

Aboriginal Plant Use Mitigation Plan 2025-2026 Annual Report

Site C Clean Energy Project

Reporting period: April 2025 through March 2026

March 31, 2026

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Table of Acronyms

BRFN	Blueberry River First Nations
DFN	Duncan's First Nation
DRFN	Doig River First Nation
DTFN	Dene Tha' First Nation
FNFN	Fort Nelson First Nation
HLFN	Horse Lake First Nation
HRFN	Halfway River First Nation
KLMSS	Kelly Lake Métis Settlement Society
MLIB	McLeod Lake Indian Band
MNBC	Métis Nation British Columbia
PRFN	Prophet River First Nation
SFN	Saulteau First Nations
WMFN	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 relies 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. Site C provides enough clean electricity to reliably power nearly 500,000 homes annually, and increases BC Hydro's total electricity supply by about 8%, strengthening energy reliability and supporting the province's growing need for clean power.

1.2 Construction Update

Construction on the Site C project began in 2015 and the project is now substantially complete.

The project's first generating unit came online in October 2024, with the second unit following in December 2024, the third in February 2025, the fourth in late March 2025 and the fifth in July 2025. By August 2025, the sixth and final generating unit was online, bringing Site C into full operation.

Key project structures such as the earthfill dam, powerhouse, spillways, approach channel, substation and transmission connection to the provincial grid continue to perform well.

Remaining areas on the project that need to be completed include:

- backfilling the tunnels that were used to divert the Peace River;
- completing the permanent access roads around the site;
- site decommissioning (e.g., worker accommodation, construction bridge)
- revegetating areas no longer required for construction; and
- building the Site C cultural centre.

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 2025 through March 2026. 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 eleventh 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 an additional four years, with the final report scheduled for submission in March 2030.

3 Ground Truthing Activities from April 2025 through March 2026

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 Nations¹.

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.

¹ 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): Saulneau 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.

As the Project is substantially complete, there are few unimpacted areas remaining within the project footprint. Nations have conveyed that there is limited or no 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.

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

Indigenous Nations	Project Component	Results
Site C Environmental Forum	Environmental Forum	On May 28, 2025, BC Hydro hosted a field tour of Site C including the dam site area and reclamation areas. The tour provided Environmental Forum members with the opportunity to see the reservoir from the Dam Buttress Corner, to discuss the approach channel and debris management and other topics. The tour continued to the Area 24/A and Area E Reclamation Areas to view the areas and participate in discussion. Forum members also had the opportunity to visit the Permanent Upstream Fishway. A total of 8 Nations were represented by 14 Environmental Forum members (MLIB, HRFN, HLFN, DRFN, MNBC, SFN, DFN, PRFN).
Doig River First Nation	Site C Construction Area tour	On August 7, 2025 BC Hydro hosted the Nation on a Site C Dam Site Tour. The tour provided the Nation representative with a view of the Site components including spillways and gates, powerhouse and permanent fishway, substation and reclamation areas.
Site C Reclamation Sub-Committee	Site C Construction Area Reclamation	On September 17, 2025, BC Hydro Reclamation Sub-committee hosted a meeting #19 to provide members with the opportunity to view reclamation areas in the Site C Construction area. Areas viewed included north bank reclamation sites and Area A.
Blueberry River First Nations	Site C and Dam site tours	On September 24, 2025 BC Hydro hosted Blueberry River First Nations on two tours of Site C and the Dam site. A morning tour was provided to community members and an afternoon tour was provided to Council and leadership. The tours provided a view of the reservoir, site components including spillways and gates, powerhouse and permanent fishway. The afternoon tour also included a tour of the Powerhouse.

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.

As the Project is substantially complete, there are few unimpacted areas remaining within the project footprint. Nations have conveyed that there is limited or no 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.

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.

<u>Trees</u>	<u>Shrubs</u>	<u>Herbs</u>
<ul style="list-style-type: none"> • Alder – Green, Mountain, Sitka, Red • Ash - Mountain • Aspen - Trembling • Birch – Paper, Water • Black spruce • Cedar • Cottonwood • Fir - Balsam (Subalpine) • Hemlock – Water, Western • Lodgepole Pine • Mountain Ash • Pin Cherry • Poplar, Balsam, Black, Silver-leaved • Spruce - Black, White, Swamp • Tamarack • Willow – Coyote, Pacific, Red 	<ul style="list-style-type: none"> • Bearberries (Kinnikinnick) • Beaver Ears (Wintergreen) • Blackberries • Blackcurrant, • Gooseberry – Black, Northern • Black Twinberry • Blueberries – lowbush, high-bush (mountain) • Bog Laurel • Bog Rosemary • Chokecherry • Cranberries – highbush, lowbush • Crowberry • Dewberry • Devil's Club • Dogwood (Red-Osier) • Dwarf Birch Scrub • Gooseberry – Black, Northern • Huckleberry 	<ul style="list-style-type: none"> • Arnica orchid • Aster • Baneberry • Bluebell (Lungwort) • Buckbean • Bunchberry • Buttercup • Cabbage - Wild • Canada Golden Rod • Cattail • Chamomile (wild) • Cloudberry • Clover • Coltsfoot • Cow Parsnip (Indian Rhubarb, Indian Parsnip) • Dogbane • Goldenrod • Goosegrass • Horseroot • Indian Carrot
<p><u>Algae, Fungi, Lichen, and Moss</u></p>		

<ul style="list-style-type: none"> • Algae • Black Tree Lichen • Birch Fungus (Chaga, Cinder Conk) • Diamond Willow Fungus • Flat Lichen • Lichen (Old Man's Beard, Witches Hair, Flat) • Mushrooms • Puffballs • Reindeer Lichen (Caribou Moss) • Rock Tripe Lichen • Shaggy Mane • Sphagnum Moss • Tamarack Moss • Tinder polypore 	<ul style="list-style-type: none"> • Juniper • Labrador tea • Mountain Alder • Prickly Rose (Wild Rose) • Raspberry • Red Swamp Currant • Rosehips • Saskatoon berries • Shrubby Cinquefoil • Silverberry (Wolf Willow) • Soapberries • Snowberry • ThimbleBerry • Trapper's Tea (Muskeg Tea) • Western Mountain Ash <p>Others</p> <ul style="list-style-type: none"> • Fern – Lady, Spiny Wood, Spiny Root • Horsetail – Common, Marsh • Sedges • Tlechuck wea? 	<ul style="list-style-type: none"> • Dandelion • Deadweed • Douglas Water Hemlock • False Solomon Seal • False Toadflax • Field Mint • Fireweed • Frog's Blanket (Bastard Toadflax, Coltsfoot, Comandra) • Harebell • Indian Hellebore • Ladyslipper Orchid, • Lily plants • Meadow Rue • Nagoonberry • Peppermint • Pink Wintergreen • Plantain • Potentilla • Sage – Pasture, Whit • Sagebrush Stinging Nettle • Strawberry • Sweetgrass • Sweetvetch – Alpine, Northern • Tall Larkspur • Tarragon • Twinflower • Rat Root (Sweet Flag) • Vetch • Wild Onion • Water Parsnip • Wild Peas • Wild Rhubarb • Wild Sarsaparilla • Yarrow
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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 at Area A, Area 13 Portage Mountain Quarry, Area E and P3 / P8. Reclamation activities for other project components will be undertaken in the period following construction.

Plant species of traditional Indigenous value that were identified through ground-truthing activities were incorporated into reclamation plans where appropriate. Reclamation plans continue to be implemented as construction works are completed at site.

The Reclamation Sub-Committee continues to meet to discuss ongoing reclamation planning and receive updates on upcoming work. As part of the Environment Committee, the Sub-Committee reviews and provides input on reclamation activities.

Table 3 summarizes the information shared and discussed during Reclamation Sub-Committee meetings within the reporting period.

Table 3: Summary of Site C Reclamation Sub-Committee meetings from April 1, 2025 to March 31, 2026

Summary of Site C Reclamation Sub-Committee	
Date	Agenda items/Summary
April 2 nd , 2025	Reviewed reclamation plans for 2025 meeting #17 (Virtual)
June 24 th , 2025	Review 2025 planting and Area A physical reclamation, meeting #18 (Virtual)
September 17 th , 2025	Review of north bank and Area A reclamation sites, meeting #19 (Field).
December 1 st , 2025	Review 2025 physical reclamation and plans for 2026, meeting #20 (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 were ordered for planting at the 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 reports² 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 Forums, EAC Working Groups, or through other project and community engagement meetings.

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 (# 105-0988-22-27 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.

² See [note 3](#).

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 2025 NIT was sent to Indigenous Nations on April 22, 2025, requesting the identification of any areas of concern by May 21, 2025. The 2026 NIT will be sent to Indigenous Nations in April 2026 and will be described during the next reporting period.

4.5 Opportunities to Harvest Traditional Medicinal Materials

Various Indigenous Nations had 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 were invited to conduct harvesting or identify areas for future harvesting.

As the Project is substantially complete, there are few unimpacted areas remaining within the project footprint. Nations have conveyed that there is limited or no 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. 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.