

Bulkley Valley Community Resources Board

PO Box 985 | Smithers, BC | V0J 2N0

June 28, 2014

Province of British Columbia
Environmental Assessment Office

Re: **BVCRB Comments on the Prince Rupert Gas Transmission Project Proposed by the TransCanada Corporation**

Dear BCEAO,

For the past 15 years the Bulkley Valley Community Resources Board (CRB) has served as a steward of the land-use direction articulated in the Bulkley Valley Land and Resource Management Plan (LRMP). During this time the CRB has been upheld as a model for many other Community Resources Boards across the Province. The recognized success of the CRB lends itself to the extensive community engagement that occurred during the development of the LRMP, and which continues to occur today. As such, it is believed that CRBs' balanced perspective is a very valuable source of public input to those Government agencies making land-use decisions. Today, the BVCRB continues to play an important role in guiding land-use planning in the Bulkley TSA.

A portion of the TransCanada Liquefied Natural Gas (LNG) pipeline is proposed to pass through the Bulkley Timber Supply Area (TSA), and more specifically through the Babine Landscape Planning Unit, defined under the Bulkley Land and Resource Management Plan (LRMP).

The BVCRB has completed a preliminary review of the information that TransCanada presented at the meeting and are prepared to offer some initial comments. These comments are limited by several factors:

- We were not provided spatial line work that indicated the specific pipeline location. Our comments are therefore general in nature;
- As a volunteer board we have limited resources available to us. These comments therefore reflect the knowledge and experience of those present on the Board;
- We operate on a consensus basis. These comments therefore reflect the common values of all members on the CRB; and
- We appreciated the expert knowledge that TransCanada brought to our May 13th meeting. Our knowledge of the project is limited to the information provided at this meeting.

What follows are direct excerpts (*in italics*) from Bulkley LRMP document, followed by specific questions and comments regarding application of this management direction from the LRMP as it relates to the TransCanada pipeline as part of the Prince Rupert Gas Transmission Project.

2.1.1 Biodiversity

The maintenance of biodiversity is an underlying objective of land and resource management at all levels of management.

2.3.1.1 Core Ecosystems

The purpose of core ecosystems is to protect values by providing representations of a cross section of ecosystems, by retaining representatives of old growth forests and providing interior-forest conditions.

A Core Ecosystem is located on the south side of French Peak and on Tsezakwa Creek. Core Ecosystems are an integral part of the Bulkley TSA so we request that TransCanada reroute the pipeline to avoid the Core Ecosystem.

While we do not endorse the following, if this pipeline is approved we ask TransCanada to carry out at minimum the specific rehabilitation practices mentioned in your presentation. This includes a narrow clearing Right of Way (RoW) and full RoW recontouring, allowing brush re-growth (except for a 3 m wide visual inspection area above the pipeline), trees/roots/brush will be spread across the recontoured portion, including over the visual inspection area and all impacted areas by this project will be appropriately reforested.

2.3.1.2 Landscape Corridors

Landscape corridors are designed to maintain connectivity within the landscape, reduce habitat fragmentation, permit movement and dispersal of plant and animal species, and maintain, within a managed forest setting, forests dominated by mature tree cover and containing most of the structure, function, micro-climatic conditions and biota associated with old growth forests.

A Landscape Corridor is located along Tsezakwa Creek and adjacent to Nilkitkwa Lake. We request that TransCanada reroute the pipeline around or under the Landscape Corridor.

While we do not endorse these activities, similar to our comments on Core Ecosystems (above), we ask TransCanada to carry out at minimum the specific rehabilitation practices mentioned in your presentation.

2.1.2.1 Circle Routes

Circular routes within the Bulkley Plan Area and connecting to adjacent districts can be potentially detrimental and should be discouraged wherever possible. This applies particularly when other values are paramount. Examples of potential problems include:

- *additional traffic and hunting pressures; and*
- *greater difficulty in hunting regulation enforcement.*

Specific concerns regarding connectors to the Morice District and along Tsezakwa Creek to the Kispiox District have been identified in the **Babine Planning Unit, 2-3.**

We request that circle routes are not built to other TSAs. If circle routes are created at the time of pipeline construction for whatever reason, they should be removed immediately upon completion of construction. We suggest that the road rehabilitation methods suggested by TransCanada as identified above for the Core Ecosystems and Landscape Corridors be used. It is critical, however, that these rehabilitation practices are well done. If these measures are not effective, then they must be replaced with barriers that are effective and be maintained by TransCanada.

Another primary concern the BVCRB has regarding TransCanada's pipeline proposal is the new access that will be created, particularly into areas that currently provide core secure habitat, and the associated potential for negative effects on sensitive wildlife species including wolverines, grizzly bears, and mountain goats. For areas where new access is created, we suggest similar access rehabilitation measures as identified for the pipeline RoW as already discussed in this letter.

2.1.4 Water Quality

Maintaining water quality in the Bulkley Plan Area is important for many reasons, including the maintenance of fish habitat...

Maintaining water quality is very important in light of the known fisheries values in this area including local fish populations in the tributaries to Nilkitkwa Lake, the upstream internationally-renowned Rainbow Alley and the downstream internationally-renowned fishery values in the Babine River.

What specific measures are proposed to maintain water quality when constructing the pipeline through this area? How does TransCanada propose to deal with the changes in hydrology, terrain stability and water quality associated with climate change over the life of the pipeline? How will the pipeline installation process under Nilkitkwa Lake be managed to ensure that contaminated drilling fluids et cetera will not enter the freshwater environment? And how will TransCanada know if these mitigative measures have been effective? If TransCanada guarantees that no contaminated drilling mud will enter the freshwater environment in the event of a frack-out, how they would do that? Also, what is the probability of a frack-out at that location and what information is the probability based on?

2.1.5 Fish and Wildlife Habitat

General management direction is designed to conserve the wide abundance of all fish and wildlife habitats and populations in the Plan Area. The relative importance of Fisheries is high for spawning, rearing, water quality and recreational fishing. Important spawning areas for salmonids include the river between Babine Lake and Nilkitkwa Lake.

Nilkitkwa Lake and its tributaries provide important habitat (spawning, rearing, over wintering, foraging et cetera) for regionally significant sport fish species including pacific salmon (Coho, Pink, Chinook, Sockeye), Rainbow Trout, Cutthroat Trout, Burbot, Mountain Whitefish, Kokanee, Steelhead and Lake Char. What specific measures does TransCanada propose to ensure there is no impact on these native species in Nilkitkwa Lake from the project works during and after pipeline construction?

A natural sockeye population resides in Tsezakwa Creek. What specific measures will TransCanada take to ensure there is no impact on this sockeye population from construction and operational activities?

Motorized access to Nilkitkwa Lake is restricted to boats. What specific measures does TransCanada propose to restrict new land based motorized access to the lake during and after pipeline construction?

2.1.6 Visual Quality

The scenic resources of the Bulkley Planning area are critical to the viability of the tourism / recreation sector and the quality of life of the residents. Landscape inventories have been completed for Babine River, Babine Lake and Nilkitkwa Lake. Visual Quality Objectives have been approved to protect the vista from these important viewpoints.

The proposed pipeline crossing of the Nilkitkwa Lake narrows has a retention visual quality objective. Has TransCanada prepared a visual impact assessment of the pipeline crossing and if so can the retention visual quality objective be maintained?

2.1.10 Cultural Heritage Resources

Other areas of significance include trail at Suskwa Pass (the original supply route to Fort Babine from Hazelton).

The 'Grease Trail' is located on the north side of Tsezakwa Creek. Protection of Heritage Resources are covered under the Heritage Conservation Act of B.C.

2.4.2 Planning Unit 2: Babine River

Within this Planning Unit, the Bulkley LRMP specifies that management should *"Follow the guidelines set out in the Babine River Interim Local Resource Use Plan (LRUP) and Coordinated Access Management Plan (CAMP)"*. Consideration of publicly-defined values requires an understanding of these documents as well as of the Bulkley LRMP. For example, LRUP objectives include *"maintaining the present population"* of grizzly bears.

Access through Grizzly Bear Habitat would typically increase poaching and bear/human encounters. Restricting road access near areas where Bears traditionally frequent is important as maintaining habitat connectivity especially along riparian and wetland corridors.

Moose are found through this unit and winter adjacent to Babine River and Nilkitkwa Lake. Waterfowl winter on both the inlet and outlet to Nilkitkwa Lake which remain ice-free.

Has TransCanada assessed habitat suitability and capability to identify important grizzly bear habitat, and potential attractive sinks within the vicinity of its proposed pipeline? What mitigation measures are proposed to manage risk for grizzly bears, including the risk of human-bear interactions?

The LRMP indicates there is high value habitat for Goats on French Peak. Were high value habitats including wolverine natal and maternal denning and goat kidding areas identified and mapped? If

so what mitigation measures are proposed to protect these areas from TransCanada's proposed pipeline project?

Introduced clover, particularly red and white clover, is a major risk factor for bears. In general, attractive habitats are a major concern in areas that are accessible to people. How will TransCanada manage ecological restoration and re-vegetation to mitigate risk to grizzly bears? And what measures are proposed to prevent the introduction of invasive weed species?

A construction camp has been proposed within the Bulkley TSA. What specific measures are proposed to manage human-bear interactions at this location?

Has TransCanada identified the Moose wintering areas adjacent to Nilkitkwa Lake and what measures has TransCanada put in place to protect them?

There are ice-free areas in Nilkitkwa Lake at the proposed pipeline crossing that are used by wildlife (waterfowl and ungulates) year round. What specific pipeline construction measures have been identified to ensure this important habitat is not impacted by the proposed pipeline project?

A larger group of humans (pipeline workers) can have a detrimental impact on habitat, wildlife and fishery values through motorized recreation, hunting and fishing. How will TransCanada mitigate the impacts of a large camp facility and storage yard on these regionally important values? Further, the proposed TransCanada camp adjacent to Nilkitkwa Lake is roughly equidistant from the Rainbow Alley and Babine River fisheries. While there are other fisheries around, these two stand out due to proximity from the camp and their importance regionally. For example, both can be accessed in a 10 minute drive and both are identified in the Bulkley LRMP (see the Babine Planning Unit, Section 2-3). How will TransCanada protect these world class fisheries from workers living in the nearby camp? Exceptionally high levels of angler effort can create conservation issues and also decline the quality of fishing experience via crowding.

A key tool for managing risk to wildlife is effective access control, especially where development creates access into previously unroaded areas that provide core security habitat for vulnerable species. We've posed several questions above under Circle Routes which will help us better understand the risk and associated uncertainties of the proposed pipeline on wildlife.

In addition to controlling access by humans, linear disturbances affect predator-prey movement dynamics. How do you propose to mitigate these effects on wildlife?

5.0 Monitoring and Amendment

The Board agrees that the effectiveness of the LRMP will hinge on monitoring.

How does TransCanada propose to monitor and respond to potential residual effects to the values of this area?

All documents referred within this letter are available on the BVCRB web site (www.bvcrb.ca). In addition, we recommend the Babine Watershed Monitoring Trust (www.babinetrust.ca) as an essential source of information for this proposed project.

The comments contained within this letter assume that TransCanada's proposed pipeline will be used to transport natural gas. The BVCRB is concerned with the possibility of converting the pipeline to transport oil. Is TransCanada willing to give written assurances to the BVCRB that this pipeline will not be used to transport oil in the future?

Finally, we are interested in your assessment of cumulative effects to the values described in this letter. How did you define cumulative effects for each value? What indicators did you use to define acceptable risk? What models did you use to assess risk? How did risk change with scenario (e.g. current development, proposed development, proposed development plus climate change and likely incremental changes such as increased access)? We would like a brief summary of your assessment and also ask that if there is evidence, scientific or otherwise, to support the efficacy of TransCanada's various proposed mitigation, that full explanations and references to support the choice of a specific mitigation be provided for the BVCRB's review.

To understand how this project assessed cumulative effects, we request that TransCanada provide the CRB with the digital field data that was used to inform this assessment in an accessible format.

This Letter may not be construed as support for TransCanada's proposed pipeline.

Thank you for the opportunity to comment.

Regards,



Jeffrey Anderson
Chairperson, Bulkley Valley Community Resources Board