



BC EAO EAC Application – Tenas Project

Section 13.0 Management Plans

Chapter 14 Public Access Management Plan

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VERSION 1.0

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Tenas Project

Section 13.0 Management Plans Chapter 14 Public Access Management Plan

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ABBREVIATIONS AND ACRONYMS

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
AQMP	Air Quality Management Plan (S13.0-C2)
BC MECCS	British Columbia Ministry of Environment and Climate Change Strategy
BC MEMLI	British Columbia Ministry of Energy, Mines and Low Carbon Innovation
BC MEMPR	British Columbia Ministry of Energy, Mines and Petroleum Resources
BC MFLNRO	British Columbia Ministry of Forests, Lands and Natural Resource Operations
BCHBCNC	Back Country Horsemen of BC – North Chapter
C	Chapter
CEMP	Construction Environmental Management Plan (S13.0-C4)
CMSTHP	Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3)
Code	Health, Safety and Reclamation Code in British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI] 2021)
EAC	Environmental Assessment Certificate
EMS	Environmental Management System (S13.0-C1)
EMP	Explosives Management Plan (S13.0-C6)
FMSCP	Fuel Management and Spill Control Plan (S13.0-C7)
JAIR	Joint Application Information Requirements for <i>Mines Act</i> and <i>Environmental Management Act</i> Permits (British Columbia Ministry of Energy, Mines and Petroleum Resources [BC MEMPR] and British Columbia Ministry of Environment and Climate Change Strategy [BC MECCS] 2019).
MA/EMA	<i>Mines Act</i> , RSBC 1996, c 293, and <i>Environmental Management Act</i> , SBC 2003, c 53
MERP	Mine Emergency Response Plan (S13.0-C9)
MTCP	Minesite Traffic Control Plan (S13.0-C10)
PAMP	Public Access Management Plan (S13.0-C14)
Project	Tenas Project
ROW	right-of-way
S	Section
SEMP	Socio-economic Management Plan (S13.0-C16)
SPP	Standard Practices and Procedures
TAC	Tenas Access Corridor
TCL	Telkwa Coal Limited
TCRC	Telkwa Coalmine Recreation Camp (Back Country Horsemen of BC – North Chapter (BCHBCNC) and Telkwa Coal Limited (TCL)
VMP	Vegetation Management Plan (S13.0-C18)
WMP	Wildlife Management Plan (S13.0-C21)

UNITS OF MEASURE

Abbreviation or Acronym	Long Form of Abbreviation or Acronym
km	kilometre
m	metre

EXECUTIVE SUMMARY

The Tenas Project (Project) is located about seven (7) kilometres (km) from the Village of Telkwa within a regional area with outdoor recreational use. Access to the Project is prescribed under the Health, Safety and Reclamation Code in British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI] 2021) (Code), *Mines Act*, RSBC 1996, c 293 (Government of British Columbia [GovBC] 1996b), and *Land Act*, RSBC 1996, c 245 (GovBC 1996a). Section 1.3.1 of the Code, Authority to Enter a Mine, pertains to public access management, and sets out the following:

Authorization

1.3.1 Other than an inspector, only persons authorized by the manager shall enter or be permitted to enter a mine.

Posting

1.3.2 Notice to this effect shall be posted at all road entrances to the mine by the manager and, for non-operating mines, the contact information of a qualified person shall be included in the notice.

Unauthorized Access

1.3.3 Unless authorized by the manager, no persons shall enter or leave a mine except by a recognized means of entry or exit. Posting and Distribution of Mines Act, Regulations

These legal requirements are for the safety of the public and Project personnel. Telkwa Coal Limited (TCL) will delineate a "No Unauthorized Entry" boundary to ensure a safe distance from mining areas. This will be appropriately marked in the field with signage. This boundary, in conjunction with communication regarding its importance and the legal requirement will minimise potential risks to employees, the public, visitors, and Minesite security. The "No Hunting" and "No Fishing" boundaries will also be established that match the "No Unauthorized Entry" boundary.

TCL has a history of working with local recreation groups and the public to facilitate access to the Project. During the previous exploration programs access requests from the public were facilitated while maintaining operational needs, ensuring public, contractor, and employee safety. This relationship will continue through the implementation of this Public Access Management Plan (PAMP).

Due to the potential for public interaction and the hazards associated with active and inactive mining areas, it is critical that the public is not allowed uncontrolled access to these portions of the Project Area. TCL will provide escorted access via operation of a lead vehicle to lead the public beyond the Project Area from either the TCL office in Telkwa, or from the Sandpit Muster Station located just north of the Tenas Access Corridor (TAC) and adjacent to the existing Telkwa Coalmine Road to the Telkwa Coalmine Recreation Camp. Furthermore, the PAMP provides the necessary Project security, and protection for TCL employees and contractors carrying out mining activities. It is envisioned that regulatory agencies will require that access to recreation and hunting areas beyond the Project Area during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases be provided.

1. INTRODUCTION

The Public Access Management Plan (PAMP) describes the management processes and procedures in place at the Tenas Project (Project) to facilitate public access around, within, and through the Project Area. The PAMP will remain in place during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases of the Project and will be subject to annual management review and revisions as required.

The Project is situated in an area where there is a potential for interaction with the public. For public and employee and contractor safety, certain areas of the Project Area dependent on Project activities will be designated as "No Unauthorized Entry" as prescribed by the Health, Safety and Reclamation Code in British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI 2021]) (Code), *Mines Act*, RSBC 1996, c 293 (Government of British Columbia [GovBC] 1996b), and *Land Act*, RSBC 1996, c 245 (GovBC 1996a). There will also be "No Hunting" and "No Fishing" boundaries established that match the "No Unauthorized Entry" boundary. These boundaries reflect the government's "No Hunting" guidance described in the *Wildlife Act*, RSBC 1996, c 488 (GovBC 1996f). Operational activities associated with the Project will affect recreational access to existing roads and trails (motorized and non-motorized recreational use) and use of areas within the Project Area.

Due to the potential for public interaction and the hazards associated with active and inactive mining areas and activities, it is critical that the public is not allowed uncontrolled access to the Project Area. The PAMP also provides the necessary site security, and protection for TCL employees and contractors. It is envisioned that the public will need to be allowed access to recreation and hunting areas beyond the Project Area during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases which is the primary objective of the PAMP.

2. PURPOSE AND OBJECTIVES

This PAMP has been developed for the purpose of public, employee, and contractor safety, and Project security while still providing for access to recreational and other uses beyond, and if need be, within the Project Area. The PAMP will seek to minimize restricted areas and provide opportunity for reasonable access to areas adjacent to, within, and beyond the "No Unauthorized Entry" boundary.

3. SCOPE AND SCALE

The scope of the PAMP is defined within the Project Area which is the same boundary used for the “No Unauthorized Entry Boundary” as illustrated by **Figure 3-1** below and on the TCL website. TCL will maintain access beyond the Project for recreational and other uses, and restrictions will be implemented in a staged manner to minimize the effect on use of the overall area. The PAMP is in effect during the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases and ceases to be in force at the final closure of the Project as approved by regulatory authorities. However, the PAMP will become less restrictive at the completion of Decommissioning and Reclamation Phase.

It is envisioned that during Project activities and phases, these boundaries might require to be changed, and these will be discussed with Indigenous nations and stakeholders to obtain input prior to implementation. The current implementation schedule is as follows:

- ▶ Environmental Assessment Certificate (EAC) Application is submitted;
- ▶ Project is granted EAC;
- ▶ *Mines Act*, RSBC 1996, c 293, and *Environmental Management Act*, SBC 2003, c 53 (*MA/EMA*) permit is submitted;
- ▶ Project is granted *MA/EMA* permit; and
- ▶ The "No Unauthorized Entry, Hunting and Fishing" boundary goes into effect with notice of commencement of Construction Phase activities.

Tenas Project

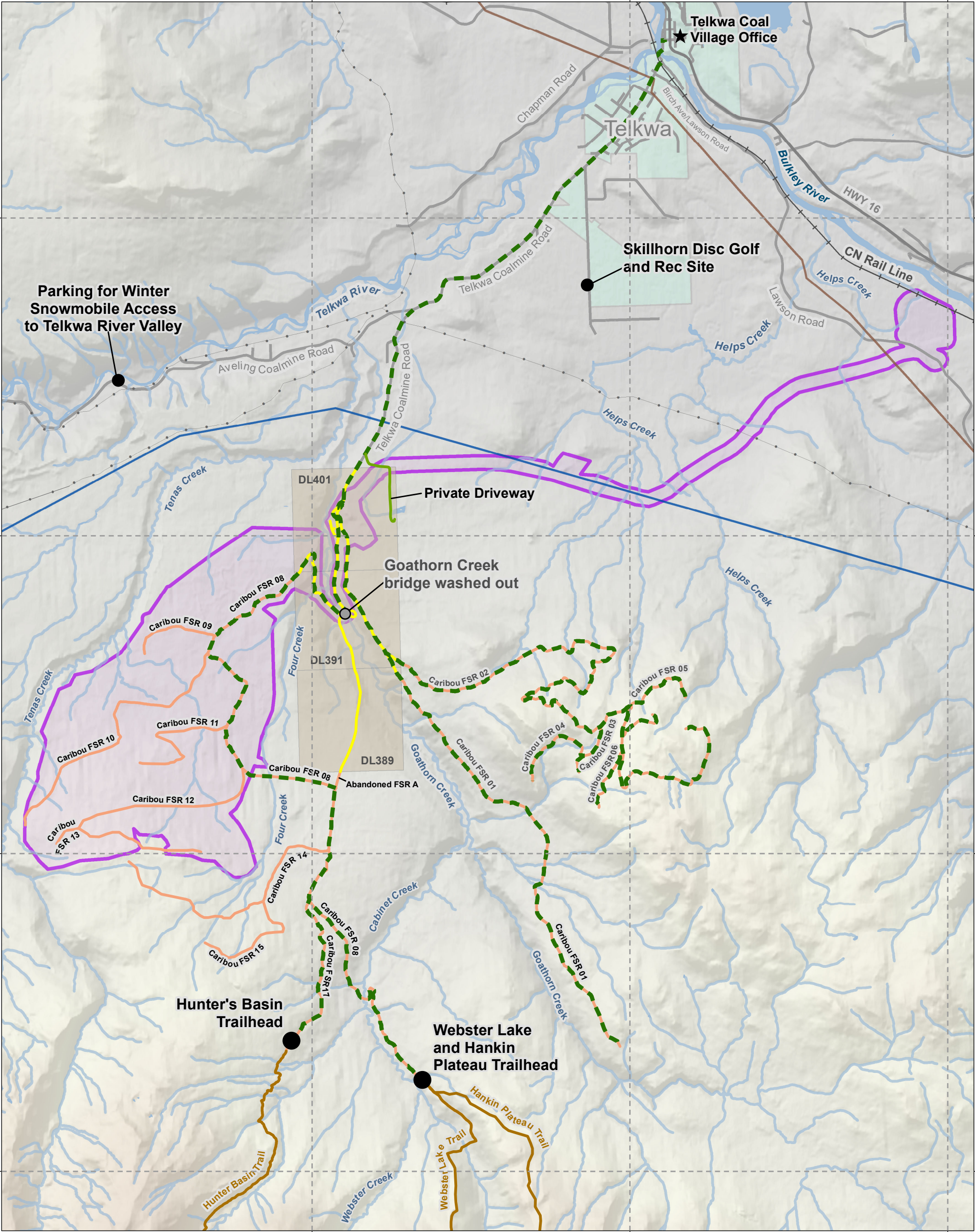
Figure 3-1

No Unauthorized Entry, Hunting, Fishing and
Project Boundary with current road regulatory ownership

NAD 83 UTM Zone 9N
Date Created: Jun 21 2021
Last updated: May 02 2022
Version: 16
Created by NB
Base Data: Geogratis, Allegiance Coal 2022



- | | | |
|--|------------------------------|------------------------------|
| No Unauthorized Entry, Hunting, and Fishing Boundary | Waterbody | Ongoing Public Access |
| CN Rail Line | Telkwa Village Boundary | Provincial Roads or Highways |
| 138 kV Transmission Line | Watercourse | TCL Private Roads |
| 500 kV Transmission Line | Pacific Natural Gas Pipeline | Forest Service Roads |
| | | Hiking Trail |



4. COMPLIANCE OBLIGATIONS

This subsection summarizes the relevant compliance approvals and requirements that the PAMP needs to address.

4.1 Regulatory Requirements

Several legislative requirements are applicable to the PAMP. A short list of these requirements and their major applicable components are provided in **Table 4.1-1** below.

Table 4.1-1: Legislation and Guidelines Relevant to Public Access Management Plan (PAMP)

Legislation, Regulations, and Guidelines	Applicable Information
British Columbia Health, Safety and Reclamation Code for Mines in British Columbia (British Columbia Ministry of Energy, Mines and Low Carbon Innovation [BC MEMLI] 2021) (Code)	Regulates mine employee and public interactions.
<i>Environmental Management Act</i> , SBC 2003, c 53 (Government of British Columbia [GovBC] 2003)	Rules regarding spills and spill reporting on public roads.
<i>Fisheries Act</i> , 1985, c F-14 (Government of Canada [GovCan] 1985)	Prohibits serious harm to fish that are part of a commercial, recreational, or Aboriginal fishery, including the permanent destruction of habitat.
<i>Forest and Range Practices Act</i> , SBC 2002, c 69 (GovBC 2002)	Regulates unauthorized road construction or modification and unauthorized cutting or damage to Crown timber (trespass).
<i>Mines Act</i> , RSBC 1996, c 293 (GovBC 1996b)	Regulates activities on mineral claims registered to the proponent and applies to mines during exploration, development, construction, production, closure, reclamation, and abandonment.
<i>Mining Right of Way Act</i> , RSBC 1996, c 294 (GovBC 1996c)	Describes the necessary approvals for constructing a right-of-way (ROW) across private and public land.
<i>Motor Vehicle Act</i> , RSBC 1996, c 318 (GovBC 1996d)	Regulates speed limits and other traffic controls on a highway.
Resource Road User Safety Guide (British Columbia Ministry of Forests, Lands and Natural Resource Operations [BC MFLNRO] and BC Forest Safety 2017)	Provides basic information for safe and responsible use of off highway recreational vehicles on resource roads
Provincial Forest Use Regulation, BC Reg. 176/95 (GovBC 1995) of the <i>Forest Practices Code of British Columbia Act</i> , RSBC 1996, c 159 (GovBC 1996a)	Regulates the issuance of special use permits for roads on land not registered under a mineral claim to the proponent. Regulates non-forestry industrial use of Forest Service Roads.
<i>Species at Risk Act</i> , SC 2002, c 29 (GovCan 2002)	Regulates road and traffic effects on wildlife and requires mitigation of potential effects on specific wildlife species.
<i>Transportation of Dangerous Goods Act</i> , SC 1992, c 34 (GovCan 1992)	Regulates the transportation of dangerous goods and provides additional powers to municipal councils to regulate the transportation of dangerous goods within their boundaries.
<i>Water Protection Act</i> , RSBC 1996, c 484 (GovBC 1996e)	Provides guidelines for the issuance of approvals to make changes in or about a stream.

Legislation, Regulations, and Guidelines	Applicable Information
<i>Wildlife Act</i> , RSBC 1996, c 488 (GovBC 1996f)	Regulates road and traffic effects on wildlife and requires mitigation of potential effects on specific wildlife species.

There is no guidance on a PAMP in the Joint Application Information Requirements for *Mines Act* and *Environmental Management Act* Permits (British Columbia Ministry of Energy, Mines and Petroleum Resources [BC MEMPR] and British Columbia Ministry of Environment and Climate Change Strategy [BC MECCS] 2019) (JAIR).

4.2 Standard Practices and Procedures (SPPs)

TCL Standard Practices and Procedures (SPPs) will conform to the Code. In addition to regulatory requirements, the Project will implement SPPs that meet or exceed the required laws and regulations.

5. RELATIONSHIP TO OTHER MANAGEMENT PLANS

The Project is governed by an **Environmental Management System (Section [S] 13.0-Chapter [C] 1) (EMS)**, an overarching management plan strategy comprising a set of processes and practices which enable TCL to manage its environmental and safety performance in a holistic way, within an integrated framework. While the management plans are part of the **EMS**, the **EMS** is not just a collection of management plans.

In addition to the overall guidance of the **EMS**, this PAMP has a relationship with other management plans that also present mitigation measures. Those management plans and their relationship to this PAMP are listed in **Table 5-1**.

Table 5-1: Management Plans with Relationship to the Public Access Management Plan (PAMP)

Management Plans	Nature of Relationship
Environmental Management System (S13.0-C1) (EMS)	Management plans are part of the EMS.
Chemicals and Materials, Storage, Transfer, and Handling Plan (S13.0-C3) (CMSTHP)	Manages the transfer of chemical materials to the Tenas Project (Project) that may interact with the public.
Construction Environmental Management Plan (S13.0-C4) (CEMP)	Manages the Construction Phase at the Project including contractor and public access referencing this document.
Fuel Management and Spill Control Plan (S13.0-C7) (FMSCP)	Manages transport and handling of fuels and spill cleanup and reporting on publicly accessible roads.
Mine Emergency Response Plan (S13.0-C9) (MERP)	Emergency response on publicly accessible roads related to the Project phases.
Socio-economic Management Plan (S13.0-C16) (SEMP)	Manages public engagement and complaints.
Vegetation Management Plan (S13.0-C18) (VMP)	Manages invasive plants within the public access to the Project.
Wildlife Management Plan (S13.0-C21) (WMP)	Manages wildlife interactions in and around publicly accessible roads.

6. DETAILS OF PUBLIC ACCESS MANAGEMENT PLAN (PAMP)

The following provides a detailed description of the proposed access management plan for the Project once it is approved and constructed.

6.1 Engagement Activities, Issues, and Mitigations

The public access management plan was expected to be one of the main concerns brought up by the public during the review of the EA. TCL in response has reached out to several people to get their input and comments on the PAMP that is currently provided in this Environmental Assessment Certificate (EAC) Application.

During the EA process, TCL expects further engagement with Indigenous, regulatory, non-governmental organizations and public. This engagement may require additional changes to the PAMP prior to it being a document of reference for the EAC if the Project is successful in obtaining one.

The following **Table 6.1-1** summarizes a list of issues and mitigations that were brought up by the engagement to date.

Table 6.1-1: Summary of Issues and Mitigations Identified Through Engagement Activities

Issue	Mitigation
Safe Access within Project Area	▪ Escort ▪ Access gates ▪ Signage ▪ Advertising ▪ Further engagement with groups ▪ Mailers ▪ Access Committee
Maintain Access to Recreational Areas	▪ Identification of recreational areas ▪ Primary and contingency means of access to these areas ▪ Unrestricted access maintained on east side of Goathorn Creek above Valley ▪ Unrestricted access maintained on the west side of Tenas Creek via the powerline FSR
Areas Access through “No Unauthorized Entry” area	▪ Numerous times provided for escort ▪ Ability to ask for times ahead of time if schedule does not work ▪ Adaptive management, if actual use dictates increased timing of escorts and locations the PAMP can be modified to allow this
Access to other areas not identified by this PAMP	▪ Adaptive management, if other areas become known to TCL during the EA process, or any phases of the Project, the PAMP can be modified to address this access

6.2 Historical and Present Public Access to Project Area

The following provides context to the development of the PAMP for the Project.

6.2.1 Historical Public Access to Project Area

The Telkwa Coalmine Road is a gazetted road to the north boundary of District Lot (DL) 401. However, prior to the Goathorn Creek bridge washing out in the late 2000’s, British Columbia of Transportation and

Infrastructure (BC MOTI) maintained the road beyond the gazetted section, through DL 401 and 391 to the Goathorn Bridge. Though DL 401 and 391 are private land parcels, with no legal tenure obtained by BC MOTI for a right of way, the road section was under the jurisdiction of BC MOTI due to maintenance activities. After the Goathorn Bridge washed out, BC MOTI reduced road maintenance to the north boundary of DL 401, with no road maintenance conducted on the road south of this boundary within the private land. This road was then designated a private road.

In the late 1990's, Manalta Coal and West Fraser completed an agreement for construction of new roads and use of existing roads on private land (DL 401, 391 & 389) owned by Manalta to provide access for commercial timber harvesting. This agreement included the access road over Goathorn Creek, located within DL 391 and other forestry service roads within DLs 401 and 389. Through several purchases, TCL has acquired all assets of Manalta Coal including the private roads and coal licenses.

Establishment of the Telkwa Caribou Wildlife Habitat area on Nov 30, 2015, led to timber harvest restrictions that did not allow West Fraser to complete their harvesting plans within the Goathorn Creek area. Through discussions with British Columbia Ministry of Forests, Lands and Natural Resource Operations (BC MFLNRO), it was determined that BC MFLNRO would take over West Fraser's responsibilities for these forestry service roads, by designating the roads as the Caribou Forest Service Roads (FSRs). BC MFLNRO designated the Caribou FSR's with the intent of conducting no maintenance and allowing the roads to self-reclaim. However, when the Caribou FSR's were established, it was not recognized that the FSRs established by West Fraser within DL 401, 391 and 389, were subject to an agreement with the private landowner. No contract or legal authorization was made with the private landowner (Manalta) prior to the designation of the Caribou FSR's. Therefore these FSRs remained private roads owned by TCL. **Figure 6.2-1** illustrates the historical access prior to the bridge of Goathorn Creek being washed out.

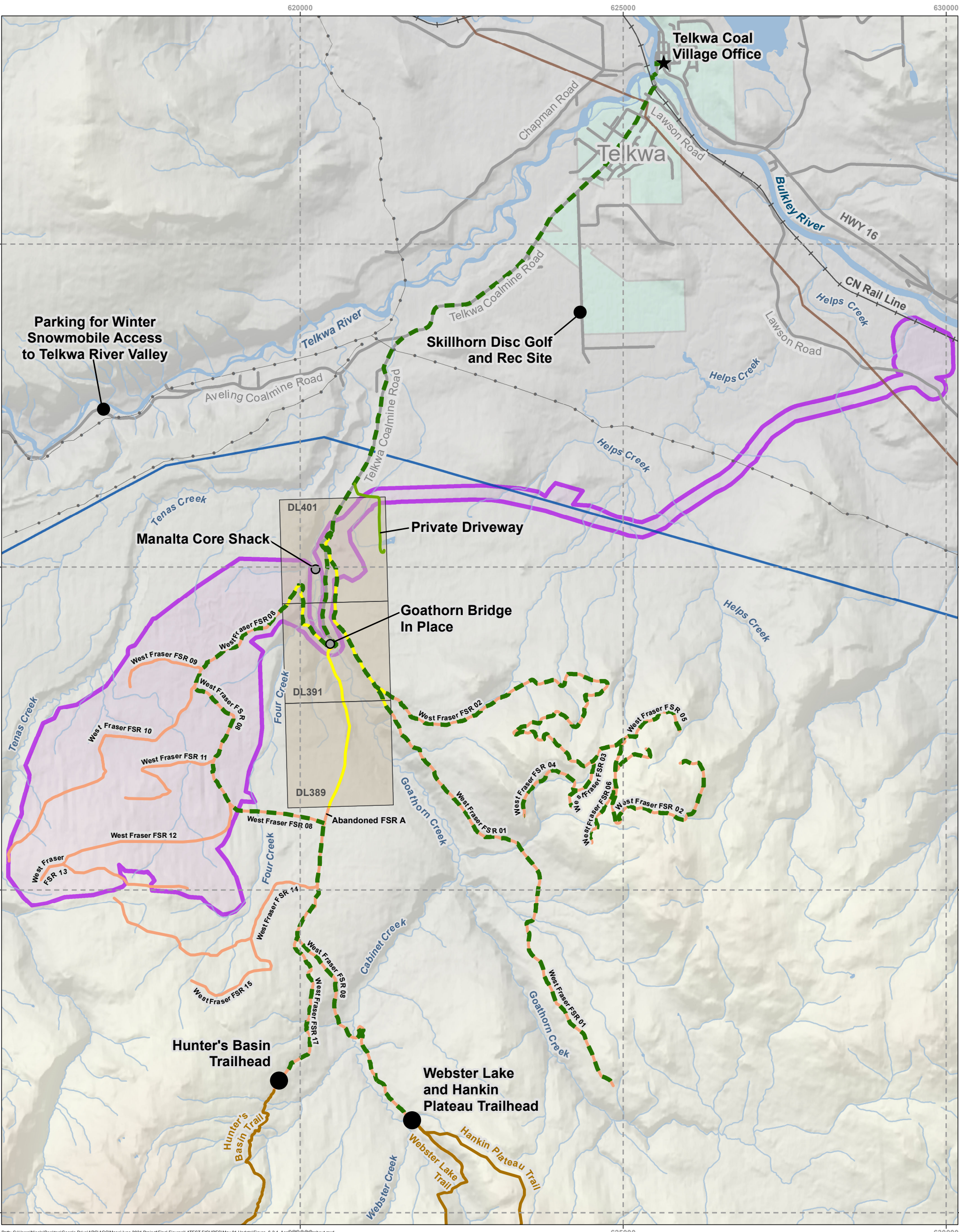
Tenas Project

Figure 6.2-1

Historical public access with road regulatory ownership



- | | | | | | |
|---|------------------------------|---|-------------------------|---|------------------------------|
|  | Project Area |  | CN Rail Line |  | Ongoing Public Access |
|  | 138 kV Transmission Line |  | Watercourse |  | Forest Service Roads |
|  | 500 kV Transmission Line |  | Waterbody |  | Provincial Roads or Highways |
|  | Pacific Natural Gas Pipeline |  | Telkwa Village Boundary |  | Hiking Trail |
| | | | |  | TCL Private Roads |



6.2.2 Ongoing Public Access to Project Area

Access to the Project today is much the same as when the Goathorn Bridge washed out over 10 years ago, apart from a minor rerouting within TCL private lands (district lots) to avoid a slide area near the Sandpit and periodic installation of a temporary bridge over Goathorn Creek to provide access for exploration and monitoring activities during winter conditions.

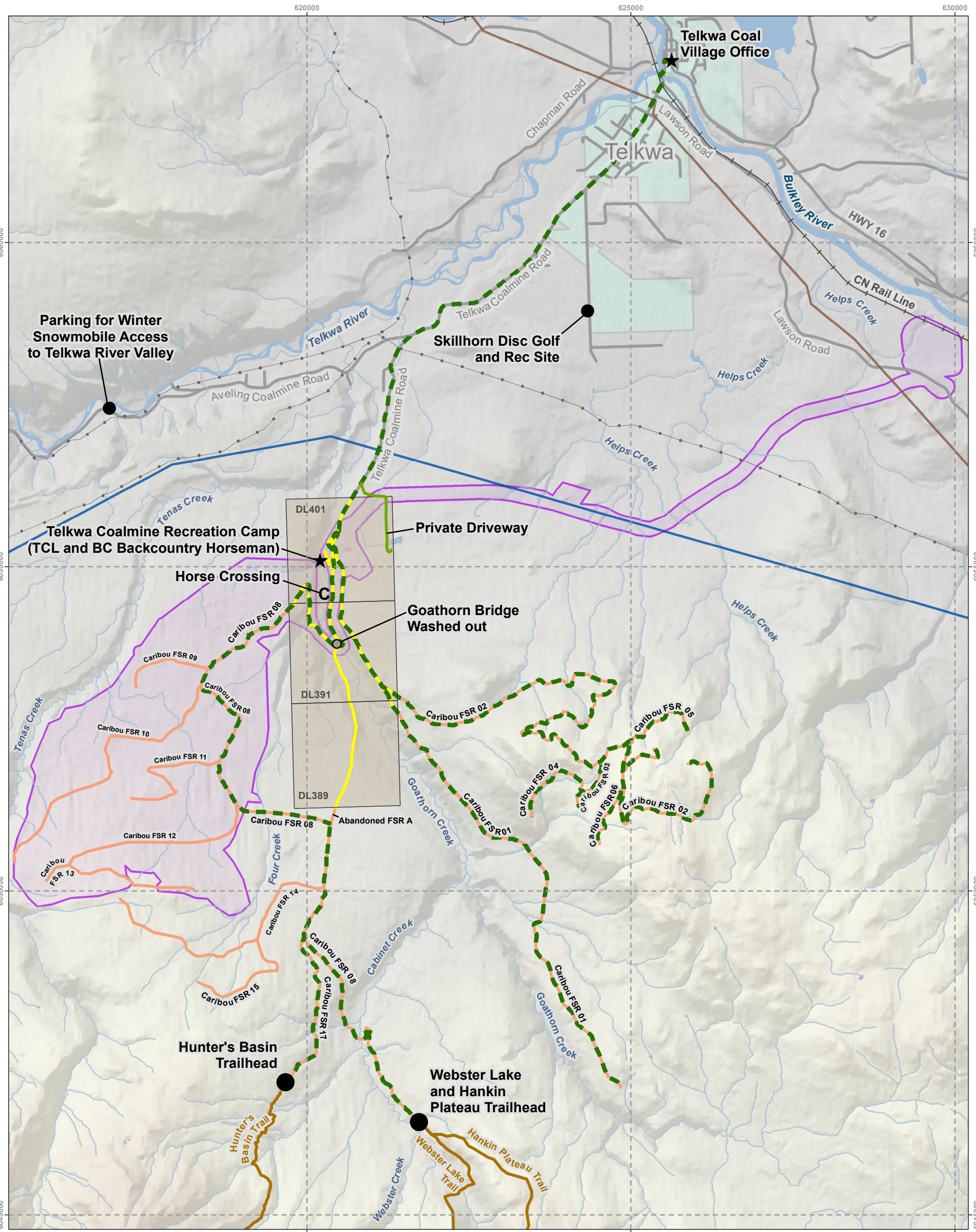
BC MOTI continues to maintain the gazetted section of the Telkwa Coalmine Road but has not conducted maintenance beyond this point (onto TCL private land) for over a decade. TCL controls the road within their private land but has not posted signage to this effect or enforced any sort of access restrictions, except during periods of active mineral exploration activity.

When TCL is conducting exploration or monitoring activities, a road use permit will be obtained from BC MFLNRO for use of the Caribou FSR's outside of the TCL private land portions. BC MFLNRO's plan for the Caribou FSR's has not changed due to TCL activities or plans, these FSR's are not maintained by BC MFLNRO and are intended to naturally reclaim to become unusable by vehicles in the future. TCL only utilizes a small portion of the Caribou FSR's, located within the Project Area on the west side of Goathorn Creek during exploration programs.

To access the west side of Goathorn Creek, the public utilizes the Gazetted Telkwa Coalmine Road which then connects to the private road through DLs 401 and 391 owned by TCL. Since the washout of the Goathorn bridge in the late 2000s, an unauthorized ford of Goathorn Creek has been established and is utilized by the public to access recreation sites on the west side of Goathorn Creek. From this ford, the access continues to a TCL private road on the west side of Goathorn Creek. This private road is used until it exits the northwest corner of DL 391 and becomes Caribou FSR 08, which leads to the trailhead for Hunter's Basin and to Caribou FSR 015 for accessing the trailhead to Webster Lake.

To access Crown land on the east side of Goathorn Creek, after leaving the Gazetted Telkwa Coalmine Road, the public travels on TCL private road through DL 401, 391 and 389, then enters onto Caribou FSR 001 which allows access to Caribou FSRs 002 through 007 on a plateau above the east side of Goathorn Creek. **Figure 6.2-2** illustrates the access currently used by the public to access the Project Area.

- | | | | | | |
|---|--------------------------|---|------------------------------|---|------------------------------|
|  | Project Area |  | Waterbody |  | Ongoing Public Access |
|  | CN Rail Line |  | Telkwa Village Boundary |  | Provincial Roads or Highways |
|  | 138 kV Transmission Line |  | Watercourse |  | TCL Private Roads |
|  | 500 kV Transmission Line |  | Pacific Natural Gas Pipeline |  | Forest Service Roads |
| | | | |  | Hiking Trail |



6.3 Indigenous Groups Access Control Procedures

TCL will work with the Office of the Wet'suwet'en (OW), Witset First Nation and Wet'suwet'en First Nation to develop a unique set of procedures that fits their individual needs and requirements. Modification of the public access control procedures maybe required to ensure Indigenous rights are respected and accommodated. Land uses identified by Indigenous groups include (but are not restricted to) access for:

- ▶ subsistence food gathering (including hunting);
- ▶ plant gathering in areas both within and outside of the Project Area; and
- ▶ performing ceremonial and feasting activities within and outside the Project Area.

It is anticipated that during the engagement process, additional Indigenous land access requirements will be identified. TCL will work with Indigenous groups to develop a workable set of access procedures that accommodate their requirements, while ensuring a controlled and safe access for all parties involved. If a single set of procedures can be developed for Indigenous groups and public access to the Project Area these will be provided for review and agreement. If need be, there can be unique access procedures for each Indigenous group and the public.

6.4 Access to Project Area after Regulatory Approvals

If the Project is approved by regulatory agencies, a safe and controlled access must be provided for Indigenous persons and surrounding public recreation. Industrial access for the project will be via the Tenas Access Corridor (TAC) which is part of the Project Area.

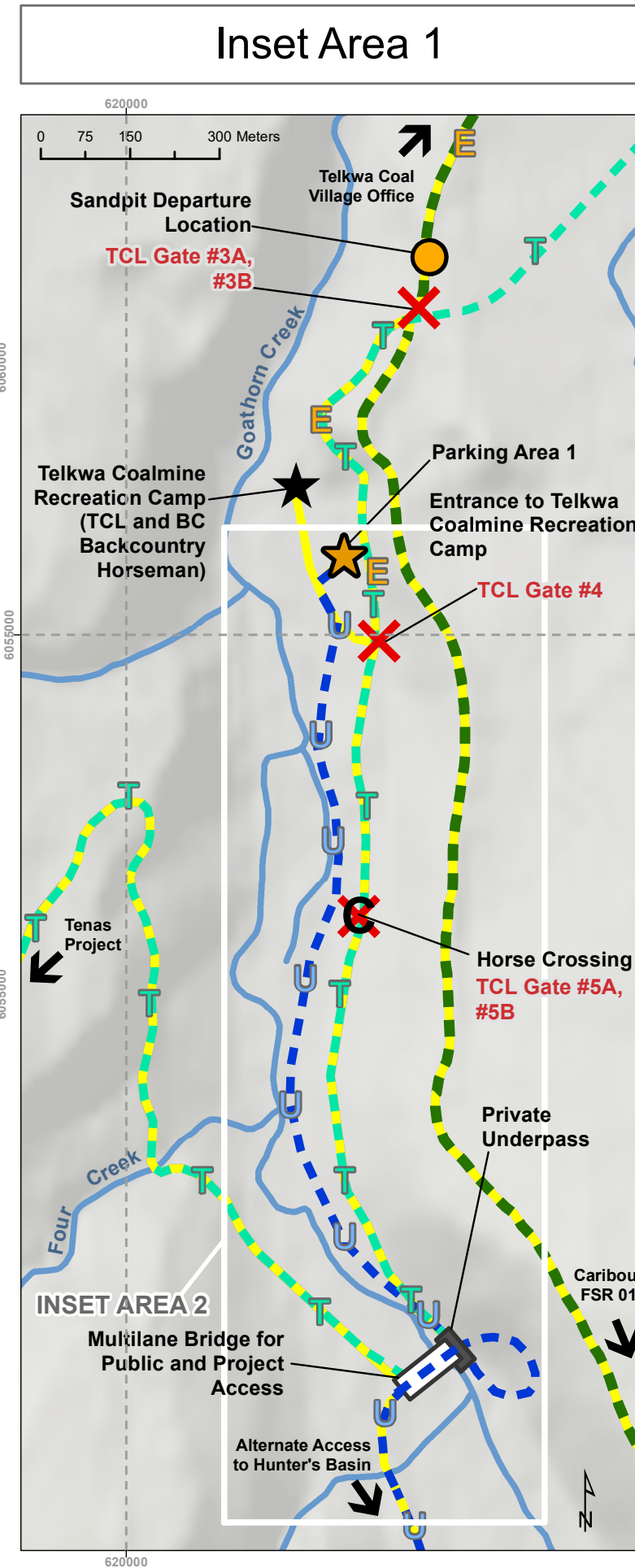
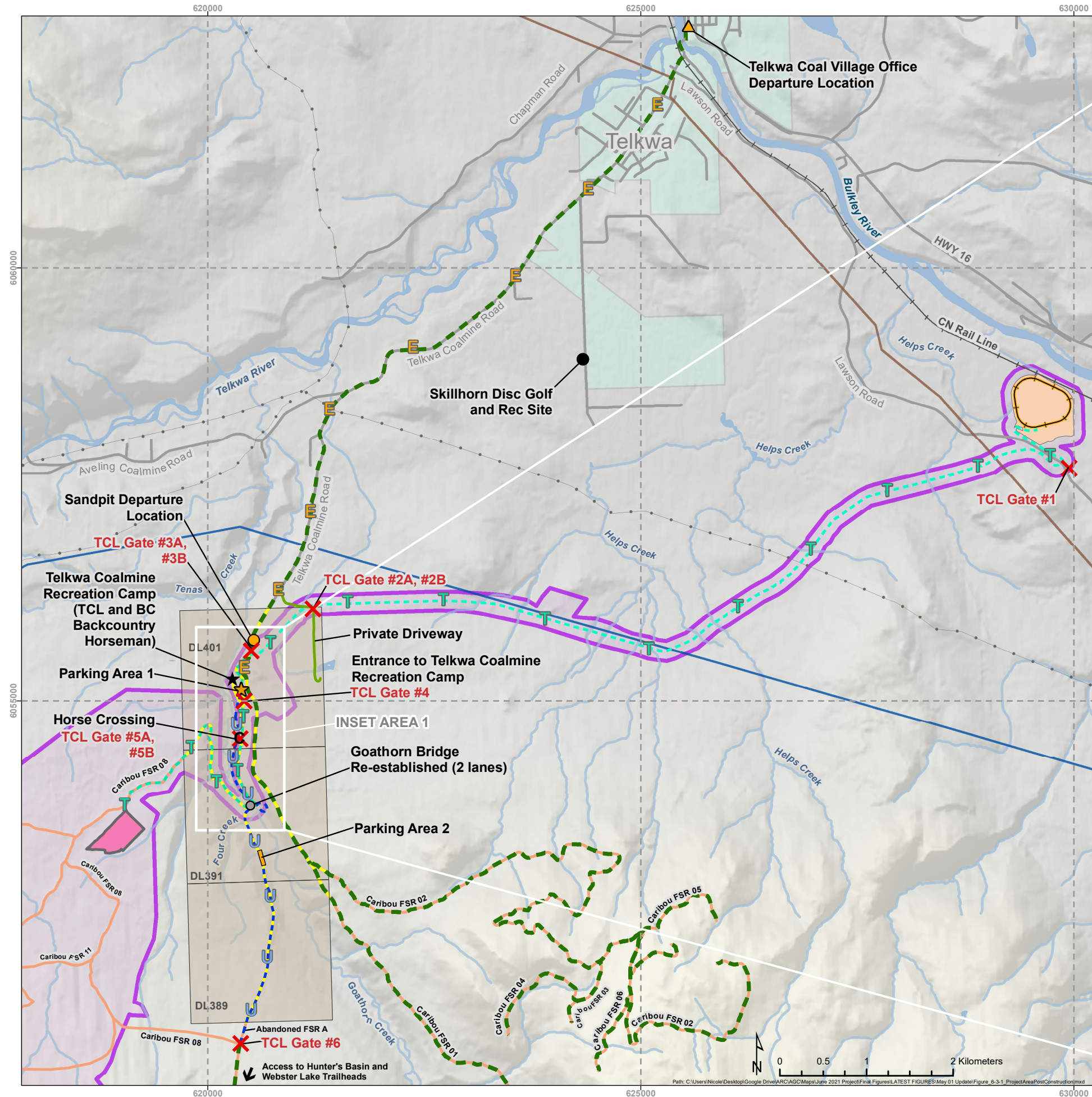
Per the *Mines Act*, RSBC 1996, c 293, and *Land Act*, RSBC 1996, c 245 requirements, a "No Unauthorized Entry, Hunting, and Fishing" boundary will be established at the outset of the Construction Phase around the Project Area to prevent unauthorized access. It will be in effect throughout the Project life.

Figure 3-1 provided earlier illustrates the "No Unauthorized Entry" boundary for the life of the Project and shows the existing FSRs, private roads and provincial roads and highways overlaid with the Project footprint.

To understand the PAMP developed, TCL is providing the ongoing public access conditions to reach Hunter Basin and the groups that have jurisdiction over these access roads which is not widely or correctly understood by the public. **Figure 6.2-2** provided previously illustrates ongoing public access roads and regulatory ownership of these roads. As shown, there are several parties involved:

- ▶ BC MOTI;
- ▶ FSR that are controlled BC MFLNRO; and
- ▶ TCL.

TCL is planning to implement Access Control Procedures to maintain public access through and beyond the Project Area to allow access to recreational locations. Public access will utilize the Telkwa Coalmine Road, existing private roads, construction of a new private road and improvements to an existing private road, and an FSR, all of which will be controlled by access gates on the TAC. **Figure 6.4-1** illustrates the access after the Project is developed. Project access will stay in place until the Decommissioning and Reclamation Phase of the Project is completed. **Figure 6.4-2** provides an illustration of Inset Area 2 to better understand the areas of proposed new access road for public access versus TCL proposed access road (TAC).



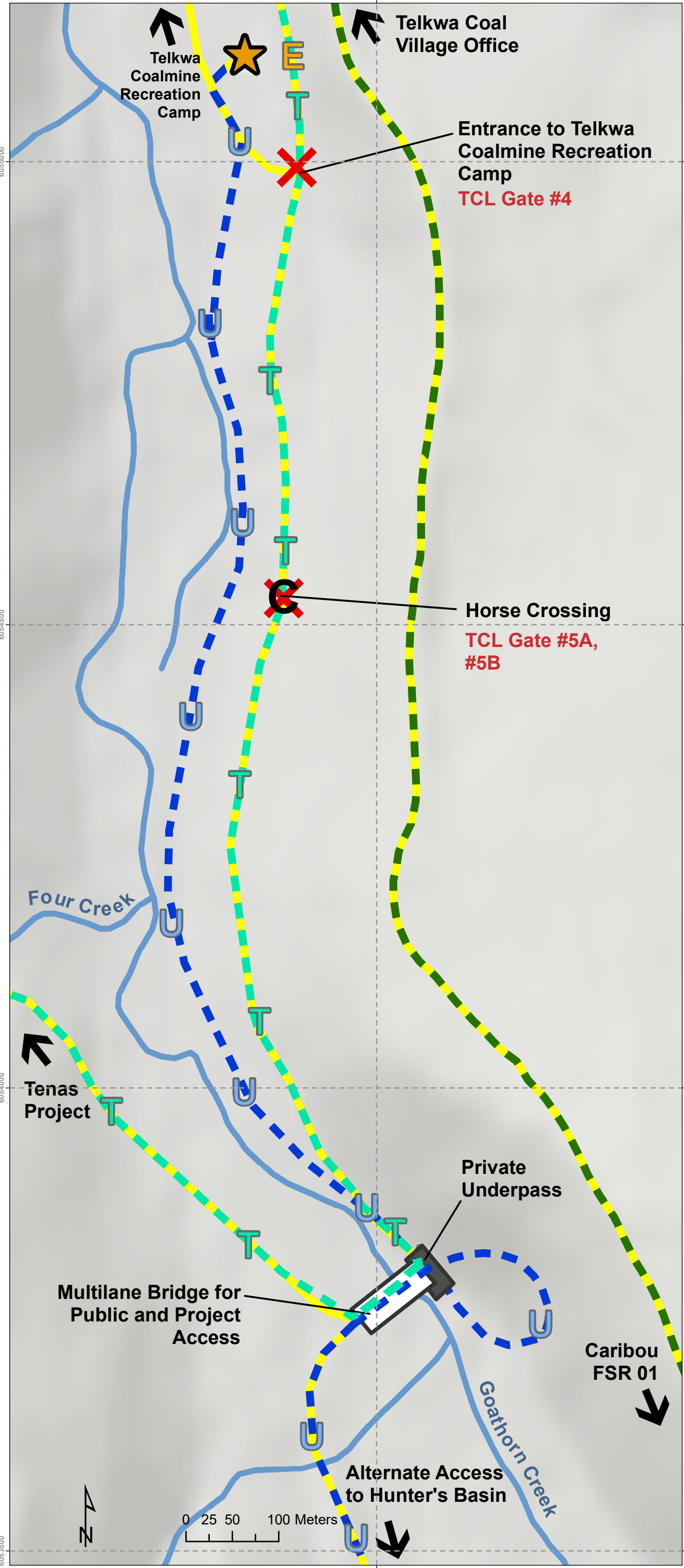
- Project Area
- Mine Infrastructure Complex (Coal Processing Plant, Administration and Mine Dry Building, Maintenance Facility)
- X Access Gates
- Pacific Natural Gas Pipeline
- CN Rail Line
- Ongoing Public Access
- Provincial Roads or Highways
- TCL Private Roads
- Forest Service Roads
- Hiking Trail
- - - Proposed TAC (Proposed access road)
- - - Proposed Alternate Private Recreational Access Road
- Waterbody
- Telkwa Village Boundary
- Rail Loop
- Rail Infrastructure
- Watercourse
- 138 kV Transmission Line
- 500 kV Transmission Line
- E Under TCL Escort
- U Unescorted New and Upgraded Public Access
- T Telkwa Coal Access for Processed Coal Haul, Supplies, and Personnel

Tenas Project

Figure 6.4-2

Public and Project Access with
road regulatory ownership
for Inset 2

- TCL Private Roads
- Proposed TAC (Proposed access road)
- Proposed Alternate Private Recreational Access Road
- Ongoing Public Access
- Access Gates
- Parking Area 1
- Horse Crossing
- Under TCL Escort
- Unescorted New and Upgraded Public Access
- Telkwa Coal Access for Coal Haul, Supplies, and Personnel
- Watercourse



6.4.1 Tenas Access Corridor (TAC)

As part of the overall Project, access to the site that allows both the haulage of processed coal and the transportation of supplies, and personnel to and from the Project and for waste materials to be hauled offsite to approved locations. The construction of the TAC and the existing Telkwa Coalmine Road will allow unintentional access to an active mining Project. The TAC will be look like very similar to FSR in the region and will be developed as an all season access for B-double trucks with a maximum weight of 110,000 kilogram (kg). A picture an existing road used for mine access and processed coal haulage is provided below which will be very similar to the TAC constructed for this Project. Additional information on the TAC is provided in **Appendix 13.1-B Tenas Access Corridor**. **Figure 6.4-3** provides a photograph of a typical access road that is used for the haulage of processed coal and transportation of services and personnel to an active mine in BC.



Figure 6.4-3: Photograph of an access road like the proposed access road (TAC) for the Operation, Decommissioning and Reclamation Phases

6.5 Public Access Post Construction

The following provides details on the public access that will be put in place for the Project once the Construction Phase is completed. It consists of the following aspects:

- ▶ public access control and project security;
- ▶ escorted public access roads;
- ▶ public escort schedule;
- ▶ unescorted public access roads;
- ▶ contingencies for public access;
- ▶ emergency situations; and
- ▶ Indigenous group access.

6.5.1 Public Access Control and Security

Access gates will be installed on the TAC to prevent unauthorized access at six (6) locations:

1. the intersection with Lawson Road (provincial road, BC MOTI) is identified as TCL GATE#1 and consists of a gate on each side of Lawson Road on the TAC road to prohibit access from Lawson Road to the Rail Infrastructure to the North or to the TAC to the South. Only TCL personnel will be able to open these gates;
2. the intersection with a private driveway into residence currently occupied is identified as TCL GATE #2A (2A) and #2B (2B) and consists of two (2) sets of gates, with one (1) set being on the private driveway (2A) and the other set on the TAC (2B). These gates will prohibit the public who are using this private driveway to access the TAC via 2B. The public will be able to activate 2A which will open the gates on the private driveway and close the gates on the TAC for a period of 60 seconds. TCL personnel will be able to control both gates.;
3. the intersection with the Telkwa Coalmine Road is identified as TCL GATE#3A (3A) and #3B (3B) and consists of two (2) sets of gates, with one set being on the Telkwa Coalmine Road (3A) and one set on the TAC (3B). These gates will prohibit the public who want to access Caribou FSR001 from accessing the TAC. The public will be able to activate 3A which will open the gates on the Telkwa Coalmine Road and close the gates on the TAC for a period of 60 seconds. This will allow the public to access Caribou FSR01 above Goathorn Creek across the TAC to the south. TCL personnel will be able to control both gates;
4. access to the entrance to the Telkwa Coalmine Recreation Camp (TCRC) is identified as TCL GATE#4 and consists of only one(1) gate blocking the entrance. This will prohibit the public from accessing the TAC from the Telkwa Coalmine Recreation Camp. Only TCL personnel will be able to open this gate; and
5. the intersection of an existing Horse Crossing is identified as the TAC TCRC Horse Crossing that allows access to an existing non-road trail system south and east of the TAC is identified as TCL GATE #5A (5A) and #5B (5B). This consists of two (2) sets of gates, with one (1) set being on the TAC TCRC Horse Crossing (5A) and one (1) set on the TAC (5B). The public will be able to activate 5A which will open this gate to the TAC TCRC Horse Crossing and close the gates on the TAC for a period of 60 seconds. This will allow the public to access the hiking and horse trails to the south of the TAC while prohibiting public access to the TAC. TCL personnel will be able to control both gates;

6. Intersection of Caribou FSR 008 and FSR 015 and is identified as TCL GATE #7 and consists of gate across the entrance to FSR 008. This gate prevents the public from accessing the Project to the east when travelling north from the recreation sites to Parking Area 2. Only TCL personnel will be able to control this gate.

Figure 6.3-1 provided earlier illustrates the locations of the access gates described above, while **Figure 6.5-1** below provides a photograph of typical gate to be installed.



Figure 6.5-1: Example of an access control gate

6.5.2 Escorted Public Access Roads

TCL is planning to implement an Access Control Procedure to maintain public access through and beyond the Project Area to allow access to recreational locations. Escorts will be available from either of the following two (2) departure locations:

- ▶ the TCL office parking lot which is at the Telkwa Village Office; and
- ▶ the Sandpit.

From these designated departure locations vehicles will be escorted by identified TCL vehicles to a parking area near the TCRC located adjacent to the east side Goathorn Creek identified as Parking Area 1. Any vehicles larger than 2.5 metres (m) in width will not be able to cross the bridge over Goathorn Creek as the lane for public access is only 3.0 m wide. The maps indicate the escort route, and the orange star indicates Parking Area 1 where vehicles will be released from escort.

TCL will consider escorting groups through the Minesite area of the Project to other locations requested or identified, if ongoing stakeholder engagement during the EAC Application review stage, Construction, Operation, Decommissioning and Reclamation and Post-Closure phases deem this is a necessary addition to the PAMP. Furthermore, if additional locations for access outside of the Project Area are requested by stakeholders, TCL will investigate adding these through the establishment of additional control gates and access control procedures.

6.5.3 Public Escort Schedule

The public will register for an escort (via lead TCL vehicle) at designated times departing from the TCL office in Telkwa and subsequently the Sandpit departure locations through to Parking Area 1 and from the Parking Area 1 back to the TCL office and/or Sandpit. The following provides the times for escort services.

Summer Schedule - High Season: between Canada Day and Labor Day long weekends:

- ▶ seven (7) days a week;
- ▶ inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.;
- ▶ outbound from the Parking Area 2 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and
- ▶ by request by using the company website, email, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required.

Summer Schedule - Low Season: between Victoria Day and Canada Day long weekends and between Labour Day and Thanksgiving Day long weekends:

- ▶ weekends including Friday only;
- ▶ inbound to Parking Area 1 every four (4) hours starting at 8:30 a.m. and ending at 20:30 p.m.;
- ▶ outbound from the Parking Area 1 every four (4) hours starting at 13:00 p.m. and ending at 21:00 pm.; and
- ▶ by request only using the company website, email, office, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required.

Winter Schedule: between Thanksgiving Day long weekend in October and Victoria Day long weekend in May of the following year:

- ▶ no service between December 20 and January 5 without prior arrangement;
- ▶ weekends not including Friday;
- ▶ inbound to Parking Area 1 at 9:30 a.m. and at 13:30 p.m. and 17:30 p.m.;
- ▶ outbound from Parking Area 1 at 13:00 p.m. and at 17:00 p.m.; and
- ▶ by request only using the company website, email, sign-in sheet in Telkwa, and/or telephone at least 72 hours prior to access being required reflecting the times below.

Furthermore, for any special events and/or other access requirements, arrangements can be made with TCL for facilitating access.

6.5.4 Unescorted Public Access Roads

Access south of the TAC will be maintained along the existing private road south of the TAC and then onto the Caribou Forestry Service Road 001 which accesses the remainder of the Caribou FSR on the eastern side of Goathorn Creek. Gates will be installed on the TAC to prevent public access from the existing private road. Similarly public access from the south to the north from the Caribou FSR will be maintained by using these same gates to allow the public to use the private road that joins to the Telkwa Coalmine Road travelling to the north.

Approximately 1,200 m south from Parking Area 1, a new private road will cross under the TAC via a private underpass (3 m wide by 3 m high) to get to the south side of the TAC. From the underpass, the road will curve around to the north onto a divided two (2)-lane bridge installed over Goathorn Creek. The divided bridge will physically separate public vehicles from Project vehicles and will allow passage of vehicles with an overall width of up to 2.5 m.

After crossing the Goathorn Creek Bridge, the public can access an existing private road that bypasses the Project Area heading due south and provides access to trailheads for Hunter Basin and Webster Creek. The private road will be jointly maintained by TCL and not for profit recreational groups for the duration of the Construction, Operation, and Decommissioning and Reclamation phases of the Project between the Bridge and Gate 6. Alternatively the province may take on responsibility for this road.

The existing, south trending private road on the west side of Goathorn Creek (accessed by the new road from Parking area 1), provides access for a broad range of transport, including by horse, walking, biking, snowmobiles, quads, side by sides, motorbikes, and motorized vehicles with 4 x 4 capability. Prior to this road becoming the alternate access TCL will conduct improvements to this road to allow the passage of most vehicles and ensure culverts, and ditches are in good condition or will be replaced. This road will not be constructed or maintained (no snow plowing, limited water control, not a smooth gravelled surface and it will be primarily single lane). Two (2)-wheel drive vehicles will have difficulty with using this road as regular plowing of snow will not be done and the road itself will be much rougher than a provincially maintained road such as the Telkwa Coalmine Road or FSR related to campgrounds. Parking area 2 will be provided on a widened section of the road to allow vehicles to park if they are not able to continue on this road due to vehicle limitations to the hiking trail heads.

TCL will install signage at several locations and provide bulletins for the public on road conditions, to minimize unsuitable vehicles from using the road network beyond the two (2) parking areas. TCL will not enforce what type of vehicle can be used on the roads; if the vehicle can fit on the road and the user feels their vehicle is capable of safely travelling on the road, they can use the road. However, road users will be responsible for their own safety, damage to vehicles, and any costs to recover vehicles.

During the Project Construction Phase, improvements to ensure vehicle access to the trail head of Hunter Basin will be undertaken by TCL, in conjunction with user groups such as the Back Country Horsemen of BC, Bulkley Valley Backpackers, and members of the Tenas Project Access Committee. These improvements may include smoothing and widening of the existing road in select areas to allow public vehicles to pass one another and brush clearing.

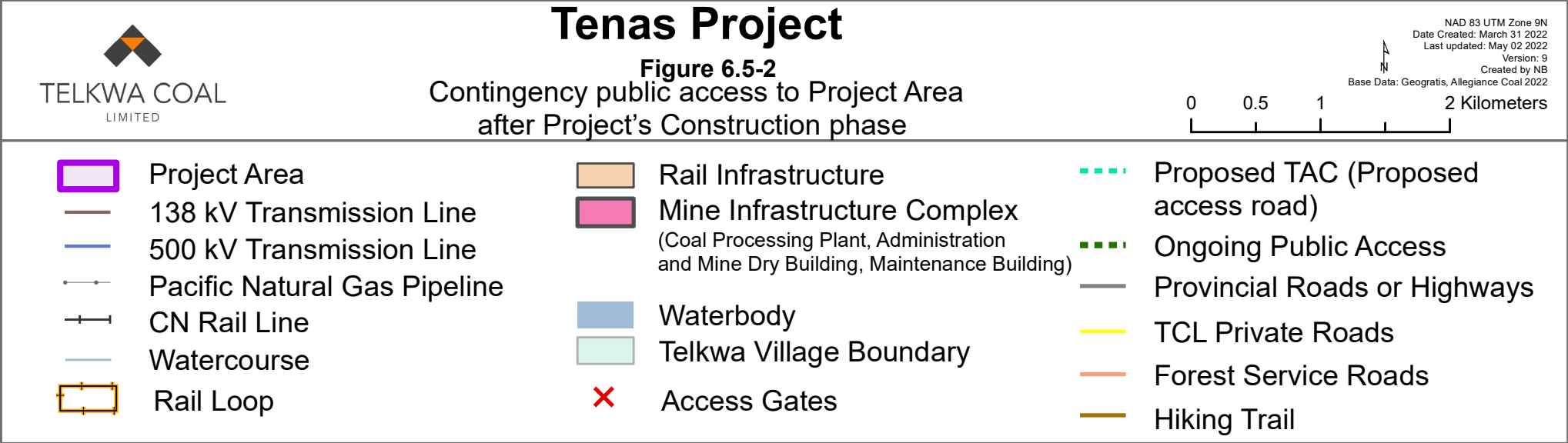
With the PAMP in place as described above, the Project will improve legal public access to recreational facilities via the re-establishment of a bridge over Goathorn Creek. Furthermore it will reduce environmental damage caused by current fording activities by vehicles through Goathorn Creek. **Figures 6.3-1 and 6.3-2**

previously provided illustrate the access to the Project Area after regulatory approvals are granted for the Project and construction activities have commenced.

The Project is not anticipated to affect access to the area west and south of Tenas Creek. Access to this area west of the Project is via the existing Powerline Access Road as previously illustrated on **Figure 3-1**. While access to the areas south of Tenas Creek is via the Averling Coalmine Road.

6.5.5 Contingencies for Public Access

During discussions with stakeholders, concerns were raised with the alternate public access road being proposed may become blocked in the future by either a wash out or tree falls that might require an extended period to remedy the situation to allow for ongoing public use. To address the possibility of a temporary closure of the alternate public access road, TCL will implement a contingency public access procedure, which requires TCL escorting public vehicles through the mine operation to Parking Lot 3 which is represented by an orange square on **Figure 6.4.1**. The departure locations for the contingency access procedure is the same as described in **6.4.1.2** (Escort Access Route). **Figure 6.5-2** below illustrates the contingency public access route to Hunter Basin trailhead.



6.5.6 Ongoing Public Access Assessment

Recreational use of the area surrounding the Project Area and the Project Area may change over time. To facilitate discussion and manage change, TCL will set up a Tenas Project Access Committee, composed of TCL representatives, Indigenous groups, regulatory agencies, and the public, with a plan to meet twice annually.

This committee will report on future and previous access activities, state of roads, use, signage, and other items that come up. TCL personnel will be responsible for biannual walks of the roads to ascertain conditions and provide feedback to the regional and provincial governments and stakeholders and the Tenas Access Committee. To enable maintenance conducted by volunteers and government personnel for recreational roads within the Project Area and beyond, TCL will provide escorted access for these maintenance vehicles and equipment to recreational trailheads beyond the Project Area and to any recreational roads/trails within the Project Area.

Proposed decommissioning and reclamation of the TAC currently requires the removal of all bridges, including the bridge over Goathorn Creek. However, if on completion of the Project, other parties are willing to take on the maintenance and reclamation obligations of this bridge and portions on the TAC and alternate access, TCL will work with these parties and government to transfer these responsibilities so that all or a portion of the TAC and bridges may stay in place for future recreational activities.

6.5.7 Emergency Situations

Emergency access will be provided as required in the event if any of the following events:

- ▶ injuries, lost persons;
- ▶ flat tires, dead batteries, low fuel;
- ▶ inoperable vehicles; and
- ▶ other issues as required.

A 24-hour number will be posted at staging areas and provided to each person escorted into the site and will be posted at the staging and parking areas. This number is to be called if any of the above emergencies occur. Furthermore, TCL will work with search and rescue, BC ambulance, local fire departments, and 911 to ensure that TCL is notified in the event of the injuries or lost persons occurring around the Project Area. TCL will provide personnel to open gates and escort any required vehicles via the quickest route to the person and emergency in question, whether this is via the mine haulroad and service road network or the recreational road network.

If an emergency occurs for the Project (such as a site wide evacuation and multiple casualty incident on the TAC), that affects escorting operations, a notice will be distributed to the two (2) departure locations to temporarily suspend access until the emergency is over. If members of the public are on the west side of Goathorn Creek a TCL designate will meet them at Parking Area 2 for escort out from the Project. For all members of the public on the east side of Goathorn Creek a TCL designate will meet them at Parking Area 1 for escort out from the Project. Once the emergency is over and normal operations resume for the Project, escorting will resume, and the public will be notified.

7. MONITORING

TCL will conduct regular inspections of the roadways, signage, and public access trails to ensure structures are in good shape. TCL will also conduct regular monitoring to ensure that the PAMP is being followed, and to gather input from users.

7.1 Performance Objectives

The data about performance objectives and targets will be collected by the Environmental Coordinator to ensure the proper implementation of this PAMP and are shown in **Table 7.1-1**.

Table 7.1-1: Performance Objectives

Objective	Target
Number of unplanned public interactions within the Project Area with mining activities	zero
Number of public incidents on the escort route	zero
Number of public complaints related to public access	continual improvement
Number of public and TCL interactions with wildlife within the Project Area that cause wildlife fatalities	zero

8. REPORTING

A monitoring program will be developed to ensure that use of the Project Area by the public is compliant with both relevant legislation and this PAMP. The monitoring program will be carried out by the Environmental Coordinator in conjunction with the vehicle Escort and reported to the Mine Manager or delegate (Mine Superintendent).

8.1 General Reporting

Reporting completed by TCL will ensure consistent implementation of the PAMP. Summary reports of monitoring activities and results will be compiled and reviewed annually.

8.2 Compliance Reporting

Compliance reporting will be subject to EAC and MA/EMA permit conditions. The information gathered during monitoring practices will be summarized with information from other management plans into an Annual Environmental Management Summary Report and upon permitting completion, the Annual Environmental Reports as required by MA/EMA permits. Community engagement activities will be an aspect of the **Socio-economic Management Plan (S13.0-C16) (SEMP)**. The **SEMP** will have requirements related to reporting on community engagement programs.

8.3 Internal Reporting

Details of monitoring programs will be reported internally on an annual basis according to the adaptive management framework of the EMS. The report will provide results of monitoring, assessment of performance objectives where applicable, and any other pertinent information.

TCL employees or contractors will be strongly encouraged to report any inefficiencies to management for evaluation consideration.

9. ROLES AND RESPONSIBILITIES

9.1 Mine Manager

The Mine Manager bears overall responsibility for the construction and operation of the Project, and responsibility for onsite environmental monitoring and compliance relating to Construction, Operation, Decommissioning and Reclamation, and Post-closure phase activities. The Mine Manager reports to the executive steering committee for TCL and will coordinate with this group to ensure that Project objectives are being met.

The Mine Manager will:

- ▶ implement the requirements of the PAMP;
- ▶ ensure adequate resources are available to enable implementation of this PAMP;
- ▶ be accountable for the overall performance of the PAMP, including reporting metrics such as performance objectives to measure and report on the outcomes of this PAMP;
- ▶ ensure road design, construction and maintenance is undertaken according to Project Approval requirements;
- ▶ chair the Tenas Project Access Committee;
- ▶ investigate accidents, near misses and complaints and develop corrective actions if necessary; and
- ▶ report incidents to agencies as required using the forms provided in **Appendix 13.14-A Incident Notification and Incident Investigation Report Forms**.

9.2 Mine Superintendent

The Mine Superintendent will be the Mine Manager's delegate as needed for the implementation of the PAMP.

9.3 Environmental Coordinator

The Environmental Coordinator is responsible for the day-to-day management of Project environmental programs and permits. The Environmental Manager reports to the Mine Superintendent.

The Environmental Coordinator will:

- ▶ assist the Mine Manager or delegate with implementation of this PAMP;
- ▶ act as a resource to the Minesite team by providing guidance relating to permit conditions, commitments, regulations, acts, and interpretation of legislation;
- ▶ deliver training and awareness programs to ensure employee and contractor competence with the PAMP;
- ▶ provide support and guidance to employees and contractors regarding the PAMP;
- ▶ work with the Mine Manager or delegate (Mine Superintendent) and Escort Personnel to gather information and report on monitoring and performance objectives as well as accidents, near misses, and complaints;

- ▶ ensure data about monitoring and performance objectives, as well as accidents, near misses and complaints is reported to the Mine Manager or delegate (Mine Superintendent) and incorporated into the Annual Environmental Management Report;
- ▶ complete an annual review of the PAMP to compare data, trends, and implementation of the PAMP and its objectives, including a review of the management plan deliverables and input received from Indigenous groups and other stakeholders;
- ▶ manage vegetation and invasive plants to ensure clear sightlines for drivers accessing the Minesite and comply with the **Vegetation Management Plan (S13.0-C18)**;
- ▶ be the liaison for government agencies for permitting and non-compliance incidents;
- ▶ conduct bi-annual inspections of road networks and generate findings as part of Tenas Project Access Committee,
- ▶ Work with Indigenous group, stakeholders, and government to keep roads in working condition over the life of the Project until the end of the Decommissioning and Reclamation Phase; and
- ▶ be the liaison for Indigenous groups, through their designated representatives, for permitting as well as traffic access issues.

9.4 Health, Safety, and Human Resources Superintendent

The Health, Safety, and Human Resources Superintendent will:

- ▶ assist the Environmental Coordinator with training and awareness programs to ensure employee and contractor competence with the PAMP; and
- ▶ retain records related to employee training programs.

9.5 Escort Personnel

TCL Escort Personnel or designates will:

- ▶ be the primary contact for disseminating information regarding the PAMP to their community, including access restrictions and protocols;
- ▶ manage the sign-in scheduling program that allows the public to request access to the Project Area;
- ▶ maintain records about the use and users of the Project Area to assist with reporting of metrics such as performance objectives; and
- ▶ provide guided access via operation of a lead vehicle to escort users of the Project Area roads between the TCL office in Telkwa and the TCRC.

9.6 Employees and Contractors

Safety and environmental training will be provided for TCL Minesite personnel and contractors involved in the Project, and it will include the PAMP requirements required for activities. The training will provide a clear explanation of everyone's roles and responsibilities regarding public access control.

Employees and contractors will:

- ▶ attend site induction and training;
- ▶ review and abide by sections of this PAMP; and

- ▶ report anyone not complying with this PAMP to their Supervisor.

9.7 Public

Members of the public will:

- ▶ abide by the access restrictions of this PAMP and any additional instructions provided by TCL personnel including Escort Personnel;
- ▶ use the sign-in scheduling program to request access to the Project Area; and
- ▶ report anyone not complying with this PAMP to TCL.

10. COMMUNICATION

Communication of the PAMP at TCL will be based on internal requirements and will be primarily through review of the PAMP and relevant SPPs with all employees and contractors. Any significant change to a road, intersection, or traffic pattern will be communicated to Minesite employees and contractors through a site-wide email, announcements over radio channels by Minesite supervisors, bulletins posted around the Minesite and bulletins at the departure locations. Also all changes will be reviewed with the Access Committee prior to and after implementation.

10.1 Training And Awareness

Operating a vehicle, including as a vehicle Escort for the Project requires training and understanding of the PAMP, as well as the **Minesite Traffic Control Plan (S13.0-C10) (MTCP)**. Furthermore, personnel must have a valid BC Class 5 Driver's License and TCL Minesite Driver's License.

10.2 Employee Training

Employees are required to review relevant management plans and/or SPP and their associated training modules at the start of employment and on annual basis. Employee training is tracked and managed by a software application by the Health, Safety, and Human Resources Department.

10.3 Contractor and Visitor Training

Contractors will review the relevant management plans and/or SPP at the start of their contract and on an annual basis if contracts are longer than 13 months in duration to ensure their compliance with these requirements. Visitors will receive an overview of the relevant SPPs during their visitor training session prior to accessing the site or from their Contract Manager. Visitors are generally restricted to being under the direction of TCL employees for use of TCL roads and will be escorted by TCL personnel onsite or accompanying TCL personnel in their vehicles.

11. EVALUATION AND ADAPTIVE MANAGEMENT

11.1 Evaluation

A review of the PAMP will be completed by the Environmental Coordinator on an annual basis to compare data, trends, and implementation of the PAMP and its objectives. This process will include a review of the management plan deliverables and input received from Indigenous groups and other stakeholders. Performance objectives and other metrics will be used to assess and evaluate the PAMP.

11.2 Adaptive Management

A philosophy of adaptive management will be adopted to ensure that management plans and mitigation measures are consistently meeting or exceeding performance targets. This will be achieved through periodic reviews of the PAMP and the results of monitoring programs.

11.3 Continual Improvement

TCL will work towards continual improvement at the Project. The Mine Manager or their delegate will investigate improvements in any trend and assess whether the practices responsible for the improvements can be applied to other areas of the Project. Deteriorating trends will be studied to determine the root cause. When the cause is identified, the Mine Manager or their delegate will implement a suitable corrective action. Examples of corrective actions could include:

- ▶ finding improved ways to manage public access to the Project Area;
- ▶ additional training of employees and contractors on procedures;
- ▶ enhancement of maintenance or monitoring measures; and/or
- ▶ additional supervisory oversight.

TCL will review the PAMP annually and amend it as required based on annual evaluations and feedback from relevant stakeholders and Indigenous groups. Any proposed changes regarding management of the public roads leading to the Project due to concerns from the public or Indigenous groups or regulators will be sent out for review by these groups as needed before being finalized and implemented into the revised PAMP.

12. CHANGE MANAGEMENT

Changing any part of this PAMP requires a formalized process to be used. If significant changes to objectives, management plan structure, operational milestones, communication and/or information management that are being planned, it is required that the Management of Change (MOC) procedure in the **EMS** be followed. Minor edits and/or updates to this PAMP will be controlled through version control and content approval functions.

13. CONCLUSION

The Project is located about 7 km from the Village of Telkwa within a regional area with outdoor recreation use. Access to the Project is prescribed by the Code, *Mines Act*, RSBC 1996, c 293, and *Land Act*, RSBC 1996, c 245.

These legal requirements are for the safety of the public. TCL will delineate a "No Unauthorized Entry" boundary to ensure a safe distance from mining areas. This will be appropriately marked in the field. This boundary, in conjunction with communication regarding its importance and the legal requirement will minimise potential risks to employees, the public, and Minesite security. "No Hunting" and "No Fishing" boundaries will also be established.

Due to the potential for public interaction and the hazards associated with active and inactive mining areas, it is critical that the public is not allowed uncontrolled access to the Project Area. TCL will provide guided access via operation of a lead vehicle to escort users of the Project Area roads .

The PAMP will mitigate potential safety issues related to public access to the Project Area.

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