation measures; and – Whether the objectives are being achieved; 	Section 6
c) Adaptive management measures to respond to monitoring and assessment results;	Section 7
d) Plan to report on the implementation of the CMMP; and	Section 8
e) Plan to engage with Aboriginal Groups with asserted traditional territories affected by the Project that overlap Caribou Ranges, as well as EC, OGC, and FLNR throughout the implementation of the CMMP.	Section 3
The Holder must: <ul style="list-style-type: none"> a) Provide a reasonable opportunity to Aboriginal Groups with asserted traditional territories affected by the Project, that overlap Caribou Ranges, as well as EC, OGC and FLNR to review and provide input regarding the content of the CMMP; and 	Section 3
b) Prepare a report to accompany the submission of the CMMP describing how input received from Aboriginal Groups with asserted traditional territories affected by the Project that overlap Caribou Ranges, EC, OGC and FLNR was addressed in the CMMP.	Section 3 Appendix A

Table 0-1. Concordance with Certificate Condition 16: Caribou Mitigation and Monitoring Plan

Certificate Condition ¹	Section
<p>In order to allow for 60 days review and comment, the Holder must provide the CMMP to EAO no less than 90 days prior to the Holder's planned date to commence Construction in Caribou Ranges. The Holder must not start Construction in the Caribou Ranges until the Plan has been approved by EAO, unless otherwise authorized by EAO.</p> <p>Once approved the Holder must provide the CMMP to FLNR and OGC.</p>	Section 3

¹ "Aboriginal" was used at the time of the EAC. The current preferred term is "Indigenous".

Notes:

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

BC OGC = British Columbia Oil and Gas Commission

BC EAO = British Columbia Environmental Assessment Office

EC updated to ECCC = Environment and Climate Change Canada

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Acronyms and Abbreviations

AMP	Access Management Plan
BC	British Columbia
BC EAO	British Columbia Environmental Assessment Office
BC ENV	British Columbia Ministry of Environment and Climate Change Strategy
BC MFLNRORD	British Columbia Ministry of Forests, Lands, Natural Resource Operations and Rural Development
BC OGC	British Columbia Oil and Gas Commission
Caribou Ranges	Moberly (Klinse-za), Scott, and Wolverine caribou ranges
CEMP	Construction Environmental Management Plan
Certificate	Environmental Assessment Certificate
CMMP or Plan	Caribou Mitigation and Monitoring Plan
COSEWIC	Committee on the Status of Endangered Wildlife in Canada
CPC	Certified Pipeline Corridor
DU	Designatable Unit
ECCC	Environment and Climate Change Canada
Enbridge	Enbridge Pipelines Inc.
<i>EPMR</i>	<i>Environmental Protection and Management Regulation</i>
<i>FRPA</i>	<i>Forest and Range Practices Act</i>
GBMMP	Grizzly Bear Mitigation and Monitoring Plan
HEWR	High Elevation Winter Range
HWCMP	Human-Wildlife Conflict Management Plan
LNG	liquified natural gas
LPU	Local Population Unit
LRMP	Land and Resource Management Plan
<i>OGAA</i>	<i>Oil and Gas Activities Act</i>
OGMA	Old Growth Management Area
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
QP	Qualified Professional
RP	Restoration Plan
RRA	Relevant Regulatory Authorities

SARA	<i>Species at Risk Act</i>
SIMP	Standardized Industry Management Practice
SRMP	Sustainable Resource Management Plan
TCEMP	Terrestrial Construction Environmental Management Plan
UWR	Ungulate Winter Range
WCGT Ltd.	Westcoast Connector Gas Transmission Ltd.
WCGT Project	Westcoast Connector Gas Transmission Project
WHA	Wildlife Habitat Area
WMP	Wetlands Management Plan
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 Plan is to address the requirements of Condition 16.

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 CMMP. 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 16.

WCGT Ltd. acknowledges the inherent connection Indigenous Peoples have with the land and that while the CMMP will satisfy the regulatory requirement, the Plan is intended to minimize impacts to caribou 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.

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 and stakeholders for
2 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. WCGT Ltd. does not have plans to build the
5 second pipeline at this time; however, should it decide to construct a second pipeline, increase capacity by
6 adding compressor stations or extend the first pipeline to Ridley Island, WCGT Ltd. will submit revised or
7 new condition 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

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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.

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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.

1 1.2 Project Interactions with Caribou and their Habitat

2 Following the hierarchy of avoid, minimize, restore-on-site and offset as a last resort, Project planning
3 considerations provided the opportunity to avoid Project interactions with caribou habitat. The CPC
4 crosses the Graham herd range; however, WCGT Ltd. Has changed the start of the location of the pipeline
5 from Cypress to Willow Flats near the existing Enbridge CS2 facility near Chetwynd BC, reducing the length
6 of the pipeline by about 90 Km. This reduction in the length of the pipeline will avoid Project interaction
7 with the Graham caribou range. The provincially mapped caribou range boundaries have also been
8 adjusted and the Project no longer interacts with the Kennedy Siding caribou range.

9 The Project interacts with three Caribou Ranges: Moberly (Klinse-Za), Scott, and Wolverine. These herds
10 are part of two Local Population Units (LPUs) of the Southern Mountain caribou population of woodland
11 caribou (*Rangifer tarandus caribou*), namely the Pine River LPU (Designatable Unit [DU] 8 – Central
12 Group) and Omineca LPU (DU 7 – Northern Group) (COSEWIC 2014; Environment Canada 2014).

13 The Southern Mountain caribou population is designated as Threatened on Schedule 1 of the *Species at*
14 *Risk Act (SARA)* [Environment Canada 2014]) and Endangered by the Committee on the Status of
15 Endangered Wildlife in Canada (COSEWIC) (2021). Provincially, the DU 7 subpopulation is Blue-listed and
16 the DU 8 subpopulation is Red-listed (BC CDC 2021).

17 Primary threats contributing to the at risk status and rapid and severe population decline of Southern
18 Mountain caribou are anthropogenic and natural habitat alteration (i.e., habitat loss, degradation, and
19 fragmentation), and the resulting increased predation. Indirect impacts of industrial development can
20 alter predator-prey dynamics by facilitating the movement of predators through the landscape by creating
21 linear corridors (e.g., seismic lines, roads, and rights-of-way). Therefore, indirectly managing caribou
22 predator density and distribution by directly managing habitat loss, degradation, and fragmentation is a
23 key element of the federal recovery strategy (Environment Canada 2014).

24 Within the Caribou Ranges and LPU boundaries, important habitat areas are identified for caribou. The
25 Project footprint crosses two approved Wildlife Habitat Areas (WHAs) for caribou and two Ungulate Winter
26 Ranges (UWRs) for caribou in the Wolverine caribou range. Project routing was designed to avoid
27 provincial High Elevation Winter Ranges (HEWR) and high/low elevation critical habitat polygons
28 designated under the *SARA* to the extent feasible.

29 One low elevation critical habitat polygon is crossed by the Project route in the Kennedy Siding caribou
30 range. The Project crosses Zones A2, B1, and B3 in the Klinse-Za caribou range, as designated under the
31 draft Inter-Governmental Partnership Agreement for the Conservation of the Central Group of the
32 Southern Mountain Caribou (refer to subsection 4.2).

2. Caribou Mitigation and Monitoring Plan Overview

This CMMP is being developed to meet the requirements of Certificate Condition 16. The Plan will be developed in collaboration with Indigenous groups, RRAs, and stakeholders.

The scope of the CMMP includes:

- Linkages to other plans, purpose and objectives, roles and responsibilities, implementation schedule, and future updates (Section 2)
- Engagement methods that identify parties to be engaged, a plan for engaging Indigenous groups, RRAs, and stakeholders, and a description of how engagement outcomes help shape the Plan (Section 3)
- Regulatory requirements related to construction and operation of the Project that may impact the CMMP (Section 4)
- A description of the CMMP mitigation measures that may be implemented during construction and operation of the Project (Section 5)
- A description of the monitoring program (Section 6), including monitoring timeframe, strategy, indicators, and targets
- A description of the adaptive management program, including how the results of monitoring will inform adaptive management and potential offsets (Section 7)
- A plan for reporting on the implementation of the CMMP including the schedule, content, and recipients of reports (Section 8)
- Professional Authentication of the CMMP (Section 9)

2.1 Purpose and Objectives

The purpose of this CMMP is to satisfy Condition 16 in the Certificate of Approval. Condition 16 requires WCGT Ltd. to design and implement strategies that address the adverse effects of the Project and the Project's contribution to cumulative adverse effects on caribou and caribou habitat. The CMMP also provides commitments pertaining to Condition 17. The objectives of the CMMP include the following:

- Avoid or minimize sensory disturbance and displacement of caribou in the Caribou Ranges
- No net loss of caribou habitat in the Caribou Ranges
- Avoidance of increased predation of caribou in the Caribou Ranges

To determine whether the CMMP meets the objectives, the CMMP identifies performance indicators and targets that will be monitored and measured to evaluate the effectiveness of caribou mitigation (Section 6). The monitoring program will inform an adaptive management process (Section 7). Corrective measures will be implemented to address mitigation that does not meet monitoring targets (Section 7).

2.2 Linkages to Other Condition Plans

Information on other condition plans prepared for the Project have been considered in this CMMP. The links between this CMMP 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 12 - Wetlands Management Plan (WMP)	<p>The WMP includes results of pre-construction surveys, recommends mitigation measures to be implemented during construction, and outlines the post-construction monitoring program for wetlands.</p> <p>The WMP also includes consideration for the objectives of the Sensitive Area Plan for Mugaha Marsh per Condition 26.</p>	<p>The WMP contains general construction and restoration measure applicable to wetlands affected by the Project. Wetlands provide habitat to caribou.</p>
Condition 13 - Grizzly Bear Mitigation and Monitoring Plan (GBMMP)	<p>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 of mitigation strategies, and reporting requirements.</p>	<p>The GBMMP outlines measures to avoid or mitigate impacts to grizzly bears and their habitat during construction and operation of the Project. The GBMMP shares several mitigation measures with CMMP related to wildlife mortality risk associated with human and wildlife access on linear corridors.</p>
Condition 15 - Human-Wildlife Conflict Management Plan (HWCMP)	<p>The HWCMP recommends mitigation measures for avoiding wildlife mortalities during construction and operations.</p>	<p>The HWCMP provides measures to avoid or minimize wildlife mortality risk during construction and operation of the Project.</p>
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 SARA 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 UWRs and Wildlife Habitat Areas (WHAs) ▪ 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 several mitigation measures with the CMMP intended to reduce habitat loss and alteration, avoid or minimize sensory disturbance to wildlife, and mitigate potential changes in wildlife mortality risk.</p>
Condition 22 - Access Management Plan (AMP)	<p>The AMP provides the means by which access will be controlled, the types and locations of access requirements, rationale to demonstrate the necessity of any new temporary or permanent access, access control management measures that will be implemented during construction and operations, and post-construction monitoring requirements.</p>	<p>The AMP provides measures to restrict or discourage unauthorized motorized access on the Project footprint, which can affect wildlife mortality risk. The AMP shares measures with the CMMP related to wildlife mortality risk associated with human and wildlife access on linear corridors.</p>

Table 2-1. Linkages to Other Condition Plans

Plan	Description of the Plan	Linkages to this Plan
Condition 25 - Restoration Plan (RP)	The RP provides recommendations for soil handling, construction cleanup, erosion control measures, revegetation plans, and life of Project vegetation management.	The RP outlines measures to limit habitat disturbance and restore disturbed habitats upon completion of construction. The RP shares several mitigation measures with the CMMP related to caribou habitat restoration.
Condition 29 – Old Growth Management Areas (OGMAs) Plan	The OGMA Plan describes the incursions, exceedances of thresholds and proposals for recruitment and replacement.	The OGMA Plan includes measures for the replacement or recruitment of old forest for OGMAs that are not practicable to avoid. The OGMA shares measures with the CMMP related to habitat restoration.
Condition 35 – Terrestrial Construction Environmental Management Plan (TCEMP)	<p>The TCEMP describes WCGT Ltd.'s 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 also includes mitigation measures to address additional Conditions:</p> <ul style="list-style-type: none"> ▪ Condition 23 – integrated pest management ▪ Condition 24 – Red- and Blue-listed plants and ecological communities ▪ Condition 27 – mitigation for Red- and Blue-listed or culturally important lichen and plant species within the Nisga'a Lava Bed Memorial Park ▪ Condition 34 – hunting, trapping, and fishing policy 	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 includes a Wildlife Encounter Contingency Plan, and a Wildlife Species of Concern and Habitat Discovery Contingency Plan, which outlines the procedures that will be implemented in the event caribou- or site-specific habitat is detected during Project activities.

1 2.3 Implementation Schedule

- 2 This CMMP 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 CMMP will be implemented throughout the pre-construction (site preparation and surveying),
- 5 construction, final clean-up, and restoration phases under the supervision of a Qualified Professional (QP).

1 WCGT Ltd. will monitor mitigation effectiveness during the construction period and in the first, third, and
2 fifth years following the first full growing season after completion of final clean-up. Routine operational
3 monitoring will occur over the life of the Project (Section 6). The effectiveness of habitat restoration
4 offsets will be monitored in the first, third, and fifth years following implementation of offset.

5 2.4 Future Updates to the Caribou Mitigation and Monitoring Plan

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

- 8 ▪ Engagement programs with Indigenous groups
- 9 ▪ Additional information becoming available (e.g., updated caribou range plans)
- 10 ▪ Changes to Project planning (e.g., engineering changes)
- 11 ▪ Commitments made during the regulatory review process
- 12 ▪ Regulatory permits and authorization conditions

13 WCGT Ltd. will not inform Indigenous groups and RRAs when minor revisions are made to the Plan (i.e.,
14 small changes that would not affect the scope and objectives of the Plan).

15 Indigenous groups and RRAs will be provided an opportunity to review and provide comment on material
16 revisions to the Plan (i.e., changes to the scope or mitigation and monitoring requirements). A Document
17 History table listing version, date, and distribution will be provided in this document.

1 3. Engagement

2 This CMMP is being developed through engagement with Indigenous groups, the BC Ministry of Forests,
3 Lands, Natural Resource Operations and Rural Development (BC MFLNRORD), the BC Oil and Gas
4 Commission (BC OGC), Environment and Climate Change Canada (ECCC). The Plan will be provided to the
5 BC EAO for review and approval at least 90 days prior to construction. Once approved, copies of the Plan
6 will be provided to BC MFLNRORD, BC OGC and ECCC.

7 Throughout the development of the detailed outline, WCGT Ltd. is engaging to ensure the CMMP is
8 reflective of Indigenous interests and concerns, meets the intent of Certificate Condition 16, and aligns
9 with regulatory requirements as informed by RRA reviewers.

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

1 4. Regulatory Framework

2 The CMMP will be developed in the context of federal and provincial regulations and policies pertaining to
3 caribou management. The regulations, policies and land use plans that will be used to develop the CMMP
4 are listed in the following subsections.

5 4.1 Indigenous Caribou Recovery and Action Plans

6 WCGT Ltd. will engage with West Moberly First Nation regarding their Klinse-Za Caribou Recovery Plan.

7 4.2 Inter-Governmental Partnership Agreement

8 West Moberly First Nations, Sauteau First Nations, BC, and ECCC developed a draft Inter-Governmental
9 Partnership Agreement for the Conservation of the Central Group of the Southern Mountain Caribou,
10 which includes the Klinse-Za caribou herd. The draft agreement seeks to identify the actions to be taken to
11 stabilize and grow the population of the Central Group of Southern Mountain Caribou, including the
12 imposition of a voluntary moratorium on hunting caribou, the establishment and management of a
13 maternal pen, implementation of traditional predator management programs, establishing a restoration
14 social enterprise and native plant nursery, and monitoring and mapping caribou habitat.

15 The draft agreement has identified areas that would be subject to management designations and
16 directions for the purpose of sustainable activity areas, protection, restoration and conservation areas as
17 well as an Indigenous group woodland licence. These areas are defined as Zones, as follows:

- 18 ▪ Sustainable Resource Activity Areas (Zones A1, B1): These areas will be managed for continued
19 ongoing economic development activities and opportunities for new development projects, which may
20 be subject to a review by the Caribou Review Committee.
- 21 ▪ Areas of Restoration and Conservation Focus (Zone B4): Continued development activities will be
22 allowed in Zone B4, similar to zone A1 and B1. Additional habitat restoration and conservation
23 requirements may be specified and new applications will be subject to a review by the Caribou Review
24 Committee.
- 25 ▪ Protection, Restoration and Conservation Areas (A2, B2, B3): Until a long-term plan for habitat
26 protection is developed and protected areas are confirmed, Zones A2, B2, and B3 are subject to an
27 interim moratorium on provincial approvals for all resource development activities, except those
28 related to emergencies, public health and safety concerns, habitat restoration, and construction and
29 work to maintain existing infrastructure. An expansion of the Klinse-Za Park is proposed in Zones B2
30 and B3 to establish a designated protected area.

31 4.3 Regional and Municipal Land Management Plans

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

1 Resource management planning documents applicable to the Plan include:

- 2 ▪ Dawson Creek LRMP
- 3 ▪ Dunlevy Creek MP
- 4 ▪ Fort St. John LRMP
- 5 ▪ Fort St. James LRMP
- 6 ▪ Mackenzie LRMP
- 7 ▪ Prince George LRMP
- 8 ▪ Vanderhoof LRMP
- 9 ▪ Bulkley LRMP
- 10 ▪ Bulkley SRMP
- 11 ▪ Lakes District LRMP
- 12 ▪ Morice LRMP

13 4.4 Provincial

14 Provincial Acts, regulations, policy and guidelines applicable to the CMMP include:

- 15 ▪ *BC Wildlife Act*
- 16 ▪ *Oil and Gas Activities Act (OGAA)*
- 17 ▪ *Forest and Range Practices Act (FRPA)*
- 18 ▪ *Environmental Protection and Management Regulation (EPMR)*
- 19 ▪ Policy for Mitigating Impacts on Environmental Values (BC MOE 2014a)
- 20 ▪ Procedure for Mitigating Impacts on Environmental Values (BC MOE 2014b)
- 21 ▪ Provincial Caribou Recovery Program Draft Herd Plans
- 22 ▪ Implementation Plan for the Ongoing Management of South Peace Northern Caribou (*Rangifer*
- 23 *tarandus caribou* pop. 15) in BC (BC MOE 2013)
- 24 ▪ Compendium of Wildlife Guidelines for Industrial Projects in the north area, BC Interim Guidance (BC
- 25 MFLNRO 2014)
- 26 ▪ Standardized Industry Management Practices (SIMPs) (BC MFLNRO 2016)

27 4.5 Federal

28 Federal Acts and guidance applicable to the CMMP include:

- 29 ▪ *SARA*
- 30 ▪ Recovery Strategy for the Woodland Caribou Southern Mountain population (*Rangifer tarandus*
- 31 *caribou*) in Canada (Environment Canada 2014)

1 5. Mitigation Program

2 The mitigation program for the CMMP will describe the strategies for achieving the CMMP objectives
3 (subsection 2.1). Primary mitigation includes the mitigation in the first steps of the mitigation hierarchy as
4 described in the Policy for Mitigating Impacts on Environmental Values (BC MOE 2014a) and Procedures
5 for Mitigating Impacts on Environmental Values (BC MOE 2014b): avoid, minimize, and restore-on-site.

6 This section of the CMMP will outline mitigation to be implemented in the Caribou Ranges to avoid
7 displacement and sensory disturbance of caribou, achieve no net loss of caribou habitat, and avoid
8 increased predation of caribou, per the objectives set out in subsection 2.1. The mitigation measures will
9 be developed in accordance with information received through engagement with Indigenous groups and
10 WCGT Ltd. standards and industry and regulatory guidelines (Section 4).

11 5.1 Avoid

12 The strategies of avoidance through pre-construction preparation (routing, siting, and design) and
13 scheduling have been and will continue to be considered in Project planning. The following routing and
14 site selection criteria were applied to reduce the potential adverse effects of the Project within caribou
15 range and identified seasonal habitats:

- 16 ■ Use existing clearings (i.e., shared workspace) to reduce the amount of new clearing and land
17 disturbance required
- 18 ■ Avoid or reduce length traversing environmentally sensitive areas (in particular, high elevation winter
19 range for caribou), where practical
- 20 ■ Use of existing access, to the extent feasible
- 21 ■ Avoid, to the extent practical, known locations that provide site-specific habitat and other sensitive
22 areas

23 Where Project activities cannot avoid the Caribou Ranges, potential effects associated with displacement
24 and sensory disturbance to caribou can be avoided or reduced by scheduling The Project activities outside
25 of sensitive timing windows. In the event that construction activities cannot avoid the sensitive timing
26 windows, WCGT Ltd. will engage with Indigenous groups and RRAs to develop a mitigation plan specific to
27 the activity that is proposed during the timing window.

28 5.2 Minimize

29 WCGT Ltd. will seek opportunities to minimize Project effects and facilitate habitat restoration within the
30 Caribou Ranges crossed by the Project. Examples include adjusting the location or configuration of
31 temporary workspace to minimize new disturbance, using existing roads or trails to access the Project, and
32 implementing reduced ground disturbance construction techniques where grading is not required (e.g.,
33 mowing/mulching, walking down low growing vegetation, and covering vegetation and surface soils with
34 snow/ice or matting to create work surfaces).

35 5.3 Restore-On-Site

36 Caribou habitat restoration on the Project footprint within the Caribou Ranges will aim to re-establish
37 native vegetation consistent with the early seral community associated with the surrounding undisturbed
38 vegetation communities, minimize increases in preferred browse for moose, elk and deer, and manage

1 access and line-of-sight. Habitat restoration measures will include ecological habitat restoration (e.g., re-
2 establishing vegetation on a trajectory towards pre-construction or adjacent habitat conditions) and
3 functional restoration (e.g., mitigating effects of predator/prey dynamics through access and line-of-sight
4 management).

5 5.4 Offsets

6 Certificate Condition 16 defines offset mitigation as the measures to offset residual adverse effects if the
7 primary mitigation is not expected to achieve the objectives within 5 years. The CMMP objective of no net
8 loss of caribou habitat in the Caribou Ranges will likely require offsets as habitat restoration cannot be
9 implemented where permanent access roads or facilities are located within the Caribou Ranges, and some
10 restoration measures generally require more than 5 years to achieve targets related to mitigating predator
11 movement and line-of-sight (refer to Section 6).

12 The offset strategy will be developed in collaboration with affected Indigenous groups and RRAs and will
13 adopt the general principles for offsets listed in the Procedures for Mitigating Impacts on Environmental
14 Values (BC MOE 2014b), as follows:

- 15 ▪ If impacts remain after all measures to avoid, minimize, and restore-on-site have been duly
16 considered, offsets may be required.
- 17 ▪ Offsets should deliver tangible, measurable, on-the-ground conservation outcomes for environmental
18 values that are clearly linked to the residual impact. Offset locations should consider range planning
19 and other caribou recovery initiatives.
- 20 ▪ Ecological equivalence is the basis for determining the offset amount and methods.
- 21 ▪ WCGT Ltd. is responsible for offsetting Project residual impacts on caribou.
- 22 ▪ Efforts will be made to secure offsets (legally or through other mechanisms) for the duration of the
23 expected Project residual effect, at a minimum.

24 5.4.1 Determining the Need for Offsets

25 WCGT Ltd. will monitor the effectiveness of the mitigation and habitat restoration measures as described
26 in Section 6. Monitoring will measure performance indicators to determine if measurable targets are met.
27 These targets comprise the criteria that will be used to determine whether offsets are needed. Corrective
28 measures will be implemented throughout the monitoring period if and where results indicate the
29 performance indicators are not trending to meeting the established targets. If there are any targets that
30 are not achieved upon completion of the monitoring program, WCGT Ltd. will initiate engagement with
31 Indigenous groups and RRAs to progress suitable offsets.

32 5.4.2 Risk and Uncertainty

33 Offsets should be designed to achieve the best conservation outcome in the shortest timeframe
34 practicable, considering the effort and resources expended (BC MOE 2014b). WCGT Ltd. will collaborate
35 with Indigenous groups and RRAs to develop and design a caribou offset program. Design elements are
36 used in offset programs to assess the value and effectiveness of offset measures, and their ability to
37 achieve the goals of the offset program (Bull et al. 2013; BBOP 2012; DSEWPC 2012b; McKenney 2005;
38 McKenney and Kiesecker 2010). Design elements can be a useful framework for collaborative
39 development of the caribou offset program. Several authors identify the following design elements for the
40 development of conservation or biodiversity offsets (BC MOE 2014b; Doswald et al. 2012; Environment
41 Canada 2012; Pilgrim and Ekstrom 2014; Sustainable Prosperity 2014).

- 1 ▪ Equivalency
- 2 ▪ Additionality
- 3 ▪ Location
- 4 ▪ Timing
- 5 ▪ Duration
- 6 ▪ Accountability

7 BC ENV has developed a Caribou Habitat Offset Decision Support Tool (Tool) that uses quantitative inputs
8 to estimate offsets and is intended to guide the conversation related to offset ratios (BC ENV 2019). WCGT
9 Ltd. will discuss with Indigenous groups and RRAs whether use of the is a suitable starting point for
10 determining offset ratios and resultant offset amounts for caribou. The BC Habitat Offset Decision Support
11 Tool Guidelines & Operational Manual (BC ENV 2019) details the approach and method used (subsection
12 5.4.3).

13 5.4.3 Offset Ratios

14 The Tool uses a mathematical equation to estimate an offset ratio by calculating ecological factors at an
15 impact site (where a development is proposed) and a proposed offset site (BC ENV 2019). Habitat value
16 modifiers are applied by the Tool to address ecological equivalence and the risks described in subsection
17 5.4.2. The Tool calculates habitat equivalence between the impacted site and proposed offset site
18 considering the following factors (BC ENV 2019):

- 19 ▪ Indigenous values
- 20 ▪ Direct impacts to habitat features
- 21 ▪ Disruption in use of habitat features
- 22 ▪ Landscape- and stand-level habitat fragmentation
- 23 ▪ Linear features
- 24 ▪ Movement barriers
- 25 ▪ Isolation of habitats
- 26 ▪ Edge effects
- 27 ▪ Aerial disturbance
- 28 ▪ General disturbance and displacement from human activities, construction activities and noise
- 29 ▪ Construction of vertical structures, including wind turbines, drill pumps, and hydro poles
- 30 ▪ Impacts to water resources, hydrology, wetland and riparian function
- 31 ▪ Changes to vegetation (e.g., through management programs and introduction of invasive plants)
- 32 ▪ Predator movement patterns
- 33 ▪ Environmental contamination

34 The Tool is currently in trial version. BC ENV has advised that it is intended to be used as a starting point in
35 discussions about offsets, and the final selected offset ratios could be further modified through those
36 discussions based on factors that the Tool may not adequately address. As the Tool is designed only to
37 address habitat-based offsets, residual effects associated with wildlife mortality cannot be addressed
38 using this Tool. In the event of a scenario that requires offsets for non-habitat impacts (e.g., direct caribou
39 mortalities caused by the Project), WCGT Ltd. will determine a suitable offset quantification through
40 engagement with Indigenous groups and with RRAs.

41 5.4.4 Offset Conservation Actions

42 Where the need for offsets is identified (subsection 5.4.1), WCGT Ltd. will implement conservation actions
43 to offset the residual impacts of the Project and contribution to cumulative effects. The following potential
44 offset options are typically used for biodiversity offsets (BC MOE 2014b; BBOP 2012; Calvet et al. 2015;

- 1 Croft et al. 2011; DSEWPC 2012a; Environment Canada 2012; McKenney 2005; Poulton 2015;
2 Sustainable Prosperity 2014; Schneider 2011; ten Kate et al. 2004; Weber 2011):
- 3 ▪ habitat restoration
 - 4 ▪ habitat enhancement
 - 5 ▪ habitat creation
 - 6 ▪ habitat protection through land securement or conservation covenants
 - 7 ▪ in-lieu offsets for habitat or population management (financial support for management actions to be
8 implemented by and under the direction of provincial or local government or organizations)

9 An in-lieu offset is required under EAC Condition 17, which directs WCGT Ltd. to enter into a Caribou
10 Agreement with BC MFLNRORD and contribute \$2 million towards the implementation of the Caribou
11 Program, which may include any of the following:

- 12 ▪ Monitoring of caribou movement and habitat use
- 13 ▪ Monitoring of caribou predator movement and habitat use
- 14 ▪ Population management
- 15 ▪ Administration of such activities

16 This subsection of the CMMP will evaluate offset options for their suitability to the Project based on offset
17 design elements and risks, costs, predicted ecological benefits, and input from Indigenous groups and
18 RRAs.

19 5.4.5 Offset Monitoring and Reporting

20 A detailed offset strategy will be developed in collaboration with potentially affected Indigenous groups
21 and RRAs. Monitoring will be a key component of the offset strategy. The timeframe for offset monitoring
22 will be established considering the expected time required for the conservation actions to achieve
23 monitoring targets. For habitat restoration, enhancement or creation offsets, the conservation actions and
24 performance indicators will target establishing a positive trajectory towards functional habitat as quickly
25 as practical and in less than 20 years, which aligns with provincial guidance (BC ENV 2019). WCGT Ltd. will
26 report the results of offset monitoring following a reporting schedule to be developed with feedback from
27 Indigenous groups and RRAs. Monitoring results will inform WCGT Ltd.'s adaptive management process
28 and the need for corrective measures, as described in Section 7.

1 6. Monitoring Program

2 To meet Condition 16 of the Certificate, WCGT Ltd. will collaborate with Indigenous groups to design and
3 implement a monitoring program to test the effectiveness of mitigation implemented on the Project
4 footprint. Other monitoring plans pertaining to caribou that will be implemented during the post-
5 construction phase of the Project are the AMP and GBMMP, Post-Construction Monitoring (PCM) Program,
6 RP, WWHMP, and WMP.

7 Reporting on mitigation effectiveness and compliance will be described in the TCEMP. Should monitoring
8 programs indicate that the measures implemented were not adequate or were ineffective at avoiding or
9 reducing potential residual effects on caribou, follow-up measures will be implemented as described in
10 Section 7 of the CMMP.

11 The monitoring timeframe and reporting on mitigation effectiveness and compliance will be described in
12 this section as development of the CMMP progresses. Should monitoring programs indicate that the
13 measures implemented were not adequate or were ineffective at achieving the CMMP objectives,
14 follow-up measures will be implemented as described in Section 7.

15 6.1 Mitigation Compliance Monitoring

16 Roles, responsibilities and frequency of compliance monitoring will be described in this section.

17 6.2 Mitigation Effectiveness Monitoring

18 WCGT Ltd. will collaborate with Indigenous groups to design and implement a monitoring program to test
19 the effectiveness of mitigation implemented for caribou and caribou habitat. Mitigation monitoring
20 involves measuring the mitigation actions against targets to determine effectiveness of restoration and
21 offsets.

22 6.3 Monitoring Timeframe

23 The PCM Program begins following the first full growing season after final clean-up of the entire Project
24 footprint and the implementation of restoration measures. Monitoring will occur in the first, third, and fifth
25 years of the PCM Program. The timeframe and potential for an extended monitoring period for caribou
26 habitat restoration and offsets will be discussed with Indigenous groups and RRAs as development of the
27 CMMP progresses.

28 6.4 Monitoring Strategy

29 To measure the performance indicators, a combination of monitoring methods will be used. WCGT Ltd. will
30 collaborate with Indigenous groups to design the monitoring methods for:

- 31 ▪ compliance
- 32 ▪ sensory disturbance and displacement
- 33 ▪ habitat restoration
- 34 ▪ access and line-of-sight management

1 7. Adaptive Management

2 This section outlines how mitigation measures will be re-evaluated should monitoring programs indicate
3 that the measures implemented were not adequate or effective at avoiding or reducing potential residual
4 effects on caribou or their habitat (i.e., monitoring targets are not achieved).

5 7.1 Adaptive Management Approach

6 The results of monitoring will inform the need for corrective measures. The need for and type of corrective
7 measures will be determined using a systematic approach. If, at any point during the monitoring period,
8 performance indicators are found to be underperforming and are unlikely to meet the targets within the
9 monitoring timeframe, corrective measures will be implemented as soon as feasible. For example, if
10 monitoring finds poor survival or growth of plantings in restored areas, a review of the installation
11 methods, seasonal conditions (e.g., harsh winter or drought), and site conditions (e.g., soil compaction,
12 erosion, poor drainage, competing vegetation) will be evaluated to determine the appropriate corrective
13 measures. Remedial measures might be implemented to address site conditions, such as erosion control,
14 decompaction, or invasive plant management, and supplemental plantings may be installed in areas with
15 high seedling mortality and low potential for natural ingress.

16 Certificate Condition 17 requires WCGT Ltd. to enter into an agreement with BC MFLNRORD whereby
17 WCGT Ltd. will contribute up to \$2 million to support a Caribou Program as described in subsection 5.4.4.
18 WCGT Ltd. will maintain an open dialogue with BC MFLNRORD regarding the implementation and results
19 of the Program, including the need for adaptive management to address potential issues identified
20 through the Program.

1 8. Reporting Requirements

2 During the PCM Program, WCGT Ltd. will provide reports following each PCM year (i.e., first, third, and fifth
3 growing season following final clean-up) to Indigenous groups upon request, the BC EAO, BC OGC, BC
4 MFLNRORD, and ECCC. Reports will be provided within 4 months (generally by January 31) following
5 completion of PCM during the growing season of each PCM year. Reporting will include detail on the
6 implementation of site-specific mitigation and habitat restoration measures, information on the indicators
7 measured and their performance in reaching the monitoring target, the monitoring methods used, details
8 of corrective actions taken (if any), as well as an updated engagement record.

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

13 **9. Professional Authentication**

14 This CMMP has been developed and signed by the QPs listed as follows. These individuals will be directly
15 responsible for providing professional services and submitting accurate work as directed by WCGT Ltd. in
16 support of the submission as required by the BC EAO.

17

18 Trevor Friesen, R.P.Bio., P.Biol.

19

20 Jody Bremner, R.P.Bio., P. Biol.

Appendix A
Report on Engagement for the CMMP