

# *Aboriginal Plant Use Mitigation Plan 2024-2025 Annual Report*

---

*Site C Clean Energy Project*

*Reporting period: April 2024 through March 2025*

*March 28, 2025*

This page is intentionally left blank.

## Table of Contents

<b>Table of Acronyms.....</b>	<b>ii</b>
<b>1 Background .....</b>	<b>1</b>
1.1 The Site C Clean Energy Project .....	1
1.2 Construction Update .....	1
<b>2 Objective and Scope .....</b>	<b>1</b>
2.1 Objective and Scope of the Aboriginal Plant Use Mitigation Plan .....	1
2.2 Reporting Period .....	2
<b>3 Ground Truthing Activities from April 2024 through March 2025 .....</b>	<b>2</b>
3.1 Invitations and Participation in Ground Truthing and Field Activities.....	2
3.2 Ground Truthing Reports .....	4
3.3 Plants of Traditional Indigenous Value identified through Ground Truthing and Consultation .....	4
3.4 Identification of Rare Plant Species .....	6
<b>4 Mitigation Measures .....</b>	<b>6</b>
4.1 Identification of Opportunities for Plant Relocation and Ecological Community Restoration .....	6
4.2 Indigenous Plant Nursery.....	7
4.3 Information shared with Indigenous Nations.....	7
4.4 Use of Herbicides and Pesticides.....	8
4.5 Opportunities to Harvest Traditional Medicinal Materials.....	8
<b>5 Future Ground Truthing, Field Activities and Harvesting.....</b>	<b>9</b>

## Table of Acronyms

<b>BRFN</b>	Blueberry River First Nations
<b>DFN</b>	Duncan's First Nation
<b>DRFN</b>	Doig River First Nation
<b>DTFN</b>	Dene Tha' First Nation
<b>FNFN</b>	Fort Nelson First Nation
<b>HLFN</b>	Horse Lake First Nation
<b>HRFN</b>	Halfway River First Nation
<b>KLMSS</b>	Kelly Lake Métis Settlement Society
<b>MLIB</b>	McLeod Lake Indian Band
<b>MNBC</b>	Métis Nation British Columbia
<b>PRFN</b>	Prophet River First Nation
<b>SFN</b>	Saulteau First Nations
<b>WMFN</b>	West Moberly First Nations

# **1 Background**

## **1.1 The Site C Clean Energy Project**

The Site C Clean Energy Project (the Project) is a third dam and generating station on the Peace River in northeast B.C. As the third project on one river system, Site C will rely on water already stored in the Williston Reservoir. Site C will generate about 35% of the energy produced at W.A.C. Bennett Dam, with only five per cent of the reservoir area. Once complete, Site C will provide enough clean electricity to reliably power nearly 500,000 homes, or 1.7 million electric vehicles, and will increase BC Hydro's current supply by eight 8%.

## **1.2 Construction Update**

Construction on the Site C Project is more than 90 per cent complete. On August 25, 2024, BC Hydro safely began filling the Site C reservoir following the completion of all necessary construction areas of the project. Reservoir filling was completed on November 7, 2024, and the reservoir has reached its normal operating range of 460 metres to 461.8 metres elevation above sea level. Key project structures such as the earthfill dam, powerhouse, spillways, and approach channel continue to perform safely.

In October 2024, the first of our generating units came online. As of March 31, 2025, three generating units are providing electricity to BC Hydro customers. The remaining generating units are anticipated come into operation by fall of 2025. In the final year of construction, project work will focus on completing the powerhouse and generating station. This includes completing the assembly of the remaining generating units, commissioning the generating units, and bringing them into service. Work has also started to revegetate areas no longer required for construction.

# **2 Objective and Scope**

## **2.1 Objective and Scope of the Aboriginal Plant Use Mitigation Plan**

The objective of the June 5, 2015 Aboriginal Plant Use Mitigation Plan (APUMP) is to fulfill the requirements of Decision Statement condition 14 and Environmental Assessment Certificate conditions 25 and 26. The APUMP outlines the approach to mitigation that will be followed during the construction phase, and as site specific opportunities are identified within the project activity zone for reclamation activities that support plants of traditional Indigenous value as well as relocation of rare plants of traditional Indigenous value. The mitigation measures related to Indigenous plant use are summarized in Volume 3, Chapter 19, Table 19.15 of the EIS and set out in [Appendix D of the APUMP](#).

The Plan covers the Project Activity Zone (PAZ) as described in the EIS and as defined in the federal Decision Statement section 1.15.

## **2.2 Reporting Period**

This annual report summarizes the implementation of the mitigation measures described in section 4.0 of the APUMP from April 2023 through March 2024. In some cases, consultation and engagement with Indigenous Nations on measures described in the Plan that took place prior to this period are also summarized here for context. This is the tenth annual report of the APUMP.

We have now entered the operations phase of the Project and the annual APUMP Reports are expected to continue for the next five years, with the final report scheduled for submission in March 2030.

## **3 Ground Truthing Activities from April 2024 through March 2025**

Starting in 2014, BC Hydro initiated ground truthing programs with the purpose of engaging with Indigenous land users, including registered trapline holders, to verify and accurately locate Indigenous land use information, and to identify concerns related to specific features, or sites that may be affected by the Project. In particular, BC Hydro has sought to verify features such as plant harvesting areas (specifically medicinal and food plants) and ecological communities that support species of high traditional plant use, the location of burial sites, and the location of cultural and habitation sites, including when and how they are used by Indigenous Nations<sup>1</sup>.

The APUMP describes the scope of the ground truthing program and how the information gained during ground truthing is used to inform mitigation measures related to plants of traditional Indigenous value.

Unless otherwise indicated, the communications summarized below are sent out to all Indigenous Nations.

### **3.1 Invitations and Participation in Ground Truthing and Field Activities**

BC Hydro maintains a standing invitation to Indigenous Nations to meet and discuss issues or concerns regarding the Project. This may include other field activities like site visits in the project activity zone with interested groups.

Ground truthing did not occur during this reporting period. As the Project nears completion, there are few unimpacted areas remaining within the project footprint. There has also been limited interest in ground truthing and harvesting in areas that have already been impacted by the Project. BC Hydro will continue to be responsive to questions or concerns raised and coordinate field activities if needed.

---

<sup>1</sup> Unless otherwise specified, the term Indigenous Nations applies to the following “Aboriginal groups” as defined in the Environmental Assessment Certificate (EAC) and federal Decision Statement (FDS): Saulteau First Nations, West Moberly First Nations, Prophet River First Nation, Blueberry River First Nations, Doig River First Nation, McLeod Lake Indian Band, Halfway River First Nation, Fort Nelson First Nation, Horse Lake First Nation, Métis Nation British Columbia, Kelly Lake Métis Settlement Society, Duncan’s First Nation, and Dene Tha’ First Nation.

During this reporting period, BC Hydro followed up with interested Indigenous Nations to coordinate and host other field activities in the dam site area and within the reservoir area. Due to the sensitive nature of the cultural information gained during ground truthing, BC Hydro does not provide site-specific details in publicly available reports such as this one.

**Table 1: Field Activities**

<b>Indigenous Nations</b>	<b>Project Component</b>	<b>Results</b>
Doig River First Nation	Site C and Dam site tour	On April 16, 2024 BC Hydro hosted the Nation on a Site C Dam Site Tour, including a tour of the Powerhouse. The tours provided community members with a view of the Site components including spillways and gates, powerhouse and permanent fishway.
Blueberry River First Nations	Site C and Dam site tour	On April 17, 2024 BC Hydro hosted the Nation on a Site C Dam Site Tour, including a tour of the Powerhouse. The tours provided community members with a view of the Site components including spillways and gates, powerhouse and permanent fishway.
Site C Environmental Forum	Environmental Forum	On May 29, 2024, BC Hydro hosted a field tour to provide Environmental Forum members with the opportunity to see the future reservoir, and to share information to prepare members for reservoir filling in fall 2024. Forum members also had the opportunity to visit newly constructed Lynx Creek boat launch; reclamation sites (Lynx Creek, Portage Mountain Quarry); and learn about bat mitigation & monitoring. Lunch and a discussion was held at the to visit Métis Nation BC's gathering space in Hudson Hope, which was funded through BC Hydro's Indigenous Traditional use fund (ITUF). A total of 10 Nations were represented by 17 Environmental Forum members (BRFN, MLIB, HRFN, HLFN, DRFN, MNBC, KLMSS, WMFN, SFN, DFN).
Saulteau First Nations – Chief and Council	Site C and Dam site tour	On May 30, 2024 BC Hydro hosted Saulteau First Nations Chief and Council on a Site C Dam Site tour including a tour of the Powerhouse. The tour provided a view of the site components including spillways and gates, powerhouse and permanent fishway.
Blueberry River First Nations	Hwy 29 and the Peace River	On May 30, 2024, BC Hydro hosted the Nation on a bus tour of Highway 29. The tour provided community members with a view of the project changes from the Highway 29 and the Peace River; and to support the Nation's understanding of construction and

<b>Indigenous Nations</b>	<b>Project Component</b>	<b>Results</b>
		mitigation activities in the valley, including reclamation. Nation members also had the opportunity to visit newly constructed Lynx Creek boat launch; reclamation sites (Lynx Creek, Portage Mountain Quarry). Information was shared to prepare members for reservoir filling in fall 2024.
Saulteau and other northern BC participating Nations in the BC Energy Regulator Liaison Program	Site C Reclamation	On September 11, 2024, BC Hydro presented an overview of the Site C Reclamation Program at the BC Energy Regulator's Liaison Program Event in Chetwynd, BC to the BC Energy Regulators Liaisons, included representatives from Saulteau, West Moberly, Halfway River First Nations.
Site C Reclamation Sub-Committee	Site C Construction Area Reclamation	On October 2, 2024, BC Hydro Reclamation Sub-committee hosted a meeting #15 to provide members with the opportunity to view reclamation areas in the Site C Construction area. Areas viewed included north bank reclamation sites the P3 / P8 fish habitat enhancement area and northeast Area A.
Blueberry River First Nations	Site C Reservoir, WAC Bennett Dam, Peace Canyon Dam	On October 16, 2024 BC Hydro hosted a highway tour with the Nation to provide with an opportunity to view the future reservoir, including Hwy 29 re-alignment work, decommissioning; and to share information to prepare members for reservoir filling in fall 2024. Nation members also had the opportunity to visit the WAC Bennett Dam and Peace Canyon Dam.

### **3.2 Ground Truthing Reports**

In previous years, ground-truthing results including final ground-truthing reports were shared with relevant members of the Project team (e.g., Environment, Transmission Line Design, Roads, Properties, Construction Management) to be incorporated into mitigation measures as described in Section 4.0 below. BC Hydro followed up with respective Indigenous Nations to share how their information had been considered and incorporated into Project planning and the development of mitigation measures. In this reporting period, no new ground truthing reports were received from Indigenous Nations.

### **3.3 Plants of Traditional Indigenous Value identified through Ground Truthing and Consultation**

Previous years' ground truthing activities had identified a number of plants with medicinal and food values. The majority of the species proposed for reclamation on the Project have traditional Indigenous value and are suited to revegetation of disturbed sites. Table 2 shows the food plants



and medicinal plants that were identified as plants typically harvested by land users during ground truthing prior to 2018 or shared by Indigenous Nations through consultation.

**Table 2: Plant Species with Cultural, Food, and Medicinal Value identified through Ground Truthing and consultation.**

<p><b><u>Trees</u></b></p> <ul style="list-style-type: none"> <li>• Alder – Green, Mountain, Sitka, Red</li> <li>• Ash - Mountain</li> <li>• Aspen - Trembling</li> <li>• Birch – Paper, Water</li> <li>• Black spruce</li> <li>• Cedar</li> <li>• Cottonwood</li> <li>• Fir - Balsam (Subalpine)</li> <li>• Hemlock – Water, Western</li> <li>• Lodgepole Pine</li> <li>• Mountain Ash</li> <li>• Pin Cherry</li> <li>• Poplar, Balsam, Black, Silver-leaved</li> <li>• Spruce - Black, White, Swamp</li> <li>• Tamarack</li> <li>• Willow – Coyote, Pacific, Red</li> </ul> <p><b><u>Algae, Fungi, Lichen, and Moss</u></b></p> <ul style="list-style-type: none"> <li>• Algae</li> <li>• Black Tree Lichen</li> <li>• Birch Fungus (Chaga, Cinder Conk)</li> <li>• Diamond Willow Fungus</li> <li>• Flat Lichen</li> <li>• Lichen (Old Man's Beard, Witches Hair, Flat)</li> <li>• Mushrooms</li> <li>• Puffballs</li> <li>• Reindeer Lichen (Caribou Moss)</li> <li>• Rock Tripe Lichen</li> <li>• Shaggy Mane</li> <li>• Sphagnum Moss</li> <li>• Tamarack Moss</li> <li>• Tinder polypore</li> </ul>	<p><b><u>Shrubs</u></b></p> <ul style="list-style-type: none"> <li>• Bearberries (Kinnikinnick)</li> <li>• Beaver Ears (Wintergreen)</li> <li>• Blackberries</li> <li>• Blackcurrant,</li> <li>• Gooseberry – Black, Northern</li> <li>• Black Twinberry</li> <li>• Blueberries – lowbush, high-bush (mountain)</li> <li>• Bog Laurel</li> <li>• Bog Rosemary</li> <li>• Chokecherry</li> <li>• Cranberries – highbush, lowbush</li> <li>• Crowberry</li> <li>• Dewberry</li> <li>• Devil's Club</li> <li>• Dogwood (Red-Osier)</li> <li>• Dwarf Birch Scrub</li> <li>• Gooseberry – Black, Northern</li> <li>• Huckleberry</li> <li>• Juniper</li> <li>• Labrador tea</li> <li>• Mountain Alder</li> <li>• Prickly Rose (Wild Rose)</li> <li>• Raspberry</li> <li>• Red Swamp Currant</li> <li>• Rosehips</li> <li>• Saskatoon berries</li> <li>• Shrubby Cinquefoil</li> <li>• Silverberry (Wolf Willow)</li> <li>• Soapberries</li> <li>• Snowberry</li> <li>• ThimbleBerry</li> <li>• Trapper's Tea (Muskeg Tea)</li> <li>• Western Mountain Ash</li> </ul> <p><b><u>Others</u></b></p> <ul style="list-style-type: none"> <li>• Fern – Lady, Spiny Wood, Spiny Root</li> <li>• Horsetail – Common, Marsh</li> <li>• Sedges</li> <li>• Tlechuck wea?</li> </ul>	<p><b><u>Herbs</u></b></p> <ul style="list-style-type: none"> <li>• Arnica orchid</li> <li>• Aster</li> <li>• Baneberry</li> <li>• Bluebell (Lungwort)</li> <li>• Buckbean</li> <li>• Bunchberry</li> <li>• Buttercup</li> <li>• Cabbage - Wild</li> <li>• Canada Golden Rod</li> <li>• Cattail</li> <li>• Chamomile (wild)</li> <li>• Cloudberry</li> <li>• Clover</li> <li>• Coltsfoot</li> <li>• Cow Parsnip (Indian Rhubarb, Indian Parsnip)</li> <li>• Dogbane</li> <li>• Goldenrod</li> <li>• Goosegrass</li> <li>• Horseroot</li> <li>• Indian Carrot</li> <li>• Dandelion</li> <li>• Deadweed</li> <li>• Douglas Water Hemlock</li> <li>• False Solomon Seal</li> <li>• False Toadflax</li> <li>• Field Mint</li> <li>• Fireweed</li> <li>• Frog's Blanket (Bastard Toadflax, Coltsfoot, Comandra)</li> <li>• Harebell</li> <li>• Indian Hellebore</li> <li>• Ladyslipper Orchid,</li> <li>• Lily plants</li> <li>• Meadow Rue</li> <li>• Nagoonberry</li> <li>• Peppermint</li> <li>• Pink Wintergreen</li> <li>• Plantain</li> <li>• Potentilla</li> <li>• Sage – Pasture, Whit</li> <li>• Sagebrush Stinging Nettle</li> <li>• Strawberry</li> <li>• Sweetgrass</li> <li>• Sweetvetch – Alpine, Northern</li> <li>• Tall Larkspur</li> <li>• Tarragon</li> <li>• Twinflower</li> </ul>
--	---	---

		<ul style="list-style-type: none"> <li>• Rat Root (Sweet Flag)</li> <li>• Vetch</li> <li>• Wild Onion</li> <li>• Water Parsnip</li> <li>• Wild Peas</li> <li>• Wild Rhubarb</li> <li>• Wild Sarsaparilla</li> <li>• Yarrow</li> </ul>
--	--	---

### 3.4 Identification of Rare Plant Species

The plant species of traditional Indigenous value identified through ground truthing, and other field activities were reviewed against the Red/Blue listed species identified by the BC Conservation Data Centre as well as species listed under the federal *Species at Risk Act*.

Of the species identified through ground truthing and other field activities to date, “Rat root” (*Acorus americanus*) is the only rare plant. Rat root is a cattail-like plant that grows in ponds, streams and wetlands. It is currently Blue listed in BC by the BC Conservation Data Centre.

## 4 Mitigation Measures

The APUMP describes mitigation measures, and measures to be developed in consultation with Indigenous Nations, that meet conditions of the EAC and FDS related to plants of traditional Indigenous value over the duration of Project construction. BC Hydro will continue to consider mitigation measures identified by Indigenous Nations through future ground truthing, field or other consultation activities.

### 4.1 Identification of Opportunities for Plant Relocation and Ecological Community Restoration

The CEMP describes the environmental requirements related to soil management, site restoration, and revegetation activities to be implemented by contractors. Reclamation activities during the reporting period have occurred along HWY29, at Portage Mountain Quarry, at Area E and at the main dam site. Reclamation activities for other project components will be undertaken in the period following construction.

Plant species of traditional Indigenous value identified through ongoing ground truthing activities will be incorporated into reclamation plans, as appropriate.

The Reclamation Sub-Committee of the Environment Committee reviews and provides input into reclamation planning. Table 3 provides a summary of information shared and discussed during the Reclamation Sub-Committee meetings during the reporting period.

**Table 3: Summary of Site C Reclamation Sub-Committee meetings from April 1, 2024 to March 31, 2025**

<b>Summary of Site C Reclamation Sub-Committee</b>	
<b>Date</b>	<b>Agenda items/Summary</b>
April 10 <sup>th</sup> , 2024	Reviewed reclamation lessons learnt and reclamation plans for 2024 meeting #13 (Virtual)
June 20 <sup>th</sup> , 2024	Updated on May 2024 planting season, meeting #14 (Virtual)
October 2nd, 2024	On October 2, 2024, BC Hydro Reclamation Sub- committee hosted a meeting #15 to provide members with the opportunity to view reclamation areas in the Site C Construction area. Areas viewed included north bank reclamation sites the P3 / P8 fish habitat enhancement area and northeast Area A (Field).
November 27 <sup>th</sup> , 2024	End of year review, meeting #16 (Virtual)

## **4.2 Indigenous Plant Nursery**

BC Hydro has entered into a contract with an Indigenous plant nursery for supply and delivery of seed and seedlings to support re-vegetation and reclamation activities. In accordance with EAC condition 26, BC Hydro will make reasonable efforts to source plants and plant seeds of high traditional Indigenous value from Indigenous plant nurseries for use in reclamation activities. The actual sourcing of seeds, seedlings and stakes for use in reclamation occurred after detailed reclamation planting prescriptions are developed through the development of reclamation plans. During this reporting period, seedlings and stakes were ordered for planting at Portage Mountain Quarry in spring of 2025 and on the project Till Conveyor in spring of 2026.

## **4.3 Information shared with Indigenous Nations**

FDS condition 14.2 requires BC Hydro to inform Indigenous Nations about Project activities that may affect the current use of lands and resources for traditional purposes. This condition is fulfilled through the implementation of the Aboriginal Group Communication Plan (AGCP). Please refer to the AGCP and its annual reports<sup>2</sup> for more information on how BC Hydro is complying with this condition.

In addition, BC Hydro engages and shares information with Indigenous Nations through regularly scheduled Environmental and Permitting Forum, EAC Working Groups, or through other project and community engagement meetings.

---

<sup>2</sup> See [note 3](#).

#### **4.4 Use of Herbicides and Pesticides**

BC Hydro consults with Indigenous Nations as required by the BC Ministry of Environment and Climate Change Strategy (MOECCS) during their review and confirmation of BC Hydro's Integrated Vegetation Management Plans (IVMPs).

BC Hydro manages vegetation around facilities and transmission/distribution lines according to two Integrated Vegetation Management Plans (IVMP):

- For Control of Vegetation at BC Hydro Facilities (# 105-0985-21/26) that describes the selection of vegetation control methods found [here](#)
- For herbicide applications along the transmission line will be conducted in accordance with the IVMP for BC Hydro Transmission and Distribution Power Line Corridors ( # 105-0982-16/21) found [here](#) .

Section 4.3.2 of the APUMP describes the considerations involved in the avoidance or minimization of herbicide and pesticide use during BC Hydro's vegetation management practice. The draft plan was submitted to Indigenous Nations for review and comment in October 2014. Comments received were considered in preparation of the July 5, 2015 version of the APUMP.

#### **Notice of Intent to Treat**

Proponents are required to submit an Annual Notice of Intent to Treat (NIT) to MOECCS each year before commencing herbicide use. [Section 42 of the Integrated Pest Management Regulation](#) stipulates what is required for a NIT; click the hyperlink to view this section of the Regulation on the BC Laws website.

Prior to any use of herbicides described in that year's NIT, an information package is sent to Indigenous Nations with maps of the proposed treatment locations and details on the treatment program. The information package requests feedback from Indigenous Nations in order to identify plant harvesting areas or other areas of cultural or spiritual importance for consideration in the development of treatment plans or to avoid those areas, where practicable.

The 2024 NIT was sent to Indigenous Nations on April 8<sup>th</sup>, 2024, requesting the identification of any areas of concern by May 8<sup>th</sup>, 2024. The 2025 NIT will be sent to Indigenous Nations in April 2025 and will be described during the next reporting period.

#### **4.5 Opportunities to Harvest Traditional Medicinal Materials**

Various Indigenous Nations have expressed interest in being able to harvest traditional medicinal materials from certain non-merchantable tree species prior to vegetation clearing, or alternatively, to have the material stockpiled after clearing so that the medicinal materials could be harvested prior to the removal of the non-merchantable material.

During ground truthing and other field activities, Indigenous Nations are invited to conduct harvesting or identify areas for future harvesting. No harvesting occurred during this reporting period.

## **5 Future Ground Truthing, Field Activities and Harvesting**

We have now entered the operations phase of the Project, and BC Hydro maintains a standing invitation to Indigenous Nations to meet and discuss issues or concerns regarding the Project. This may include other field activities like site visits in the project activity zone with interested groups.

BC Hydro will continue to be responsive to questions or concerns raised and coordinate field activities if needed.