



# Blackwater Gold Project

## Final Transmission Line Routing Plan (Phase 1)

March 2021

Project No.: 0575928-0001

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## 1. BACKGROUND, PURPOSE, AND OBJECTIVES

On June 21, 2019, New Gold Inc. (New Gold) received Environmental Assessment Certificate (EAC) #M19-01 for the Blackwater Gold Project (the Project), a new open pit gold and silver mine with associated ore processing facilities located 110 kilometres southwest of Vanderhoof in central British Columbia (BC). The Project includes a 140 kilometre, 230 kilovolt transmission line. Three routing options for the transmission line are being considered with the final route to be confirmed based on consultations with Indigenous nations and stakeholders and engineering considerations, during permitting.

On August 7, 2020, Artemis Gold Inc. (Artemis Gold) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold. Subsequently the EAC was transferred to BW Gold LTD. (BW Gold) under the 2018 *Environmental Assessment Act*.

Condition 39 of the EAC requires BW Gold to develop a Final Transmission Line Routing Plan (FTLRP) in consultation with the BC Ministry of Environment and Climate Change Strategy (ENV); the BC Ministry of Forestry, Natural Resource Operations and Rural Development (FLNRORD); Ulkatcho First Nation, Lhoosk'uz Dené Nation, Nadleh Whut'en First Nation, Stelat'en First Nation, Saik'uz First Nation, and Nazko First Nation (Indigenous nations).

Under Condition 39, the FTLRP is to be developed in two phases. This document has been developed to satisfy the requirement for Phase 1 of the FTLRP, including seeking input from ENV, FLNRORD and Indigenous nations (the Parties). In a November 2, 2020 email to the Parties and EAO, BW Gold proposed an accelerated submission timeline for the draft of the Phase 1 FTLRP. The change was proposed to provide sufficient time for consultation on the final transmission line routing earlier than allowed for in the condition as written and to harmonize the review with other construction permits for the Project. The Parties approved the request or provided no comment on the accelerated timing. Consistent with the subsequent discussions with the EAO and feedback received, Phase 1 of the FTLRP is being submitted in advance of the 75 day period following the submission of the Document Submission Plan (Condition 10 of the Certificate).

## 2. COMPLIANCE OBLIGATIONS

Specific requirements for the FTLRP (Phase 1) under Condition 39 of the EAC are reproduced below.

*Phase 1 of the FTLRP must include at least the following:*

- a) *the means by which the Holder [i.e., New Gold] will consult with FLNRORD, Aboriginal Groups, existing tenure holders, permit holders, property owners, recreationalists, and other land users potentially affected by the transmission line routing options on the potential effects of the transmission line to those parties, including the means by which the Holder will identify the appropriate parties to be consulted;*
- b) *the mitigation measures to address potential impacts from the transmission line that will be proposed to the parties identified in paragraph a); and*
- c) *the means by which the Holder will notify the EAO [i.e., Environmental Assessment Office] Aboriginal Groups and parties identified in paragraph a) of the final route selection.*

In addition, Condition 2 of the EAC requires that all plans, programs, or other documents required by the EAC must, at a minimum, include the following information:

- a) *purpose and objectives of the plan, program or other document;*
- b) *roles and responsibilities of the Holder and Employees;*

- c) *names and, if applicable, professional certifications and professional stamps/seals, of those responsible for the preparation of the plan, program, or other document;*
- d) *schedule for implementing the plan, program or other document throughout the relevant Project phases;*
- e) *means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness; [not applicable to this plan]*
- f) *schedules and methods for the submission of reporting to specific agencies, Aboriginal Groups and the public and the required form and content of those reports; and*
- g) *process and timing for updating and revising the plan, program or other document, including any consultation with agencies and Aboriginal Groups that would occur in connection with such updates and revisions.*

### 3. PREPARATION OF THIS PLAN

This plan has been prepared by Environmental Resources Management Canada Ltd. for Ryan Todd, VP Environment and Social Responsibility, Artemis Gold.

## 4. PHASE 1 ENGAGEMENT AND COMMUNICATION

### 4.1 Identification of Potentially Affected Parties

BW Gold will engage with ENV, FLNRORD, and Indigenous nations on the transmission line routing options, specifically the Stellako Re-route, the Big Bend Re-route and the Mills Ranch Re-route. Additionally, BW Gold will identify the appropriate parties for engagement on the three routing options, which may include other Indigenous groups, tenure holders, private property owners, recreationalists, and other land users. Appropriate parties will be identified by:

- reviewing comments from government agencies, Indigenous groups, stakeholders and the public that were submitted on the transmission line during the environmental assessment (EA) review, and identifying those parties who commented on any of the three routing options;
- reviewing publicly-available government databases to identify private (freehold) lands, commercial (e.g., commercial recreation, mining, energy, forestry, agriculture, trapping, and guide outfitting) Crown land interests and non-commercial land interests (e.g., hunting, fishing, public recreation) overlapping and/or abutting the three routing options; and
- preparing maps of private land, commercial and non-commercial interests overlapping and/or abutting each route option and tabulating contact information for each interest.

### 4.2 Engagement Activities

BW Gold will undertake the following engagement activities:

1. Follow up with the EAO to confirm ENV and FLNRORD contacts to be consulted on the FTLRP (Phase 1).
2. Email the draft FTLRP (Phase 1) to ENV, FLNRORD, and Indigenous nations (copying the EAO on the request) for 3-week review and comment. Revise the draft FTLRP (Phase 1), taking into account the comments provided on the draft plan. Document the comments and BW Gold responses in a comment tracking table and incorporate this information into Phase 2 of the FTLRP.

3. Prepare a package, including a cover letter, map(s) identifying the location of the interest in relation to a routing option, and the proposed mitigation measures (identified in Appendix A). The package would be provided to ENV, FLNRORD, Indigenous nations and the identified parties by email or other available contact information. The cover letter would: 1) identify the purpose of the letter by referring to the EAC condition; 2) invite the party to provide comments on the potential effects of a routing option and proposed mitigation measures; 3) request written comments within 3 weeks; and 4) provide BW Gold contact information. The maps in each package would be customized for each party.
4. Three days after emailing the package, send a follow up email to confirm receipt of the package. For parties who did not receive the package via email, other means of verifying receipt will be implemented, including telephone follow up or confirmation of delivery via registered mail.
5. If a response has not been received within three weeks, follow up to see if further time is needed for review.
6. Confirm receipt of comments.
7. After reviewing the comments, follow up if clarification is required on the comments.
8. In a tracking table, document the comments on the FTLRP (Phase 1) and BW Gold responses (Note: The results of consultations on the three routing options will be incorporated into the Phase 2 of the FTLRP).

### 4.3 Proposed Mitigation Measures

Measures to mitigate the effects of the transmission line on commercial and non-commercial interests and land uses is provided in Appendix A. These measures include the mitigations identified for the non-traditional land and resource use and visual resources valued components identified in the mitigations table submitted to the Environmental Assessment Office (EAO), 180 days after the issuance of the EAC as required by Condition 43.

## 5. COMMUNICATION OF FINAL ROUTE SELECTION

BW Gold will communicate the final route selection to EAO, ENV, FLNRORD, Indigenous nations, and other identified parties as described in Section 4.1 by e-mail and/or traditional mail.

## 6. SCHEDULE FOR IMPLEMENTING THIS PLAN

BW Gold will provide the draft FTLRP Phase 1 to the EAO, ENV, FLNRORD, and Indigenous nations at least one year prior to the planned commencement of construction of the transmission line, or as noted in the Document Submission Plan required by Condition 10 of the EAC. The draft Phase 2 plan will also be developed in consultation with the EAO, ENV, FLNRORD and Indigenous nations, and will be submitted to the EAO, ENV, FLNRORD and Indigenous nations at least 90 days prior to the planned commencement of transmission line construction, or as noted in the Document Submission Plan.

Pursuant to Condition 39, BW Gold must not commence construction of the transmission line until Phase 2 of the plan has been approved by the EAO, unless otherwise authorized by the EAO. The Condition also requires both phases of the FTLRP and any amendments thereto be implemented to the satisfaction

of a Qualified Professional<sup>1</sup> throughout the Project's Construction, Operations, and Closure phases, and the satisfaction of the EAO.

## **7. AMENDMENTS TO THIS PLAN**

BW Gold may amend this FTLRP by providing the proposed amendments in draft form to FLNRORD and Indigenous nations at least 45 days prior to submitting the amendments to the EAO.

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<sup>1</sup> Qualified Professional is defined in the EAC.

**APPENDIX A**      **APPENDIX A: SUMMARY OF MEASURES TO MITIGATE (APRIL 2020; UPDATED AS PER EAC CONDITION 43 )**

## Appendix A: Summary of Measures to Mitigate (April 2020; updated as per EAC Condition 43 )

- BW Gold will implement the following measures to mitigate potential effects of the transmission line on commercial and non-commercial interests and land uses and interests:
- Locate the transmission line within or alongside the footprints of existing long-term linear infrastructure (roads and transmission lines) to cluster disturbance, as will be described in the Final Transmission Line Routing Plan.
- Use existing roads and trails and follow existing linear disturbances and cleared areas to support transmission line construction, as will be described in the Construction Environmental Management Plan (CEMP).
- Avoid increasing disturbance within remaining areas of intact forests (i.e., areas with low levels of landscape disturbance) as will be described in the CEMP.
- Align the transmission line right of way (RoW) to run in parallel to the natural contours of the landscape rather than perpendicular, as will be described in the Final Transmission Line Routing Plan.
- Incorporate traditional knowledge in the finalization of the proposed transmission line alignment to avoid impacting important sites and/or reduce adverse impacts on Indigenous rights and interests.
- Work with FLNRORD and Stellat'en First Nation to address potential access management issues related to the Stellako Wildlife Management Area (WMA), including monitoring of potential project related effects on the Stellako WMA as part of its Wildlife Management Plan. Should unanticipated effects be observed in the Stellako WMA associated with the transmission line, NG will consider appropriate offset activities for those impacts in consultation with FLNRORD and the Stellat'en First Nation.
- Consult with tenure holders to identify mutually-acceptable accommodations for potential Project effects, in accordance with relevant guidance including Forests, Lands and Natural Resources Operations's (2008) *Practical Guide to Effective Coordination of Resource Tenures*.
- Identify alternative watering locations in discussion with the land and/or livestock owner(s), if livestock access to water supply is curtailed by mine operations activities or infrastructure (Agriculture and Range).
- Locate proposed access roads and transmission lines away from wetland and riparian areas or spanning wetlands.
- Use helicopters to support transmission line construction in steep areas, as will be described in the CEMP
- Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the transmission line that may provide cover and facilitate furbearer movement.
- Protect groundwater wells with temporary fencing during construction.
- Narrow the transmission line RoW to avoid overlap with PID 928048.
- Work with Recreation Sites and Trails BC (Ministry of Forests, Lands, Natural Resource Operations and Rural Development [FLNRORD]) to mitigate potential effects on Brewster Lake (REC1497), including maintaining the transmission line outside of the Brewster Lake Recreation Area viewshed.
- Work with Recreation Sites and Trails BC (FLNRORD) during the permitting stage to ensure that all potential impacts to affected recreational sites are avoided or adequately mitigated (e.g., REC5660 Mary Jane Lake).

- Avoid REC1606 Cabin Creek Falls site, REC 1406 Cabin Creek Trail and REC1097 Cut-off Creek, as will be described in the Final Transmission Line Routing Plan.
- Work with FLNRORD during detailed engineering of the transmission line at the permitting stage with the goal of avoiding MN4848 (growth and yield plot). If avoidance is not possible and prior to construction, BW Gold will have this plot re-measured at BW Gold's cost by a contractor to be approved by FLNRORD.
- Work with MOTI to complete the required gravel/quarrying volumes testing for Land file 0107944 and compensate MOTI for the volume sterilized, if any, prior to start of construction in this area.
- Develop site-specific measures and/or designs at Nechako and Stellako river crossings so structures do not unnecessarily affect natural lines (e.g., treelines, ridgelines, river banks), as will be described in the Final Transmission Line Routing Plan
- Deploy markers on the shield wires on the transmission line and phase conductors on distribution lines, as will be described in the CEMP.
- Follow BC FLNRORD guidelines and requirements for clearing, handling, and hauling beetle-infested wood.
- Provide timber from transmission line clearing to the Fraser Lake community forest.
- Notify the Stellat'en First Nation of Construction and Post-closure schedules and consult with Stellat'en First Nation to identify and address any concerns regarding access to the tenure, including placement of transmission line towers.
- Provide maps and early notification of Project development and other physical work to affected regional forestry stakeholders.
- Work Nadleh and Stellat'en First Nations to develop a research and monitoring program to study the potential effects of EMF [electromagnetic fields] on birds along the transmission line. Existing information on the effects of EMF on birds from other transmission lines will be used to inform initial mitigation strategies.
- If appropriate, further viewshed analysis will be considered during the detailed design and final site specific routing of the transmission line.
- Work collaboratively with the Vanderhoof Forest District to manage vegetation cover between transmission line and the Hobson Lake Recreation Site.
- Compensate affected trapline holders in accordance with industry and provincial protocols with associated proof of lost revenue.
- Implement visual quality mitigation measures for the transmission line including clear-spanning trails, avoiding tower and pole placement on trails, minimizing placement of towers/poles on top of ridgelines, summits, or other locations where they may be silhouetted against the sky and locating towers/poles and ROW to take advantage of natural screening from vegetation and topography (all indicators), as will be described in the Final Transmission Line Routing Plan.
- Investigate measures to soften the visual effect of overhead cables where the transmission line crosses the trails and sites (e.g., Cheslatta Trail and Messue Wagon Trail).
- Investigate measures to soften the visual effects associated with overhead cables where the Stellako River flows underneath the proposed transmission line.
- Place towers/poles away from river banks, as will be described in the Final Transmission Line Routing Plan

- Paint or stain transmission line towers/poles to blend in with surrounding environment, as will be described in the Final Transmission Line Routing Plan
- Consider site-specific landscaping and vegetation screening in shared access areas at Site 5 (Nechako River crossing), Site 7 (Brewster Lake) and Site 9 (Tatelukuz Lake), as will be described in the Final Transmission Line Routing Plan
- Work collaboratively with the Vanderhoof Forest District to manage vegetation cover between the proposed transmission line and the Hobson Lake Recreation Site.
- Provide the construction schedule to tenure holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges and the local offices of BC FLNRORD) overlapping the Project, 30 days prior to the start of construction and resolve any issues related to access as per appropriate industry and provincial standards, guidelines and best practices.
- Facilitate movement of livestock and farm machinery across ROW corridors, where applicable.
- Facilitate movement of livestock and farm machinery across RoW corridors to be identified in the Final Transmission Line Routing Plan.
- Notify livestock owners of the construction schedule and activities to allow livestock to be moved to other pastures if necessary and/or where applicable.
- Install fencing to restrict cattle movement into the transmission line RoW (Land File 0194075), as identified in the Final Transmission Line Routing Plan.
- Require project drivers to close gates properly when vehicles require access to ROW corridors on fenced and gated lands.
- During the early years of Operations, deactivate and decommission access roads that are constructed to support transmission line construction to limit predator movements and vision along the line.
- Implement the Transportation Access Management Plan (draft plan provided in Section 12.2.1.18.4.14 of the Application for an Environmental Assessment Certificate/Environmental Impact Statement (2013; Application/EIS), including a Traffic Management Plan (draft plan provided in Section 12.2.1.18.4.14.7.4 of the Application/EIS).
- Conduct inspections for potential hazard trees that may fall into the transmission line ROW and contact either the transmission line poles or the conducting lines.
- Establish an Access Management Working Group with Indigenous participation.
- Implement an Air Quality and Dust Management Plan, which will include measures to mitigate dust emissions during transmission line construction.
- Require Project vehicles to use only the RoWs and designated access roads near Project development areas to minimize compaction of agricultural soil (Agriculture and Range), as will be described in the CEMP.
- Implement a monitoring program (during spring migration, breeding, and fall migration) along the transmission line. Monitoring will include: monitoring bird mortality along the line, investigating any bird mortality incidents, and implementing adaptive management to prevent further mortality, as will be described in the Wildlife Monitoring and Management Plan
- Consult the Village of Fraser Lake on transmission line access road decommissioning.
- Decommission the transmission line when no longer required.

