



Aboriginal Plant Use Mitigation Plan 2017-2018 Annual Report

Site C Clean Energy Project

Reporting period: June 2017 through March 2018

Date: March 29, 2018

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Table of Contents

Table of Acronyms	ii
1 Background	1
1.1 The Site C Clean Energy Project	1
1.2 Description of Site Preparation and Construction Activities during the Reporting Period	1
2 Objective and Scope	2
2.1 Objective of the Aboriginal Plant Use Mitigation Plan	2
2.2 Scope and Reporting Period	4
3 Ground Truthing Activities from June 2017 through March 2018	4
3.1 Invitations and Participation in Ground Truthing Activities	4
3.2 Ground Truthing Reports	7
3.3 Plants of Traditional Aboriginal Value Identified Through Ground Truthing	7
3.4 Identification of rare plant species.....	8
4 Mitigation Measures	9
4.1 Identification of Opportunities for Plant Relocation and Ecological Community Restoration	9
4.2 Indigenous Plant Nursery.....	9
4.3 Information Shared with Aboriginal Groups	9
4.4 Use of Herbicides and Pesticides.....	9
4.5 Opportunities to Harvest Traditional Medicinal Materials.....	10
5 Future Ground Truthing	11

Table of Acronyms

BRFN	Blueberry River First Nations
DFN	Duncan's First Nation
DFO	Fisheries and Oceans Canada
DRFN	Doig River First Nation
DTFN	Dene Tha' First Nation
EAO	BC Environmental Assessment Office
FLNR	BC Ministry of Forests, Lands, Natural Resource Operations & Rural Development
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
MOTI	BC Ministry of Transportation and Infrastructure
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) will be the third dam and generating station on the Peace River in northeast B.C. The Project will provide 1,100 megawatts of capacity and about 5,100 gigawatt hours of energy each year to the province's integrated electricity system. The Project will be a source of clean, reliable and cost-effective electricity for BC Hydro's customers for more than 100 years.

The key components of the Project are:

- an earthfill dam, approximately 1,050 metres long and 60 metres high above the riverbed;
- an 83 kilometre long reservoir that will be, on average, two to three times the width of the current river;
- a generating station with six 183 MW generating units;
- two new 500 kilovolt AC transmission lines that will connect the Project facilities to the Peace Canyon Substation, along an existing right-of-way;
- realignment of six segments of Highway 29 over a total distance of approximately 30 kilometers; and
- construction of a berm at Hudson's Hope.

The Project also includes the construction of temporary access roads, a temporary bridge across the Peace River, and worker accommodation at the dam site.

1.2 Description of Site Preparation and Construction Activities during the Reporting Period

The reporting period for this annual report coincides generally with the third year of project construction.

Below is a high-level summary of construction activities that took place during this period:

- the main civil works contractor continued physical works in the dam site area;
- excavation progressed on the north and south banks, including north bank slope stabilization and excavation for the tailrace and inlet portal, spillways, diversion tunnels and south bank approach channel.
- on-site concrete batching continued;
- riprap production continued along with placement along the cofferdam;
- work continued on the south bank drainage tunnel;
- excavation for the diversion tunnels and earthfill dam began;
- upgrades to public roads on the north bank were advanced;
- access roads were constructed on the south bank and road maintenance activities continued;

- the turbines and generators contractor completed construction of their temporary on-site manufacturing facility and continued operations;
- the north bank viewpoint was completed;
- waste wood and debris was disposed or removed from site;
- upgrade work was completed inside the switchyard building at Peace Canyon generating station;
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- excavation and site preparation continued for the Site C substation;
- transmission line clearing and access road construction continued;
- the contract for the Generating Station and Spillway was awarded; and
- geotechnical investigations resumed for the Highway 29 realignment at Halfway River.

More detailed descriptions of construction activities that took place during the reporting period can be found in the quarterly Notices of Construction Activities¹ (also referred to as Construction Notification Letters, or Construction Notices).

2 Objective and Scope

2.1 Objective of the Aboriginal Plant Use Mitigation Plan

The objective of the June 5, 2015 Aboriginal Plant Use Mitigation Plan² (APUMP) is to fulfill the requirements of Decision Statement condition 14 and Environmental Assessment Certificate conditions 25 and 26.

Federal Decision Statement Condition 14

14. Current use of lands and resources for traditional purposes

- 14.1. The Proponent shall engage Reservoir Area Aboriginal groups and Immediate Downstream Aboriginal groups to identify and develop mitigation measures that could address impacts to current use of lands and resources for traditional purposes.*
- 14.2. The Proponent shall inform Reservoir Area Aboriginal groups and Immediate Downstream Aboriginal groups about Designated Project activities that may affect the current use of lands and resources for traditional purposes including harvesting of plants, fish and wildlife and access to land for the purposes of those uses.*
- 14.3. The Proponent shall seek the views of Reservoir Area Aboriginal groups and Immediate Downstream Aboriginal groups on methods to avoid or minimize the use of herbicides and pesticides near locations of plants of importance to those groups.*

¹ Available with the bi-weekly Construction Bulletins on the project website: <https://www.sitecproject.com/construction-activities/construction-bulletins> (click hyperlink to open).

² Available in the *Mitigation, Management, and Monitoring Plans* section of the project's Environmental Management document library: <https://www.sitecproject.com/document-library/environmental-management> (click hyperlink to open).

- 14.4. *The Proponent shall report to the Agency on any actions implemented as a result of the activities outlined in conditions 14.1, 14.2 and 14.3 on an annual basis starting immediately prior to construction and for the first five years of operation.*

EAC Condition 25

The EAC Holder must undertake a ground truthing program of traditional plants currently used by Aboriginal Groups in collaboration with Aboriginal Groups prior to construction. Where specific plants are known to be harvested by Aboriginal Groups, the EAC Holder must make reasonable efforts to consult interested Aboriginal Groups using the results of the ground truthing to inform the development and implementation of mitigation and compensation measures to accommodate adverse effects of the Project on plants traditionally used by Aboriginal Groups.

EAC Condition 26

The EAC Holder must develop an Aboriginal Plant Use Mitigation Plan to describe how the effects of the Project on plants currently harvested by Aboriginal Groups will be mitigated, including through compensation measures.

The Aboriginal Plant Use Mitigation Plan must include at least the following:

- *Identify within the Project footprint including areas being reclaimed potential sites for relocation of medicinal and food plants; relocate when deemed necessary by a QEP.*
- *Identify within the Project footprint including areas being reclaimed opportunities to restore ecological communities that support species of high traditional use value for affected Aboriginal Groups and undertake restoration of those ecological communities where deemed necessary by a QEP.*
- *Identify opportunities and provide financial support for propagation of indigenous plant species for use in reclamation programs, such as that offered through the indigenous nursery owned by the West Moberly First Nation and Sauleteau First Nation. The EAC Holder must make reasonable commercial efforts to obtain up to \$1 million in commercial service contracts with indigenous nurseries for provision of plants.*

The EAC Holder must make reasonable efforts to develop the Aboriginal Plant Use Mitigation Plan in collaboration with FLNR and Aboriginal Groups, at least 90 days prior to Project activities that may affect traditional plants.

The EAC Holder must file the final Aboriginal Plant Use Mitigation Plan with EAO, FLNR and Aboriginal Groups at least 30 days prior to Project activities that may affect traditional plants.

The EAC Holder must develop, implement and adhere to the final Aboriginal Plant Use Mitigation Plan, and any amendments, to the satisfaction of EAO.

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 high Aboriginal value as well as relocation of rare plants of high traditional Aboriginal value. The mitigation measures related to Aboriginal plant use are summarized in Volume 3, Chapter 19, Table 19.15 of the EIS and are also found in Appendix D of the APUMP³.

³ See note 2. Click hyperlink to open to [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 Scope and Reporting Period

This annual report summarizes the implementation of the mitigation measures described in section 4.0 of the APUMP from June 2017 through March 2018. In some cases, consultation and engagement with Aboriginal groups on measures described in the Plan that took place prior to this period are also summarized here for context.

This is the third annual report of the APUMP.

3 Ground Truthing Activities from June 2017 through March 2018

Starting in 2014, BC Hydro initiated ground truthing programs with the purpose of engaging with Aboriginal land users, including registered trapline holders, to verify and accurately locate Aboriginal land use information, and to identify concerns related to specific features, or sites that may be affected by the Project. In particular, BC Hydro is seeking 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 Aboriginal groups.

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 Aboriginal value. The Cultural Resources Mitigation Plan⁴ describes how ground truthing information related to cultural, habitation and burial sites (including access to those sites) is used to develop mitigation measures related to those sites.

Unless otherwise indicated, the communications summarized below are sent out to all Aboriginal groups named in the Environmental Assessment Certificate (EAC) and federal Decision Statement (FDS): Blueberry River First Nations (BRFN), Duncan's First Nation (DFN), Doig River First Nation (DRFN), Dene Tha' First Nation (DTFN), Fort Nelson First Nation (FNFN), Horse Lake First Nation (HLFN), Halfway River First Nation (HRFN), Kelly Lake Métis Settlement Society (KLMSS), McLeod Lake Indian Band (MLIB), Métis Nation British Columbia (MNBC), Prophet River First Nation (PRFN), Sauteau First Nations (SFN), and West Moberly First Nations (WMFN).

3.1 Invitations and Participation in Ground Truthing Activities

Commencing in early 2014, BC Hydro has expressed interest in and invited Aboriginal groups to participate in ground truthing prior to the commencement of construction in order to verify site-specific harvesting, habitation and other important cultural sites, with an initial focus on the dam site area.

During this reporting period, BC Hydro followed up with interested Aboriginal groups to either plan ground truthing activities to be carried out with BC Hydro field support, or to facilitate independent ground truthing activities. Invitations were communicated during meetings and correspondence with individual Aboriginal groups, as well as through discussions at the Permitting Forum. As follow up to the letter of invitation of April 6, 2017, BC Hydro sent further

⁴ See note 2.

letters on 9th and 10th, 2018, to Aboriginal Groups that included an update on upcoming construction activities and a renewed request to review and identify any areas of interest or concern.

Ground truthing activities undertaken in the reporting period are summarized in Table 1, organized by Aboriginal Group.

For the purposes of this report, the ground truthing activities described relate to the verification of plant harvesting areas and/or plants of traditional Aboriginal value. In some cases, however, the ground truthing activities included scope related to potential burial or other cultural sites. Ground truthing related to burial sites or other cultural sites is described in the Annual Report for the Cultural Resources Mitigation Plan. Due to the sensitive nature of the cultural information gained during ground truthing, BC Hydro is not able to provide site-specific details in publicly available reports such as this one.

Table 1: Ground Truthing Activities Undertaken

Aboriginal Group	Project Component	Results	Next Steps
Blueberry River First Nations (BRFN)	Reservoir Highway 29 Dam Site	Ground truthing activities took place from June 22 to 30, 2017 at Cache Creek, Halfway River, Lynx Creek, Dry Creek, Farrell Creek, the Dam Site and Moberly Lake.	BC Hydro remains open to ground truthing additional areas of interest with BRFN.
Doig River First Nations (DRFN)	Reservoir Transmission Line Highway 29	Ground truthing activities took place on June 19 and 20 th , 2017 at Cache Creek and the Halfway River. Additional activities took place on July 6 to 7 at Cache Creek and from Taylor to Halfway River.	BC Hydro remains open to ground truthing additional areas of interest with DRFN.
Halfway River First Nation (HRFN)	Reservoir Highway 29 Reservoir Highway 29	Ground truthing activities took place on February 28, 2017 at Cache Creek and March 1, 2017 at Watson Slough to identify areas of traditional use. Ground truthing activities took place between August 21–to 23, 2017, at the confluence of the Peace and Halfway Rivers. On September 18 to 19, and 25 to 26, 2017, the following areas were surveyed to record areas of cultural significance: the Halfway/Peace confluence; the Cache Creek Valley; and the Peace River, west of the Halfway/Peace confluence to points west of Farrell Creek.	BC Hydro remains open to ground truthing additional areas of interest with HRFN.

McLeod Lake Indian Band (MLIB)	Transmission Line	Ground truthing activities took place along the transmission line on June 27 and 28, 2017.	BC Hydro remains open to ground truthing additional areas of interest with MLIB.
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Some Aboriginal Groups identified areas of interest for ground truthing but were unable to schedule or conduct ground truthing during the reporting period. BC Hydro will continue to work with these groups, and remains open to scheduling ground truthing in these areas of interest.

Ground truthing activities that BC Hydro was working to coordinate and schedule but were not conducted during the reporting period are described in Table 2.

Table 2: Ground Truthing Activities Coordinated but Not Undertaken

Aboriginal Group	Project Component	Results	Next Steps
Dene Tha' First Nation (DTFN)	Transmission Line	DTFN expressed interest in ground truthing the transmission line during permit consultation meetings with FLNR. BC Hydro followed up, however no ground truthing activities took place during the reporting period.	BC Hydro remains open to ground truthing areas of interest along the transmission line with DTFN.
Kelly Lake Métis Settlement Society (KLMSS)	Reservoir Transmission Line Highway 29	BC Hydro and KLMSS made efforts to coordinate ground truthing activities for summer 2017. Due to scheduling conflicts and availability, no ground truthing activities took place during the reporting period.	BC Hydro remains open to ground truthing additional areas of interest with KLMSS.
McLeod Lake	Cache Creek Highway 29	While BC Hydro and MLIB ground truthed areas along Highway 29, Cache Creek and the Halfway River, Marl Fen and Watson Slough, BC Hydro is open to further ground truthing activities in areas of Cache Creek and along Highway 29 that MLIB have not ground-truthed before.	BC Hydro remains open to ground truthing additional areas of interest with MLIB.
Prophet River First Nation (PRFN)	Reservoir Transmission Line Highway 29	No ground truthing activities took place during the reporting period.	BC Hydro remains open to ground truthing areas of interest with PRFN.
Saulteau First Nations (SFN)	Reservoir Transmission Line Highway 29	SFN expressed interest in ground truthing, but were unable to do so in 2017.	BC Hydro will continue to work with SFN to identify and coordinate ground truthing of other areas of

Aboriginal Group	Project Component	Results	Next Steps
			importance to SFN in 2018.
West Moberly First Nations (WMFN)	Reservoir Transmission Line Highway 29	No ground truthing activities took place during the reporting period.	BC Hydro remains open to ground truthing areas of interest with WMFN.

3.2 Ground Truthing Reports

Results of ground truthing activities conducted jointly by Aboriginal groups with BC Hydro participation are summarized in individual reports prepared by BC Hydro's traditional land use consultant (Traditions Consulting Ltd.) and shared with the ground truthing participants for review and comment prior to finalization.

In this reporting period, BCH worked with MLIB to finalize the June 2017 ground truthing report.

With respect to ground truthing activities completed independently by Aboriginal groups, reports were received DRFN in September 2017, and an interim report was received from HRFN in December 2017. At the end of this reporting period, BC Hydro was expecting reports from independent ground truthing activities conducted in 2017 from BRFN..

Finalised ground truthing reports are shared with relevant members of the Site C team (e.g., Environment, Transmission Line Design, Roads, Properties, Construction Management) to identify potential measures to avoid or mitigate effects of the project on specific Aboriginal sites or features identified during ground truthing activities. BC Hydro will follow up with the respective Aboriginal groups to share how their information has been considered and incorporated in the Project design and/or mitigation measures developed.

3.3 Plants of Traditional Aboriginal Value Identified Through Ground Truthing

Ground truthing activities have identified a number of plants with medicinal and food values. Table 3 shows the food plants and medicinal plants that were identified as plants typically harvested by land users during ground truthing in 2014 and 2015. New additions in this reporting period are shown in blue text.

Table 3: Plant Species with Cultural, Food, and Medicinal Value Identified Through Ground Truthing

Alder	Crowberry	Moss, Sphagnum
Alder, green	Currant, black	Mountain Ash
Alder, red	Dandelions	Mushroom, Puff Ball
Alder, mountain	Deadweed	Mushrooms
Algae	Devil's club	Onion (wild)
Arnica orchid	Dewberry	Orchid, Ladyslipper
Ash, mountain	Dogwood, Red-Osier	Parsnip (Cow's Parsnip)
Aspen, Trembling	False Solomon Seal	Peas (wild)

Baneberry	False Toad-flax	Pink Wintergreen
Bearberries (a.k.a. kinnikinnick)	Fern Spiny Root	Plantain
Beaver Ears (Wintergreen)	Fir, Balsam (Subalpine)	Poplar, Balsam
Birch, Water	Fireweed	Poplar, Black
Birch, Paper	Flat Lichen	Poplar, Silver-leaved
Black spruce	Frog Blanket (Colt's Foot)	Potentilla
Blackberries	Fungus, birch	Raspberry
Bluebell (a.k.a. lungwort)	Fungus, willow	Rat root
Blueberries	Goldenrod	Red willow
Blueberries – high-bush (mountain)	Gooseberries	Rhubarb (wild)
Buckbean	Goosegrass	Rose (wild)
Bunchberries	Hemlock (Water - Western)	Rosehips
Buttercup	Horseroot	Sage
Cabbage (wild)	Horsetail	Saskatoon berries
Cedar	Huckleberries	Silverberry
Chamomile (wild)	Indian Carrot	Soapberries
Cherry, choke	Indian Parsnip	Spruce (Black, White, Swamp)
Cherry, pin	Pine (Jack, Lodgepole)	Stinging nettle
Cinquefoil	Juniper	Strawberries (wild)
Cloudberry	Labrador tea	Swamp Currant
Clover	Lichen (Old Man's Beard, Witches Hair, Flat)	Tamarack Moss
Comandra	Lily plants	Trapper's (muskeg) tea
Cottonwood	Low-bush blueberries	Willow (Pacific, 'Red')
Cranberries – high & low bush	Mint (<i>wild</i>)/ Peppermint	Yarrow
Aster	Sedges	Twinflower
Meadow rue	Snowberry	Vetch
Sarsaparilla	Tlechuck wea?	Wolf willow

3.4 Identification of rare plant species

The plant species of traditional Aboriginal value identified through ground truthing 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 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 Red-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 Aboriginal groups, that meet conditions of the EAC and FDS related to plants of traditional aboriginal value over the duration of Project construction. Moving forward, BC Hydro will continue to consider mitigation measures identified by Aboriginal groups through future ground truthing 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 for the various project components (e.g., portions of the dam site area, Highway 29 right-of-way and reservoir shoreline) will be undertaken in the period following construction.

BC Hydro continues to work with Aboriginal groups to identify plant species of Aboriginal value through ongoing groundtruthing activities. These species will be incorporated into reclamation plans, as appropriate. As draft reclamation plans are developed to address the adverse effects of the project on plants traditionally used by Aboriginal groups they will be provided to Aboriginal Groups for review and comment.

4.2 Indigenous Plant Nursery

BC Hydro has entered into a contract with an indigenous plant nursery for supply and delivery of live native grass seeds suitable for dry or hydro seed application 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 Aboriginal value from indigenous plant nurseries for use in reclamation activities. The actual sourcing of seeds, seedlings and stakes for use in reclamation will occur after detailed reclamation planting prescriptions are developed through the development of reclamation plans.

4.3 Information Shared with Aboriginal Groups

FDS condition 14.2 requires BC Hydro to inform Aboriginal groups 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 reports⁵ for more information on how BC Hydro is complying with this condition.

4.4 Use of Herbicides and Pesticides

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 Aboriginal groups for review and comment in October 2014. Comments received were considered in preparation of the July 5, 2015 version of the APUMP.

BC Hydro manages vegetation around facilities and transmission lines according to two Integrated Vegetation Management Plans (IVMPs); one for BC Hydro's facilities, and one for transmission line rights-of-way. These plans are available on BC Hydro's public website:

⁵ See note 5.

- [IVMP for Transmission Rights of Way \(April 2017\)](#); Confirmation number 105-0982-16/21
- [IVMP for Control of Vegetation at BC Hydro Facilities \(August 2016\)](#); Confirmation number 105-0983-16/21

BC Hydro consults with Aboriginal Groups as required by the BC Ministry of Environment during their review and confirmation of BC Hydro's plans.

BC Hydro sends letters to Aboriginal Groups providing links to the IVMPs and asking Aboriginal Groups if they would like to provide comments. BC Hydro follows up on the letter with phone calls to confirm that the Aboriginal Group has received the information and whether the nation has any comments. Any comments received and emails/letters/phone calls made to Aboriginal Groups are summarized in a spreadsheet which is submitted to the BC MOE. The MOE will confirm the PMP and provide a "confirmation number" once the requirements of the PMP submission are met (consultation is one of many requirements).

BC Hydro sent out the above two IVMPs for review and comment in December 2015 to the following Aboriginal groups that are named in the Site C Environmental Assessment Certificate and federal Decision statement:

- Blueberry River First Nations
- Doig River First Nation
- Fort Nelson First Nation
- Halfway River First Nation
- McLeod Lake Indian Band
- Prophet River First Nation
- Sauteau First Nations
- West Moberly First Nations
- Dene Tha' First Nation

Notice of Intent to Treat

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

Prior to any use of herbicides described in that year's NIT, an information package is sent to affected Aboriginal groups with maps of the proposed treatment locations and details on the treatment program. The information package requests feedback from Aboriginal groups in order to identify areas of concern for consideration in the development of treatment plans.

An information package was sent to Aboriginal groups on June 16, 2017 and Aboriginal groups were invited to identify any areas of concern by July 12, 2017. On January 9th and 10th, 2018, Aboriginal Groups also received a letter that included an update on upcoming construction activities and a renewed request to review and identify any areas of interest or concern.

4.5 Opportunities to Harvest Traditional Medicinal Materials

Various First 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. This interest was conveyed to clearing contractors working both on the transmission line and also in the Bear Flats / Cache Creek area, and the species of interest were stockpiled or temporarily protected to allow time for those nations that expressed interest in the opportunity to harvest the material. The opportunity was communicated to the First Nations whose communities are closest to the area, along with the locations of felled and gathered trees. Additionally, the clearing contractor for the transmission line committed to trucking non-merchantable wood, including tree species of cultural interest to one of the Aboriginal Groups communities in the coming winter.

5 Future Ground Truthing

BC Hydro is working with each interested Aboriginal group directly to plan and coordinate ground truthing in the spring and summer of 2018. More information on these activities will be provided in the 2018 annual report.

Information received through ground truthing activities will inform the development of mitigation measures when the information is received.