



# Blackwater Mine



## Final Transmission Line Routing Plan (Phase 2)

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# Work Instructions

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## Acronyms and Abbreviations

Aboriginal Groups or Indigenous Nations	Ulkatcho First Nation, Lhoosk'uz Dené Nation, Nadleh Whut'en First Nation, Stelat'en First Nation, Saik'uz First Nation, and Nazko First Nation (as defined in the Project's Environmental Assessment Certificate #M19-01)
Application/EIS	Blackwater Gold Project Application for an Environmental Assessment Certificate / Environmental Impact Statement
Artemis	Artemis Gold Inc.
BC	British Columbia
Blackwater or Project	Blackwater Gold Project
BW Gold	BW Gold LTD.
CPD	Certified Project Description
CCN	Cheslatta Carrier Nation
CSFN	Carrier Sekani First Nations
DS	Decision Statement
EAC	Environmental Assessment Certificate
ELoMC	Environmental Life of Mine Committee
EMP	BC's Environmental Mitigation Policy
ENV	Ministry of Environment and Climate Change Strategy
ERM	ERM Consultants Canada Ltd.
FSR	Forest Service Road
FTLRP	Final Transmission Line Routing Plan
ha	Hectare
Indigenous groups or Aboriginal Peoples	Lhoosk'uz Dené Nation, Ulkatcho First Nation, Nadleh Whut'en First Nation, Saik'uz First Nation, Stelat'en First Nation, Nazko First Nation, Skin Tyee Nation, T̓silhqot'in Nation, Métis Nation British Columbia, and Nee-Tahi-Buhn Band (as defined in the Project's federal Decision Statement)
km	Kilometre
kV	Kilovolt
LDN	Lhoosk'uz Dené Nation
LOO	Licence of Occupation
m	Metre
Main Route	The initial transmission line route filed as part of the EIA/Application in October 2015. Also referred to as the Proposed New Alignment (PNA).
MOF	Ministry of Forests

MoTI	Ministry of Transportation and Infrastructure
New Gold	New Gold Inc.
NTBC	Nature Trust of BC
OLTC	Occupant Licence to Cut
PNA	Proposed New Alignment
Project	Blackwater Gold Project
Re-Routes	Sub-segments of the PNA routing with alternative options: Stellako; Big Bend; and Mills Ranch re-routes.
RoW	Right-of-way
SFN	Saik'uz First Nation
SRWMA	Stellako River Wildlife Management Area
StFN	Stellat'en First Nation
STN	Skin Tyee Nation
t	Tonne
TL	Transmission Line
TL ARMP	Transmission Line Agriculture and Range Management Plan
TL ARMP	Transmission Line Agriculture and Range Management Plan
TL CEMP	Transmission Line Construction Environmental Management Plan
TL CEMP	Transmission Line Construction Environmental Management Plan
TL IVMP	Transmission Line Integrated Vegetation Management Plan
Trails BC	The Trails Society of British Columbia
UFN	Ulkatcho First Nation
VC	Valued Component
WMA	Wildlife Management Area
WMMP	Wildlife Mitigation and Management Plan

# 1.0 Project Overview

The Blackwater Gold Project (the Project) is a gold and silver open pit mine located in central British Columbia (BC), approximately 112 kilometres (km) southwest of Vanderhoof, 160 km southwest of Prince George, and 446 km northeast of Vancouver.

The Project is presently accessed via the Kluskus Forest Service Road (FSR), the Kluskus-Ootsa FSR, and an exploration access road which connects to the Kluskus-Ootsa FSR at km 124.5. The Kluskus FSR joins Highway 16 approximately 10 km west of Vanderhoof. A new, approximately 13.8 km road (Mine Access Road) will be built to replace the existing exploration access road, which will be decommissioned. Driving time from Vanderhoof to the mine site is about 2.5 hours.

Major mine components include a tailings storage facility, ore processing facilities, waste rock, overburden and soil stockpiles, borrow areas and quarries, water management infrastructure, water treatment plants, accommodation camps and ancillary facilities. The gold and silver will be recovered into a gold-silver doré product and shipped by air and/or transported by road. Electrical power will be supplied by a new approximately 135 km, 230 kilovolt (kV) overland transmission line (TL) that will connect to the BC Hydro grid at the Glenannan substation located near the Endako mine, 65 km west of Vanderhoof. The TL will service the Project during construction, operations and through the post-closure phase, with the reclamation of the TL during the post-closure phase of the mine anticipated to be more than 46 years in the future. Detailed TL routing maps are provided in Appendix A.

The Blackwater mine site is located within the traditional territories of Lhoosk'uz Dené Nation (LDN), Ulkatcho First Nation (UFN), Skin Tyee Nation and T̓silhqot'in Nation. The Kluskus and Kluskus-Ootsa FSRs and Project TL cross the traditional territories of Nadleh Whut'en First Nation (NWFN), Saik'uz First Nation (SFN), and Stelat'en First Nation (StFN; collectively, the Carrier Sekani First Nations) as well as the traditional territories of the Nazko First Nation (NFN), Nee-Tahi-Buhn Band, Cheslatta Carrier Nation (CCN), and Yekooche First Nation (EAO 2019a).

Project construction is anticipated to take two years. Mine development will be phased with an initial milling capacity of 15,000 tonnes per day (t/d) or 5.5 million tonnes per annum (Mtpa) for the first five years of operation. After the first five years, the milling capacity will increase to 33,000 t/d or 12 Mtpa for the next five years, and to 55,000 t/d or 20,000 Mtpa in Year 11 until the end of the 23-year mine life. The Closure phase is 24 years to approximately 45 years, ending when the Open Pit has filled and the TSF is allowed to passively discharge to Davidson Creek, and the Post-closure phase is 46+ years.

New Gold Inc. (New Gold) received Environmental Assessment Certificate (EAC) #M19-01 on June 21, 2019 under the 2002 *Environmental Assessment Act* (EAO 2019b) and a Decision Statement (DS) on April 15, 2019 under the *Canadian Environmental Assessment Act, 2012* (CEA Agency 2019b). In August 2020, Artemis Gold Inc. (Artemis) acquired the mineral tenures, assets and rights in the Blackwater Project that were previously held by New Gold. On August 7, 2020, the Certificate was transferred to BW Gold LTD. (BW Gold), a wholly-owned subsidiary of Artemis, under the 2018 *Environmental Assessment Act*. The Impact Assessment Agency of Canada notified BW Gold on September 25, 2020 to verify that written notice had been provided within 30 days of the change of proponent as required in Condition 2.16 of the DS, and that a process had been initiated to amend the DS.

The TL was originally defined in the 2015 Project Application for an Environmental Assessment Certificate/ Environmental Impact Statement (the Application/EIS). In 2016-2017 significant changes were made in collaboration with the CSFN. These changes to the Application/EIS TL alignment resulted in the March 2017, *Effects Assessment of Proposed Change to Transmission Line Alignment Addendum Report* (the Effects Report) and included the three identified re-route options (Stellako, Big Bend, and Ranch Mills).

In April 2019, New Gold<sup>1</sup> received the federal DS, followed by the EAC in June 2019. The EAC certified a routing path (the Proposed New Alignment [PNA]), as well as the three re-routes. One of the conditions of the EAC, Condition 39 (Final Transmission Line Routing Plan; FTLRP) required that, in identifying the final route, the Holder undertake additional consultation with Parties regarding the PNA and three re-routes, and that the Holder identify the measures to avoid and mitigate effects.

## 2.0 Purpose and Objectives

The purpose of the Final Transmission Line Routing Plan Phase 2 (FTLRP Phase 2) is to fulfill the Environmental Assessment Office (EAO) EAC Condition 39 (d)-(h) by providing an overview of the TL, including the physical setting, outcomes of the consultation process as described in the Final Transmission Line Routing Plan (FTLRP Phase 1), a description of how the consultation informed the rationale for selecting the final TL route, and the avoidance and mitigation measures being implemented. In addition, the FTLRP Phase 2 demonstrates fulfillment of the Canadian Environmental Assessment Agency's (CEAA) DS Condition 6.9. FTLRP Phase 1 was submitted to the EAO on March 5, 2021, in fulfillment of Certificate Condition 39 (a)-(c).

EAC Condition 39 requires that the plan be developed in consultation with Ministry of Environment and Climate Change Strategy (ENV), Ministry of Forests (MOF) and Aboriginal Groups. Table 2-1 summarizes the Condition 39 (d)-(h) requirements and the applicable section in the FTLRP Phase 2.

**Table 2-1: EAC Condition 39**

EAO Certificate Condition 39	Section
d) a report on the results of the consultation in paragraph a), which must include at least the following:	
i) how the consultation influenced the selection of the final route;	5, 5.1
ii) identification of the final route selection, including mapping at the same scale(s) as in Schedule A of this Certificate;	5, 5.1
iii) the extent to which mitigation measures address the potential effects; and	5.2
iv) any changes made to mitigation measures to address concerns identified through the consultation in paragraph a).	5.2
e) the means by which the mitigation measures for the valued component Visual Resources and Non-Traditional Land Use in the in the Mitigations Table required under Condition 43 will be implemented with respect to the full route of the TL, including the final routing option selected;	6
f) the means by which the Holder will avoid impacts to recreational sites or to the use of recreation sites. Where the Holder is of the view that avoidance is not possible, the Holder must provide a rationale for why that is the case, and describe the mitigation measures that will be taken to limit the effects on recreation sites or their use;	7
g) the specific mitigation measures developed to address issues identified in paragraph d); and	5.2

<sup>1</sup> On August 7, 2020, Artemis acquired the mineral tenures, assets, and rights in the Blackwater Project previously held by New Gold. Subsequently, the EAC was transferred to BW Gold under BC's *Environmental Assessment Act*, SBC 2018, c 51.

<b>EAO Certificate Condition 39</b>	<b>Section</b>
h) with respect to the Stellako River Wildlife Management Area (SRWMA):	
i) how the mitigation measures have taken into consideration BC EMP in identifying the effects to the SRWMA and the means to avoid, minimize, restore on site, and offset impacts to the SRWMA; and	8
ii) how the Holder has addressed any comments received by the MOF Regional Manager responsible for the SRWMA.	8.2

The Holder must provide the draft FTLRP Phase 2 plan that was developed in consultation with ENV, MOF, and Aboriginal Groups to the EAO, ENV, MOF, and Aboriginal Groups a minimum of 90 days prior to the planned commencement of Construction of the TL, or as listed in the Document Submission Plan required by Condition 10 of this Certificate.

Table 2-2 summarizes a related CEEA DS condition and the applicable section in the FTLRP Phase 2.

**Table 2-2: Applicable CEEA Decision Statement Conditions**

<b>CEEA Decision Statement Conditions Related to Transmission Line Consultation</b>	<b>Section</b>
6.9 The Proponent shall determine the location of the transmission line towers in consultation with Indigenous groups, to mitigate visual effects of the transmission line where the transmission line crosses trails and sites of importance to Indigenous peoples, unless not technically and economically feasible.	7.2

BW Gold is consulting on the location of the towers to mitigate visual effects of the TL where it crosses trails and sites of importance to Indigenous peoples as part of this FTLRP Phase 2. The maps in Appendix A show the transmission line in relation to known heritage trails. In order to facilitate a review of the TL as it relates trails and sites of importance to Indigenous peoples, which may be confidential, digital files of Appendix A will be provided to Indigenous peoples.

## **3.0 Compliance Obligations, Guidance, and Best Management Practices**

### **3.1 Legislation**

Federal legislation applicable to the FTLRP Phase 2 includes:

- *Canadian Environmental Protection Act, 1999*;
- *Impact Assessment Act*; and
- *United Nations Declaration on the Rights of Indigenous Peoples Act*.

Provincial legislation applicable to the FTLRP Phase 2 includes:

- *Declaration on the Rights of Indigenous Peoples Act*;
- *Environmental Assessment Act*;
- *Environmental Management Act*; and
- *Mines Act*, including:
  - Health, Safety and Reclamation Code for Mines in British Columbia.

## 3.2 Existing and Needed Permits

BW Gold has secured the necessary permits to construct the TL.

The TL is 134.3 km in length. The 126.3 km segment commencing at Glenannan Substation and ending at the Mine boundary, is permitted under a Licence of Occupation (LOO) #7409823 and #7410296 under the *Land Act* (however see Section 8.2 for amendments currently being contemplated). The remaining approx. 8 km is within the Permitted Mine Area and is permitted under *Mines Act* Permit M-246.

Clearing activities and associated watercourse and wetland crossings are permitted under the *Forest and Range Practices Act* Regulations, as Occupant Licence to Cut (OLTC) # L52116, L52117, L52136, LL52137, and L52140.

Other authorizations include a Works Permit, Junction Permit, Access Permit and Crossing Permit for works within Crown tenures.

## 3.3 Linkages to Other Management Plans

Management Plans have been developed to address potential environmental effects. There are two types of plans: 1) TL-specific plans, submitted as part of the TL permit application, and 2) measures applicable to the TL construction, incorporated within EAC management plans or the *Joint Mines Act / Environmental Management Act* Major Works management plans.

TL-specific Management Plans:

- TL Construction Environmental Management Plan (TL CEMP; ERM 2022a)
- TL Air Quality and Dust Management Plan (ERM 2022b)
- TL Archaeological and Cultural Heritage Resource Management and Impact Mitigation Plan (ERM 2022c)
- TL Agriculture and Range Management Plan (TL ARMP; Artemis 2022a)
- TL Fuel Management and Spill Control Plan (Artemis 2022b)
- TL Industrial and Domestic Waste Management Plan (Artemis 2022c)
- TL Integrated Vegetation Management Plan (ERM 2022d)
- TL Noise and Vibration Management Plan (Artemis 2022d)
- TL Conceptual Reclamation and Closure Plan (Artemis 2022e)
- TL Surface Erosion Prevention and Sediment Control Plan (Artemis 2022f)
- TL Sedimentation Monitoring Plan (Framework and Guidelines) – EAC 29 (Artemis 2022g)
- TL Wildfire Management Plan (Artemis 2022h)

EAC and Major Works Management Plans that apply to the TL:

- Wildlife Management and Mitigation Plan – EAC 23 (ERM 2022e)
- Wetlands Management and Offsetting Plan – EAC 24 (ERM 2022f)

## 4.0 Current Land Use Along the Transmission Line Corridor

The TL alignment is located within the traditional territories of UFN, LDN, STN, TN, and CCN, as well as the traditional territories of the CSFNs. Figure A1-2 provides a map of each nation's traditional territory in relation to the TL alignment. Current known traditional uses within the area include plant gathering (Messue Wagon Trail and other trails) and fishing, hunting, trapping (ERM 2017).

No provincial or federal parks, protected areas, or *Land Act* "Environment, Conservation and Recreation" Crown land parcels are crossed by the TL alignment. One wildlife management area designated under the *Wildlife Act* (the Stellako River Wildlife Management Area [SRWMA]) is crossed at the Stellako River. No recreation sites are crossed. In collaboration with the CSFNs and to respond to LWRS comments, the alignment was adjusted to avoid the Cut-Off Creek Recreation Site (REC1097), Cabin Creek Falls Recreation Site (REC16064) and the Cabin Creek Falls Trail (REC4106).

A crossing analysis performed on January 19, 2022, indicated the following land tenures and private lands are crossed by the TL:

- 21 mineral tenures (11 held by BW Gold);
- 3 forestry tenure holders, 2 forest licence holders, 18 cutting permit areas (4 held by BW Gold);
- 4 range tenures;
- 6 guide certificates;
- 16 traplines;
- 2 quarrying (aggregate) reserve notations;
- 3 utility reserve notations, 4 utility statutory rights-of-way, 1 licence;
- 2 parcels of private property (Nature Trust of BC [NTBC], BC Hydro); and,
- 4 other *Land Act* tenures (Agriculture, Residential, Investigative).

Recreational use in the region includes hunting, fishing, all-terrain vehicle use, snowmobiling, hiking, camping, cross-country skiing, horseback riding, fishing, hunting, interpretive cultural heritage experiences, and ecotourism. Subject to restrictions, there are open hunting seasons for mule deer (*Odocoileus hemionus*), white tailed deer (*Odocoileus virginianus*), moose, black bear, wolf, cougar, coyote, lynx, snowshoe hare *Lepus americanus*, ruffed and spruce grouse (*Tetraoninae* spp.), ptarmigan (*Lagopus muta*), ducks (*Anas* spp.), and geese (*Anatidae* spp.).

Guide outfitters bring guided non-resident hunters into the region, primarily during hunting seasons in the fall (September to October) and spring (April to June). Some guides operate by motor vehicle and by non-motorized (horseback) means depending on the boundary of the Semi-Primitive Non-Motorized vehicle designation within the LWRS Vanderhoof Access Management Plan.

Other tenure holders have varying degrees of use and presence within their tenure area seasonally or year-round, depending on the specific resource activity.

## 4.1 Identified Parties

Over 60 individuals or entities are included within the definition of a party<sup>2</sup> as described in Condition 39 (a), where the Parties include the following groups, if they are potentially affected by the TL routing options:

- Aboriginal Groups;
- MOF;
- Private property owners, and private properties within 500 m of the proposed re-routes;
- Recreationalists and land users whose interests intersected with the proposed re-route segments;
- Existing tenure holders whose tenures overlapped or were in proximity to the re-routes:
  - Forest licence holders,
  - Guide outfitters,
  - Trapline holders,
  - Ministry of Transportation and Infrastructure (MoTI), and
  - BC Hydro (Utilities).

In addition, ENV has been consulted as part of the FTLRP development even though it is not expressly listed as a party.

## 5.0 Report on the Results of Consultation

The FTLRP Phase 1 described the approach that BW Gold would take to consultation on the TL routing options, the proposed mitigation measures, and the approaching to notifying parties of the final route selection. The purpose of this section is to provide the report on the results of the consultation that occurred with these parties, as required by EAC Condition 39 (d), and a description of the specific mitigation measures developed to address the issues identified during this consultation, as required by EAC Condition (g).

As required by EAC Condition 39 (a)-(c), BW Gold developed a FTLRP Phase 1 in consultation with the ENV, MOF, and Aboriginal Groups. The Final Plan was submitted to the EAO on March 5, 2021.

BW Gold undertook the following consultation activities, consistent with EAC Condition 4:

1. Prepared a package, including a cover letter, map(s) identifying the location of the interest in relation to a routing option (or options), and the proposed mitigation measures (identified in Appendix A). The package was provided to identified Parties by email or other available contact information on February 26, 2021. The cover letter: 1) identified the purpose of the letter by referring to the EAC condition; 2) invited the party to provide comments on the potential effects of a routing option and proposed mitigation measures; 3) requested written comments within 3 weeks; and 4) provided BW Gold contact information. The maps in each package were customized for each party. BW Gold requested written comments from Parties by March 23, 2021.

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<sup>2</sup> In addition to the parties, comments were received from six members of the public. One individual commented on the potential visual effect in the Stellako re-route area for a planned future residence in this area. No other comments informed the understanding of the potential effects or mitigation measures.

2. Three days after emailing the package, BW Gold sent 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 were implemented, including telephone follow-up or confirmation of delivery via registered mail.
3. If a response had not been received within three weeks, BW Gold followed up to see if further time was needed for review.
4. BW Gold confirmed receipt of comments.
5. After reviewing the comments, BW Gold provided responses to the comments received. As necessary, BW Gold followed up if clarification was required on the comments.
6. The comments and responses were documented in a tracking table.

In total, 68 parties were consulted on the FTLRP Phase 1.3 BW Gold received 36 responses, of which 25 provided comments and 11 expressed no concerns. There were 32 parties that did not provide a written response.<sup>4</sup> In addition, two public comments were received from parties who were not originally shared the FTLRP Phase 1. The majority of respondents did not indicate a route preference and ten of these responses indicated the following route preferences:

- Two respondents preferred the PNA over the Stellako re-route;
- Two respondents preferred the Stellako re-route;
- Two respondents preferred the Big Bend re-route;
- One respondent preferred the PNA; and
- One respondent commented on a preference for the PNA over the Mills Ranch re-route.

BW Gold responded to questions, comments, and concerns through letters or email. The most common question was related to the proposed width of the right-of-way (RoW). Table 5-1 summarizes comments and BW Gold’s responses.

**Table 5-1: Summary of Comments Raised and BW Gold’s Responses**

General Comment	BW Gold Response
Support for the Project	BW Gold did not respond to emails indicating general support for the Project.
Request for RoW width	The RoW width is specified in the Certified Project Description of the EAC. It says “the TL must be constructed within an up to 40 m wide cleared RoW for standard spans, and within an up to 50 m cleared RoW for long spans.”
Project schedule and potential impact on recreational/ commercial activities	From a timing perspective, the TL permit application is targeted to be submitted in Q3 2021, following the selection of a final routing and completion of feasibility-level design. Construction is not expected to commence until Q2 2022, at the earliest.
Revegetation and/or reclamation	Full revegetation on the TL ROW corridor is not anticipated since vegetation must be maintained during operation to ensure safe clearance limits with TL infrastructure in accordance with the TL Integrated Vegetation Management

<sup>3</sup> Note that in some cases two or more parties held one tenure, in which case all received the letter or email. In other cases, one party held two or more tenures, in which case they received one letter or email for each tenure.

<sup>4</sup> However, seven of those parties responded to a different tenure that they held (so they are being counted both as “responses” and as “no response”. In addition, four parties that did not respond held two tenures, so they are counted as eight “no responses”.

General Comment	BW Gold Response
	Plan. Natural regeneration is anticipated during the early operational period while promoting a self-sustaining, native shrub community with a minimum height of 1 m. Revegetation associated with access roads that are not required for the operational access network will be competed in accordance with the TL Vegetation and Access MP, and ultimately, TL reclamation will be in accordance with the TL Conceptual Reclamation Plan.
Effects on sensitive habitat and wildlife	The Project tried to route the TL to follow as much disturbed area as possible, to avoid the creation of incremental disturbance on the land base and further fragmenting wildlife habitat.
Access restrictions (TL crossings of roads, road use)	BW Gold will have a detailed construction schedule for the TL that will outline the work scope and timing of specific work scopes. BW Gold can provide the schedules, including the periods and locations that may be required for road closures and provide regular correspondence that provides status updates.
Increase in access along the RoW	As a general principle, the Project tried to route the line to follow as much disturbed area as possible, to avoid the creation of incremental disturbance on the land base and further fragmenting wildlife habitat. As such, most of the routing has been set along existing disturbances (e.g., BC Hydro lines, access roads, etc.).
Visual impacts of the TL	As a general principle, the Project tried to route the line to follow as much disturbed area as possible, to avoid the creation of incremental disturbance on the land base.
Effectiveness of mitigation measures	The TL Project execution plan is currently underway and will incorporate continued refinement of mitigation measures through consultation with Indigenous groups, landowners, tenure Holders and government officials that form part of the TL permitting process.

## 5.1 Feedback on the Route Options

This section discusses BW Gold’s consideration of views by those Parties who expressed a preference or had questions or comments about the TL route options, including how the views expressed by Parties influenced the final TL route selection. BW Gold considered the specific concerns raised by the Parties, as well as prevailing environmental disturbance and wildlife management concerns, in the selection of the final route.

Below is a brief description of each route option and consultation views and considerations as to why that route was or was not chosen. The Stellako Re-Route was ultimately selected following consultation, and is showing in Appendix A.

### 5.1.1 Stellako Re-Route (Selected)

The 7.2 km long Stellako re-route (km 0.8 to 7.4) parallels the BC Hydro transmission line RoW, crossing the Stellako River approximately 1.5 km north of the Application/EIS TL Alignment crossing (see map book pages A1-2 and A1-3 in Appendix A).

The Stellako re-route was identified in response to concerns raised by MOF regarding access and potential effects on riparian areas at the Stellako River. The primary rationale of the Stellako re-route was

to minimize the area of the SRWMA that would be crossed by the TL, and to mitigate concerns concerning the creation of additional access to the Stellako River by co-locating the TL corridor in close proximity to an existing BC Hydro TL corridor.

The re-route topography has a gentler terrain, soils are less prone to erosion, and access is assumed to be more reliable along the current BC Hydro RoW. The Stellako re-route is preferred for the lowest impact on fish and fish habitat and presents less new disturbance to wildlife habitat as well as fewer red-listed plant species.

The Nadleh Whut'en and StFN also expressed a preference for the Stellako re-route, as they did not want a new corridor to and across the Stellako River created.

The Stellako re-route crosses a private property owned by the NTBC. BW Gold has been in extensive discussions with NTBC regarding an agreement to cross their property and it is understood an agreement will be required for use of their property. Through those discussions, NTBC has expressed an openness to crossing their property and has not expressed a preference for the Stellako re-route or its alternative.

The MoTI preferred avoidance of two Crown gravel interests associated with the Stellako re-route:

1. Tenure 57122 (Crown Land File 107944), a *Land Act* S.16 Map Reserve, which was avoided by the updated TL alignment; and
2. A gravel reserve Notation (R157022) (Crown Land File 7409741), which has not been converted to a S.16 Map Reserve (Lands, Spring, 2022) and BW Gold understands would be compatible with the TL RoW should MoTI wish in the future to convert the notation to a *Land Act* Tenure and quarry in the proximity of the TL.

MoTI's concern above was responded to, and further engagement in Spring 2022 resulted in the above result. Comments were received from one local landowner (NTBC) regarding the proximity of the route crossing to their property, and these comments were considered and a response was provided.

BW Gold's decision to select the Stellako route was based on MOF, Nadleh Whut'en and StFNs' preference for the re-route, as well as the overall reduction in environmental impacts when compared to the Application/EIS TL alignment.

### 5.1.2 Big Bend Re-Route (Not Selected)

The 20.4 km Big Bend re-route (km 91.1 to 106.9) would parallel the Kluskus-Ootsa and Kluskus FSRs, instead of taking a more direct route along Marten Road (see map book pages A1-24 and A1-28 in Appendix A. The Big Bend re-route would largely follows areas of existing disturbance but would be longer than the Application/EIS TL Alignment and would pass through a section of Nazko First Nation's traditional territory. When the Big Bend re-route would be added to the PNA, the total length of the TL would be extended to 139 km (an additional ~7km).

The Big Bend re-route has generally flat terrain but also carries the potential for more interactions with FSR crossings and less erosion-prone soils. This route would provide better access because of the proximity to FSRs and a greater opportunity to avoid wetlands than the primary route. Despite the route being longer, there were generally fewer forested areas being crossed.

Particularly relevant in the decision to not select the Big Bend re-route was the opposition expressed by the Saik'uz Nation, in whose territory the routing options are located.

### 5.1.3 Mills Ranch Re-Route (Not Selected)

The proposed 15.3 km Mills Ranch re-route (km 104 to 118.6) is located near Chedakuz Creek and Tatelkuz Lake. When it owned the Project, New Gold identified the Mills Ranch re-route to create a buffer between the TL and an airstrip located on private property (see map book pages A1-2 and A1-3 in Appendix A).

The re-route would deviate from the Kluskus-Ootsa FSR, crossing Chedakuz Creek north of the Application/EIS TL Alignment crossing at a location to the north of the private property. The Mills Ranch re-route would have avoided potential impacts to air traffic but would be in an area with high ecological and recreational values.

The topography of this re-route is steep and hilly. There would be fewer interactions with FSRs and greater distance from existing FSRs. Soils are considered susceptible to erosion. The route would allow for potentially full avoidance of blue-listed wetlands but would have crossed through unlisted wetlands and created more new disturbance of wildlife habitat and fragmentation of the ecosystem due to access road construction requirements and the RoW. There would be more red-listed species in this area. The area of the Mills Ranch re-route has also been identified as being regionally important to grizzly bear and moose. Greater timber-cutting volume, more access roads and potential watercourse crossings would also be required along this re-route.

The re-route would have been further from an airstrip that is located on adjacent private property, which was a concern for one party who commented in several follow-up meetings (though they did not respond or express a preference in writing during the comment period). One party preferred the Application/EIS TL route as the re-route would have intersected their tenure to the north. Given the potential for environmental impacts, and opposition expressed by the Saik'uz First Nation this route was not chosen.

## 5.2 Mitigation Measures to Address Issues Identified

The proposed mitigation measures were shared with the Parties as an Appendix to the *Phase 1 FTLRP: Blackwater Gold Project*. As a part of the consultation process, the Parties were invited to identify their preferred route (as discussed previously in Section 5) and to submit comments about the adequacy of mitigation measures.

During this consultation process, BW Gold considered and developed new mitigation measures in consideration of specific comments or concerns. For the most part, the types of concerns raised were mitigated by engineering design changes – for example selecting one routing over another or making slight routing adjustments, such as moving the TL from one side of a road to another.

Table 5-2 outlines the concerns raised by Parties during the consultation process, BW Gold's response and the mitigation measures in place, and/or the extent to which the issue is mitigated. Only comments that raised specific concerns or potential effects are included in Table 5-2, but comments seeking general information (e.g., workforce, RoW width), regarding routing preference, or expressing project support are not included. For confidentiality, individuals have not been identified by name, but rather under more general categories. BW Gold will continue to have ongoing communications with potentially impacted Parties as construction progresses.

As a general mitigation measure applicable to all Parties, a schedule of activities was emailed in January 2022 to all Parties, and an updated schedule was emailed in September 2022. The September 2022 notification included information on the BW Gold Community Feedback Mechanism. The schedule was also posted on the BW Gold website where the public can sign up to receive notifications on construction updates and schedules.

**Table 5-2: Mitigation Measures to Address Concerns and Comments**

Party	Concern or Comment	Response and Mitigation Measures (Cross-referenced to Management Plans, as Relevant)	Extent to which Effects is Mitigated
Guide Outfitter	The main concern was the disruption of wilderness guiding operations with increased industrial activity. They also asked what the reseeding plan was and if clover would be planted.	<p>BW Gold clarified that the TL will be routed along as much disturbed area as possible to avoid disturbance of the land base and fragmenting of wildlife habitat. The intent is to allow the natural vegetation to re-colonize the cleared RoW with native vegetation. Clover is not proposed to be used in revegetation.</p> <p><i>TL CEMP s 9.12</i></p> <p>To limit disruption to sensitive receptors (hunting, guide outfitting and trapping) mitigation measures will be implemented in accordance with the TL IVMP (as determined by a qualified professional) including:</p> <ul style="list-style-type: none"> <li>• Use noise abatement;</li> <li>• Schedule construction activities at noise sensitive locations and times; and</li> <li>• Avoid low altitude flights except on final approach and take-off.</li> </ul> <p><i>TL IVMP s 7.1</i></p> <p>In areas where only tree removal is required, retain shrub and herbaceous vegetation to encourage a self-sustaining, native shrub community with a minimum height of 1 m.</p>	If successfully mitigated, then there will be no disruption to wilderness guiding and vegetative restoration will be realized.
Private Property Owner	Commenter was concerned about the TL crossing the Stellako River as it impacted the physical and visual part of the river and a salmon spawning area.	<p>BW Gold responded and provided a hard copy map via mail of the overall TL for greater clarity on re-route and also a large-scale map of the Stellako re-route area. In a follow-up letter BW Gold outlined general principles for the TL routing including; minimizing land base disturbance to limit fragmenting wildlife habitat. Noting most of the TL routing has been set along existing disturbances and subsequent updates to the routing is located further from the property which is preferred by the property owner.</p>	Concern has been mitigated through response design, and mitigation measures. The Stellako re-route was selected which would limit visibility from the property owner versus the PNA. The transmission line will cross the Stellako aerially, and no in-water works are anticipated.
Forestry Tenure Holder	<p>A forestry tenure holder listed several concerns, the ones related to the TL are:</p> <ul style="list-style-type: none"> <li>• Disruption of day-to-day business operations including any road closures.</li> <li>• The tenure Holder would like to be compensated for the cost of any plan amendments required because of TL construction or operation overlaps.</li> <li>• Requested appropriate crossing structure be installed with sufficient height and weight (with a L100 rating) wherever the TL crosses an existing road.</li> <li>• Did not want the TL to restrict access to any part of the Vanderhoof Forest District and expects permission to cross the TL with roads in the future.</li> <li>• Wanted to ensure road safety be maintained by all BW Gold workers and contractors and participate in road use agreements with road permit Holders which will include the cost of road maintenance and applicable road use fees.</li> <li>• There are overlaps with the TL RoW and the tenure Holder's permitted and planned cut blocks – The tenure Holder wants to ensure their activity is not disrupted and that they have access to all merchantable timber.</li> <li>• The tenure Holder expects the right of first refusal for merchantable timber within their chart area that overlaps with the TL RoW.</li> <li>• Opportunities: the tenure Holder is interested in sharing costs or resources with BW Gold such as digital imagery, road construction and the use of logging camps.</li> </ul>	<p>BW Gold will provide a detailed construction schedule that will outline scope and timing of specific work scopes. This will include specific details regarding the timing of any road closures and updates will be provided regularly.</p> <p>BW Gold will work with the tenure holder to understand the potential impacts of cut blocks, road use and silviculture planning. BW Gold also requested a map and GIS data of affected cut blocks. BW Gold is open to considering reasonable compensation based on industry-standard practices to be agreed upon by both Parties.</p> <p>BW Gold replied to the tenure holder that they will engage in conversations to better understand the planned forestry activities in geographic context of the TL and future roads.</p> <p>BW Gold requested clarification on silviculture planning, and road use and cutting plans, which the tenure holder has not yet provided. Upon receipt the parties have agreed to discuss solutions.</p> <p>BW Gold will work with the tenure Holder to enable proper access and understand the required fees for Project contractors and personnel. Safety is also a priority for BW Gold and safety will be maintained.</p> <p>As the cutbacks are currently an unknown factor, BW Gold welcomes further specific conversations with the tenure Holder, understanding that both Parties will have uncertainties to work through together.</p>	Discussions are ongoing with a forestry tenure holder. BW Gold anticipates that, with this mitigation, there will be no disruption to forestry operations.

Party	Concern or Comment	Response and Mitigation Measures (Cross-referenced to Management Plans, as Relevant)	Extent to which Effects is Mitigated
		<p>BW Gold requested a map of the tenure Holder Chart Area to review in consideration of potential commercial arrangements. Once the tenure Holder provides data, further discussion will occur.</p> <p>Opportunities: BW Gold responded and agreed with the tenure Holder's assessment of opportunities to share resources that will mutually benefit both Parties.</p> <p>Ongoing meetings and correspondence have occurred with the tenure Holder to discuss TL construction schedule, harvesting and forestry amendments.</p> <p><i>TL CEMP s. 9.12</i></p> <p>Provide the construction schedule to tenure holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges and the local offices of BC MOF) 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.</p> <p><i>TL CEMP s. 9.1</i></p> <p>Traffic and Site Access category (various mitigation measures with respect to road safety)</p>	
Private Property Owner	<p>Commenter already has two transmission lines going through their land and expressed concerns about additional noise, an increase in recreation vehicle traffic and litter, and disturbance near their property.</p>	<p>The TL is designed to be within existing disturbed areas to the extent possible and parallel the BC Hydro transmission line RoW, reducing new infrastructure crossings and localizing disturbance to the same areas.</p> <p>BW Gold has developed a TL Noise and Vibration Management Plan to mitigate noise concerns and has plans in place to manage refuse and road deactivation.</p> <p><i>TL NVMP s. 8</i></p> <p>In order to mitigate noise and vibration during the construction phase, the operation of heavy equipment will only take place between 7:00am to 9:00pm while operating <u>within 300 m</u> of any residence(s).</p> <p><i>TL CEMP s 9.12</i></p> <p>To limit disruption to sensitive receptors (hunting, guide outfitting and trapping) mitigation measures will be implemented in accordance with the TL Integrated Vegetation Management Plan (TL IVMP) (as determined by a qualified professional) including:</p> <ul style="list-style-type: none"> <li>• Use noise abatement;</li> <li>• Schedule construction activities at noise sensitive locations and times; and</li> <li>• Avoid low altitude flights except on final approach and take-off.</li> </ul> <p><i>TL CEMP s 9.1</i></p> <p>Site Tidiness and Waste Management categories (various mitigation measures with respect to waste management).</p> <p><i>TL CEMP s. 9.1</i></p> <p>Equipment Use (various mitigation measures with respect to equipment use and noise abatement requirements).</p> <p><i>TL IVMP s 7.1</i></p> <p>Limit vegetation disturbance to areas within the approved TL RoW.</p>	<p>BW Gold will continue to work with the landowner to address their concerns. The effective implementation of BW Gold plans, and communication of the Project schedule and use of roads, will effectively mitigate any concerns.</p>

Party	Concern or Comment	Response and Mitigation Measures (Cross-referenced to Management Plans, as Relevant)	Extent to which Effects is Mitigated
Aggregate Tenure	<p>A tenure holder expressed concern about the Stellako re-route because of a high-quality gravel reserve planned to be used in the future. The tenure holder asked if we select the Stellako Re-route, and if the TL could move to the west edge of the RoW. Specifically: The tenure holder preferred avoidance of Gravel Reserve Notations (Crown Land file 107944) (Tenure 57122) and 7409741 (R157022).</p>	<p>Tenure 57122 has been avoided. R157022 has not transitioned into a Section 16 Map Reserve Lands (as of Spring 2022). The TL RoW is compatible with R157022, should the tenure Holder wish in the future to convert it to a <i>Land Act</i> Tenure and quarry in the proximity of the TL.</p>	<p>Routing has been selected to not impact the tenure holder's access and use of gravel reserves.</p>
Guide Outfitter	<p>Tenure holder requested further consultation pursuant to Condition 38 obligations.</p>	<p>BW Gold responded with suggested dates and times for a meeting and a meeting date was set. Condition 38 meetings were held, and drafts reviewed, resulting in the plan accepted by EAO in March 2022. Key actions involve sharing information between the Parties. The tenure holder has not responded to correspondence, offers of participation or requests for information to date in 2022.</p> <p>Development of the Tenure Holder Communications and Mitigation Plan (in fulfillment of EAC Condition 38).</p>	<p>A plan to mitigate impacts has been developed pursuant to EAC Condition 38.</p>
LDN & UFN	<p>No additional effects were identified. The commenters requested the following mitigation measures:</p> <ul style="list-style-type: none"> <li>• Establish an acceptable buffer (typically at least 30 m) zones around wetlands or riparian areas within which disturbance will not occur. Where unavoidable (e.g., crossings), additional mitigation measures should be implemented to minimize adverse impacts on these areas: <ul style="list-style-type: none"> <li>- Provide a summary of what these additional mitigation measures will be</li> <li>- Include discussion on: pre-clearing surveys, commitments to working outside sensitive windows, avoidance of sensitive habitat features, salvage (if needed)</li> <li>- Include: allowance for green-up to a certain height (e.g., for trees/shrubs that are re-establishing), policy not to cut trees/shrubs below this threshold height (see condition 23)</li> </ul> </li> <li>• Include commitment to use a Qualified Professional to design reduced sightlines</li> <li>• Condition 23 states that a vegetation and access management plan must be created – these mitigation measures only mention an access management plan – please update</li> <li>• Provide details on policy for reducing the spread of invasive plant species from the roadside, how will BW Gold ensure that those species are not spread throughout the transmission line RoW and impact the ability of native species to regenerate</li> <li>• What is the proposed revegetation plan for the transmission line RoW? How will this be monitored? How soon will it be implemented? What triggers will result in adaptive management/corrective action? What are the adaptive management responses/corrective actions that BW Gold is committing to implement?</li> <li>• Regarding mitigation for fencing to restrict cattle movement into the transmission line RoW, add that BW Gold will also maintain this fencing. Include monitoring.</li> <li>• Including information re monitoring and enforcement of the following mitigation: “Require drivers to close gates properly when vehicles require access to RoW corridors on fenced and gated lands”</li> <li>• Specify that project vehicles will be restricted to access roads and not permitted to drive throughout the RoW</li> <li>• Adjust mitigation to include all soils, not just those which are “agricultural soil”</li> </ul>	<p>BW Gold responded to LDN and UFN on April 17, 2021 and committed: “Your input will be carried forward and integrated into the final mitigation measures that will be developed for the selected route alignment and form part of Phase 2 for the FTLRP Phase 2”.</p>	<p>BW Gold has included mitigation measures within the management plans and will continue to consult with LDN and UFN to address concerns going forward.</p>

Party	Concern or Comment	Response and Mitigation Measures (Cross-referenced to Management Plans, as Relevant)	Extent to which Effects is Mitigated
	<ul style="list-style-type: none"> <li>• Include an erosion and sediment control plan for the construction of the transmission line RoW, and include monitoring</li> <li>• Include an invasive species management plan for the construction of the transmission line RoW</li> <li>• Add a commitment to invite Aboriginal Group monitors to be involved in the construction and maintenance activities</li> <li>• Provide a summary of how the Mitigation Table required by condition 43 has been/will be met through the implementation of a FTLRP</li> </ul>		
Range Tenure and Trapline	Commenter expressed that they did not want the line to go through their leased property, which would happen with the Mills Ranch re-route.	BW Gold responded that their input would be considered for final routing.	The tenure is avoided as BW Gold did not select the Mills re-route.
Mineral Tenure	Tenure holder was concerned about the Big Bend re-route as they expressed that it would cause ground on either side of the TL to end up "sterilized" which could impede exploration and development activities. They also requested to be consulted if any of the routing proposals would result in the TL crossing the Nechako property.	BW Gold responded that final routing selection would be communicated as well as notifying the tenure Holder that the width of the TL can be up to 50 m.	The tenures are avoided as BW Gold did not select the Big Bend re-route.
Private Property Owner (within 500 m of TL)	Commenter was concerned about work being done near their property and potential damage to fences as they keep cattle. Also concerned about helicopters flying close by.	<p>BW Gold notified landowner that the TL Project execution plan is currently underway and once this plan is further progressed, BW can respond more specifically to concerns around scheduling and provide any additional communication on potential disturbances from the TL construction work.</p> <p><i>TL IVMP s 7.1</i> Limit vegetation disturbance to areas within the approved TL RoW.</p> <p><i>TL CEMP s. 9.12</i> To avoid potential impacts to livestock during construction activities, livestock owners will be notified of the construction schedule and activities to allow livestock to be moved to other pastures if necessary and/or where applicable.</p> <p><i>TL NVMP s. 8</i> In order to mitigate noise and vibration during the construction phase, the operation of heavy equipment will only take place between 7:00am to 9:00pm while operating <u>within 300 m</u> of any residence(s).</p>	No damage to fences would occur as it would be outside of the future permitted TL RoW. BW Gold will communicate re helicopter and construction traffic as per the TL CEMP.
CSFNs	<p>The CSFNs provided comments on the Phase 1 FTLRP and requested clarification on how the selection of the final route would be completed (with an opportunity for consensus) and requested an in-person meeting at which the final routing would be presented, in addition to receiving the final routing maps before application submittal.</p> <hr/> <p>During meetings in summer 2022, StFN raised concerns in regard to the routing of the transmission line in an area south of the Stellako River and north of Francois Lake Road. StFN has requested that the transmission line be moved as far east as possible in this area while remaining within the Certified Project Description (CPD) boundary, except near a member's residence where it is requested that the line be moved as far west as possible while remaining within the CPD boundary.</p>	<p>BW Gold held community meetings on the TL routing selection once COVID-19 restrictions allowed; Saik'uz Community meeting April 19, 2022, 4-8 pm; Stellat'en Community Meeting April 20, 2022, 4-8 pm; Nadleh Whut'en Community Meeting Thursday, June 23, 2022, 4-8 pm.</p> <hr/> <p>BW Gold continues to work with StFN to accommodate this request and will update this FTLRP (Phase 2) as needed to reflect the outcomes of these discussions.</p>	BW Gold continues to work with the CSFNs to accommodate requests.

Party	Concern or Comment	Response and Mitigation Measures (Cross-referenced to Management Plans, as Relevant)	Extent to which Effects is Mitigated
	<p>During meetings in summer and fall 2022, StFN raised access management to the TL corridor in the area between the Stellako River and north of Francois Lake Road as being of particular concern. The primary concern was the potential for increased motorized (i.e., ATV) access. Foot and horseback access were explicitly not raised at concerns. A mitigation measure, StFN recommended that the TL access points from existing public access (e.g., Francois Lake Road) be gated and that boulders be placed laterally from the gates some distance to tie into adjacent forest or other existing feature that would restrict access.</p>	<p>BW Gold will implement this mitigation, or a mitigation which achieves a similar objective (e.g., a boulder barrier with no gates), following construction.</p>	
Private Property Owner	<p>Private landowner raised concerns about the location of the TL on their property, as well as a desire for an agreement to cross the property.</p>	<p>BW Gold collaborated with the private landowner to locate the TL and poles in locations that would minimize impacts. Consensus was reached on locations. BW Gold continues to engage with the private landowner regarding an agreement.</p>	<p>The consensus on pole locations is understood to be reflection that effects have been adequately mitigated. An agreement to cross private property is a typical mitigation, and continues to be advanced.</p>
Private Property Owner	<p>Commenter was concerned about the position of the TL lines interfering with their air strip if the PNA was selected.</p>	<p>BW Gold engaged in meetings, teleconferences, and site visits and both Parties agreed to locate the TL on the north side of the TL RoW along the Kluskus FSR to mitigate impacts to the airstrip.</p>	<p>Concerns about the position of the TL line relative to the airstrip have been avoided through siting of the TL.</p>

In addition to route selection and the avoidance measures described above, BW Gold has taken some general approaches to address the effects and concerns raised by Parties:

- BW Gold was able to satisfy a Tenure Holder’s request to not to disturb a gravel reserve on the Stellako Re-route by moving the TL west while respecting the interests of other Parties to stay as far away from the Stellako River as possible except at the point of crossing.
- Relocating the TL to the north side of the Kluskus FSR to avoid impacts to a private landowners airstrip.
- Wherever possible, over the entire length of the TL, the clearing limits were refined to avoid leaving narrow bands of trees, except where desired to screen features such as recreation sites.
- BW Gold will continue to consult with potentially impacted parties, and will seek to address concerns raised, before construction, during construction, and in operations.

In addition, mitigation measures that have been updated following engagement on the FTLRP Phase 1 are listed below:

- Commitment to provide detailed construction schedules and maps to any party who requests them.
- Agreement to continue working with forest tenure holders to better understand the potential impacts to cut blocks and agreeing to discuss and provide reasonable compensation, where appropriate.
- Work with NTBC to minimize direct impacts on their property (through TL routing and the number of poles). BW Gold will discuss financial compensation for residual effects on NTBC’s property.

## 6.0 Mitigation Measures for Visual Resources and Non-Traditional Land Use

This section describes the mitigation measures for the valued component Visual Resources and Non-Traditional Land Use in the in the Mitigations Table required under Condition 43 will be implemented with respect to the full route of the TL, including the final routing option. The Condition 43 mitigation matrix lists the mitigations taken to address Visual Resource and Non-Traditional Land Use concerns. Relevant mitigations were also included in the FTLRP Phase 1 as Appendix A (where indicated).

Table 6-1 describes how these mitigation measures will be implemented as they relate to Visual Resources and Table 6-2 describes mitigation measures as they relate to Non-Traditional Land Use.

**Table 6-1: Visual Resources Mitigation Measures**

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
Locate the TL within or alongside the footprints of existing long-term linear infrastructure (roads and transmission lines) to cluster disturbance, as will be described in the FTLRP.	<i>TL CEMP s. 9.4</i> Where design, engineering, environmental and heritage constraints allowed, the location of the TL poles was selected to cluster any potential disturbance next to existing infrastructure such as roads, while maintaining safe electrical and vehicle distances.

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
	<p><i>TL CEMP s. 9.4</i></p> <p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and also facilitate movement and cover for wildlife as directed by a Qualified Professional.</p> <p><i>TL CEMP s. 9.10</i></p> <p>Use existing roads and cleared/disturbed areas rather than disturbing new areas</p>
<p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may provide cover and facilitate furbearer movement.</p>	<p><i>TL CEMP s. 9.4</i></p> <p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and also facilitate movement and cover for wildlife as directed by a Qualified Professional.</p>
<p>Align the TL RoW to run in parallel to the natural contours of the landscape rather than perpendicular, as will be described in the FTLRP.</p>	<p><i>TL CEMP s. 9.4</i></p> <p>Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p>
<p>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, riverbanks), as will be described in the FTLRP.</p>	<p>Where design and engineering constraints allowed, the location and height of the TL poles were selected to keep the profile of the TL hidden behind trees.</p> <p>The placement of poles will be as far back from the riverbank as possible, subject to design and engineering constraints.</p>
<p>Place towers/poles away from riverbanks, as will be described in the FTLRP.</p>	<p>The placement of poles will be as far back from the riverbank as possible, subject to design and engineering constraints.</p>
<p>Revegetate with native vegetation and establish a composition consistent with the surrounding undisturbed landscape when construction is within line of sight of a known viewpoint.</p>	<p><i>TL CEMP s. 9.4</i></p> <p>Revegetate with native vegetation and establish a composition consistent with the surrounding undisturbed landscape when construction is within line of sight of a known and significant viewpoint.</p> <p>TL Conceptual Reclamation and Closure Plan s. 4.2 planting and promotion of native trees and shrubs, including both deciduous and conifer species, and a climate adapted species mix.</p>
<p>Avoid REC1606 Cabin Creek Falls site, REC 1406 Cabin Creek Trail and REC1097 Cut-off Creek, as will be described in the FTLRP.</p>	<p>The TL route will be outside of the Cabin Creek Falls Recreation area.</p>
<p>Consult with the Village of Fraser Lake on TL access road decommissioning.</p>	<p>The Village of Fraser Lake will be consulted prior to decommissioning of the access road.</p>

<b>Original Mitigation Measure (in FTLRP Phase 1)</b>	<b>Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)</b>
<p>Notify the Stelat'en First Nation of Construction and Post-closure schedules and consult with Stelat'en First Nation to identify and address any concerns regarding access to the tenure, including placement of TL towers.</p>	<p><i>TL CEMP s. 9.12</i>            Notify the Stelat'en First Nation of Construction and Post-closure schedules and consult with Stelat'en First Nation to identify and address any concerns regarding access to the tenure, including placement of TL towers.</p>
<p>Provide maps and early notification of Project development and other physical work to affected regional forestry stakeholders.</p>	<p><i>TL CEMP s. 9.12</i>            Provide maps and early notification of Project development and other physical work to affected regional forestry stakeholders.</p>
<p>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.</p>	<p><i>TL CEMP s. 9.10</i>            Use existing roads and cleared/disturbed areas rather than disturbing new areas.</p>
<p>Develop site-specific measures and/or designs at Nechako and Stellako River crossings so structures do not unnecessarily affect natural lines (e.g., tree lines, ridgelines, riverbanks), as will be described in the FTLRP.</p>	<p>The TL will include aerial cables over the Nechako River and Stellako River.            Parallel the BC Hydro RoW at the Stellako River crossing to co-locate the visual disturbance associated with the TL and to avoid creation of a new access corridor to the river.            The placement of poles will be setback from the riverbank to mitigate viewshed impacts.            The TL aerial crossing of the Nechako River will be approximately 295.5 m long to address visual quality and riparian vegetation retention.  <i>TL CEMP s. 9.4</i>            Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p>
<p>Implement visual quality mitigation measures for the TL 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 FTLRP.</p>	<p><i>TL CEMP s. 9.4</i>            Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.  <i>TL CEMP s. 9.4</i>            Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and facilitate movement and cover for wildlife as directed by a Qualified Professional.</p>

<b>Original Mitigation Measure (in FTLRP Phase 1)</b>	<b>Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)</b>
Monitoring of visual impacts at varying distances from the mine site, near sensitive receptors, to be conducted at specific stages during the construction and operations phases.	<i>(This monitoring measure is with respect to the mine site, and should not have been included in the Phase 1 FTLRP. It is not carried forward.)</i>
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 FTLRP.	TL will follow an existing disturbance at Brewster Lake Rec Area and be placed on the opposite side of the FSR. The TL aerial crossing of the Nechako River will be approximately 295.5 m long to address visual quality and riparian vegetation retention. The TL will follow the Kluskus-Ootsa FSR, approximately 1.6 km from Tatelkuz Lake.
Paint or stain TL towers/poles to blend in with surrounding environment, as will be described in the FTLRP.	Poles will be natural wood colour.
Work with Recreation Sites and Trails BC (MOF) 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).	The TL route will be outside of recreation sites. Minimum required pole heights will be maintained, and the route will parallel the existing disturbance to minimize any visual impacts.
If appropriate, further viewshed analysis will be considered during the detailed design and final site-specific routing of the TL.	<i>(No further viewshed analysis has been requested during the implementation of the Phase 1 FTLRP, and as such, no further viewshed analysis is proposed.)</i>
Work collaboratively with the Vanderhoof Forest District to manage vegetation cover between the TL and the Hobson Lake Recreation Site.	<i>(This mitigation measure is not carried forward, as during consultation with the Vanderhoof Forest District in April 2022 the Hobson Lake Recreation Area was not identified as a recreation area of concern/interest.)</i>
Work with Recreation Sites and Trails BC (Ministry of Forests, Lands, Natural Resource Operations and Rural Development [MOF]) to mitigate potential effects on Brewster Lake (REC1497), including maintaining the TL outside of the Brewster Lake Recreation Area viewshed.	The TL route will be outside of recreation sites. Minimum required pole heights will be maintained, and the route will parallel the existing disturbance to minimize any visual impacts.
Investigate measures to soften the visual effect of overhead cables where the TL crosses the trails and sites (including Cheslatta Trail and Messue Wagon Trail).	A site investigation was completed and the angle of crossing the Messue Trail was amended to align more closely with the adjoining FSR.

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
Investigate measures to soften the visual effects associated with overhead cables where the Stellako River flows underneath the proposed TL.	<p><i>TL CEMP s. 9.4</i></p> <p>Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p> <p><i>TL CEMP s. 9.4</i></p> <p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and facilitate movement and cover for wildlife as directed by a Qualified Professional.</p>

**Table 6-2: Non-Traditional Land and Resource Use Mitigation Measures**

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
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' (2008) Practical Guide to Effective Coordination of Resource Tenures.	<p>Pole locations within the approved alignment have been optimized to minimize road crossings and creating slivers or narrow bands of trees between disturbances.</p> <p>Consult MoTI and adopt MOTI's road clearance requirements.</p> <p><i>TL CEMP s. 9.12</i></p> <p>Provide the construction schedule to tenure holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges and the local offices of BC MOF) overlapping the Project (or any other Stakeholder who requests them), 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.</p>
Identify alternative watering locations in discussion with the land and/or livestock owner(s), if livestock access to a water supply is curtailed by mine operations activities or infrastructure.	<p><i>TL ARMP s. 6.1 (Table 6-2)</i></p> <p>Meet with the Licensees that hold the range tenures in the vicinity of the TL to develop a current listing of natural range barriers, existing fences/range infrastructure, water sources, and locations that are required to facilitate the movement of livestock and machinery.</p> <p><i>TL ARMP s. 6.1 (Table 6-2)</i></p> <p>Identify current and alternative watering locations in discussion with the land and/or livestock owner(s) if livestock access to a water supply is curtailed by mine operations activities or infrastructure.</p> <p><i>TL CEMP s. 9.12</i></p> <p>If livestock access to a water supply is curtailed with the construction of TL infrastructure or habitat offsetting (e.g., cattle exclusion fencing from fish habitat offsetting):</p>

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
	<ul style="list-style-type: none"> <li>The EM will Identify alternative watering locations in discussion with the land and/or livestock owner(s).</li> </ul>
Protect groundwater wells with temporary fencing during construction.	<p><i>(No groundwater wells have been identified within proximity of the TL.)</i></p> <p><i>TL ARMP s. 6.1 (Table 6-2)</i></p> <p>Identification and fencing of groundwater resources that may be impacted by Project activities to maintain potential future use.</p>
Narrow the TL RoW to avoid overlap with PID 928048.	Narrow the TL RoW to avoid overlap with PID 928048, unless otherwise mutually agreed to with the landowner.
Provide the construction schedule to tenure Holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges, and the local offices of BC MOF) 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.	<p><i>TL CEMP s. 9.12</i></p> <p>Provide the construction schedule to tenure holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges and the local offices of BC MOF) overlapping the Project (or any other Stakeholder who requests them), 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.</p>
Facilitate movement of livestock and farm machinery across RoW corridors, where applicable.	<p><i>TL ARMP s. 6.1 (Table 6-2)</i></p> <ul style="list-style-type: none"> <li>Provide the construction schedule to tenure holders and recreational groups (e.g., Northwest Brigade Paddling Club, nearby lodges and the local offices of BC MOF) overlapping the Project (or any other Stakeholder who requests them), 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.</li> <li>Where required, install fencing to restrict cattle movement on to TL RoW, and ensure that movement of livestock and farm machinery is supported via communication between agriculture/range users and Project staff.</li> <li>Communicate the location of fencing and gates/access points associated with RoW exclusion fencing.</li> <li>If livestock access/movement is negatively impacted by construction activities, mutually acceptable strategies to address these impacts will be determined and implemented.</li> </ul>

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
<p>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.</p>	<p><i>TL ARMP s. 6.1 (Table 6-2)</i></p> <p>Require Project vehicles to use only the RoWs and designated access roads near Project development areas to minimize the compaction of soil.</p> <p><i>TL CEMP s. 9.12</i></p> <p>To minimize compaction of agricultural soil:</p> <ul style="list-style-type: none"> <li>• Project vehicles will be restricted to use the RoWs and designated access roads near Project development areas through training and signage.</li> </ul>
<p>Establish an Access Management Working Group with Aboriginal participation and consult with Aboriginal groups and appropriate regulatory agencies on the appropriate mechanisms to control access (including the use of and locations of gates on the mine access road), to monitor the effectiveness of those measures, and implement adaptive management should those measures prove less effective than anticipated.</p>	<p>Establish an Access Management Working Group with Aboriginal participation and consult with Aboriginal groups and appropriate regulatory agencies on the appropriate mechanisms to control access (including the use of and locations of gates on the mine access road), to monitor the effectiveness of those measures, and implement adaptive management should those measures prove less effective than anticipated.</p>
<p>Use existing roads and trails and follow existing linear disturbances and cleared areas to support TL construction, as will be described in the CEMP.</p>	<p><i>TL CEMP s. 9.10</i></p> <p>Use existing roads and cleared / disturbed areas rather than disturbing new areas.</p>
<p>Work with Recreation Sites and Trails BC (MOF) to mitigate potential effects on Brewster Lake (REC1497), including maintaining the TL outside of the Brewster Lake Recreation Area viewshed.</p>	<p>The TL route will be outside of recreation sites. Minimum required pole heights will be maintained, and the route will parallel the existing disturbance to minimize any visual impacts.</p>
<p>Provide timber from TL clearing to the Fraser Lake community forest.</p>	<p><i>TL CEMP s.9.12</i></p> <p>The Community Forest, an area-based tenure, will have access to any merchantable timber removed in the Fraser Lake community forest.</p>
<p>Work with MOF during detailed engineering of the TL at the permitting stage with the goal of avoiding MN4848 (growth and yield plot). If avoidance is not possible prior to construction, BW Gold will have this plot re-measured at BW Gold's cost by a contractor to be approved by MOF.</p>	<p>MOF confirmed that a growth and yield plot would be impacted by the TL RoW. As requested by FNLROD on July 12, 2022, BW Gold will provide the opportunity for MOF to get one final measurement of the plot before TL construction and then MOF will no longer maintain an interest in the site. MOF will confirm with BW Gold once the plot measurement is completed.</p>

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
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 the start of construction in this area.	BW Gold has confirmed that the S.16 gravel reserve in Land File 0107944 will be avoided by the TL minor routing adjustment change, hence no longer resulting in sterilization or testing requirements.
Require Project drivers to close gates properly when vehicles require access to RoW corridors on fenced and gated lands.	<i>TL ARMP s. 6.1 (Table 6-2)</i> Require Project drivers to close gates properly when vehicles require access to RoW corridors on fenced and gated lands.
Install fencing to restrict cattle movement into the TL RoW (Land File 0194075), as will be described in the FTLRP.	<i>TL ARMP s. 6.1 (Table 6-2)</i> Where required, install fencing to restrict cattle movement onto TL RoW, and ensure that movement of livestock and farm machinery is supported via communication between agriculture/range users and Project staff.
Facilitate movement of livestock and farm machinery across RoW corridors to be identified in the FTLRP.	<i>TL ARMP s. 6.1 (Table 6-2)</i> <ul style="list-style-type: none"> <li>• Provide construction schedule and list of activities (including closure windows) 30 days prior to construction to potentially affected agriculture and range stakeholders to facilitate livestock management and allow livestock to be moved to other grazing opportunities if necessary and/or when applicable.</li> <li>• Where required, install fencing to restrict cattle movement onto TL RoW, and ensure that movement of livestock and farm machinery is supported via communication between agriculture/range users and Project staff.</li> </ul>
Compensate affected trapline holders in accordance with industry and provincial protocols with associated proof of lost revenue.	Compensate affected trapline holders in accordance with industry and provincial protocols with associated proof of lost revenue.
Follow BC MOF guidelines and requirements for clearing, handling, and hauling beetle-infested wood.	<i>TL CEMP s. 9.12</i> To minimize the potential escape of beetles from infested logs during the clearing, handling, and hauling of beetle-infested wood the Site Supervisor will implement the following mitigations as guided by a Qualified Professional and in accordance with guidance provided by MOF: <ul style="list-style-type: none"> <li>• Determine if woody debris stored on site has bark beetles and if noted, adopt measures to control infestation and spread (determined by a Qualified Professional);</li> <li>• Assess windthrow to determine if bark beetles require salvage of downed trees; and</li> </ul>

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
	<ul style="list-style-type: none"> <li>• Prior to hauling beetle-infested wood, determine the high beetle flight period and reduce transport windows accordingly.</li> </ul>
<i>New mitigation (not in FTLRP Phase 1)</i>	<p><i>TL CEMP s. 9.12</i></p> <p>Public access to recreational and snowmobiling trails that are affected by construction activities will be managed by:</p> <ul style="list-style-type: none"> <li>• Adjusting the schedule of construction activities to avoid impact; or</li> <li>• Erecting appropriate signage (as determined in consultation with MOF) on affected recreational and snowmobiling trails, if adjusting scheduling is not possible.</li> </ul>
<i>New mitigation (not in FTLRP Phase 1)</i>	<p><i>Community Effects Monitoring and Management Program s. 8.4</i></p> <ul style="list-style-type: none"> <li>• Employees and contractors will reside in camp accommodations while working on the Project during all phases of the Project. Project staff (employees and contractors) will stay at the camp when practical and when another option is not available.</li> <li>• To minimize traffic on the Kluskus and Kluskus-Ootsa FSRs, employees and contractors will be bused or shuttled to the mine site from defined pickup points.</li> </ul>
<i>New mitigation (not in FTLRP Phase 1)</i>	<p><i>TL CEMP s. 9.12 (Table 9.12-1)</i></p> <p>To limit the disruption to sensitive receptors (hunting, guide outfitting and trapping) mitigation measures will be implemented in accordance with the NVMP (as determined by a Qualified Professional) including:</p> <ul style="list-style-type: none"> <li>• Use noise abatement;</li> <li>• Schedule construction activities at noise-sensitive locations and times; and</li> <li>• Avoid low-altitude flights except on the final approach and take-off.</li> </ul> <p><i>Noise and Vibration Effects Monitoring and Mitigation Plan (NVMP) s. Table 6.1-2</i></p> <ul style="list-style-type: none"> <li>• During maintenance, check that noise abatement devices are in good order (e.g., brakes, exhaust mufflers, engine hoods).</li> <li>• Select vehicles with industry-standard noise abatement technology, including exhaust and compressor/fan noise.</li> <li>• Use a noise-attenuating jacket around the jackhammer.</li> <li>• Position noisy equipment in sheltered or enclosed locations if practicable.</li> </ul>

Original Mitigation Measure (in FTLRP Phase 1)	Final Mitigation Measure (Cross-referenced to Management Plans, as Relevant)
	<ul style="list-style-type: none"> <li>• Maintain equipment in good working condition.</li> <li>• Turn equipment off when not in use if practicable.</li> <li>• Select equipment with industry-standard noise abatement technology, including exhaust, and compressor/fan noise.</li> <li>• Operate equipment within specifications and capacity (i.e., do not overload machines).</li> <li>• Select equipment with industry-standard noise abatement technology, including exhaust, and compressor/fan noise.</li> <li>• Equipment maintenance: maintain equipment on a regular basis, replace worn parts, lubricate as required.</li> </ul>
<p><i>New mitigation (not in FTLRP Phase 1)</i></p>	<p><i>TL CEMP s. 9.8.2</i></p> <ul style="list-style-type: none"> <li>• After working in areas with known infestations, clean vehicles, and equipment at the infested site or in an area where contamination and seed spread is unlikely, such as mud-free, gravel, concrete, or other hard surfaces. If this is not possible, a regularly maintained area will be used for cleaning, such as the truck washing bay.</li> <li>• Equipment cleaning will be located outside any Riparian Management Area in accordance with the Riparian Area Management Standard Operating Procedure. After cleaning, operators will inspect vehicle and equipment to ensure excess mud, soil, vegetation, and debris is removed and left at the site of infestation.</li> <li>• If vehicles or earth-moving equipment are causing the spread of invasive plants, subject to the direction of a qualified person, a quarantine area may be established which may include blocking off the infestation, implementing treatment and control measures, and using portable wash stations.</li> </ul>
<p><i>New mitigation (not in FTLRP Phase 1)</i></p>	<p><i>TL CEMP s. 9.10</i></p> <p>Progressively reclaim roads and infrastructure in accordance with the TL Conceptual Reclamation and Closure Plan when no longer required</p> <p><i>TL CEMP s. 6 (Table 6-1)</i></p> <ul style="list-style-type: none"> <li>• Post-construction reclamation: Reclaim and/or decommission temporary access trails on RoW.</li> <li>• Closure: Reclamation of the RoW and any remaining access roads.</li> <li>• Closure: The majority of power line structures will be removed, although wood poles near creeks or wetlands may be retained to provide nesting habitat for raptors.</li> </ul>

## 7.0 Avoidance and Mitigation of Impacts to Recreational Sites

This section discusses how BW Gold will avoid impacts to recreational sites and the use of recreational sites. Where avoidance is not possible, this section will provide a rationale for why this is not the case, and the mitigation measures to limit the effects on recreation sites and their use.

One of the primary means of avoiding recreational sites was by choosing an alignment with minimal interaction in the design phase. In collaboration with the CSFNs and in response to MOF comments, the alignment (within the Corridor as defined in the Certified Project Description) was adjusted during the design phase to avoid the Mary Jane Lake recreation site (REC56660), Cut-Off Creek recreation site (REC1097), the Cabin Creek Falls Recreation Site (REC16064), Cabin Creek Falls Trail (REC4106), and Brewster Lake recreation site (REC1497). As such, only Messue Wagon Trail (REC1476) is crossed. The Final TL RoW was adjusted within the approved Corridor within the Certified Project Description.

Table 7-1 lists recreation sites within proximity, and with the potential to interact with, the proposed TL. The key mitigation measures are presented to demonstrate considerations to limit the effects on recreation sites and their use. General mitigation applicable to all includes communicating the construction schedule on the BW Gold website, posting signs about construction activities at key locations and directly communicating with potentially affected stakeholders in advance of construction. In reviewing impacts to Recreation Areas, visual quality objectives were identified by MOF. The mitigation measures regarding visual quality (discussed in the previous section) are particularly relevant for reducing impacts to the experience at recreation sites.

**Table 7-1: Recreation Areas within Proximity to the TL and Key Mitigation Measures**

Recreation Area	Mitigation
<p>Mary Jane Lake (REC56660)</p>	<p>TL RoW is outside of the recreation area. It was moved to the opposite side of the Holy Cross FSR, which borders the recreation area.)</p> <p>Poles are located below ridgelines; minimum required pole heights are maintained and the route parallels the existing FSR disturbance.</p> <p>Condition 43 mitigations during the routing process: work with staff from recreation sites and Trails BC 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, REC1097 Cut-off Creek).</p> <p><i>TL CEMP s. 9.4</i></p> <p>Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p> <p><i>TL CEMP s. 9.4</i></p> <p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and facilitate movement and cover for wildlife as directed by a Qualified Professional.</p>
<p>Cheslatta Trail (REC6084)</p>	<p>The trail is crossed by the TL RoW at a 90 degree angle using the existing firebreaks, avoiding new trail construction.</p> <p><i>TL CEMP s. 9.4</i></p> <p>Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p>

Recreation Area	Mitigation
	<p><i>TL CEMP s. 9.4</i></p> <p>Deploy berms, woody debris, and/or other visual barriers in appropriate locations along the TL that may deter human access and facilitate movement and cover for wildlife as directed by a Qualified Professional.</p>
<p>Cabin Creek Falls (REC16064)</p>	<p>TL RoW is outside of the recreation area. The TL RoW was shifted within the Study Corridor to follow the Holy Cross FSR on the opposite side of the FSR from Cabin Creek Falls.</p> <p>Condition 43 mitigations during the routing process:</p> <ul style="list-style-type: none"> <li>• Avoid REC16064 Cabin Creek Falls site, REC 1406 Cabin Creek Trail and REC1097 Cut-off Creek.</li> </ul> <p>Minimum required pole heights are maintained and the route parallels the existing disturbance.</p> <p><i>TL CEMP s. 9.4</i></p> <p>Visual impacts associated with the TL have been mitigated to the degree practicable through engineering design and infrastructure siting.</p>
<p>Cut-off Creek (REC1097)</p>	<p>TL RoW is outside of the recreation area. The TL RoW was shifted within the Study Corridor to the western portion boundary.</p> <p>Pole 279 will be placed below the bench to retain a low pole and reduce visibility from the recreation area, unless this is not achievable from a health and safety or engineering aspect.</p> <p>Condition 43 mitigations during the routing process:</p> <ul style="list-style-type: none"> <li>• Work with staff from recreation sites and Trails BC 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, REC1097 Cut-off Creek).</li> <li>• Condition 43 mitigations during the routing process: avoid REC1606 Cabin Creek Falls site, REC 1406 Cabin Creek Trail and REC1097 Cut-off Creek.</li> </ul>
<p>Brewster Lake (REC1497)</p>	<p>TL RoW is outside of the recreation area. The TL RoW was shifted to the opposite side of the Study Corridor, and parallels the FSR on the opposite side of the recreation area.</p> <p>Minimum required pole heights are maintained and the route parallels the existing disturbance.</p> <p>Condition 43 mitigations during the routing process:</p> <p>Work with MOF and the staff of the Trails Society of British Columbia (Trails BC) to mitigate potential effects on Brewster Lake (REC1497).</p> <p>Maintain the TL outside of the Brewster Lake Recreation Area.</p>
<p>Messue Wagon Trail (REC1476)</p>	<p>A site investigation was completed and the angle of crossing the Messue Trail was amended to align more closely with the adjoining FSR.</p> <p>TL RoW now crosses at an oblique angle and near the intersection of an existing FSR, retaining use of an existing disturbance.</p>

## 8.0 Stellako River Wildlife Management Area

This section discusses how the mitigation measures have taken into consideration BC's Environmental Mitigation Policy (EMP; BC Ministry of Environment and Climate Change Strategy 2014) in identifying the effects to the SRWMA and the means to avoid, minimize, restore on site, and offset impacts to the SRWMA, and how BW Gold has addressed comments from MOF's Regional Manager responsible for the SRWMA.

BW Gold considered BC's EMP throughout all planning phases for the TL. The design and routing phase included avoidance of key sensitive habitats and minimizing the length of the TL, assessment for possible Valued Component (VC) interactions, and determination of mitigations required. The EMP was also used throughout the design of management and monitoring plans.

The Application/EIS considered initial effects predicted for VCs and proposed mitigation measures. Additionally, the *Blackwater Gold Project Proposed Change to the Transmission Line Alignment – Wildlife Effects Assessment* memo (March 21, 2017) outlines the re-routing which includes the SRWMA and re-assesses potential effects to wildlife.

### 8.1 Identified Potential Effects and Mitigations in the SRWMA

Potential effects of the TL were updated for the re-route, which includes the SRWMA. The new alignment was proposed as a design mitigation to mitigate effects on wildlife including moose and grizzly bears. The mitigation hierarchy (from the EMP) was employed through several principles which guided the update for the TL route:

- avoiding intact forest areas;
- aligning the TL in already disturbed areas where possible;
- reducing the overall area requiring clearing; and
- applying traditional knowledge to avoid impacting important sites.

The re-alignment reduced the loss of high quality undisturbed habitat for moose, grizzly bear, and wolverine, and decreased overall habitat loss for all other wildlife VCs. However, habitat loss (during all Project phases) and alteration (during construction) were still considered potential effects for all VCs. Potential effects of mortality risk were also included for amphibians (western toad), moose, grizzly bear, furbearers, and bats. Potential changes to movement and population dynamics were included for moose.

In response to the above and as established through the EIS and EA review process, mitigation measures are included in the Wildlife Mitigation and Monitoring Plan (WMMP) for implementation along the TL and SRWMA to reduce potential effects to wildlife VCs, including:

- Construction management to reduce disturbance of new areas (e.g., use of existing roads and disturbances for clearing access, implementing vegetation management practices);
- Habitat management to restore functional habitat post-construction (e.g., deploying woody debris as visual barriers, facilitating vegetation regrowth); and
- Monitoring and offsetting any potential effects in the SRWMA, as determined in consultation with the StFN and MOF.

A mitigation measure identified in the FTLRP Phase 1 included: Work with MOF and StFN to address potential access management issues related to the SRWMA, including monitoring of potential Project-related effects on the SRWMA as part of its Wildlife Management Plan. Should unanticipated

effects be observed in the SRWMA associated with the TL, BW Gold will consider appropriate offset activities for those impacts in consultation with MOF and the StFN.

BW Gold has received initial feedback from StFN regarding successful means to prevent access along linear corridors, and will be implementing this feedback (or as otherwise updated) as part of implementing its access management program for the TL and associated access roads.

## 8.2 Engagement for the SRWMA

The SRWMA is held in two titles. One portion is Crown Land; the other portion is private land owned by the NTBC, and is covenanted as a WMA. Engagement with MOF and the NTBC occurred in 2021 when determining the TL alignment.

The Environmental Monitoring Committee (required by EAC Condition 19) expressed a preference for the Stellako re-route, as it places the crossing immediately parallel to the BC Hydro crossing, which was viewed as the least impactful option to habitat and wildlife.

On the private land, BW Gold also collaborated with the NTBC to choose a location for the TL that minimizes impacts. The transmission line on NTBC property within the SRWMA must be within the CPD boundaries, and is further constrained by a BW Hydro transmission line and statutory right-of-way (SROW), a vacant BC Hydro SROW, archaeology sites and slopes down to the Stellako River on the western and northern boundaries of the property. NTBC requires an agreement to build on their property and BW Gold is currently in discussions regarding an agreement for access which would include financial offsets to support acquiring additional conservation properties and/or implementing mitigation initiatives on the SRWMA within NTBC lands.

BW Gold has engaged with MOF regarding crossing the SRWMA, and approval to cross the SRWMA for the areas covered by Ministry of Water, Land and Resource Stewardship (WLRs) File No. 7409823 and 7410296 was granted on May 12, 2023.

BW Gold is seeking a revised Licence of Occupation for the SRWMA crossing. The revised Licence of Occupation area has been shared with NTBC and MOF. BW Gold will continue to engage with WLRs (MOF), NTBC, and StFN during the review of provincial permit applications, and is seeking a new approval from MOF to cross the SRWMA and continues to seek agreement with NTBC.

## 9.0 Adaptive Management and Follow-up

The mitigation measures included in the FTLRP Phase 2 are included within other management plans and, as such, will be reviewed annually by the EM to evaluate the effectiveness of the measures. The strategy employed by BW Gold will be monitoring are described in the respective management plans.

BW Gold will conduct and document management reviews of the plans referenced by the FTLRP Phase 2 on a regular basis. Such reviews will ensure the integration of monitoring results with other aspects of the Project (e.g., other management plans) and that necessary adjustments are implemented as required.

The timing of plan updates may be informed by changes to other relevant management plans, monitoring results and regulatory changes.

## 10.0 Plan Revision

Proposed revisions will be reviewed and discussed with the Blackwater Environmental Life of Mine Committee (ELoMC) prior to adopting and implementing the changes to the FTLRP Phase 2.

## **11.0 Plan Preparation**

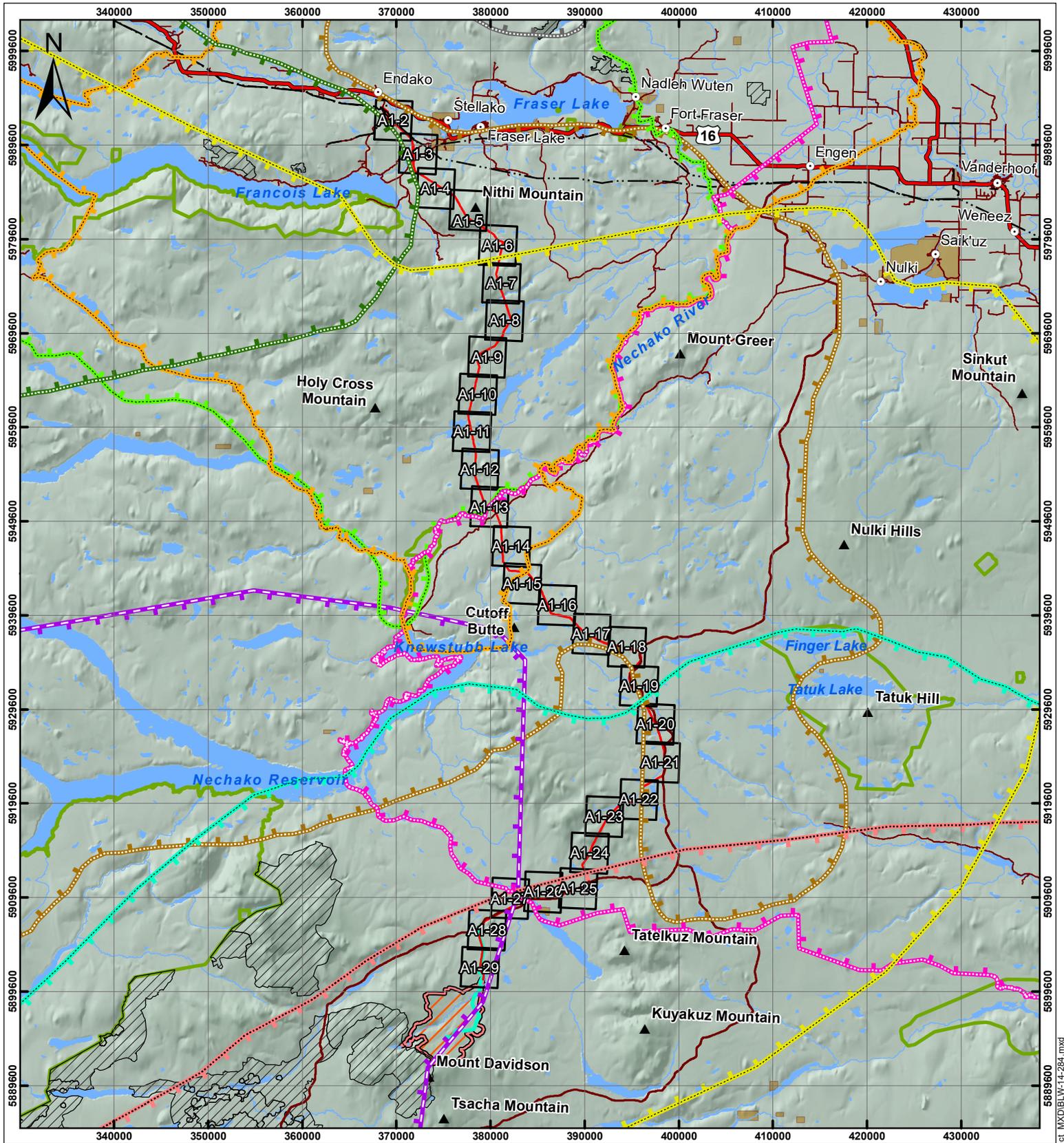
This plan was prepared by Nathan Braun and Mark Welsh of ERM Consultants Canada. The plan has been approved by Ryan Todd, of BW Gold.

## 12.0 References

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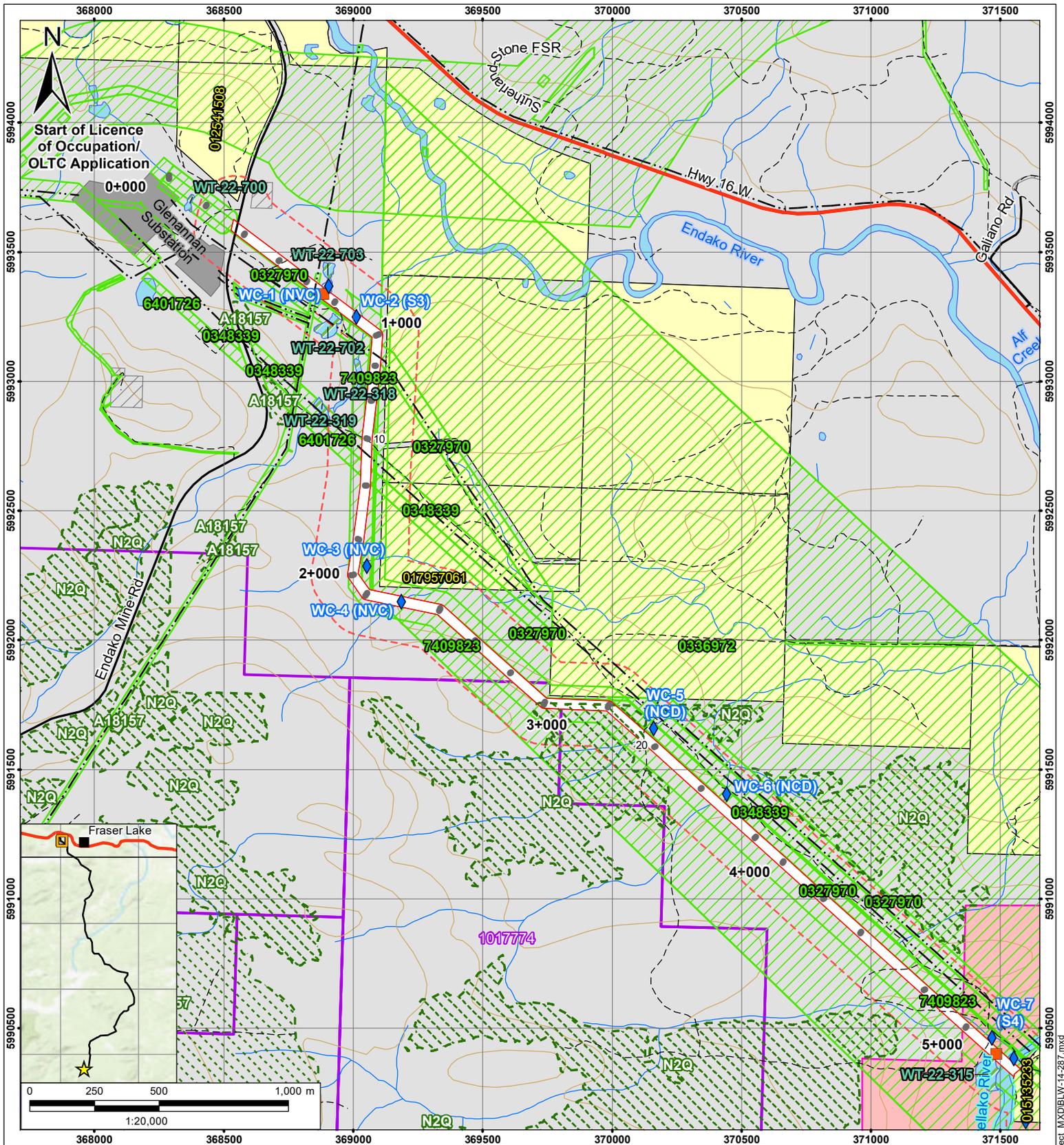
# Appendix A – Transmission Line Map Book



○ Community	Indian Reserve	Lhoosk'uz Dene Nation
▲ Mountain	Transmission Line Corridor	Nadleh Whut'en First Nation
— Highway	Mine Access Road	Saik'uz First Nation
- - - BC Hydro Transmission Line	Certified Project Description Map	Stellat'en First Nation
— Forest Service Road	Mine Site	Tsilhqot'in National Government
— Other Road	<b>Traditional Territories</b>	Ulkatcho First Nation
— Watercourse	Skin Tye Nation	Nazko First Nation
Waterbody	Yekooche First Nation	Cheslatta Carrier Nation
Ungulate Winter Range	Nee Tahi Buhn First Nation	
Parks and Protected Areas		

**Blackwater Gold Project**  
**TRANSMISSION LINE MAP**  
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## Blackwater Gold Project TRANSMISSION LINE MAPBOOK

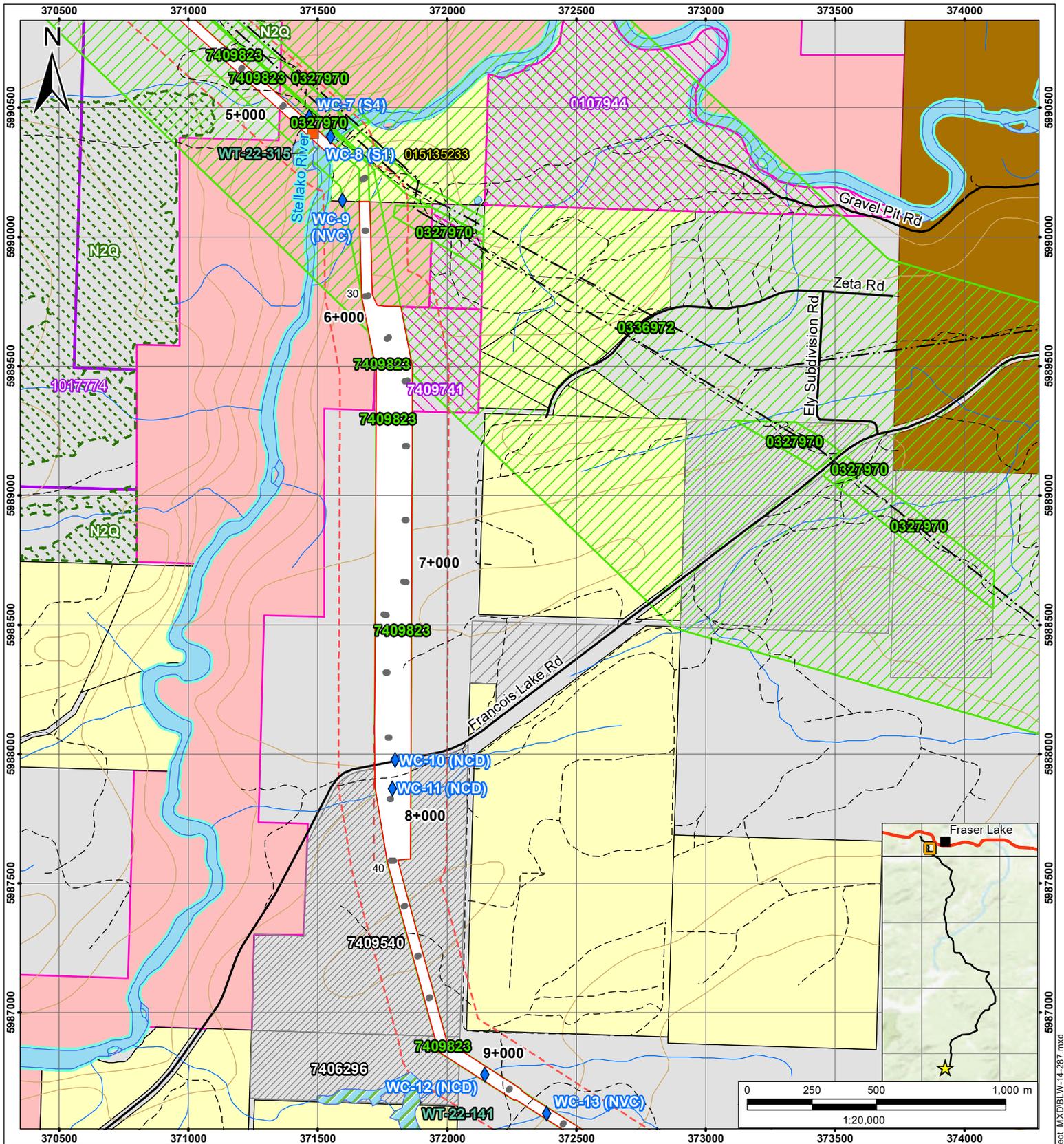
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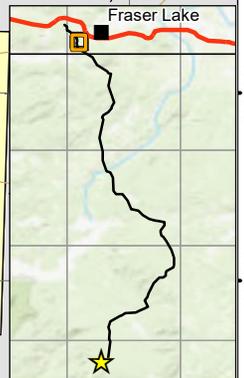
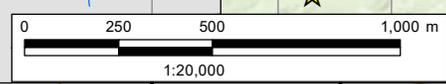
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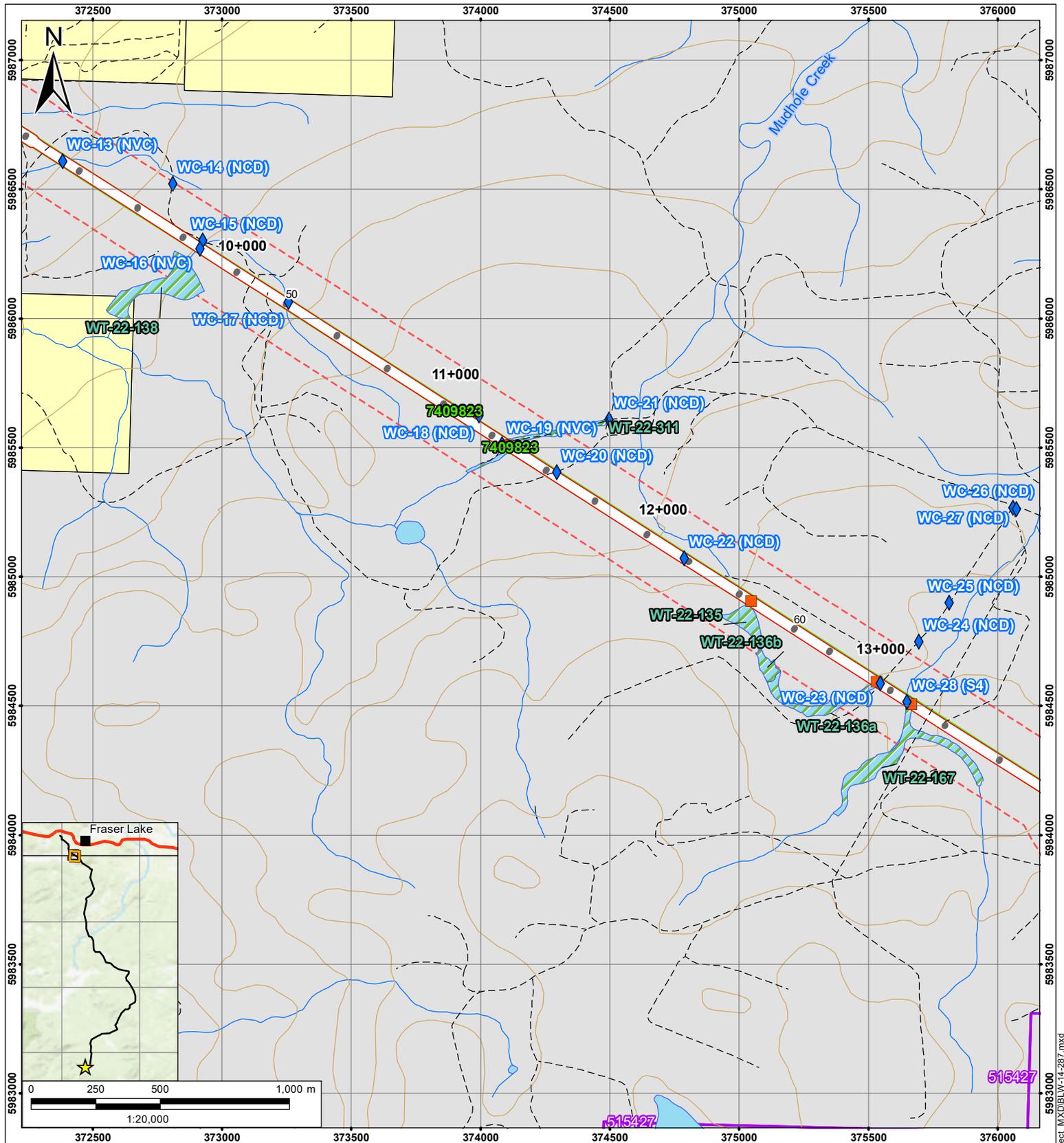


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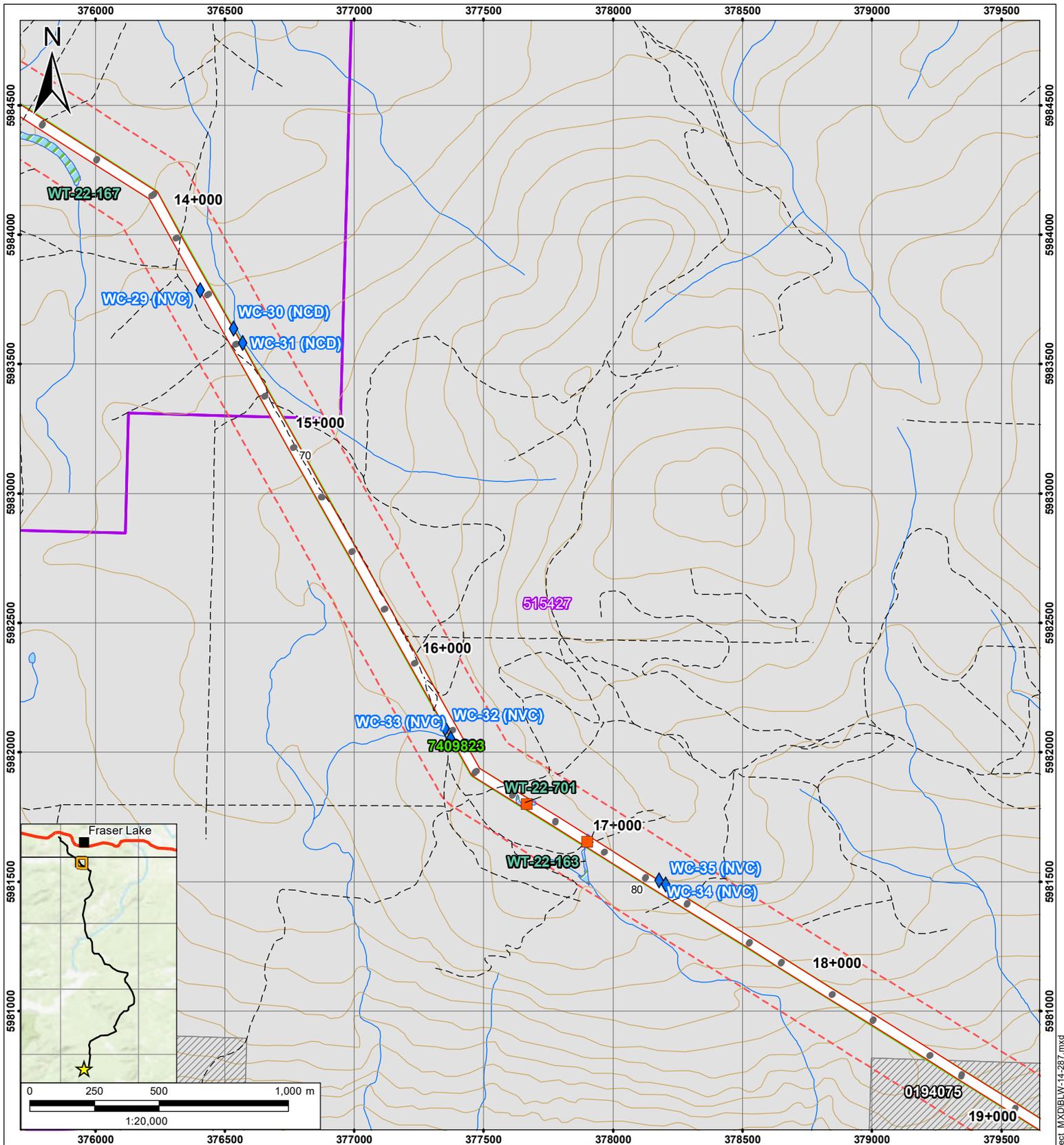
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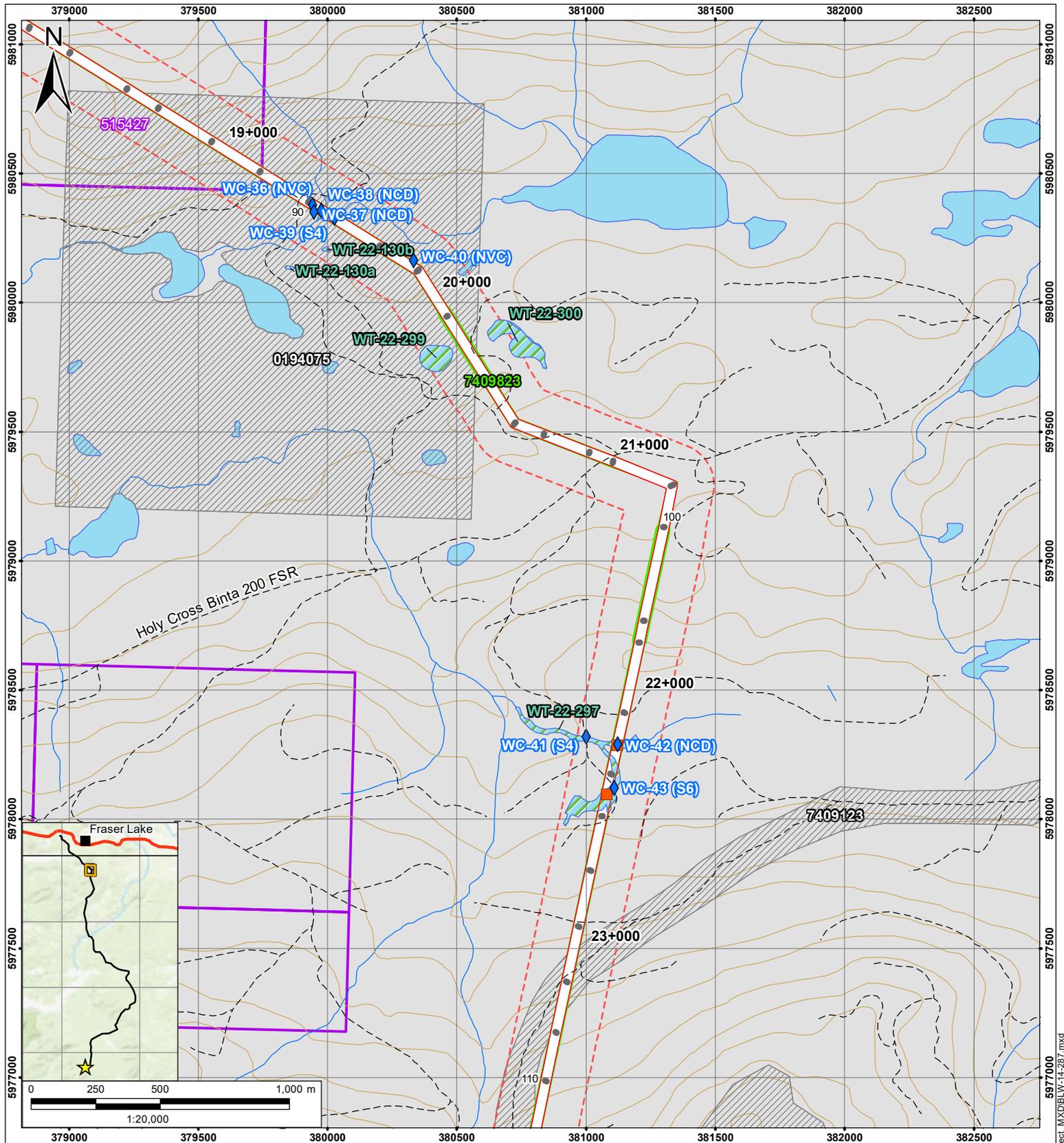
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| ★ Mine Site                    | — 100 ft Contour                    | ▨ Utility Tenure                                       |
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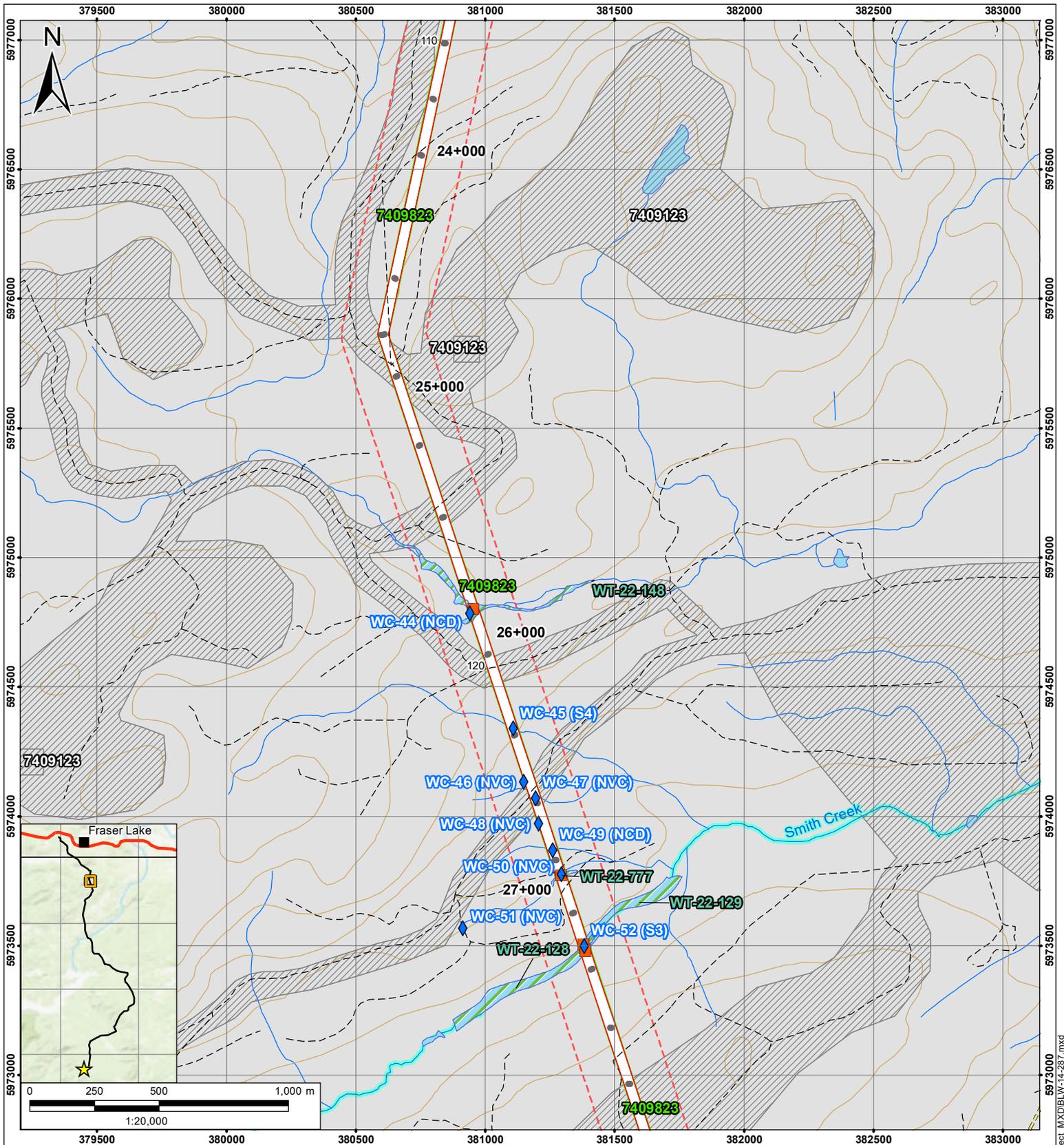
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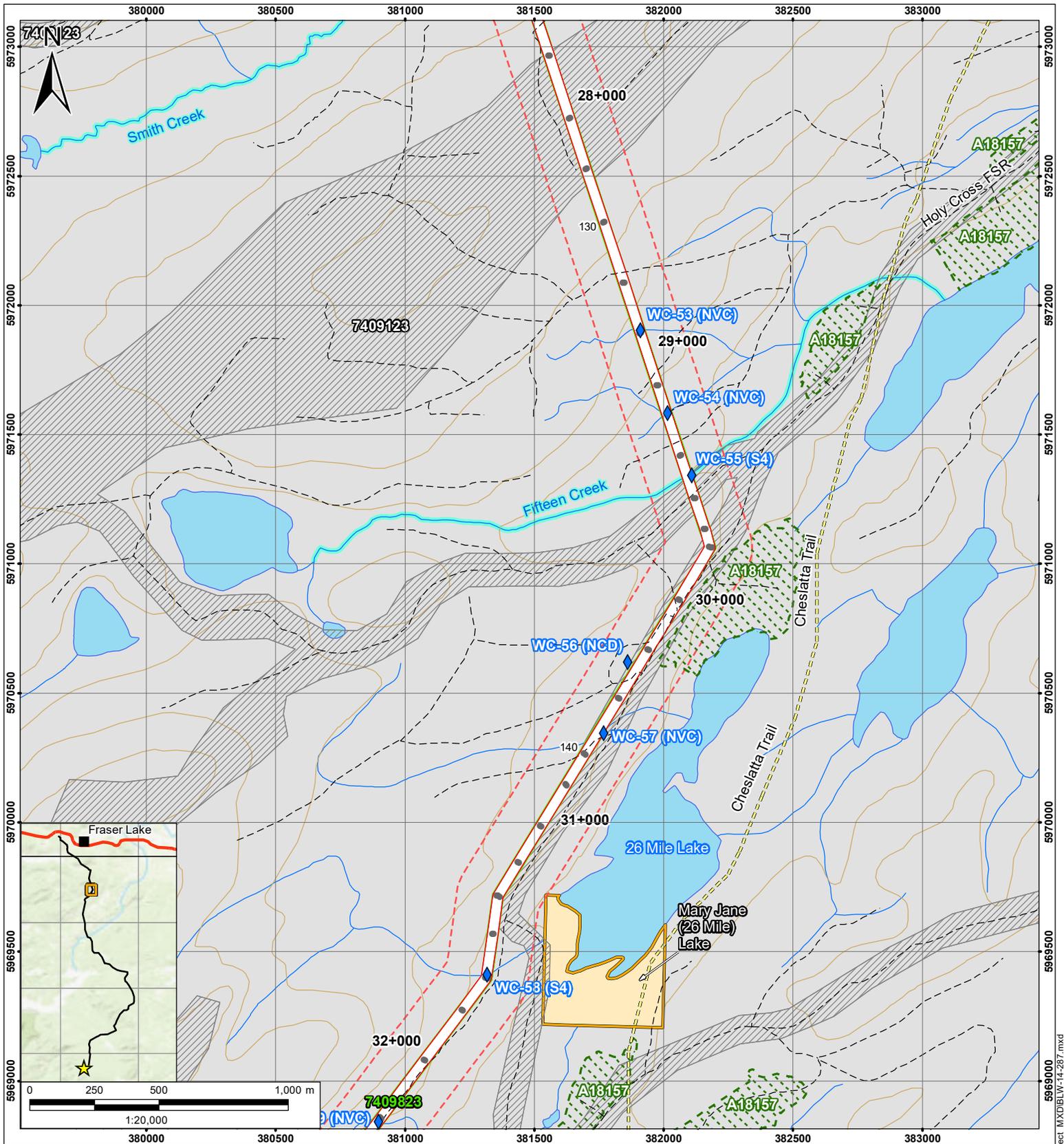
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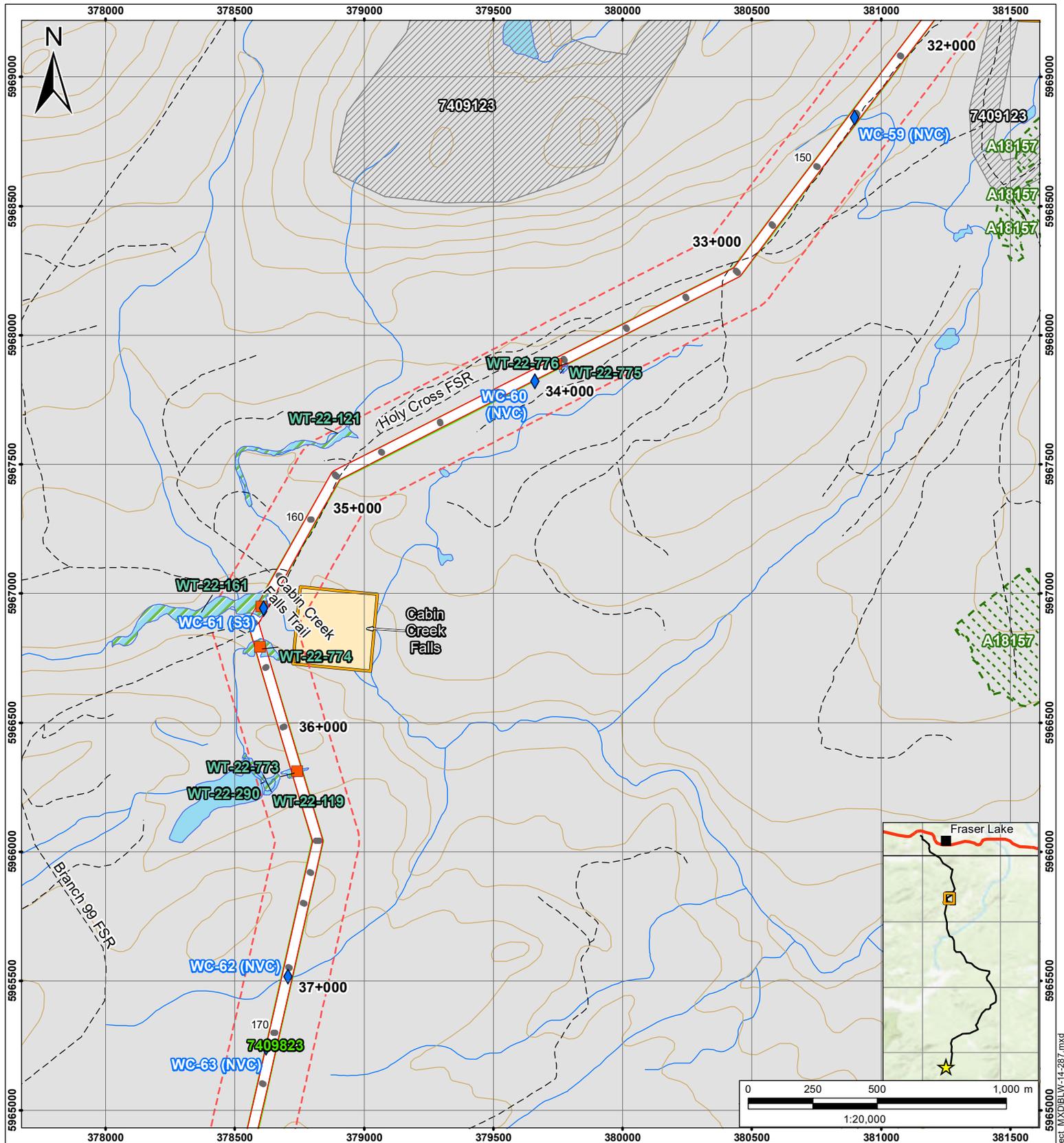
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| --- Existing Resource Road     |                                     |  |
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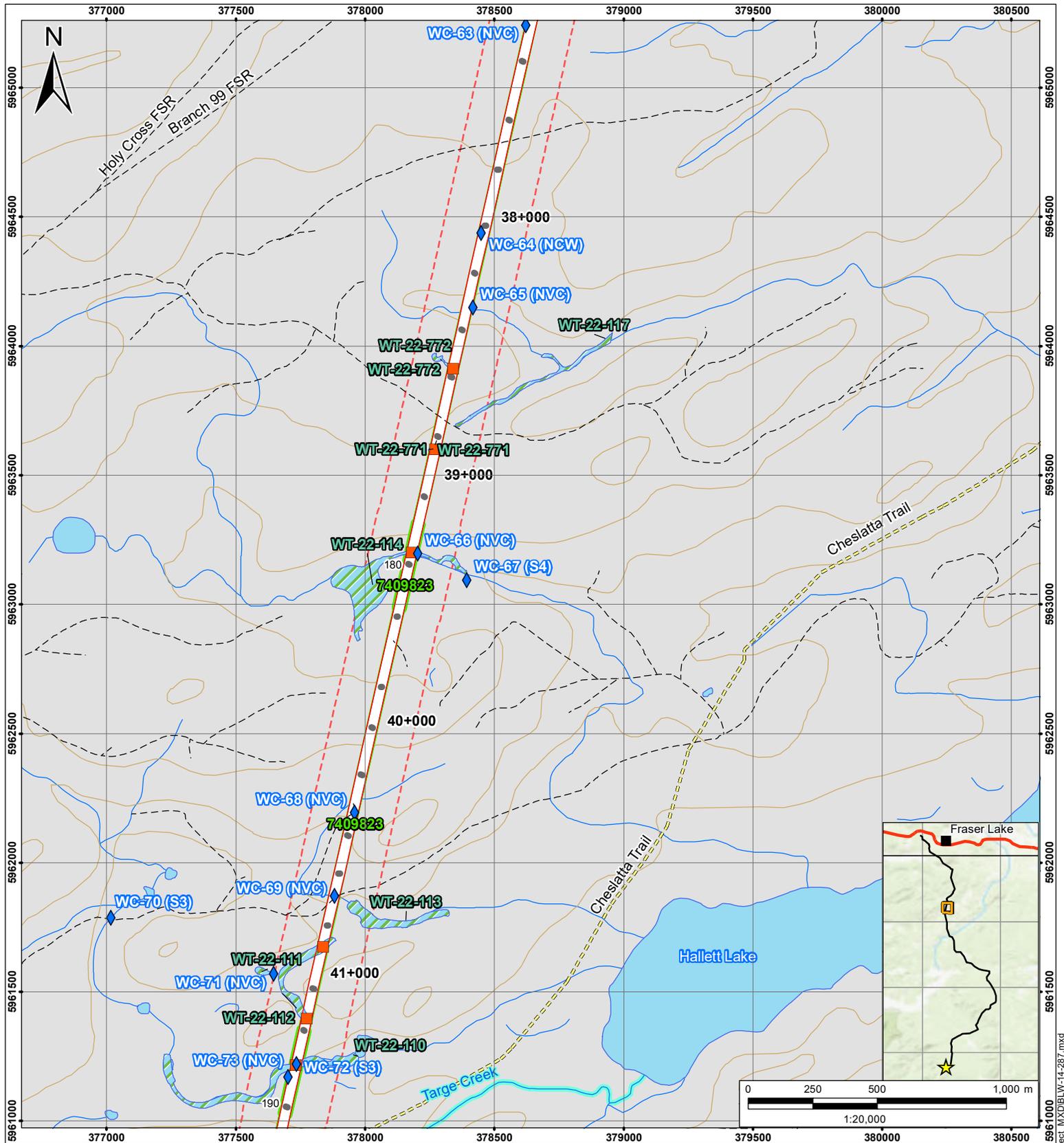
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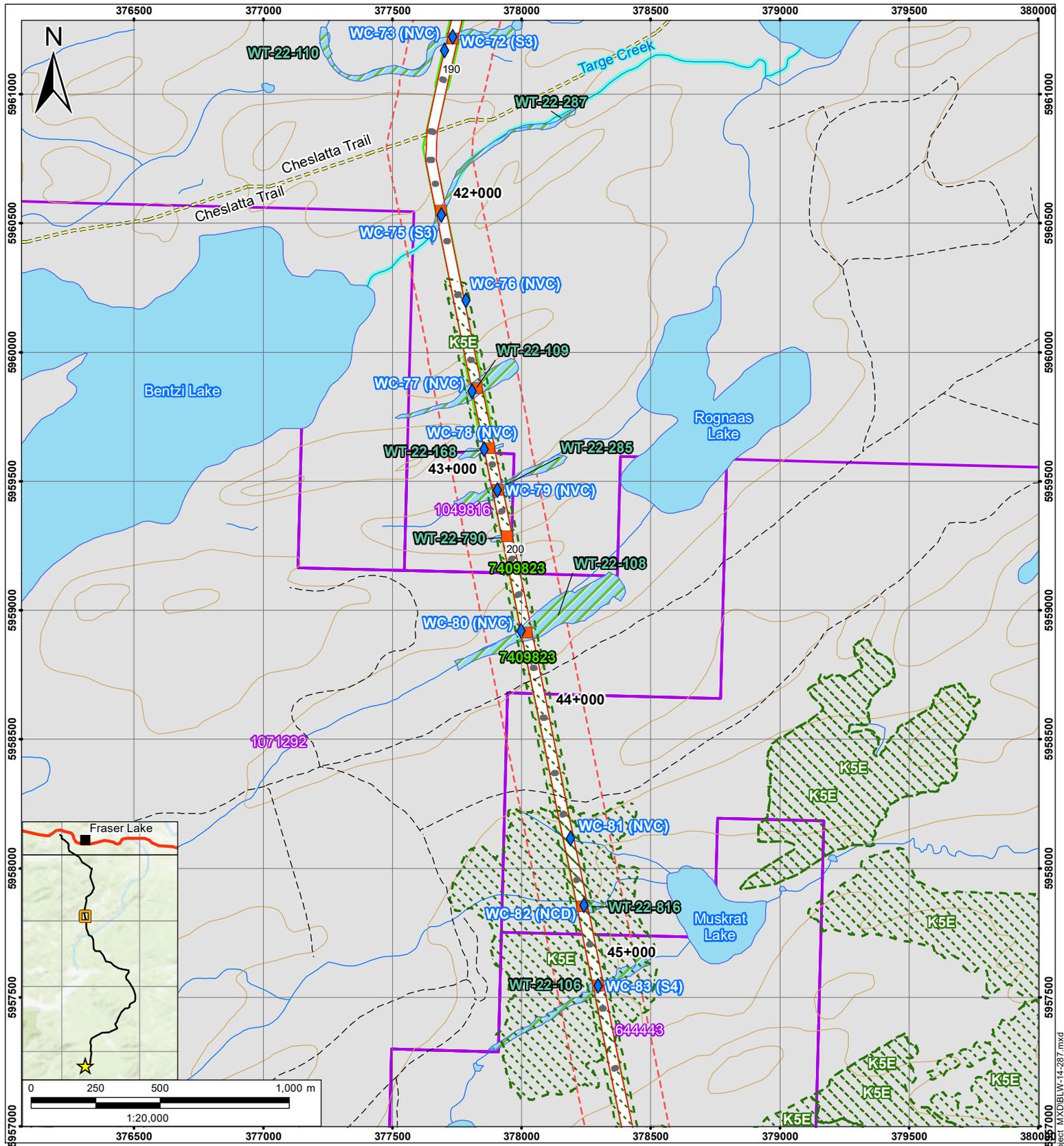
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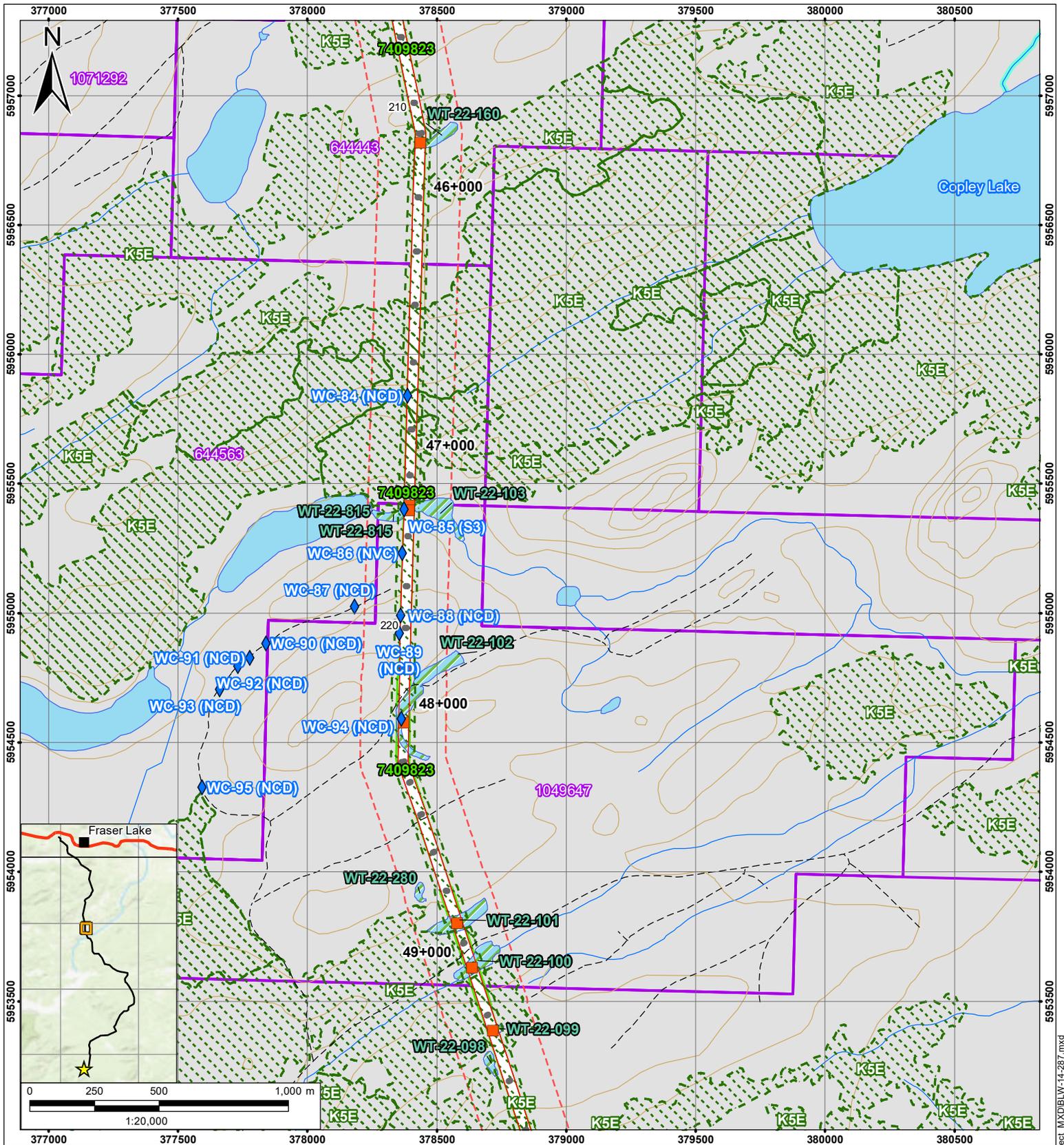
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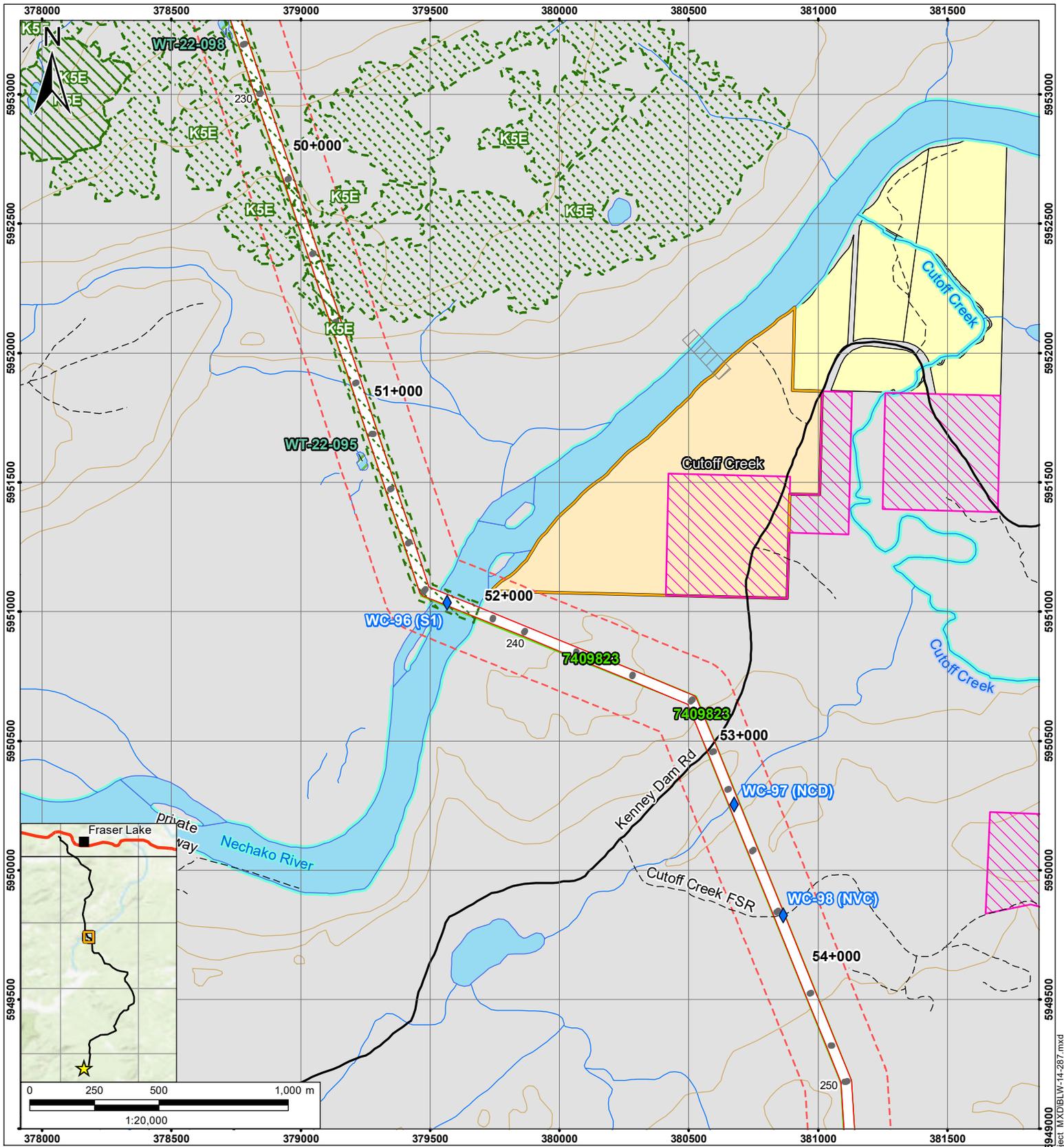
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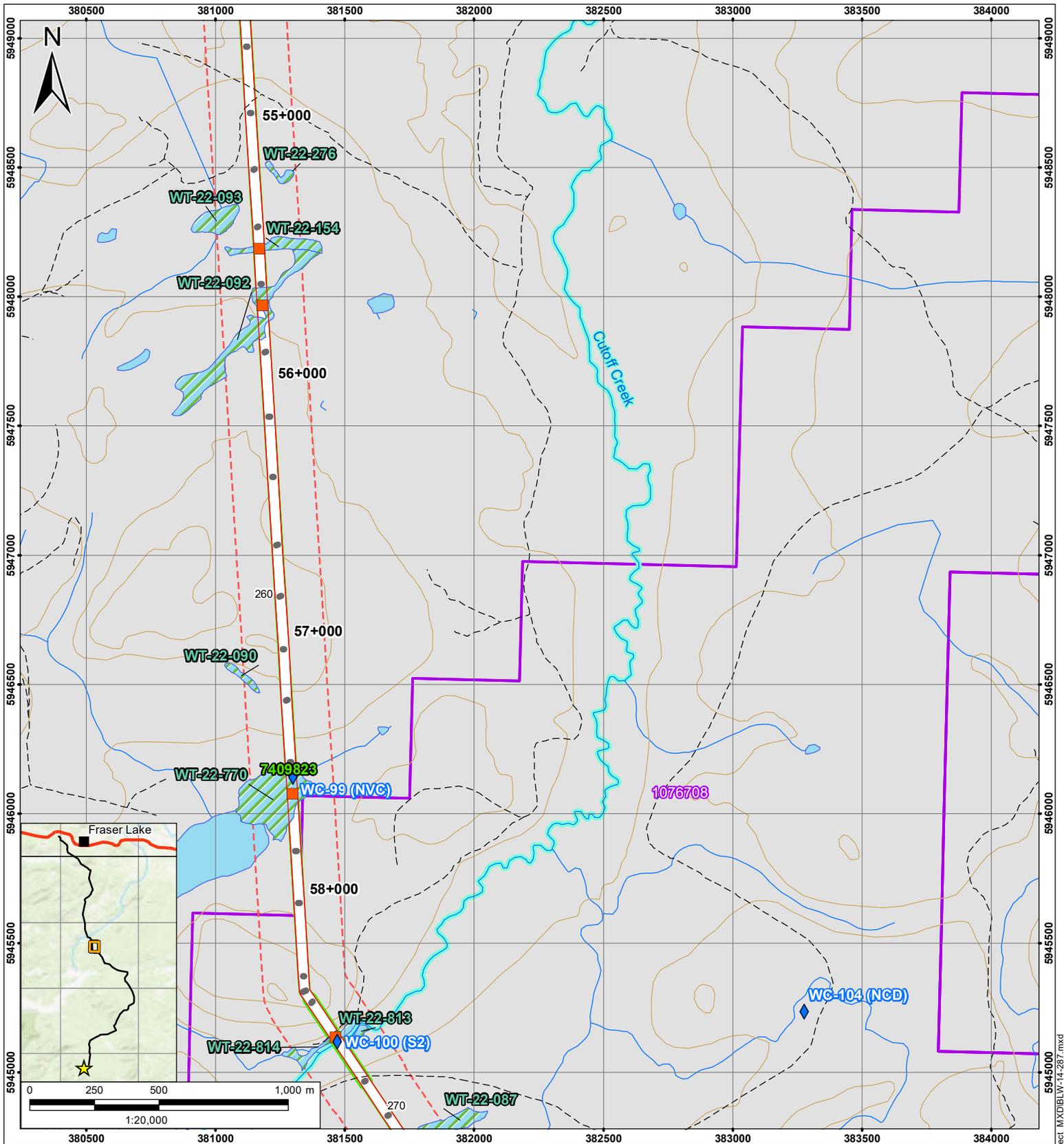
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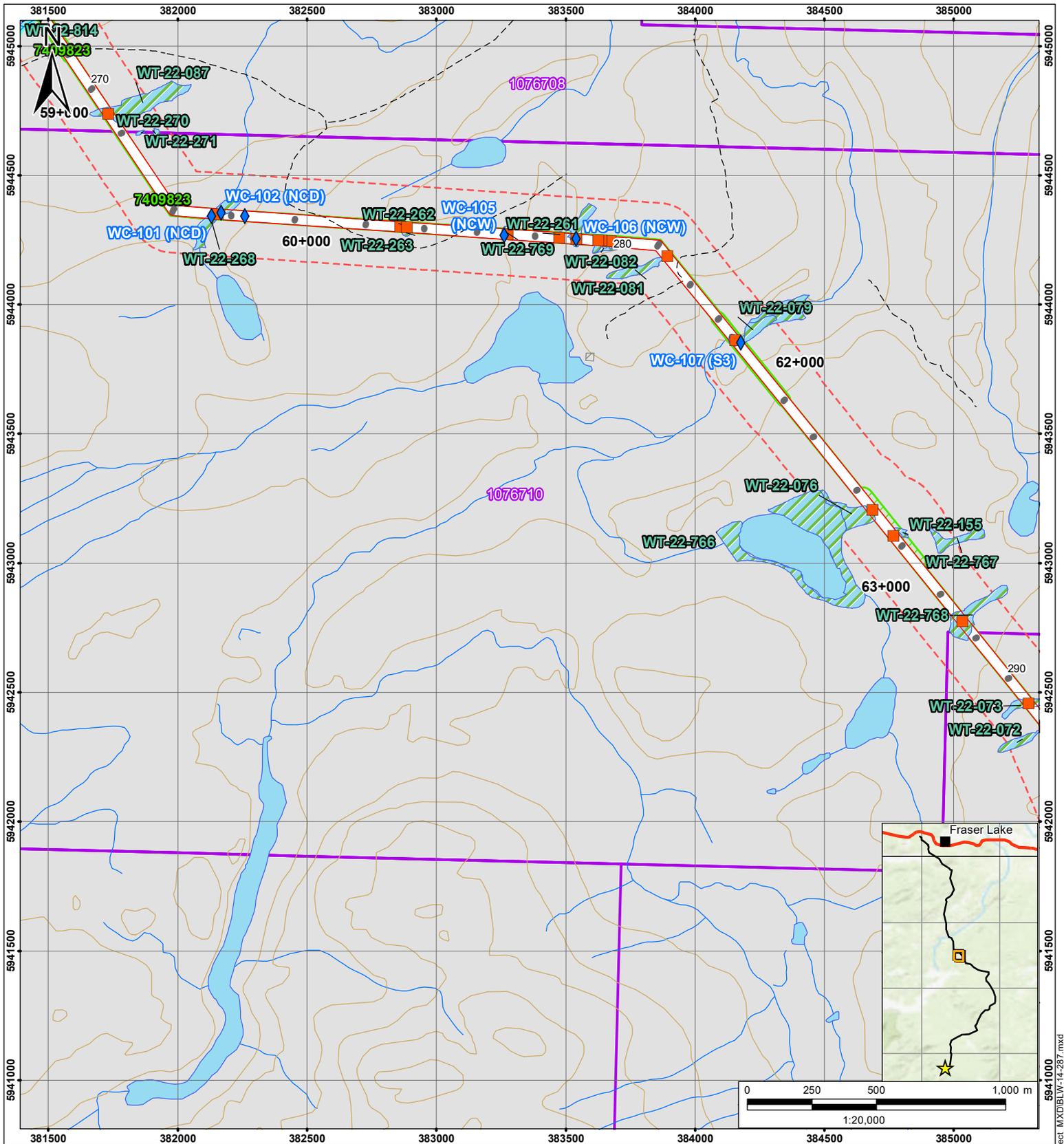
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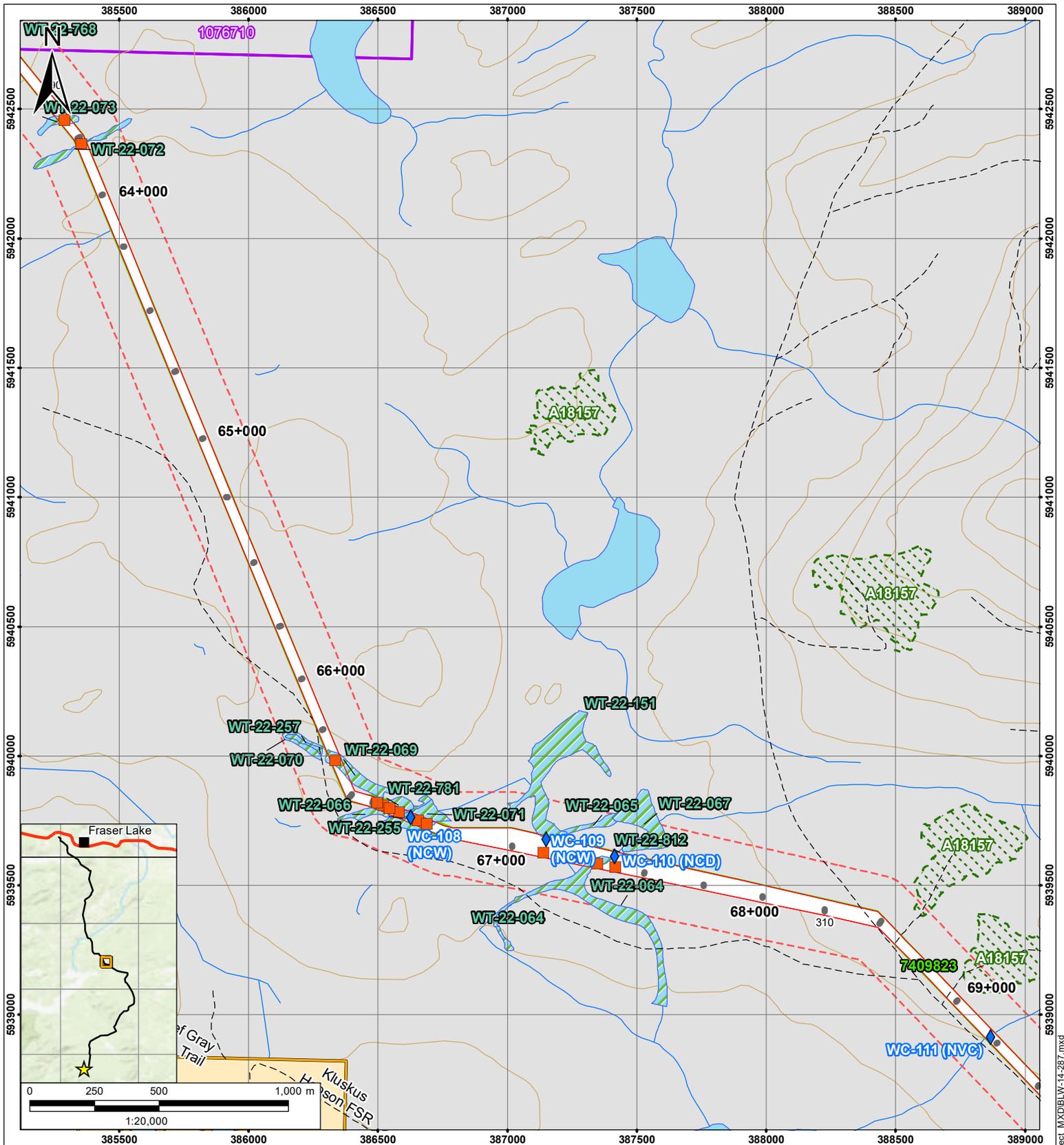
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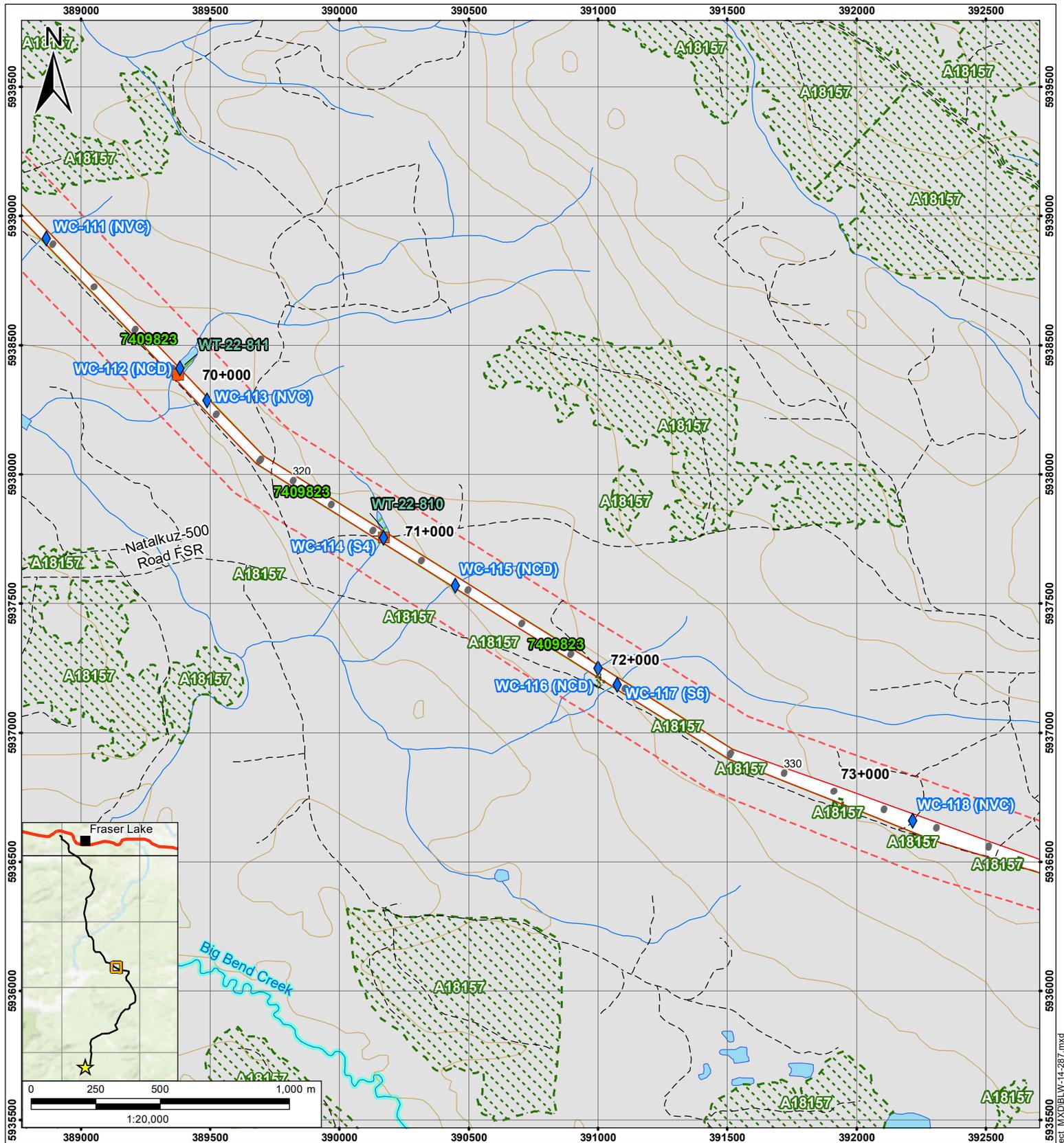
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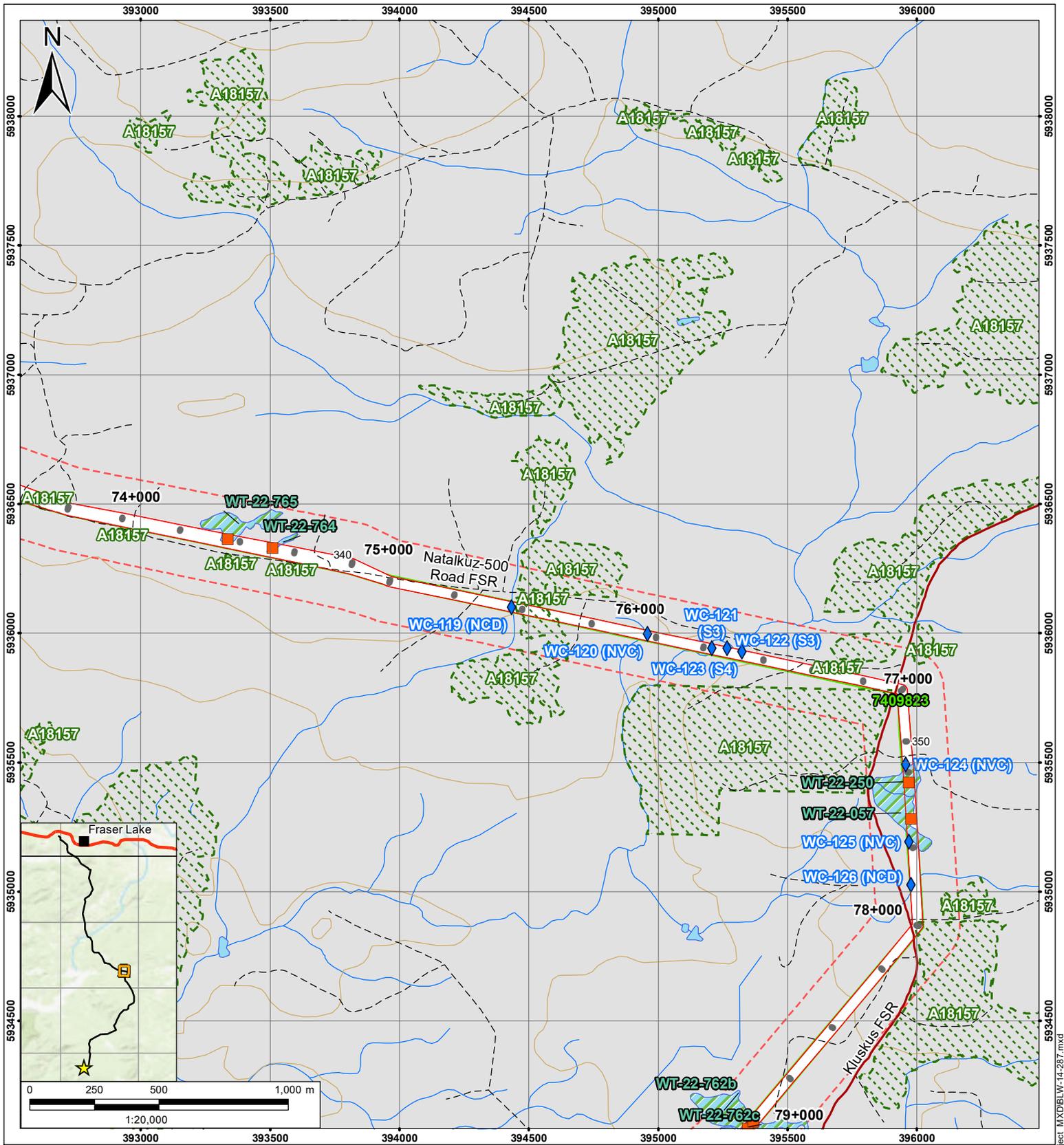
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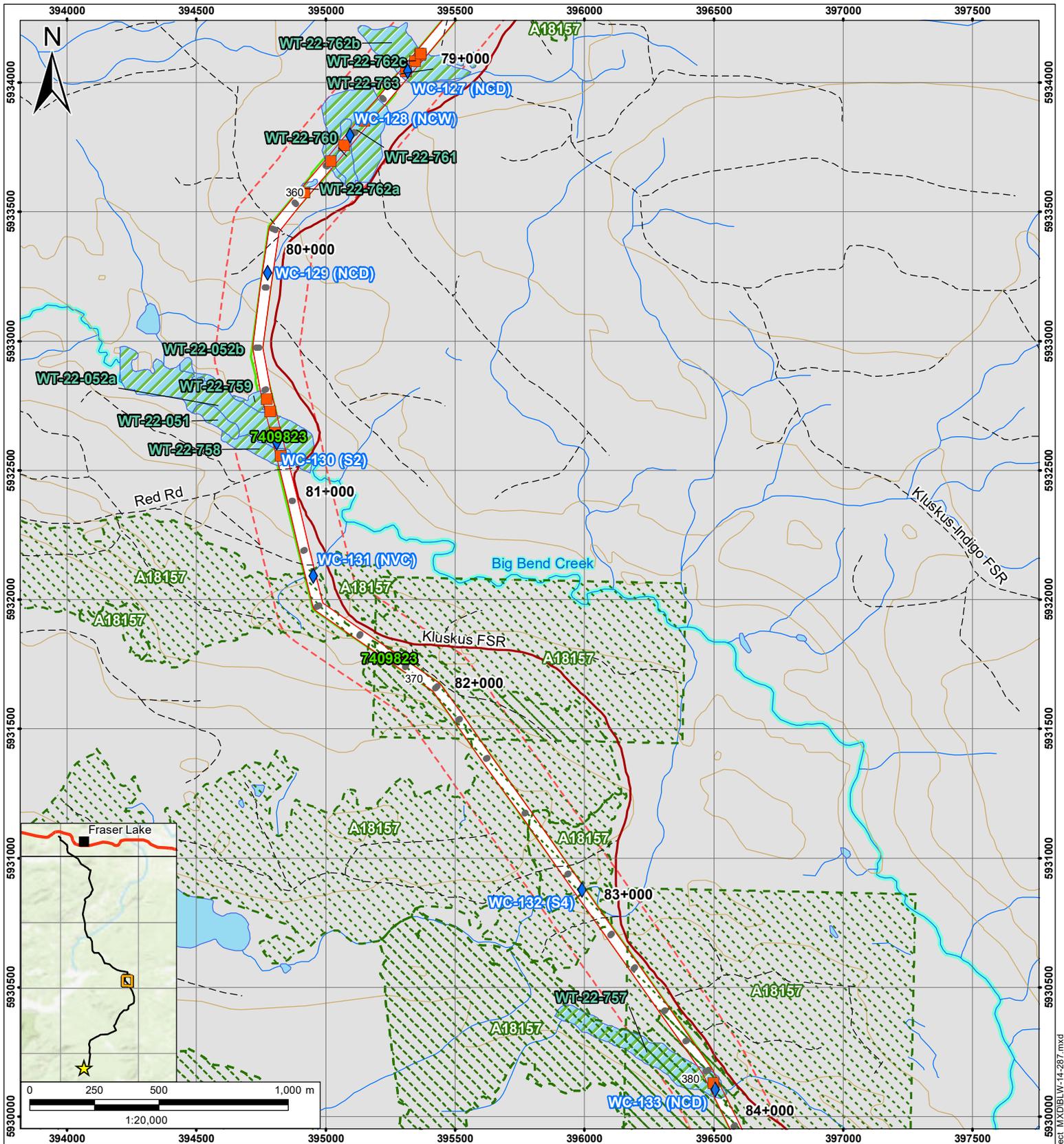
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## Blackwater Gold Project TRANSMISSION LINE MAPBOOK

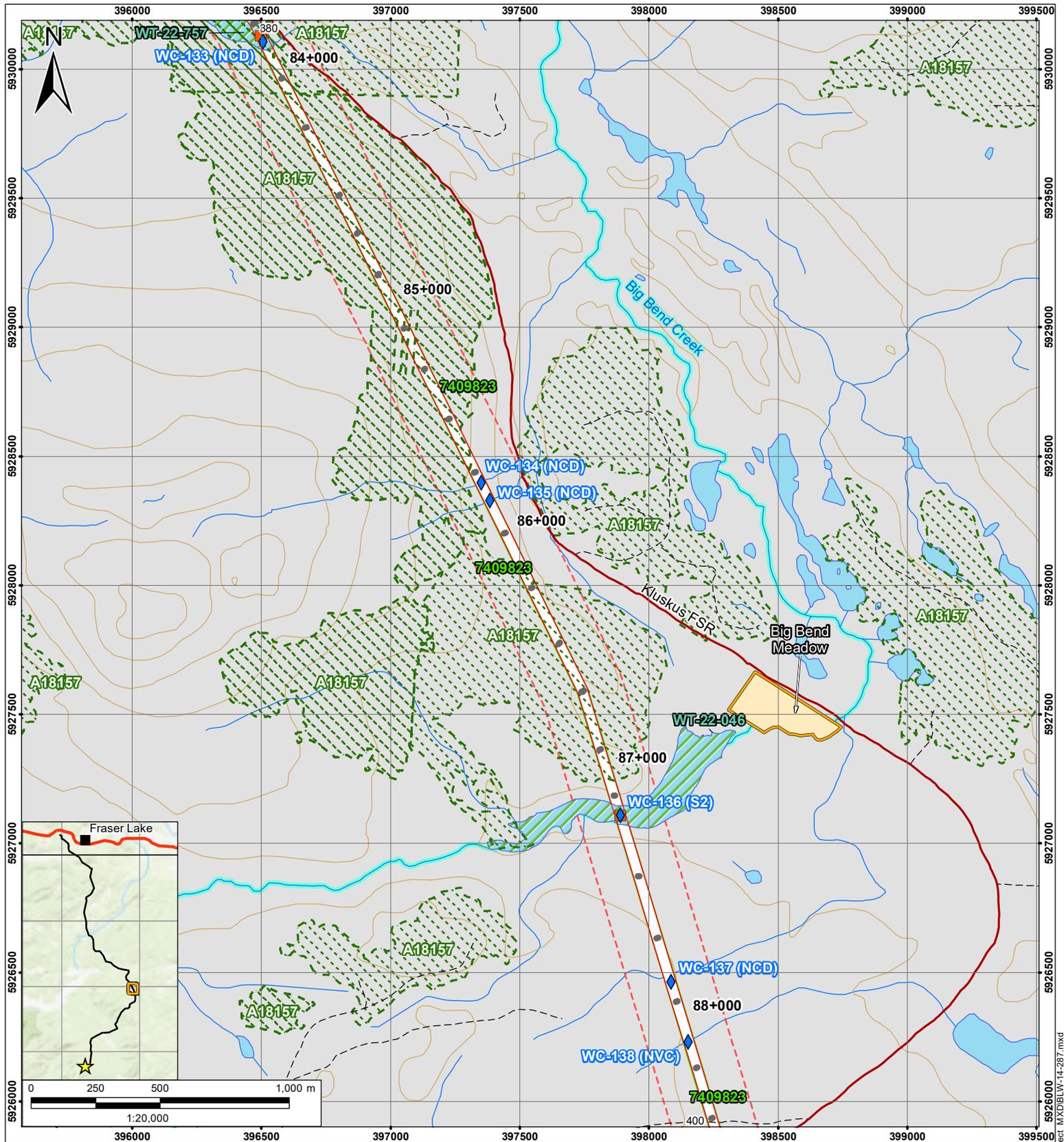
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- ★ Mine Site
- Transmission Pole
- Watercourse on TL ROW
- WC-X (Classification)
- Wetland Crossing
- Existing Transmission Line
- Wildlife Management Area
- Highway
- Road
- Existing Resource Road
- Trail
- 100 ft Contour
- Watercourse (BC Freshwater Atlas)
- YDWL Classified Watercourse
- Waterbody
- Wetland (WT-XX)
- Blue-listed Wetland
- Private Land
- Indian Reserve
- Forest Recreation Site
- Utility Tenure
- Quarrying Tenure
- Other Land Act Tenure
- Forest Harvest Authorizations
- Mineral Tenure
- Mine Site
- Mine Access Road
- TL Corridor (Certified Project Description Boundary)
- Transmission Line ROW

## Blackwater Gold Project TRANSMISSION LINE MAPBOOK

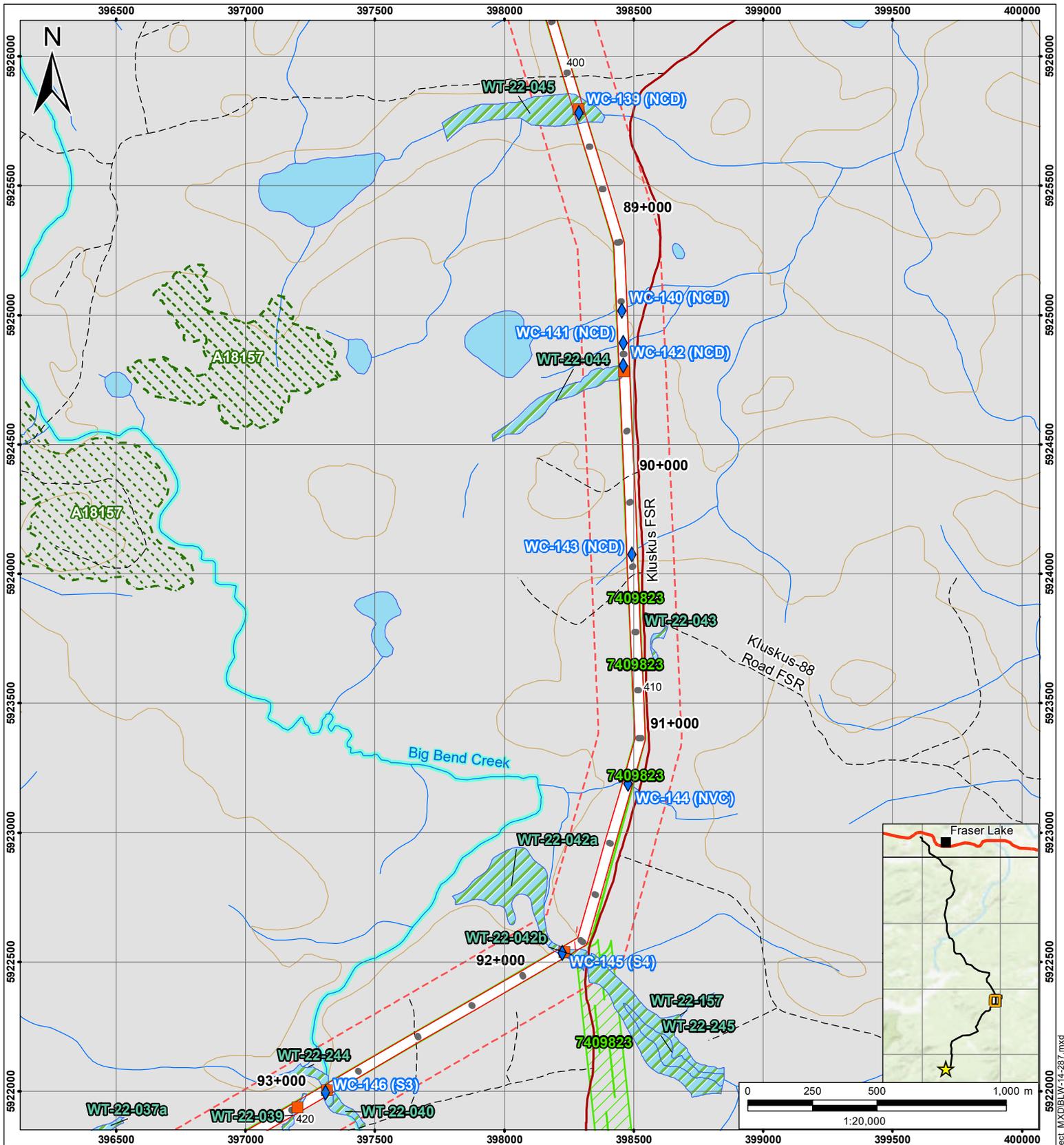
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- |                              |                                     |  |
|------------------------------|-------------------------------------|--|
| ★ Mine Site                  | — 100 ft Contour                    | ▨ Utility Tenure                                       |
| ● Transmission Pole          | — Watercourse (BC Freshwater Atlas) | ▨ Quarrying Tenure                                     |
| ◆ Watercourse on TL ROW      | — YDWL Classified Watercourse       | ▨ Other Land Act Tenure                                |
| WC-X (Classification)        | — Waterbody                         | ▨ Forest Harvest Authorizations                        |
| ■ Wetland Crossing           | ▨ Wetland (WT-XX)                   | ▨ Mineral Tenure                                       |
| — Existing Transmission Line | — Blue-listed Wetland               | ▨ Mine Site  |
| ▨ Wildlife Management Area   | — Private Land                      | ▨ Mine Access Road                                     |
| — Highway                    | — Indian Reserve                    | ▨ TL Corridor (Certified Project Description Boundary) |
| — Road                       | ▨ Forest Recreation Site            | ▨ Transmission Line ROW                                |
| — Existing Resource Road     |                                     |  |
| — Trail                      |                                     |  |

## Blackwater Gold Project TRANSMISSION LINE MAPBOOK

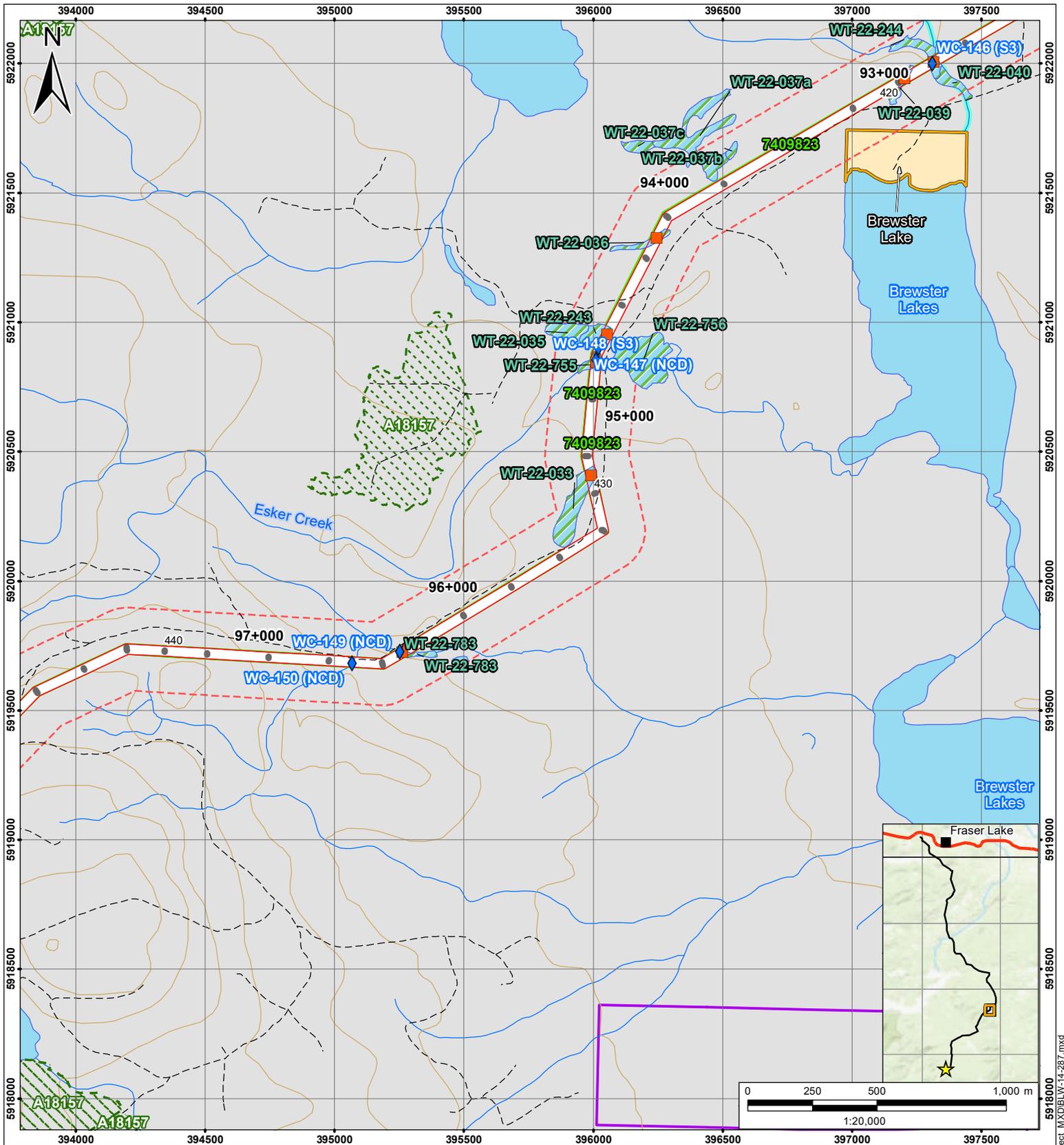
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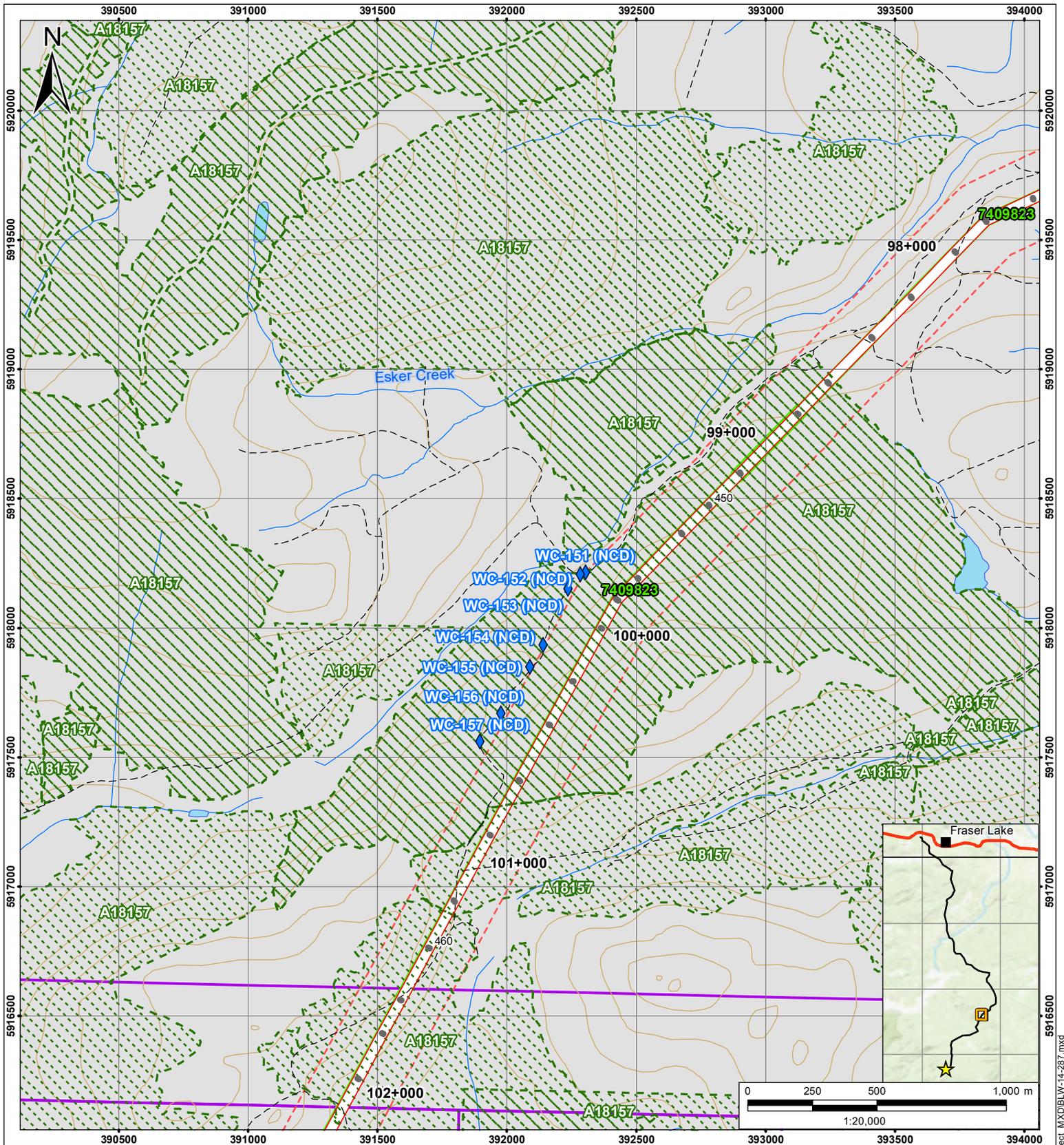
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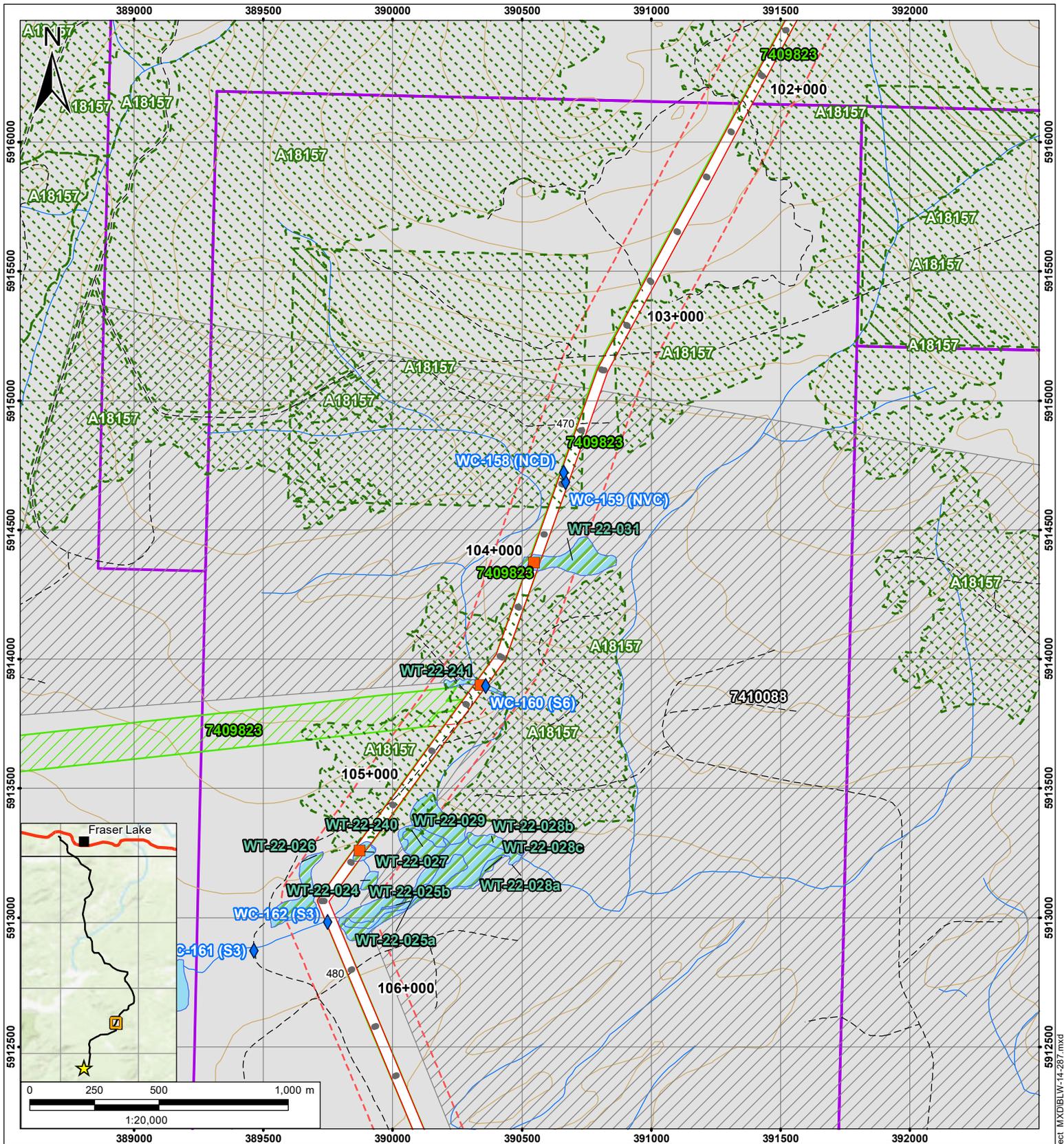
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- |                                |                                     |  |
|--------------------------------|-------------------------------------|--|
| ★ Mine Site                    | — 100 ft Contour                    | ▨ Utility Tenure                                       |
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| ◆ WC-X (Classification)        | ■ Waterbody                         | ▨ Forest Harvest Authorizations                        |
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| --- Existing Transmission Line | ■ Blue-listed Wetland               | ▨ Mine Site  |
| ▨ Wildlife Management Area     | ■ Private Land                      | ▨ Mine Access Road                                     |
| — Highway                      | ■ Indian Reserve                    | ▨ TL Corridor (Certified Project Description Boundary) |
| — Road                         | ■ Forest Recreation Site            | ▨ Transmission Line ROW                                |
| — Existing Resource Road       |                                     |  |
| --- Trail                      |                                     |  |

**Blackwater Gold Project**  
**TRANSMISSION LINE**  
**MAPBOOK**

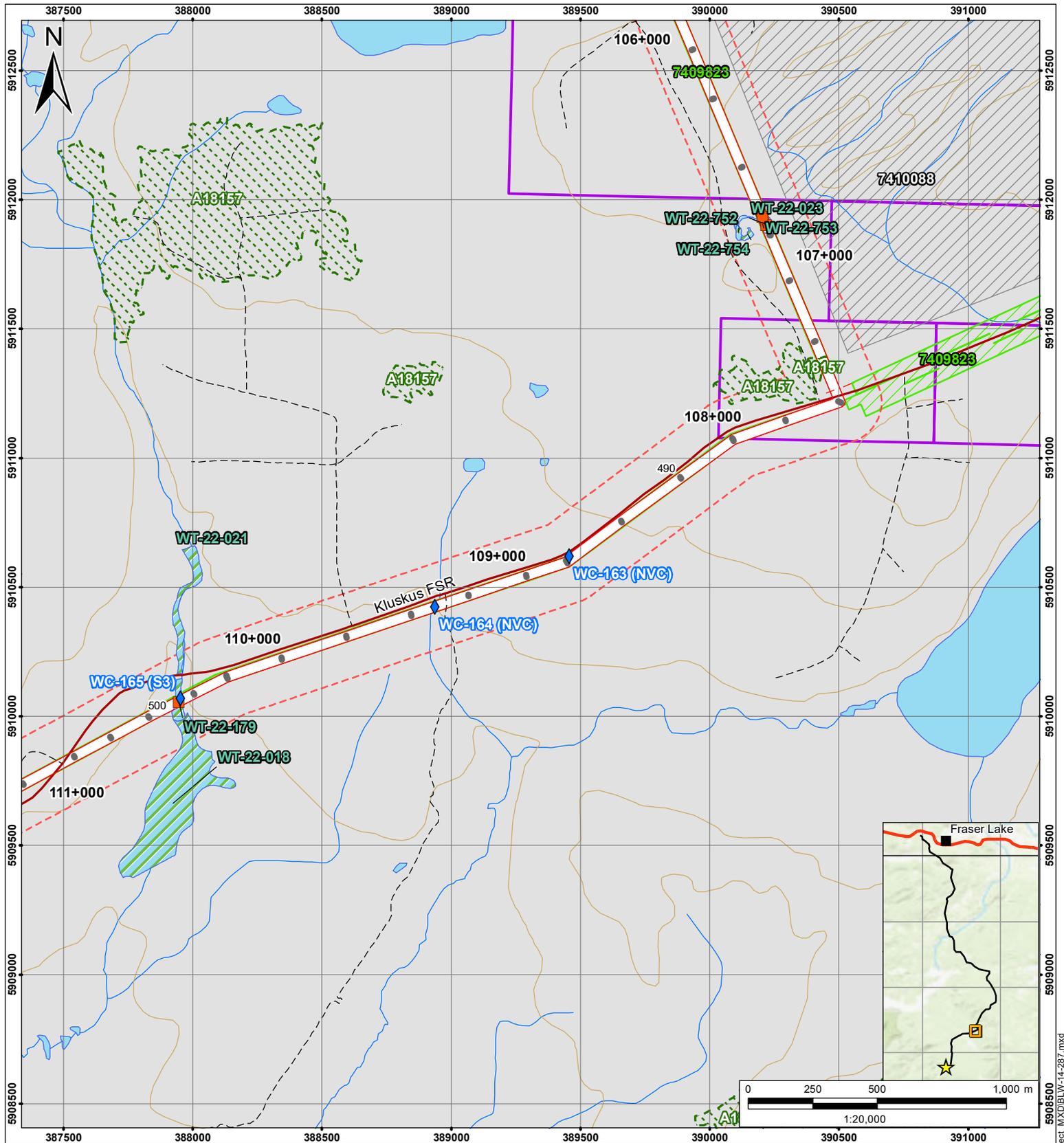
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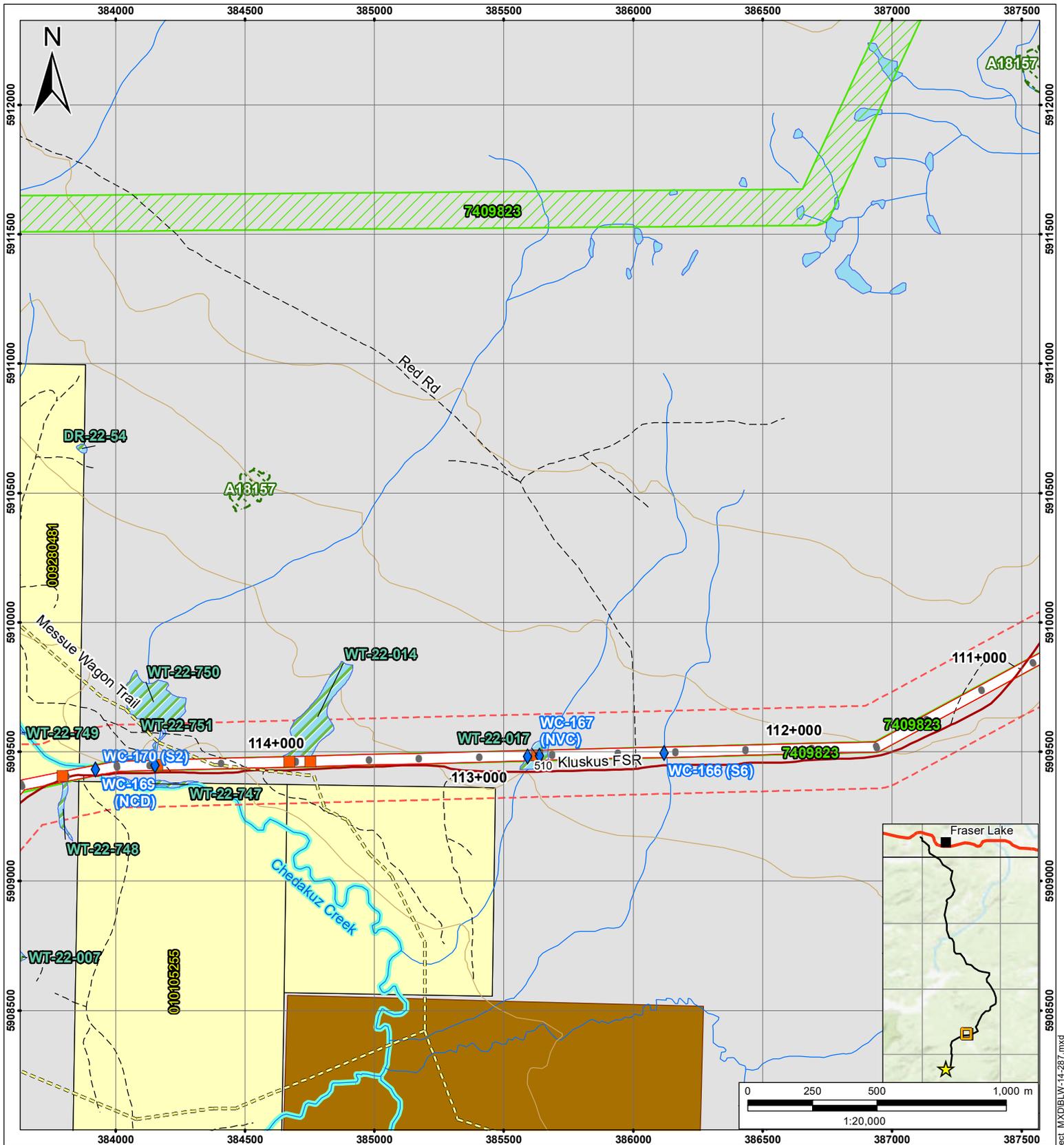
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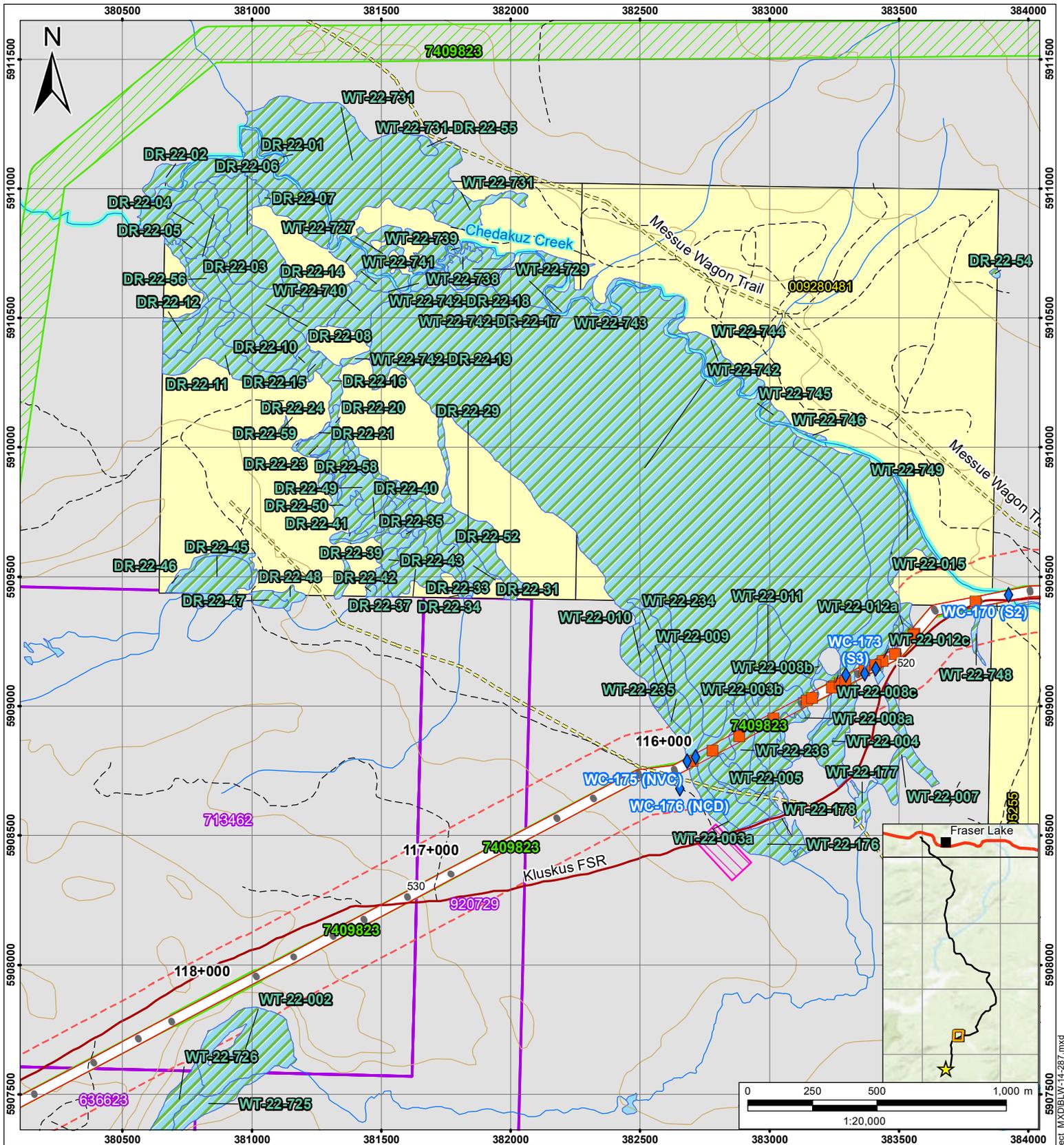
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 GIS No.: A1-26  
 Drawn By: SConard

Projection: Transverse Mercator  
 Datum: North American 1983  
 Checked by: N. Bishop

Figure No.:  
**A1-26**

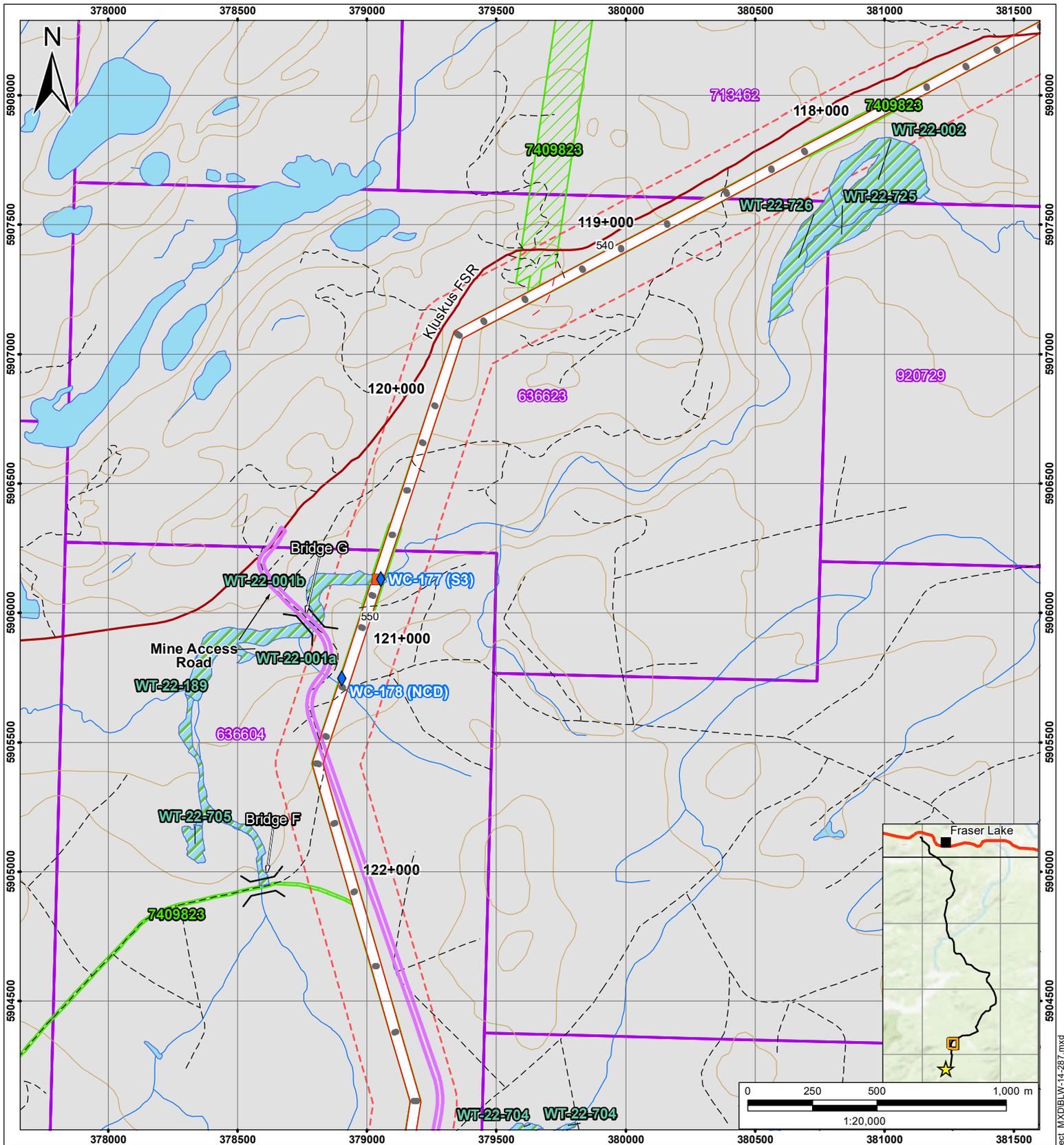
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Blackwater Gold Project  
**TRANSMISSION LINE  
MAPBOOK**

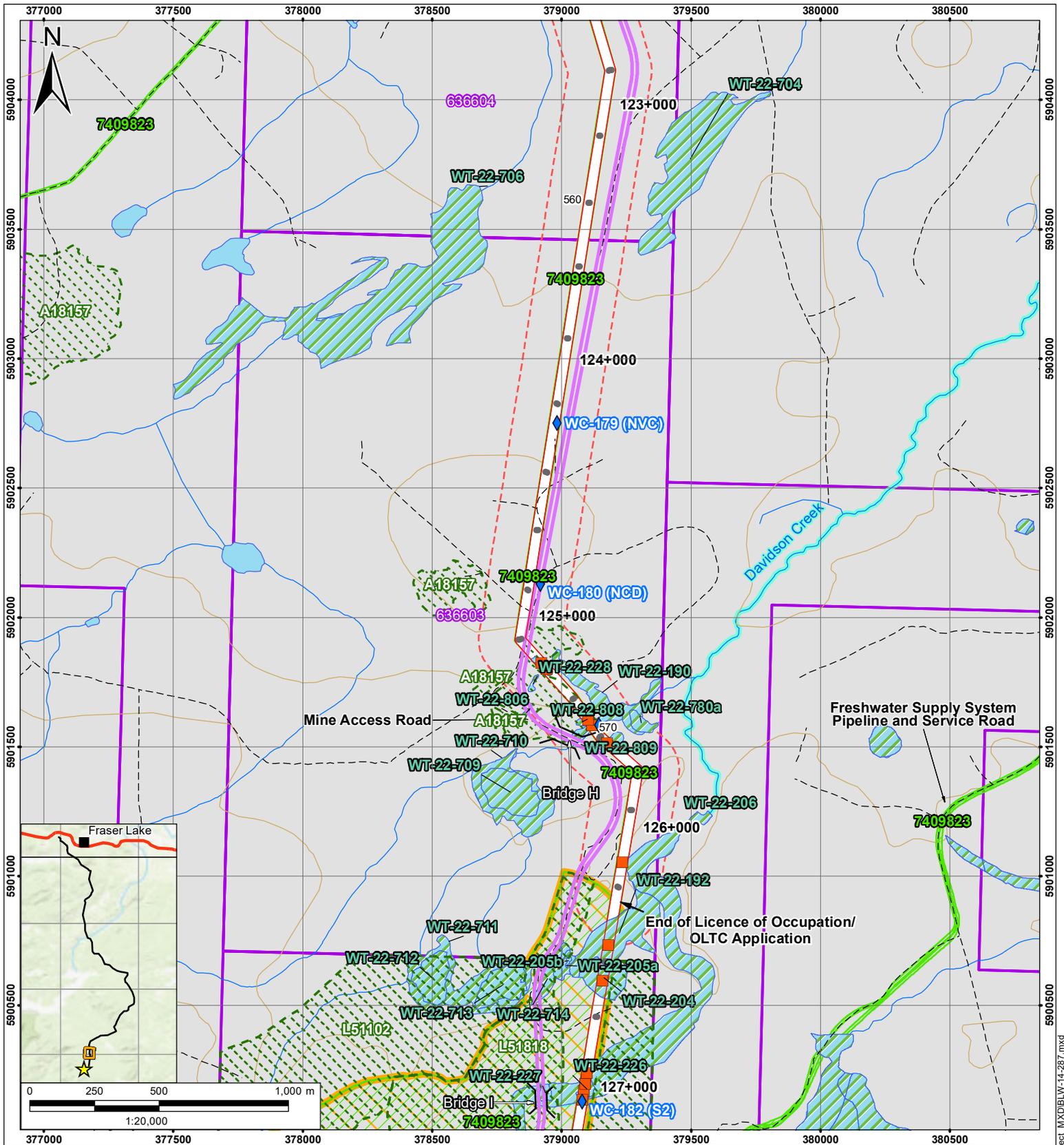
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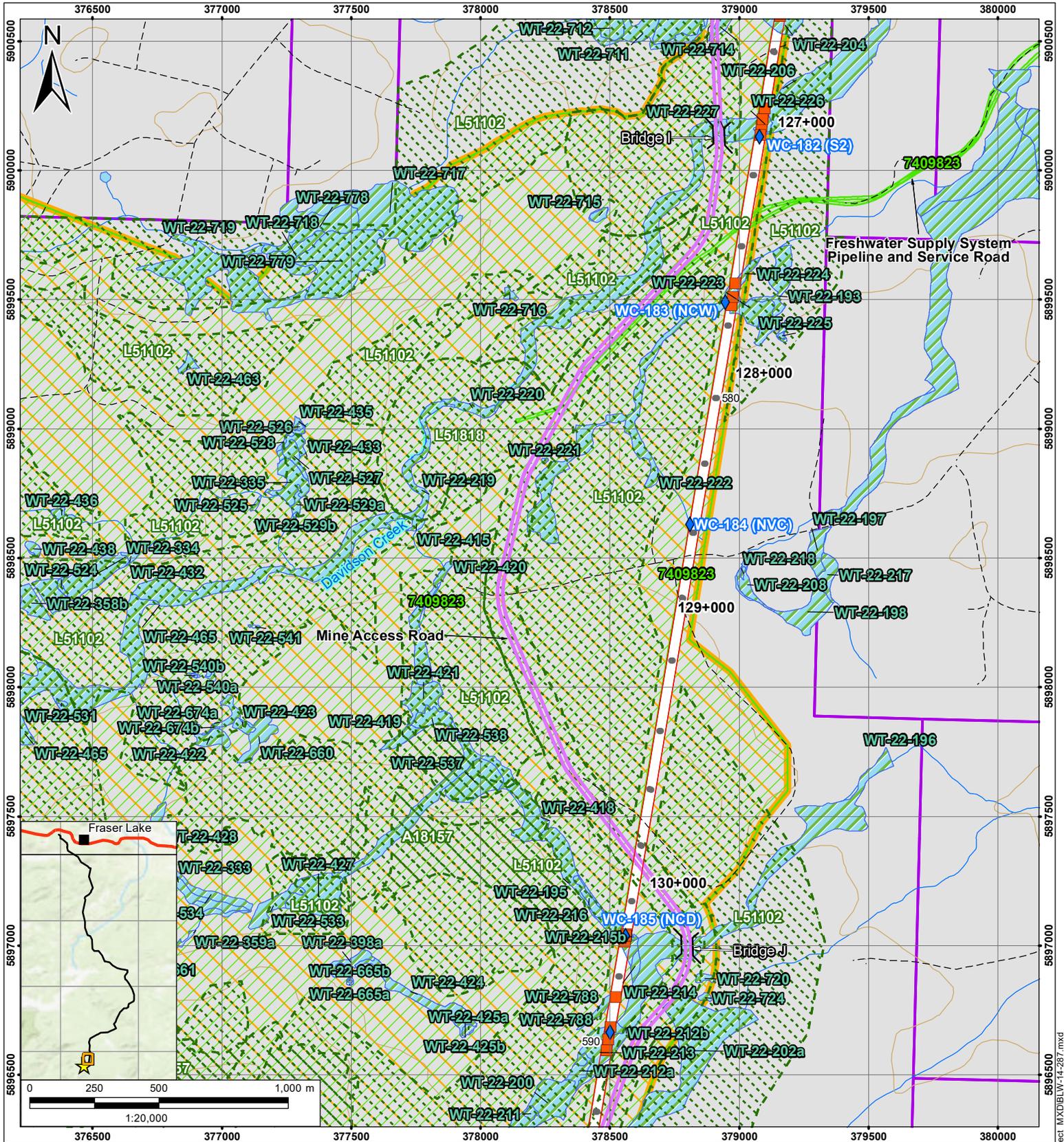
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 Datum: North American 1983  
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Figure No.:  
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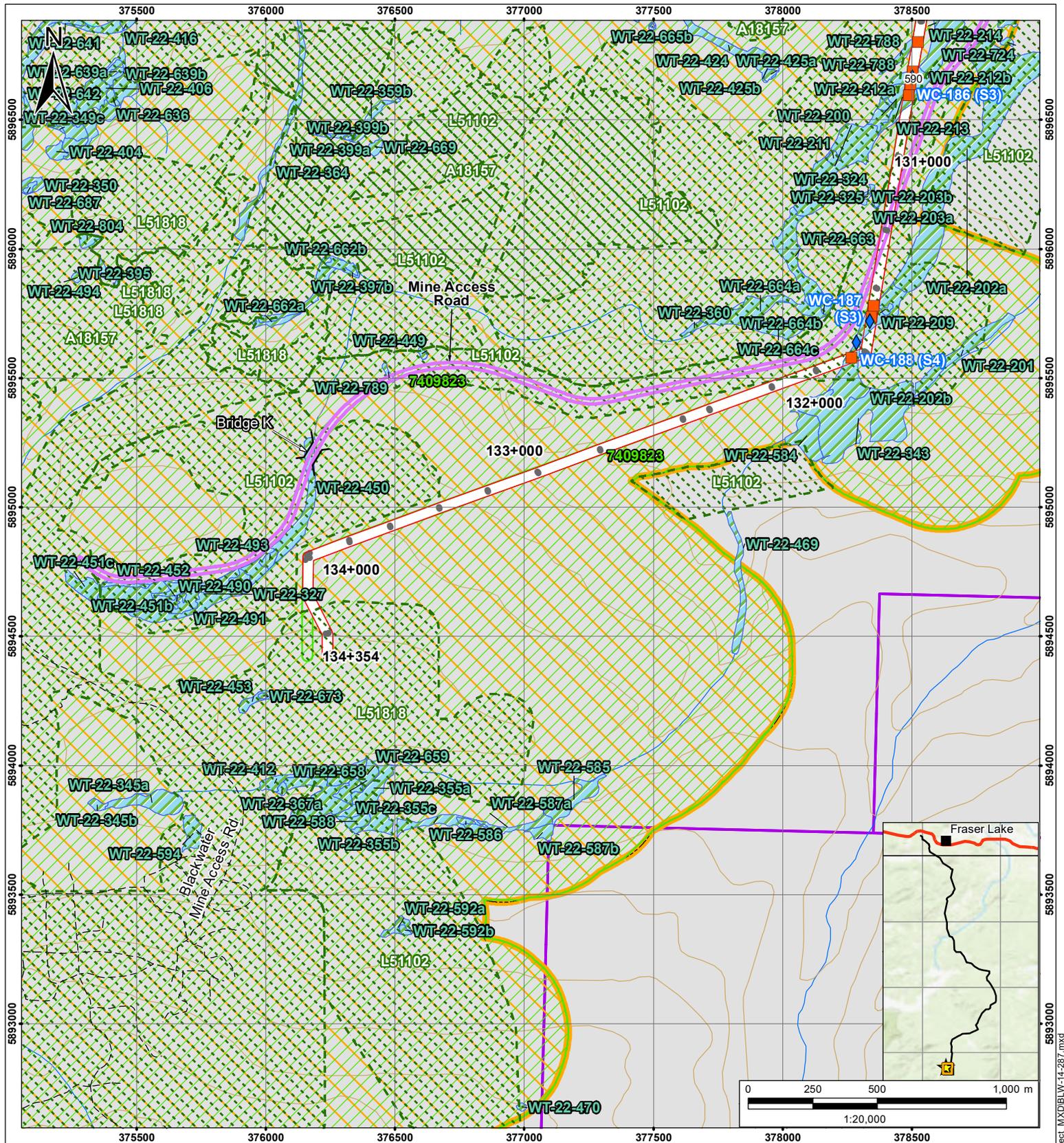
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**TRANSMISSION LINE**  
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