

April 1, 2026

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**SUBJECT: Supplemental Responses to December 2022 Environmental Assessment Review
Process Comments Regarding Wetlands (Comments 368, 381, 12, and 13)**

Dear Ms. Ferbey,

Telkwa Mining Limited (TML) is in the Application Review phase for the Tenas Steelmaking Coal Project (Project). This letter provides responses to the outstanding information requests on the topic of wetlands referenced as Comment Numbers 368 and 381 in the current Information Tracking Table (ITT) table for the Project, as well as Comments 12 and 13 related to the Vegetation Valued Component Environmental Effects Assessment.

ITT COMMENT NUMBERS 368 AND 381

On January 28, 2026, the British Columbia (BC) Environmental Assessment Office (EAO) requested the following, in relation to ITT Comment Numbers 368 and 381:

As discussed, please find attached WLRS comments outlining the outstanding information regarding wetlands required prior to moving into the effects assessment phase of the EA. In summary, TML will need to provide the following:

- *The type and extent of wetlands disturbed and/or lost, including a function-based description of the wetland features and services that will be removed (e.g., water storage, nutrient cycling, flood attenuation, sediment trapping, groundwater recharge, and habitat provisioning).*
- *The wetland functions that will be lost and the specific ecological impacts of those losses, including whether proposed reclamation will adequately replace those functions.*

- *Species and communities likely to be impacted by wetland loss, including wildlife, fish, and avian species that rely on wetland habitat. Please specifically highlight any species of conservation concern and clearly characterize the nature and magnitude of impacts (e.g., habitat loss, reduced breeding/foraging opportunities, migration corridor disruption, and reduced habitat connectivity).*
- *The type and extent of anticipated wetland reclamation, including size, wetland type, and functional outcomes.*

The specific ITT comments are listed below, followed by a response to these comments.

COMMENT NUMBER 368

WLRs Comments – January 28, 2026

WLRs Comment #3: The proposed reclamation still does not represent like-for-like compensation, which is important to maintain habitat types, biodiversity and other wetland functions.

WLRs Comment #5: Please specifically indicate wildlife, fish, and avian species that will be impacted by wetland habitat loss and characterize the impacts. Highlight species of conservation concern.

COMMENT NUMBER 381

WLRs Comments – January 28, 2026

WLRs Comment #1: The proponents response does not adequately address the request. Please characterize impacts specific to the wetland functions that will be lost, and whether or not reclamation will address loss.

WLRs Comment #7 (part 2): WLRs maintains request for TML to develop a comprehensive compensation plan as previously described.

SUPPLEMENTAL RESPONSE TO COMMENTS 368 AND 381 – MARCH 24, 2026

The type and extent of wetlands altered and/or lost were included in the last TML response to WLRs. A Wetland Replacement Plan has been provided as Enclosure 1. In accordance with the BC Policy and Procedures for Mitigating Impacts on Environmental Values (BC Ministry of Environment 2014a, b), the Plan builds upon the characterization of residual effects in the Environmental Assessment Certificate Application to establish a comprehensive framework for replacing wetlands anticipated to be disturbed within the Project Footprint. The Wetland Replacement Plan details TML's adherence to the provincial mitigation hierarchy, prioritizing

avoidance and minimization strategies—such as clustering infrastructure and utilizing existing disturbances—before addressing residual impacts through on-site reclamation. While swamp wetlands comprise the vast majority of the disturbed area, the footprint also overlaps bog, marsh, and open water classes; these systems currently provide moderate to high hydrological, biogeochemical, and habitat functions, including providing habitat with the potential support species of conservation concern like the western toad and Rusty Blackbird.

To address these losses, TML commits to a robust phased reclamation strategy that will restore 100.1 hectares (ha) of diverse functional wetland complexes that integrate open water, marsh, and swamp ecosystems within former water management ponds, resulting in a net increase of 34.1 ha of total wetland area by Year 25. The strategy targets "like-for-like" replacement of wetland class and function where feasible, compensating for small deficits in swamp and bog area through a surplus of open water and marsh ecosystems at a 2.5:1 habitat offset ratio. These reclaimed wetland areas are designed to initiate some hydrological, habitat, and climate functions immediately, with complex habitat and biogeochemical services maturing over the short-to-medium term.

COMMENT NUMBER 12 AND COMMENT NUMBER 13 RELATED TO THE VEGETATION VALUED COMPONENT ENVIRONMENTAL EFFECTS ASSESSMENT

Comment Numbers 12 and 13 and the TML responses are detailed below.

COMMENT NUMBER 12

1. (Reference: reviewer has selected on Ch 4.7, Page 74, Table 5.4-6: Summary of Effect Characteristics Ratings for the Alteration/Loss of Wetlands Subcomponent, row Duration)

The proponent isn't intending to compensate for direct wetland disturbance on a like-for-like basis. If wetlands are not reclaimed on a like-for-like basis then the residual effect will persist long-term.

The re-establishment of peat-forming plant communities may show initial success within the first few years; however, the development and accumulation of peat layers is expected to take significantly longer than 52-years (post-closure period).

WLRS requests that the proponent reconsider the assigned Duration rating to ensure it reflects the time required for a fully established wetland. A fully established wetland should meet the ecological and functional criteria outlined in the reclamation and offsetting plan, including hydrological stability, vegetation composition, and peat accumulation consistent with natural reference conditions.

Accurate representation of the timeline is essential for evaluating long-term ecological outcomes and determining appropriate mitigation and monitoring strategies.

COMMENT NUMBER 13

2. (Reference: reviewer has selected on Ch 4.7, Page 74, Table 5.4-6: Summary of Effect Characteristics Ratings for the Alteration/Loss of Wetlands Subcomponent, row Reversibility)

The proponent isn't intending to compensate for direct wetland disturbance on a like-for-like basis. If wetlands are not reclaimed on a like-for-like basis then the residual effect is considered irreversible.

SUPPLEMENTAL RESPONSE TO COMMENTS NUMBER 12 AND 13 – MARCH 24, 2026

A Wetland Replacement Plan has been provided as Enclosure 1. The wetland replacement strategy focuses on establishing diverse functional wetland complexes, integrating open water, marsh, and swamp ecosystems. While this strategy targets "like-for-like" replacement of wetland class and function where feasible, bog reclamation is not specifically planned due to the technical complexity and long timescales required for peat accumulation.

In alignment with a habitat-based replacement strategy, the preliminary habitat balance anticipates a surplus of 51.9 ha of open water wetland and 5.5 ha of marsh wetland habitat, alongside a deficit of 17.1 ha of swamp and 6.1 ha of bog wetlands. While bog and swamp ecosystems are characterized by elevated carbon storage and treed habitats, they share many habitat functions with marsh and open water classes, such as foraging for bats and furbearers and migration habitat for waterbirds.

The Wetland Replacement Plan compensates for the loss of functions from the 23.2 ha deficit of swamp and bog habitat with a 57.4 ha surplus of marsh and open water habitats at a 2.5:1 ratio, reclaiming diverse functional wetland complexes that integrate multiple classes to enhance ecosystem performance and resilience. This substantial surplus provides a breadth of biochemical pathways and habitat varieties—including breeding and living habitat for amphibians and waterfowl—intended to provide ecological functions originally present within the Project Footprint, and account for the temporal lag between initial disturbance and full maturation of reclaimed wetland functions.

The reversibility provided within the effects characterization for Alteration/Loss of Wetlands is consistent with this plan (i.e., Partially Reversible). Similarly, the duration provided within the effects characterization for Alteration/Loss of Wetlands is consistent with this plan (i.e., Medium-term, re-establishing by the end of the Post-closure Phase). All planned wetland reclamation is expected to be completed by Year 25, with some wetland functions anticipated to be provided

immediately and others improving over the short-to medium-term (i.e., to approximately 20 years post reclamation).

REFERENCES CITED

BC Ministry of Environment. 2014a. Procedures for Mitigating Impacts on Environmental Values. (https://www2.gov.bc.ca/assets/gov/environment/natural-resource-policy-legislation/environmental-mitigation-policy/em_procedures_may27_2014.pdf)

BC Ministry of Environment. 2014b. Policy for Mitigating Impacts on Environmental Values. (https://www2.gov.bc.ca/assets/gov/environment/natural-resource-policy-legislation/environmental-mitigation-policy/em_policy_may13_2014.pdf).

Sincerely yours,



Daniel J. Farmer
Project and Development Manager
Telkwa Mining Limited

Cc:

Enclosures:

1 Wetland Replacement Plan

Enclosure 1

WETLAND REPLACEMENT PLAN

Wetland Replacement Plan Tenas Steelmaking Coal Project



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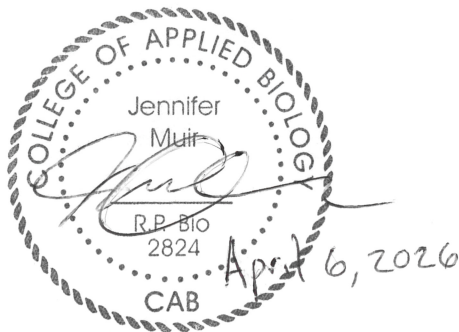




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1 INTRODUCTION

Telkwa Mining Limited (Telkwa Mining) plans to develop the Tenas Steelmaking Coal Project (Project), an open pit coal mine located approximately seven kilometres southwest from the village of Telkwa, British Columbia (BC; Figure 1). The Project is anticipated to produce approximately 825,000 tonnes per year of metallurgical or coking coal used in steel production. It would include an open pit mine and a Coal Processing Plant (CPP), featuring storage piles, surface water management features, water supply wells, mine haul roads, a power line, a rail loadout facility and rail loop, and related infrastructure. The Project will have a life-of-mine of approximately 26.5 years, including the Construction, Operation, Decommissioning and Reclamation, and Post-closure phases.

The Project-specific Environmental Assessment Certificate (EAC) Application predicts one of the residual effects of the Project will be alteration / loss of wetlands and wetland functions (Telkwa Coal Limited 2022a). This residual effect was predicted to be Not Significant; that is, not expected to alter the integrity of the Vegetation Valued Component within the Vegetation Regional Study Area beyond an acceptable level (i.e., it remains sustainable and is available to contribute to ecological function).

Telkwa Mining has retained EDI Environmental Dynamics Inc. (EDI) to prepare a Wetland Replacement Plan (Plan). In alignment with the BC *Policy and Procedures for Mitigating Impacts on Environmental Values* (BC Ministry of Environment 2014a, b), this Plan builds on the characterization of residual effects on wetlands provided in the EAC Application and establishes a comprehensive framework for their replacement. The Plan describes Telkwa Mining's commitment to the provincial mitigation hierarchy—prioritizing avoidance and minimization before addressing residual impacts through onsite reclamation, targeting like-for-like replacement of wetland class, area, and function.



1.1 REGULATORY AND POLICY CONTEXT

The Project is currently in the application review phase under the 2018 BC *Environmental Assessment Act*. The Plan has incorporated the engagement and feedback received through the EAC Application review process with Environment and Climate Change Canada (ECCC) and the BC Ministry of Water, Lands and Resource Stewardship (MWLRS), and presents a summary of the processes that have been undertaken to date toward selection of approaches in accordance with the BC Environmental Mitigation Policy, and Procedures for Mitigating Impacts on Environmental Values (BC Ministry of Environment 2014a, b).

Guidance documents that have informed the Plan include:

- Wetlands of British Columbia: A Guide to Identification (MacKenzie and Moran 2004);
- British Columbia Wetland Identification and Delineation Manual – Draft Standard for Field Testing (Resources Information Standards Committee 2025);
- Wetland Ways: Interim Guidelines for Wetland Protection and Conservation in British Columbia (Cox and Cullington 2009);
- Forested Wetlands - Functions, Benefits and the Use of Best Management Practices (Welsch et al. 1995);
- Riparian Management Area Guidebook (BC Ministry of Forests 2024);
- Develop With Care, Environmental Guidelines for Urban and Rural Land Development in British Columbia (Government of British Columbia 2014);
- Wetland Ecological Functions Assessment: An Overview of Approaches (Hanson et al. 2008).

1.2 ENGAGEMENT

In alignment with the transparency and consultation principles of the BC Environmental Mitigation Policy (BC Ministry of Environment 2014b), Telkwa Mining plans to initiate engagement related to this Plan with Indigenous groups, regulatory agencies, and affected stakeholders during the permitting process for the Project. These collaborative efforts aim to validate the proposed functional replacement strategies. Any actionable outcomes from this engagement will be integrated into the Plan as part of the Project's permitting phase (see Section 7.1).



2 PURPOSE AND OBJECTIVES

The primary purpose of this Plan is to address the anticipated loss of wetlands and their associated functions resulting from the Project. In alignment with the BC Environmental Mitigation Policy (BC Ministry of Environment 2014b), this Plan follows the standard mitigation hierarchy — Avoid, Minimize, Restore onsite, and Offset — across all Project phases, including Construction, Operation, Decommissioning and Reclamation, and Post-closure. The Plan serves to:

- Describe the specific type, area, and functions of wetlands anticipated to be disturbed within the Project Footprint;
- Characterize Project adherence to provincial policies through a commitment to prioritize the avoidance and minimization of wetland disturbance prior to wetland replacement;
- Outline a strategic on-site reclamation approach that compensates for the loss of wetland habitats through the reclamation of resilient ecosystem complexes;
- Utilize a phased reclamation approach, beginning with the North Management Pond by Year 5, to serve as an early-stage opportunity for ongoing research and the refinement of revegetation strategies; and,
- Detail site-specific monitoring protocols to document the successful establishment of vegetation and wildlife habitat, addressing any functional deficiencies through iterative updates to the reclamation design.

As a "living document," this Plan will be updated with the results of engagement (see Section 1.2) and field assessments that will be completed during the Project permitting phase (see Section 7.1).



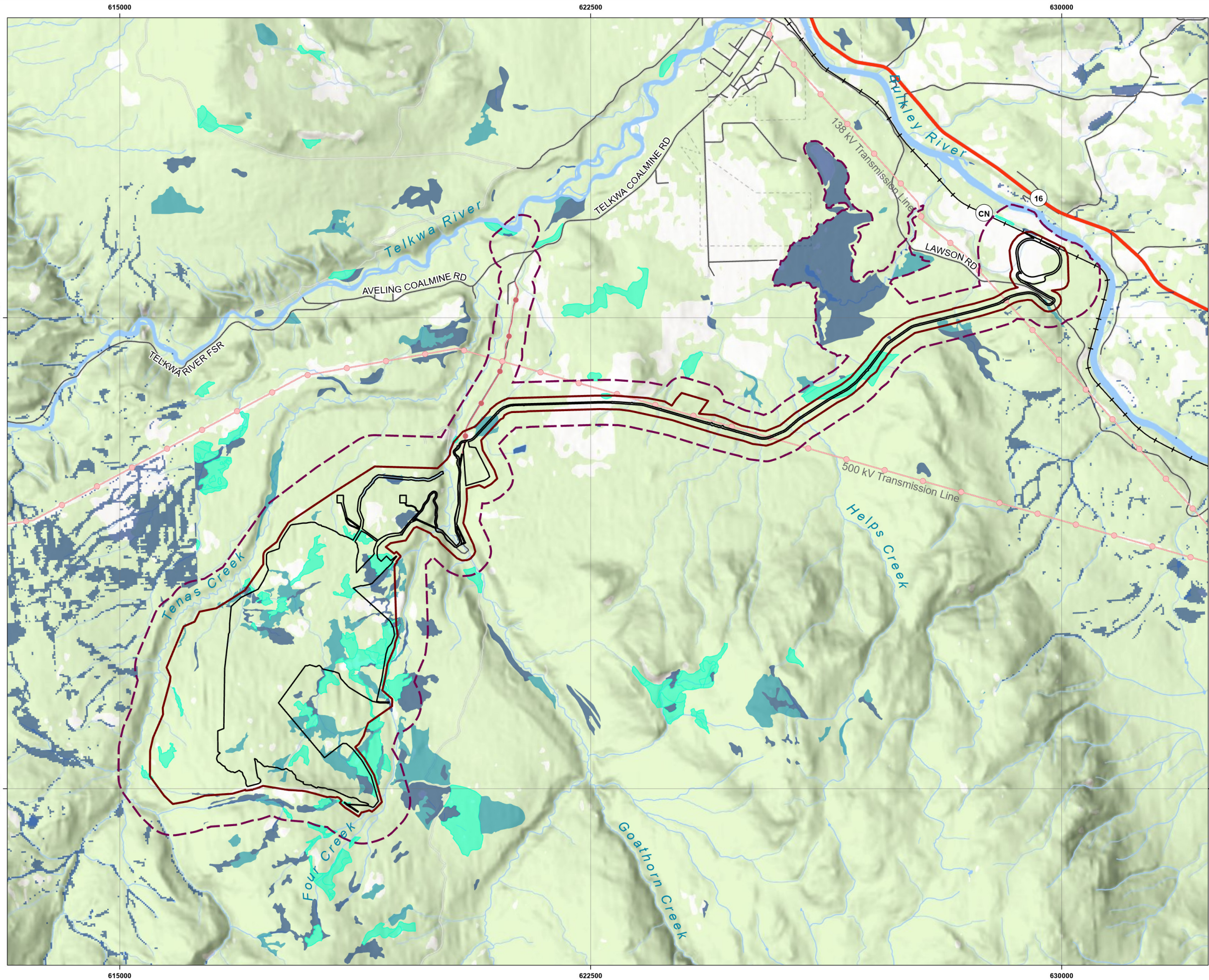
3 WETLAND TYPE, AREA, AND FUNCTIONS SUMMARY

3.1 ASSESSMENT AREAS

The assessment areas for the Plan are generally consistent with the spatial boundaries presented in Chapter 7 of Section 4.0 of the Project EAC Application (Telkwa Coal Limited 2022a; Figure 2); however, minor changes to the Project Footprint and Project Area have been undertaken since the EAC Application as the Project design process has progressed. Assessment areas include:

- **Project Footprint:** the area of direct physical disturbance anticipated to result from the Project. The Project Footprint occupies approximately 863 hectares (ha);
- **Project Area:** the maximum area within which the Project will be constructed and operated, including the minesite, rail infrastructure, and access corridor components. The Project Area occupies approximately 1,915 ha; and,
- **Vegetation Local Study Area (LSA):** Created using a historic version of the Project Footprint, it includes a 250 m buffer on gravel quarries and linear infrastructure (except the Rail Loop), Minesite and Mine Infrastructure Complex (i.e., roads, powerlines, utility distribution network); a 400 m buffer around all other infrastructure (e.g., Rail Infrastructure, Explosive Facility and Explosive Magazine, open pit), and a large wetland complex located downgradient from the Project to encompass potential indirect effects on wetlands downgradient. The Vegetation LSA is approximately 3,331 ha in size.

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Tenas Steelmaking Coal Project

Wetlands mapped within the Project assessment areas

Legend

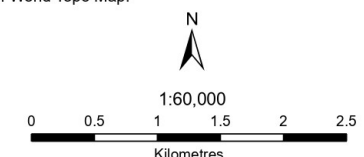
- Highway
- Road
- Rail Line
- Existing 25 kV Powerline
- Transmission Line
- Watercourse
- Waterbody
- Project Footprint
- Project Area
- Vegetation Local Study Area
- Wetland Ecosystems (% of Polygon)
 - 10 - 20%
 - 30 - 50%
 - >50%

Notes

1. All mapped features are approximate and should be used for discussion purposes only.
2. This map is not intended to be a "stand-alone" document, but a visual aid of the information contained within the referenced Report. It is intended to be used in conjunction with the scope of services and limitations described therein.

Sources

- Project Footprint. Telkwa Mining Limited. March, 2026.
- Project Area. Telkwa Mining Limited. February, 2025.
- Wetlands. Derived from PEM/TEM. Ardea (March 30, 2021) and reviewed by EDI Environmental Dynamics Inc. February 26, 2026.
- Vegetation Local Study Area. EDI Environmental Dynamics Inc. 2020.
- Powerline. Telkwa Mining Limited. April 21, 2021.
- Base Data. Government of British Columbia.
- Basemap. World Topo Map.



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Figure 2





3.2 METHODS

3.2.1 BASELINE STUDIES 2017–2019

3.2.1.1 Wetland Identification and Delineation

Project-specific wetland delineation and classification was completed by Ardea Biological Consulting (Smithers, BC) from 2017 to 2019 in accordance with the following methods:

- Wetlands were mapped as part of Terrestrial Ecosystem Mapping (TEM);
- TEM was completed at a 1:5,000 scale and Survey Intensity Level (SIL) of 1/2 within the Vegetation LSA related to the minesite, Goathorn Creek, and rail infrastructure areas; and at 1:10,000 scale and SIL 2 within the Vegetation LSA related to the access corridor;
- Wetlands were classified according to the classifications in A Field Guide to Site Identification and Interpretation for the Prince Rupert Forest Region (Banner et al. 1993), Field Guide to Identification and Interpretation of Hardwood-Dominated Ecosystems in the SBSdk and ICHmc2 of the Prince Rupert Forest Region (Williams et al. 2001), and Wetlands of British Columbia (MacKenzie and Moran 2004); and,
- Wetland delineation and classification was field verified within the Project Area through full, ground and visual plots (Ardea Biological Consulting 2022).

3.2.1.2 Wetland Functional Assessment

Wetland functional assessments were completed within the Project Area in 2018 with the use of a Project-specific wetland functional assessment (Ardea Biological Consulting 2022). The assessments included both desktop assessment and field data collection to determine ratings based on hydrological, biochemical, habitat, and climate functions. Data collected to determine wetland functional ratings included:

- wetland boundary, class, and size;
- hydrodynamic index (measure of flow through);
- watershed characteristics and drainage pathways;
- hydric soil indicators, rooting depth and depth to water;
- water pH;
- plant inventory and relevant percent cover;
- wildlife habitat use and value;
- effects from disturbance (e.g. roads, farming, forestry); and,
- current and historical wetland condition and function.

Survey methods were adapted from the Forest and Range Evaluation Program (FREP) wetland protocol (BC Ministry of Forests 2023). Wetland functional ratings and rating scales were developed based on those



described in Wetland Ecological Functions Assessment: An Overview of Approaches (Hanson et al. 2008) with adjustments made based on likely functions anticipated to be offered by the observed wetland types and sizes (Ardea Biological Consulting 2022).

3.3 EFFECTS SUMMARY

Potential direct and indirect effects on wetland area and functions were assessed within Section 5.4.3 of Chapter 7 of Section 4.0 of the Project EAC Application (Telkwa Coal Limited 2022a). Indirect effects assessed included introduction and/or proliferation of invasive plants, edge effects, changes to water quantity and quality, and dust deposition during all Project phases. For the purposes of this Plan, residual direct effects on wetlands are expected to occur within the Project Footprint. Although residual indirect effects are predicted outside of the Project Footprint, they are expected to be limited and isolated and are not expected to result in a loss of wetland function. As such, this Plan restricts wetland replacement to areas of lost wetland function on the Project Footprint.

The vegetation within the Project Footprint has experienced extensive historical and contemporary disturbance related to forestry activities (e.g., access development and timber harvest), agricultural activities, trails, existing roads (e.g., Telkwa Coalmine Road, Lawson Road) transmission lines (e.g., 25 kV and 500 kV), and the CN Railway. The Project Footprint, including the Tenas Access Corridor (TAC) has been designed to use areas of existing disturbance to the extent feasible (e.g., access paralleling existing linear disturbance corridors, upgrading existing roads).

Wetland areas within the Project Footprint were calculated using TEM polygons, which categorize the landscape into distinct units based on biological and physical attributes. Because a single TEM polygon often contains a mosaic of different ecosystem types, each polygon is assigned "deciles" representing the percentage of the total area occupied by up to three distinct ecosystem components. For this Plan, standard TEM calculations were used, whereby wetland area was calculated by multiplying the total area of each polygon within the Project Footprint by the decile percentage attributed to a wetland site series.

The primary limitation of this method is the spatial uncertainty regarding the exact location of a wetland within a larger polygon, as TEM defines the proportion of an ecosystem rather than its specific geographic boundaries. For wetlands that are only partially located within the Project Footprint, it is possible that the wetlands may not be present within the Project Footprint at all. Additionally, the accuracy of these calculations is influenced by the mapping scale; for instance, the 1:10,000 scale used for the access corridor may fail to detect smaller, isolated wetlands compared to the 1:5,000 scale applied to the minesite. To address these uncertainties, additional field verification and delineation is planned to be completed during the Project permitting phase (see Section 7.1).

3.3.1 WETLAND TYPES AND AREAS

The 863.6 ha Project Footprint overlaps 66.0 ha of 4 wetland classes: swamp, bog, marsh, and open water wetlands (Table 1, Figure 3 to Figure 8), representing 7.6% of the total Project Footprint. No fen wetlands



have been identified in the Project Footprint (Figure 4). Of this 66.0 ha of wetland disturbance, 65.3 ha is associated with the Minesite, and 0.7 ha is associated with the TAC (Table 1). A description of the wetlands anticipated to be disturbed by the Project are provided in the following sections.

3.3.1.1 Bog Wetlands

Bog wetlands are defined as shrubby or treed nutrient-poor peatlands with ericaceous shrubs and hummock-forming *Sphagnum* moss (MacKenzie and Moran 2004). Bog wetlands have been mapped within approximately 6.1 ha of the Project Footprint, entirely within the Minesite (Table 1, Figure 3, Figure 8), representing 0.7% of the total Project Footprint. Bog communities mapped within the Minesite include black spruce – creeping snowberry – peatmoss (SBSmc2/Wb01), black spruce – water sedge – peatmoss (SBSmc2/Wb05), and black spruce – soft-leaved sedge – peat-mosses (SBSdk/10; Table 1).

3.3.1.2 Fen Wetlands

Fen wetlands are defined as peatlands fed by mineral-rich groundwater (MacKenzie and Moran 2004). No fen wetlands have been identified in the Project Footprint (Table 1, Figure 4, Figure 8).

3.3.1.3 Marsh Wetlands

Marsh wetlands are defined as non-tidal mineral wetlands dominated by grass-like vegetation (MacKenzie and Moran 2004). Marsh wetlands were mapped within approximately 0.3 ha of the Project Footprint, predominantly associated with the TAC (Table 1, Figure 5, Figure 8), representing <0.1% of the total Project Footprint. In addition, <0.1 ha of marsh wetland disturbance is anticipated, related to upgrades of existing roads. Mapped marsh wetland communities within the Project Footprint include the beaked sedge – water sedge (Wm01) and swamp horsetail – beaked sedge (Wm02) communities (Table 1).

3.3.1.4 Open Water Wetlands

Open water wetlands are defined as shallow waters dominated by rooted, submerged, and floating aquatic plants (MacKenzie and Moran 2004). Open water wetlands have been mapped within less than 0.1 ha associated with a tributary to Goathorn Creek Table 1, Figure 6, Figure 8. This represents less than 0.1% of the Project Footprint.

3.3.1.5 Swamp Wetlands

Swamp wetlands are defined as mineral wetlands dominated by forest, trees, or tall shrubs with a fluctuating near-surface water table (MacKenzie and Moran 2004). Swamp wetlands are the most commonly mapped wetland ecosystems, with 59.5 ha of swamp wetlands mapped within the Project Footprint, including 59.2 ha mapped within the Minesite (including 0.3 ha of anticipated disturbance related to upgrades of existing roads), and 0.4 ha mapped within the TAC (Table 1, Figure 7, Figure 8). Swamp wetlands have been mapped within 6.9% of the total Project Footprint.



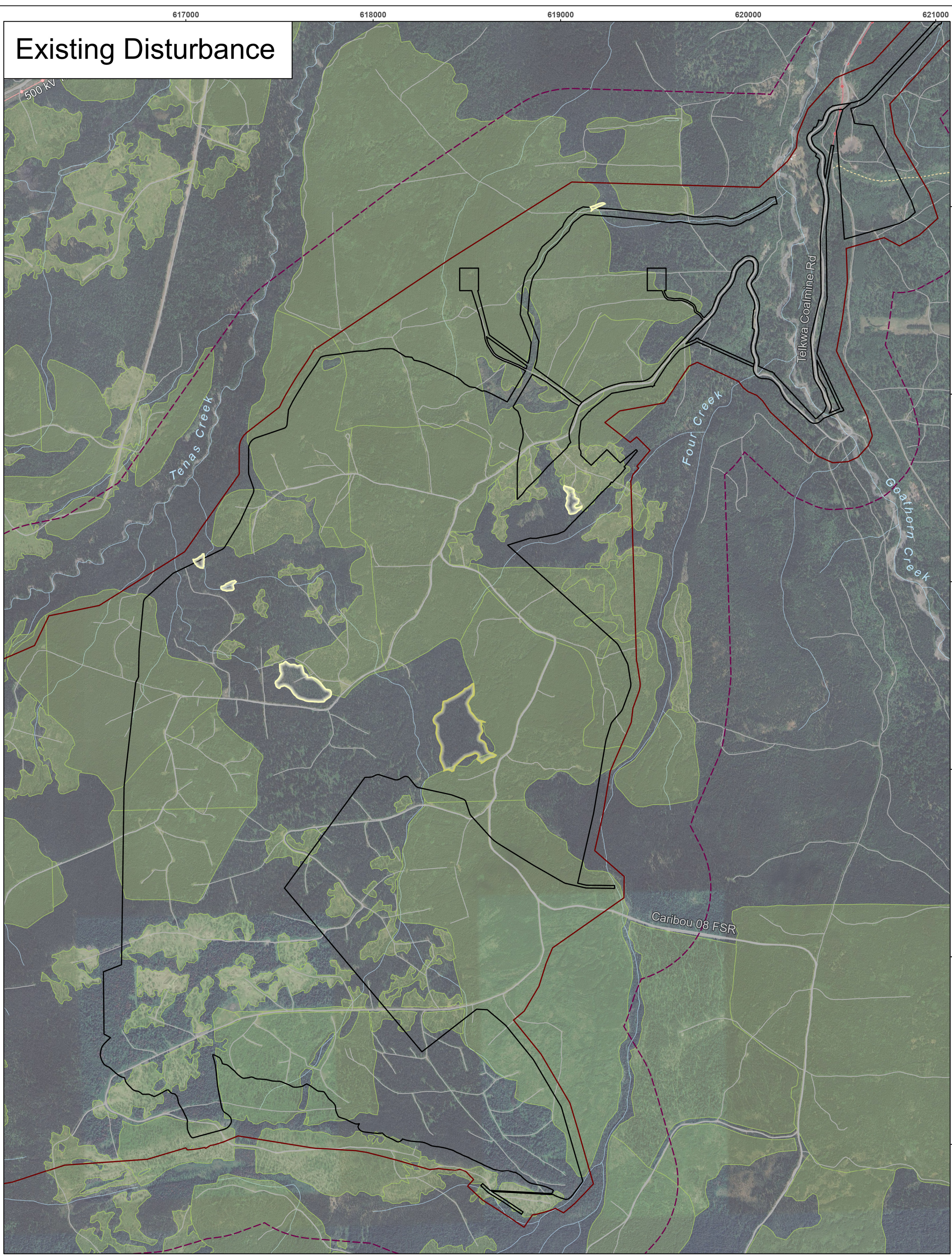
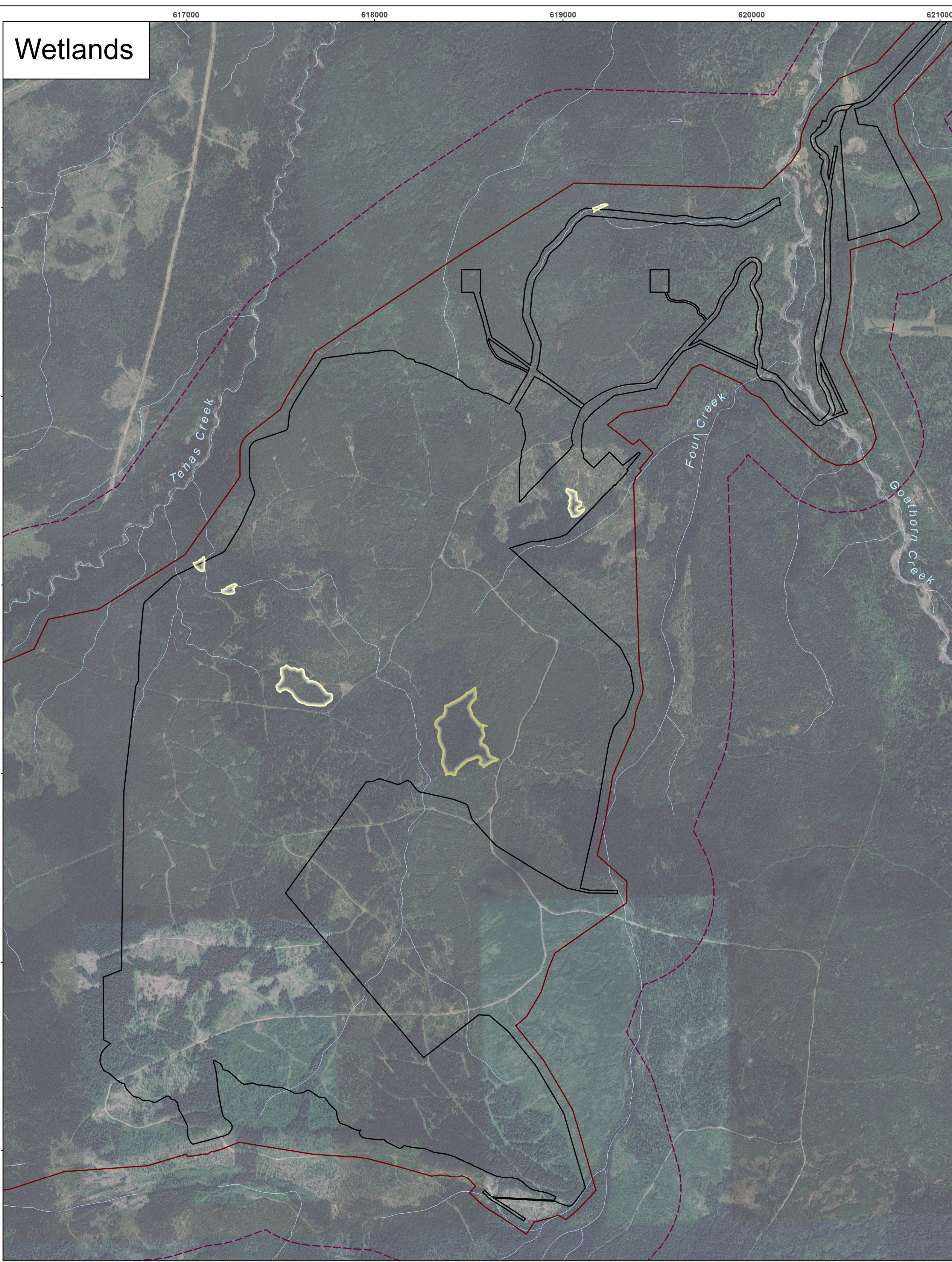
3.3.2 LISTED PLANTS, LICHENS AND ECOLOGICAL COMMUNITIES

No historical records of listed plants or lichens have been identified within any wetlands within the Project Footprint (Telkwa Coal Limited 2022a). Six Blue-listed wetland ecological community types are present within the Project Footprint, occupying approximately 7% of the Project Footprint (Table 1). The effects of the Project on listed ecological communities were assessed within Section 5.4.4 of Chapter 7 of Section 4.0 of the Project EAC and were found to be Not-Significant.

Table 1. Wetland ecosystems identified in the Local Study Area.

Wetland Class	BEC Subzone	Site Series	Map Code	Common Name	BC List	Minesite Footprint (ha)	Tenas Access Corridor Footprint (ha)	Rail Loop Footprint (ha)	Total (ha)
Bog	SBSdk	09	BS	black spruce - creeping-snowberry - <i>Sphagnum</i>	Blue-listed	-	-	-	-
		10	SS	black spruce - soft-leaved sedge – peat-mosses	Yellow-listed	<0.1	-	-	<0.1
	SBSmc2	12	SS	black spruce/hybrid white spruce - scrub birch - sedge	Not listed	-	-	-	-
		-	Wb01	black spruce - creeping snowberry - peatmoss	Blue-listed	2.7	-	-	2.7
		-	Wb05	black spruce - water sedge - peatmoss	Yellow-listed	3.5	-	-	3.5
				Total Bog	-	6.1	0	0	6.1
Fen	SBSdk	00	WF	willow – sedge fen	Not listed	-	-	-	-
	SBSmc2	00	WF	willow - sedge fen	Not listed	-	-	-	-
		-	Wf01	water sedge - beaked sedge	Yellow-listed	-	-	-	-
				Total Fen	-	0	0	0	0
Marsh	SBSdk	-	Wm01	beaked sedge - water sedge	Yellow-listed	-	<0.1	-	<0.1
		-	Wm02	swamp horsetail - beaked sedge	Blue-listed	<0.1	0.3	-	0.3
		-	Wm05	common cattail marsh	Blue-listed	-	-	-	-
	SBSmc2	-	Wm02	swamp horsetail - beaked sedge	Blue-listed	-	-	-	-
				Total Marsh		<0.1	0.3	0	0.3
Open Water	SBSdk	00	PD	pond	Not listed	-	-	-	-
		00	OW	open water	Not listed	-	-	-	-
	SBSmc2	00	OW	open water	Not listed	<0.1	-	-	<0.1
				Total Open Water	-	<0.1	0	0	<0.1
Swamp	SBSdk	07 ¹	SH	hybrid white spruce - horsetail	Blue-listed	-	-	-	-
		07b	SH	hybrid white spruce - horsetail (poorly drained)	Blue-listed	-	0.3	-	0.3
		-	Ws02	mountain alder - pink spirea - Sitka sedge	Yellow-listed	<0.1	-	-	<0.1
		-	Ws03	Bebb’s willow - bluejoint reedgrass	Blue-listed	-	0.1	-	0.1
		-	Ws04	Drummond's willow - beaked sedge	Not listed	-	<0.1	-	<0.1
	SBSmc2	10 ¹	SH	hybrid white spruce - horsetail	Blue-listed	<0.1	-	-	<0.1
		10b	SH	hybrid white spruce - horsetail - leafy mosses (lacustrine/morainal)	Blue-listed	59.0	-	-	59.0
		--	Ws02	mountain alder - pink spirea - Sitka sedge	Yellow-listed	0.1	-	-	0.1
		--	Ws03	Bebb’s willow - bluejoint reedgrass	Blue-listed	-	-	-	-
				Total Swamp	-	59.2	0.4	0	59.5
Grand Total					-	65.3	0.7	0	66.0

Notes:
BEC= Biogeoclimatic Ecosystem Classification; BC=British Columbia; ha=hectare; SBSdk=sub-boreal spruce zone dry cool subzone; SBSmc2=sub-boreal spruce zone moist cold subzone Babine variant
1 The SBSdk/07 and SBSmc2/10 site series are conservatively classified as the Ws07 wetland in areas of the Vegetation Regional Study Area where drainage conditions were not characterized.



Tenas Steelmaking Coal Project

Bog wetlands mapped within the Minesite

Anticipated bog wetland disturbance by year and Project component.

Year	Minesite (ha)	Minesite - Existing Road (ha)	Tenas Access Corridor (ha)	Rail Loop (ha)	Total (ha)
5	6.1	0	0	0	6.1
10	0	0	0	0	0
15	0	0	0	0	0
20	0	0	0	0	0
Total	6.1	0	0	0	6.1

Bog wetlands within the Vegetation LSA were observed to have:

- Low to Moderate hydrological functions
- Low to High biogeochemical functions
- Moderate to High habitat functions
- Low to Moderate climate functions

Bog wetlands can provide the following habitat:

- Foraging habitat for furbearers, caribou, bats, listed bird species (e.g., Bank Swallow, Barn Swallow, Black Swift), and raptors
- Foraging and breeding habitat for Rusty Blackbird and migratory breeding landbirds
- Foraging and migration habitat for migratory breeding waterbirds

Legend

Project Footprint

Project Area

Vegetation Local Study Area

Bog Ecosystems (% of Polygon)

10 to 20%

30 to 50%

>50%

Watercourse

Waterbody

Disturbance

Highway

Primary Road

Road

Trail

Railway

Existing 25 kV Powerline

Transmission Line

Agriculture

Cutblock

Disturbance Schedule

Year 5

Year 10

Year 15

Year 20

Notes

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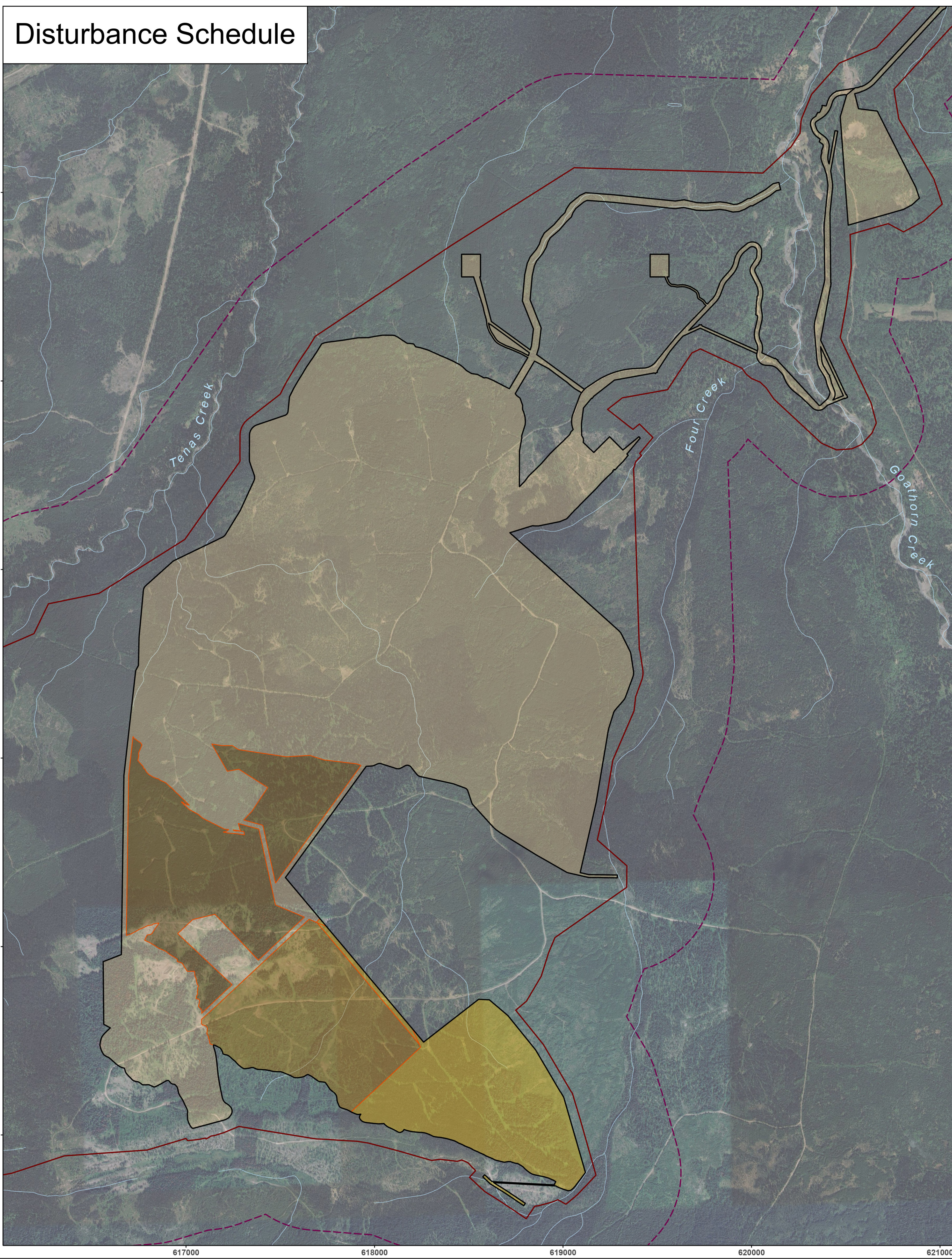
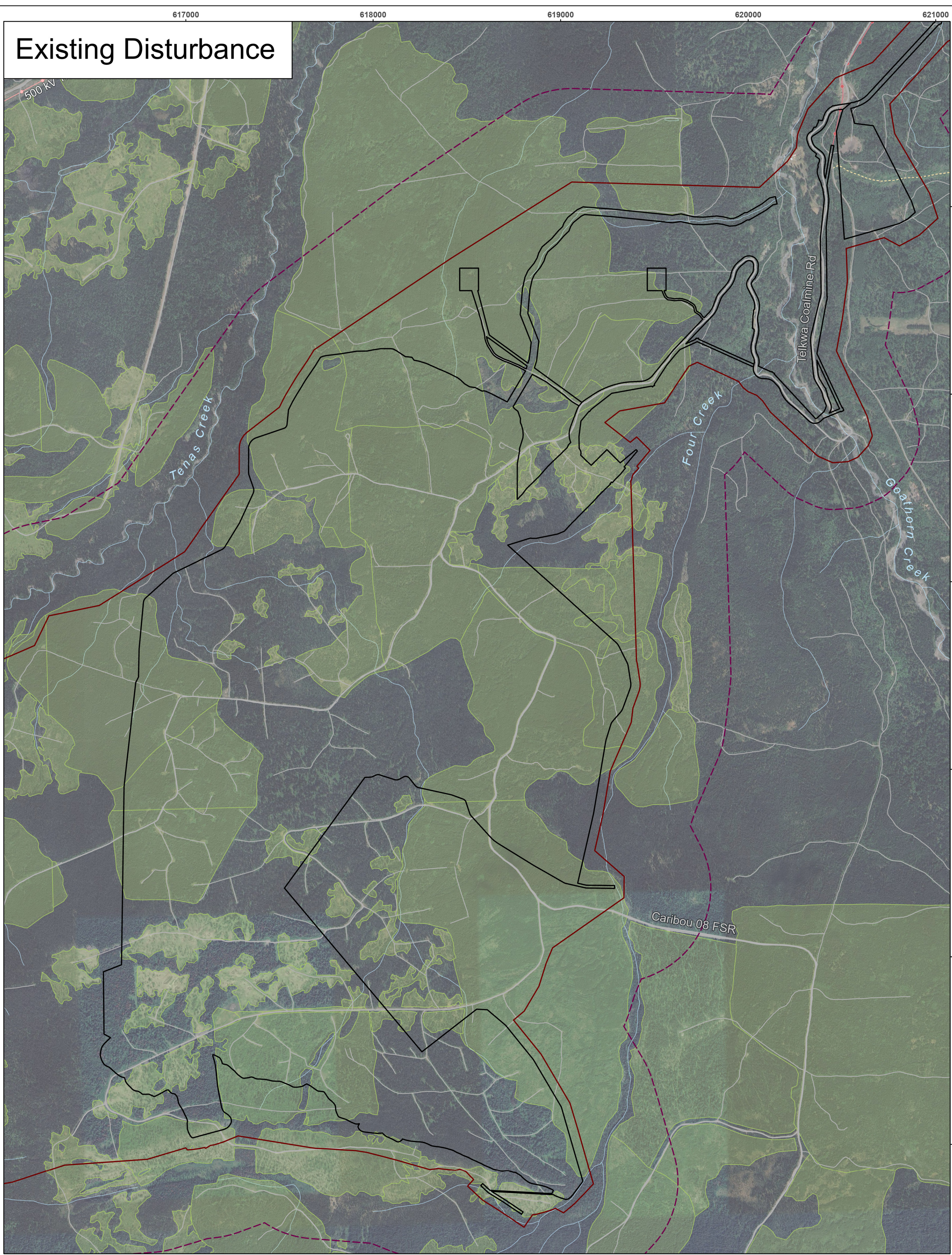
Figure 3

Production Date: Mar 24, 2026

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Tenas Steelmaking Coal Project					
Fen wetlands mapped within the Minesite					
Anticipated fen wetland disturbance by year and Project component.					
Year	Minesite (ha)	Minesite - Existing Road (ha)	Tenas Access Corridor (ha)	Rail Loop (ha)	Total (ha)
5	0	0	0	0	0
10	0	0	0	0	0
15	0	0	0	0	0
20	0	0	0	0	0
Total	0	0	0	0	0

Legend

Project Footprint

Project Area

Vegetation Local Study Area

Fen Ecosystems (% of Polygon)

10 to 20%

30 to 50%

>50%

Watercourse

Waterbody

Disturbance

Highway

Primary Road

Road

Trail

Railway

Existing 25 kV Powerline

Transmission Line

Agriculture

Cutblock

Disturbance Schedule

Year 5

Year 10

Year 15

Year 20

Notes

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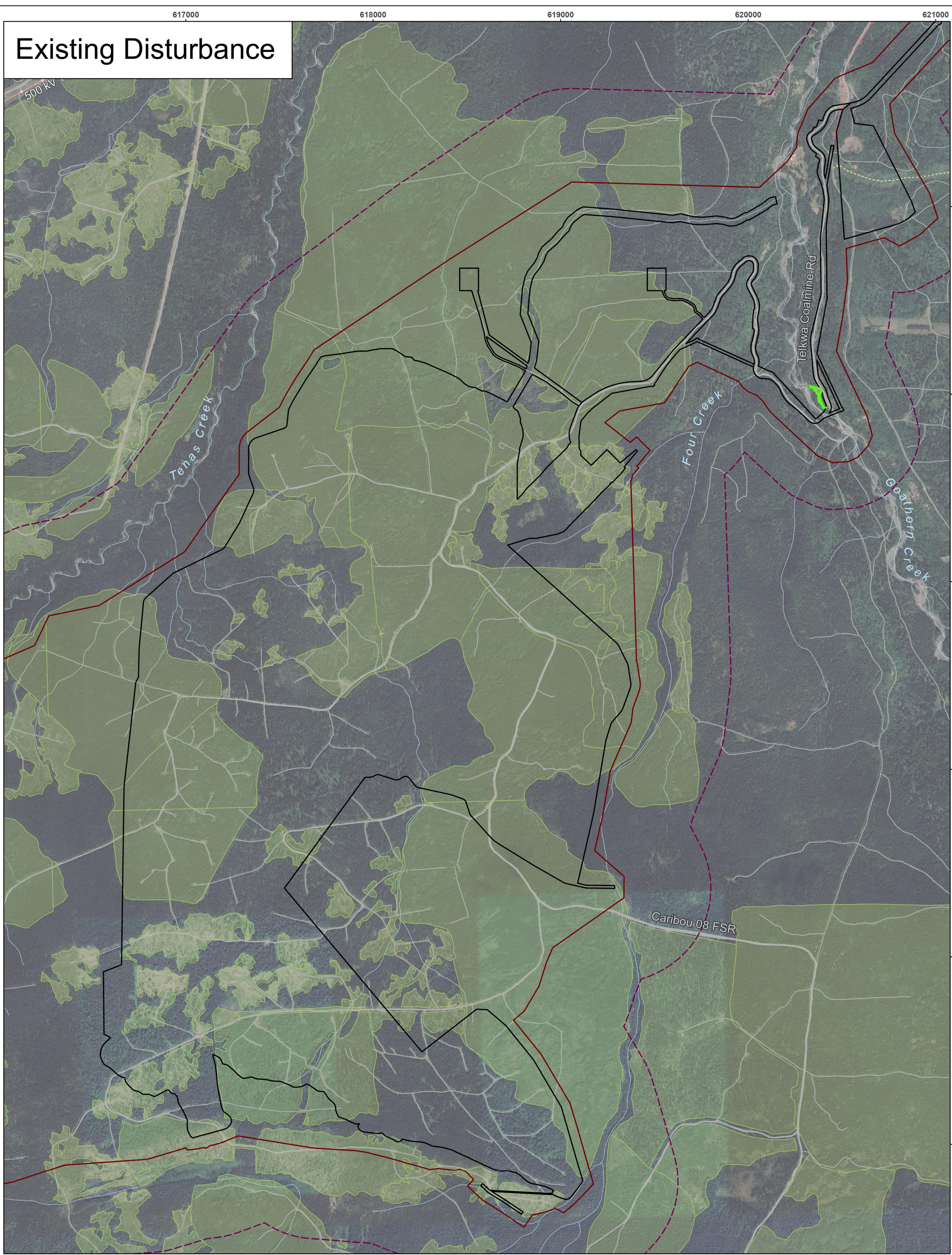
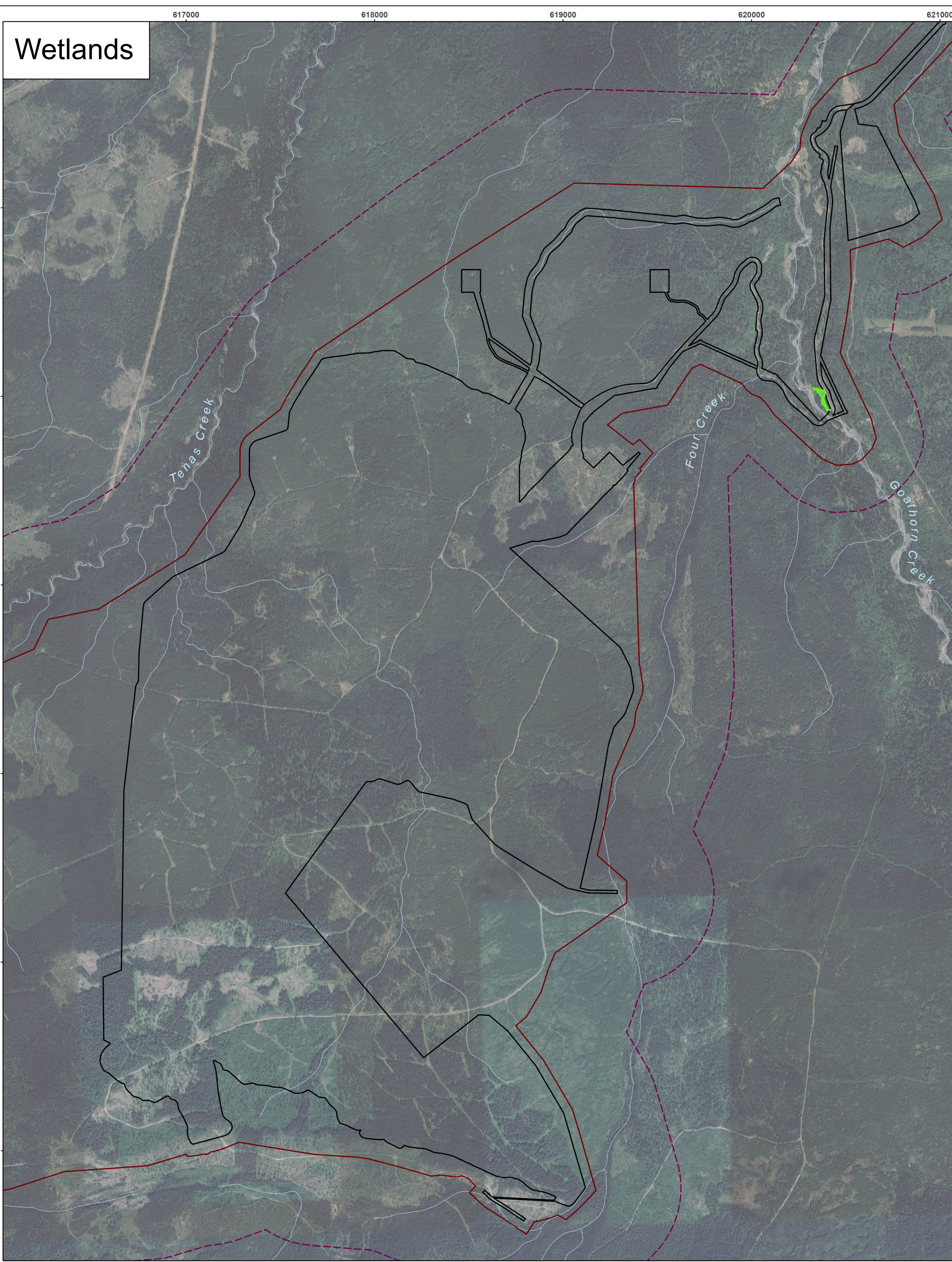
Figure 4

Production Date: Mar 24, 2026

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Tenas Steelmaking Coal Project

Marsh wetlands mapped within the Minesite

Anticipated marsh wetland disturbance by year and Project component.

Year	Minesite (ha)	Minesite - Existing Road (ha)	Tenas Access Corridor (ha)	Rail Loop (ha)	Total (ha)
5	0	<0.1	0.3	0	0.3
10	0	0	0	0	0
15	0	0	0	0	0
20	0	0	0	0	0
Total	0	<0.1	0.3	0	0.3

Marsh wetlands within the Vegetation LSA were observed to have:

- Low to High hydrological functions
- Moderate to High biogeochemical functions
- Moderate to High habitat functions
- Moderate to Moderate-High climate functions

Marsh wetlands can provide the following habitat:

- Foraging habitat for furbearers, grizzly bear, bats, migratory breeding landbirds, listed bird species (e.g., Rusty Blackbird, Bank Swallow, Barn Swallow, Black Swift), and raptors
- Breeding and living habitat for western toad
- Breeding, foraging, and migration habitat for migratory breeding waterbirds

Legend

Project Footprint

Project Area

Vegetation Local Study Area

Marsh Ecosystems (% of Polygon)

10 to 20%

30 to 50%

>50%

Watercourse

Waterbody

Disturbance

Highway

Primary Road

Road

Trail

Railway

Existing 25 kV Powerline

Transmission Line

Agriculture

Cutblock

Disturbance Schedule

Year 5

Year 10

Year 15

Year 20

Notes

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- Cutblocks. Government of British Columbia.

- Base Data. Government of British Columbia.

- Imagery. Google Earth. May 26, 2023.

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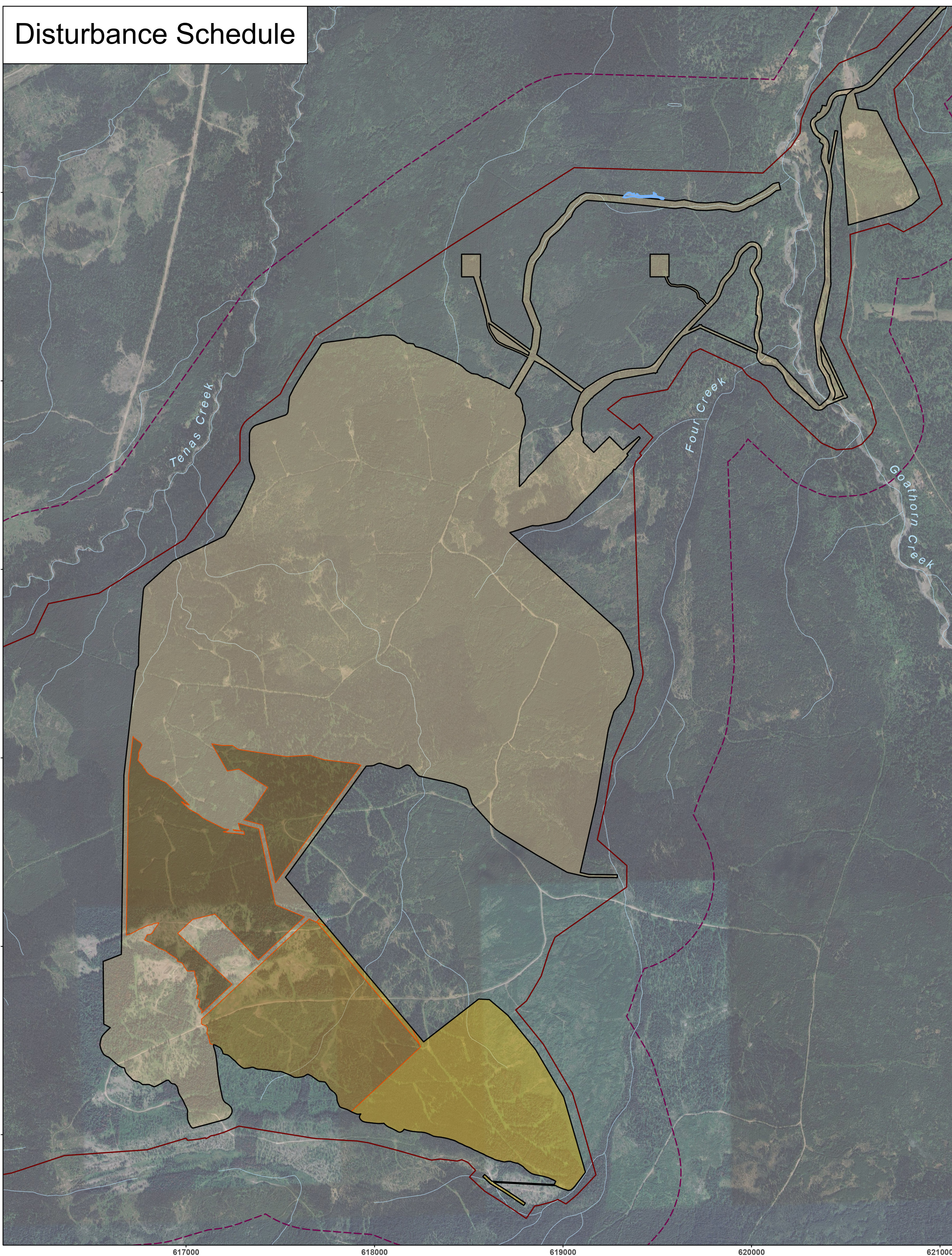
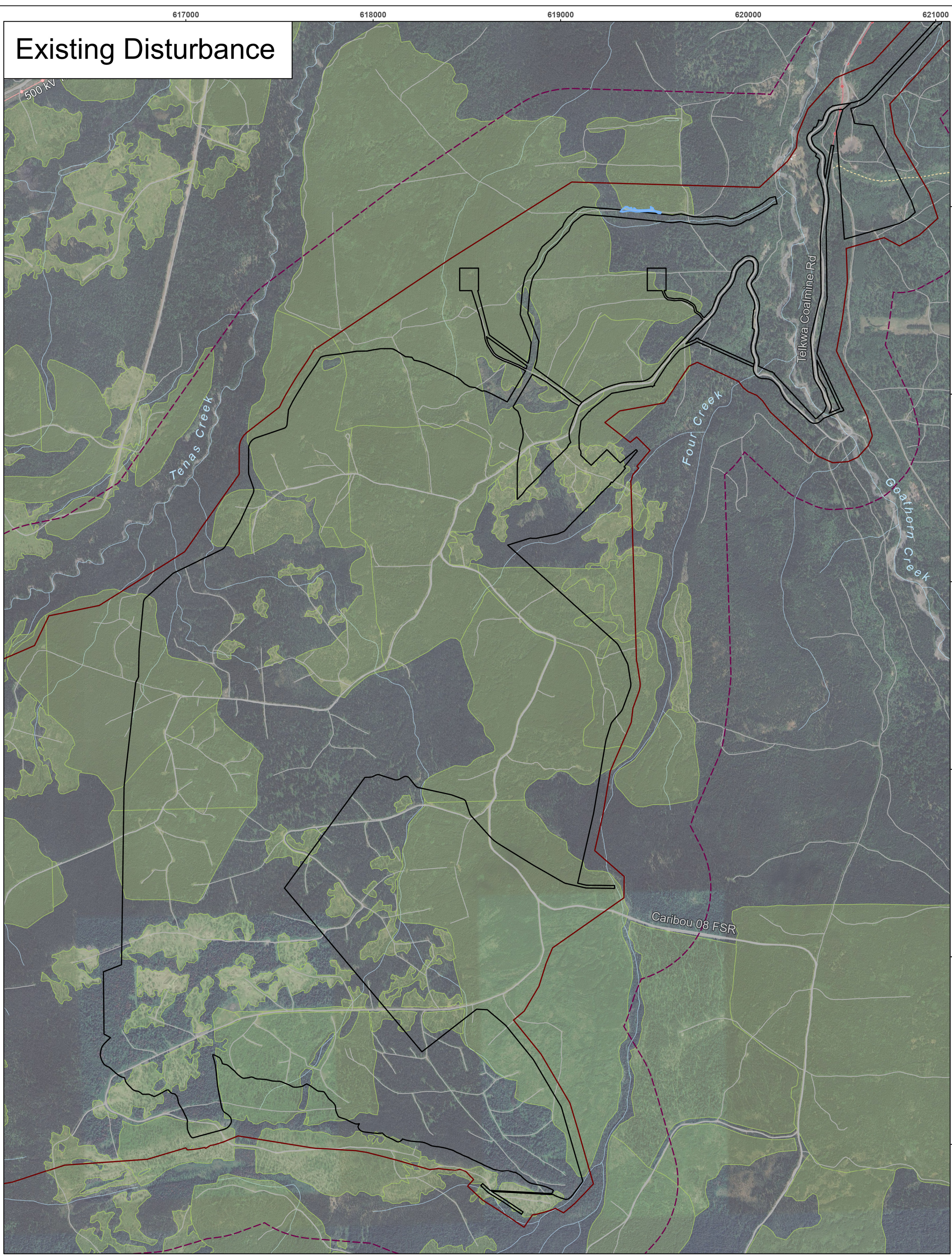
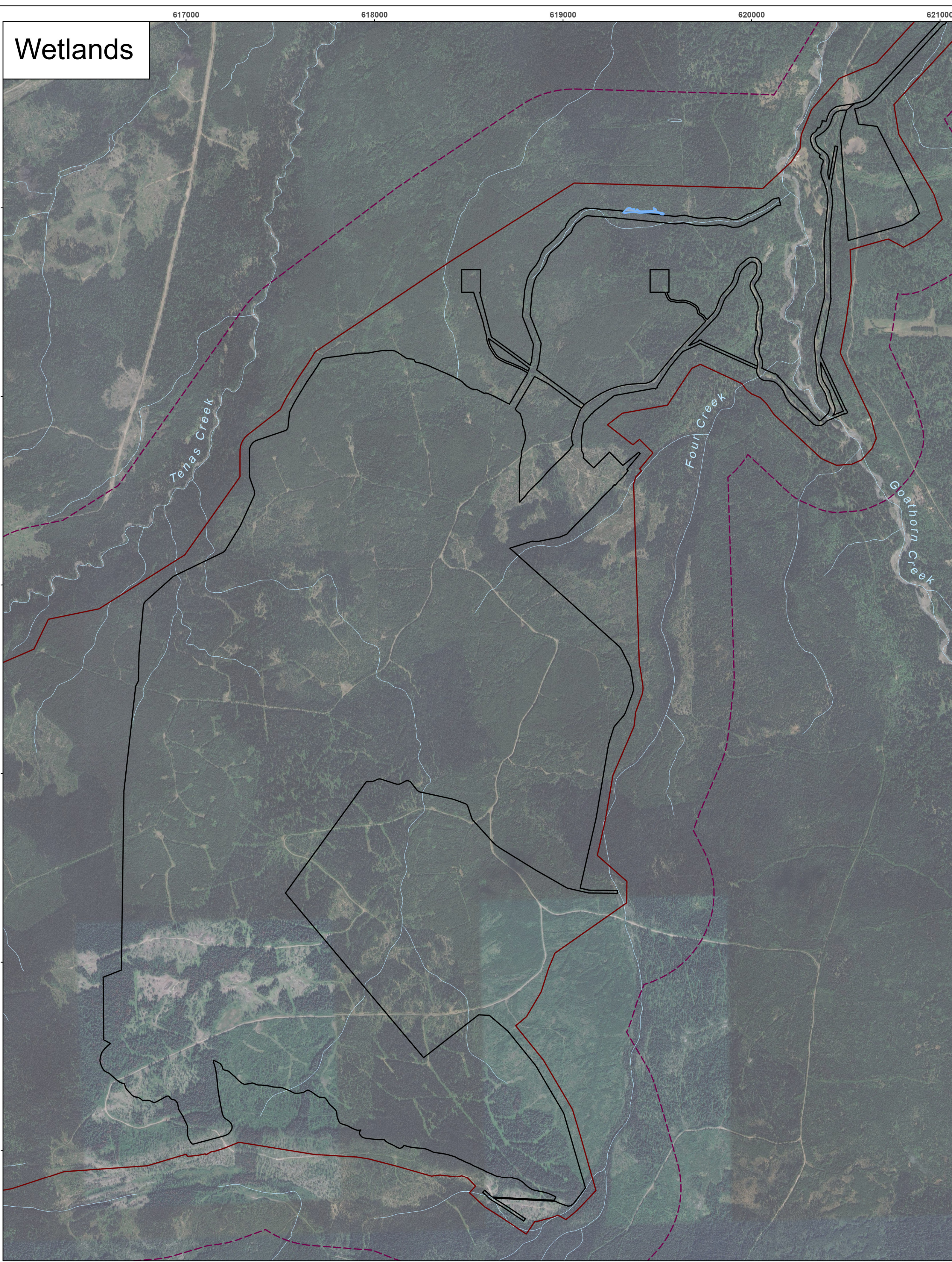
Figure 5

Production Date: Mar 24, 2026

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Tenas Steelmaking Coal Project					
Open water wetlands mapped within the Minesite					
Anticipated open water wetland disturbance by year and Project component.					
Year	Minesite (ha)	Minesite - Existing Road (ha)	Tenas Access Corridor (ha)	Rail Loop (ha)	Total (ha)
5	<0.1	0	0	0	<0.1
10	0	0	0	0	0
15	0	0	0	0	0
20	0	0	0	0	0
Total	<0.1	0	0	0	<0.1

Open water wetlands within the Vegetation LSA were observed to have:

- Low to Moderate hydrological functions
- Low to High biogeochemical functions
- Moderate to High habitat functions
- Low to Moderate climate functions

Open water wetlands can provide the following habitat:

- Foraging habitat for bats, migratory breeding landbirds, listed bird species (e.g., Rusty Blackbird, Bank Swallow, Barn Swallow, Black Swift), and raptors
- Breeding and living habitat for western toad
- Breeding, foraging, and migration habitat for migratory breeding waterbirds

Legend

Project Footprint

Project Area

Vegetation Local Study Area

Open Water Ecosystems (% of Polygon)

- 10 to 20%
- 30 to 50%
- >50%
- Watercourse
- Waterbody

Disturbance

- Highway
- Primary Road
- Road
- Trail
- Railway
- Existing 25 kV Powerline
- Transmission Line
- Agriculture
- Cutblock

Disturbance Schedule

- Year 5
- Year 10
- Year 15
- Year 20

Notes

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- Base Data. Government of British Columbia.
- Imagery. Google Earth. May 26, 2023.

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Figure 6

Production Date: Mar 24, 2026

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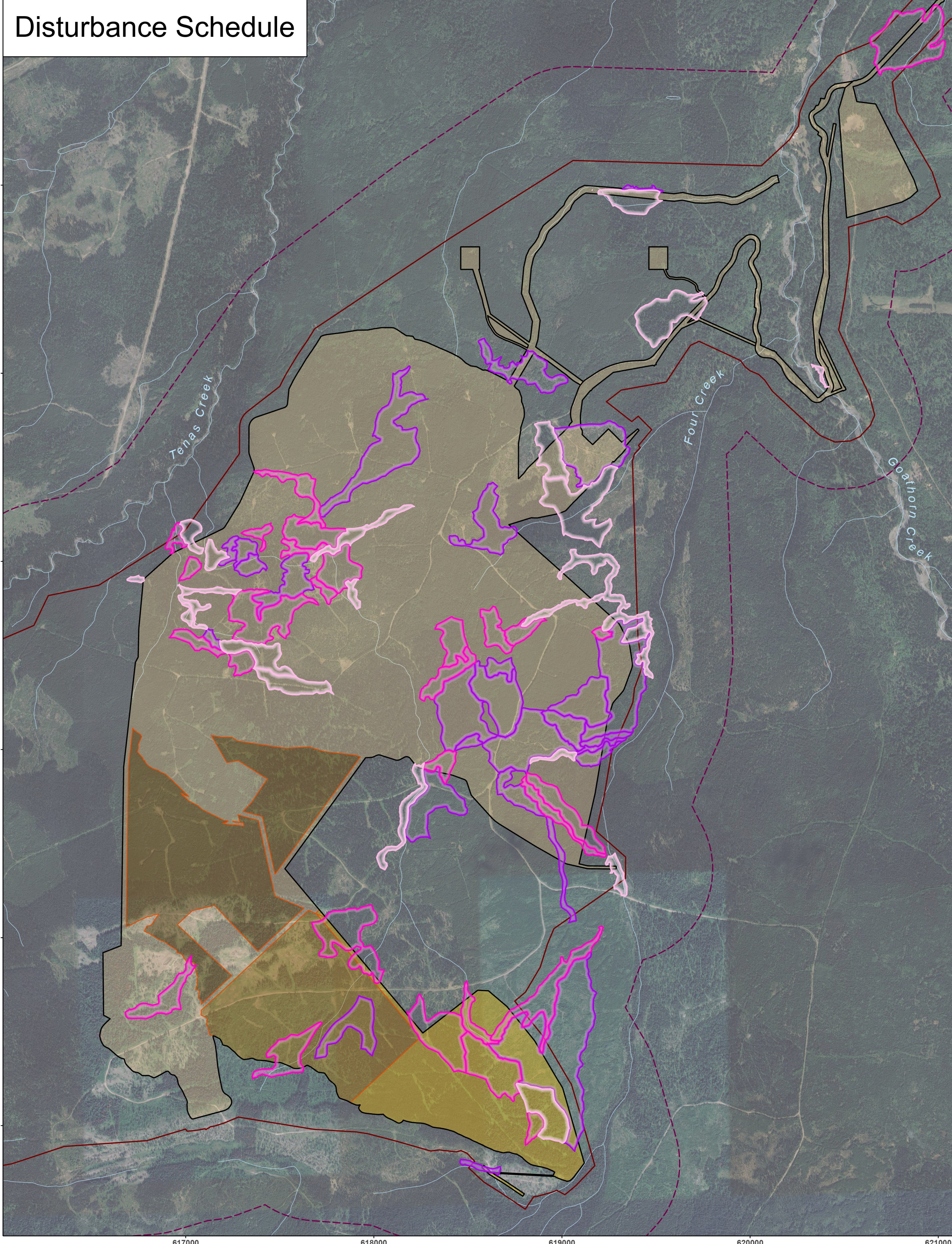
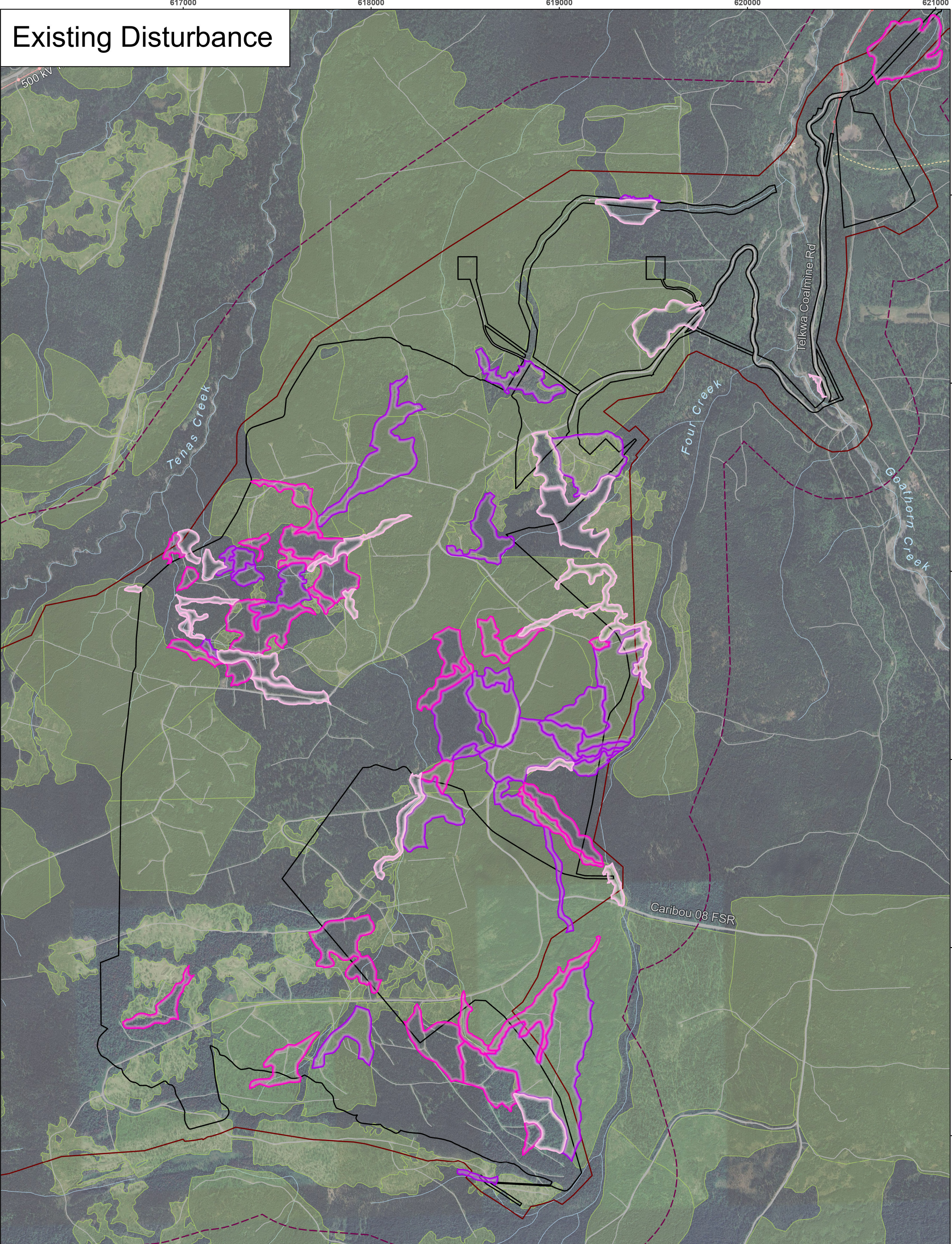
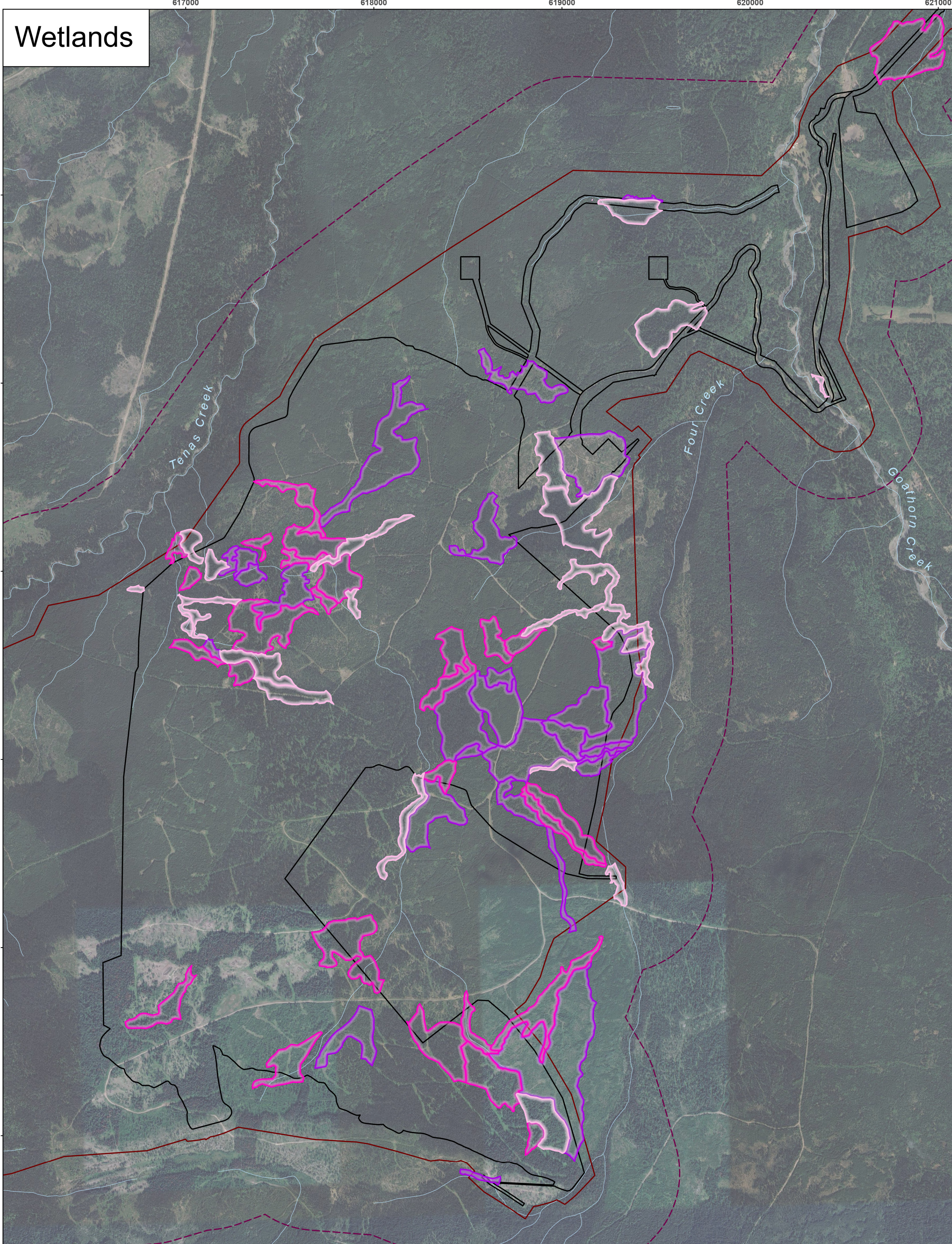
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Tenas Steelmaking Coal Project

Swamp wetlands mapped within the Minesite

Anticipated swamp wetland disturbance by year and Project component.

Year	Minesite (ha)	Minesite - Existing Road (ha)	Tenas Access Corridor (ha)	Rail Loop (ha)	Total (ha)
5	46.3	0.3	0.4	0	47
10	9.7	0	0	0	9.7
15	2.8	0	0	0	2.8
20	<0.1	0	0	0	<0.1
Total	58.8	0.3	0.4	0	59.5

Swamp wetlands within the Vegetation LSA were observed to have:

- Low to Moderate hydrological functions
- Low to High biogeochemical functions
- Moderate to High habitat functions
- Low to Moderate climate functions

Swamp wetlands can provide the following habitat:

- Foraging habitat for furbearers, grizzly bear, moose, bats, listed bird species (e.g., Bank Swallow, Barn Swallow, Black Swift), and raptors
- Breeding and living habitat for western toad
- Foraging and breeding habitat for migratory breeding landbirds and Rusty Blackbird
- Breeding, foraging, and migration habitat for migratory breeding waterbirds

Legend

Project Footprint

Project Area

Vegetation Local Study Area

Swamp Ecosystems (% of Polygon)

10 to 20%

30 to 50%

>50%

Watercourse

Waterbody

Disturbance

Highway

Primary Road

Road

Trail

Railway

Existing 25 kV Powerline

Transmission Line

Agriculture

Cutblock

Disturbance Schedule

Year 5

Year 10

Year 15

Year 20

Notes

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Figure 7

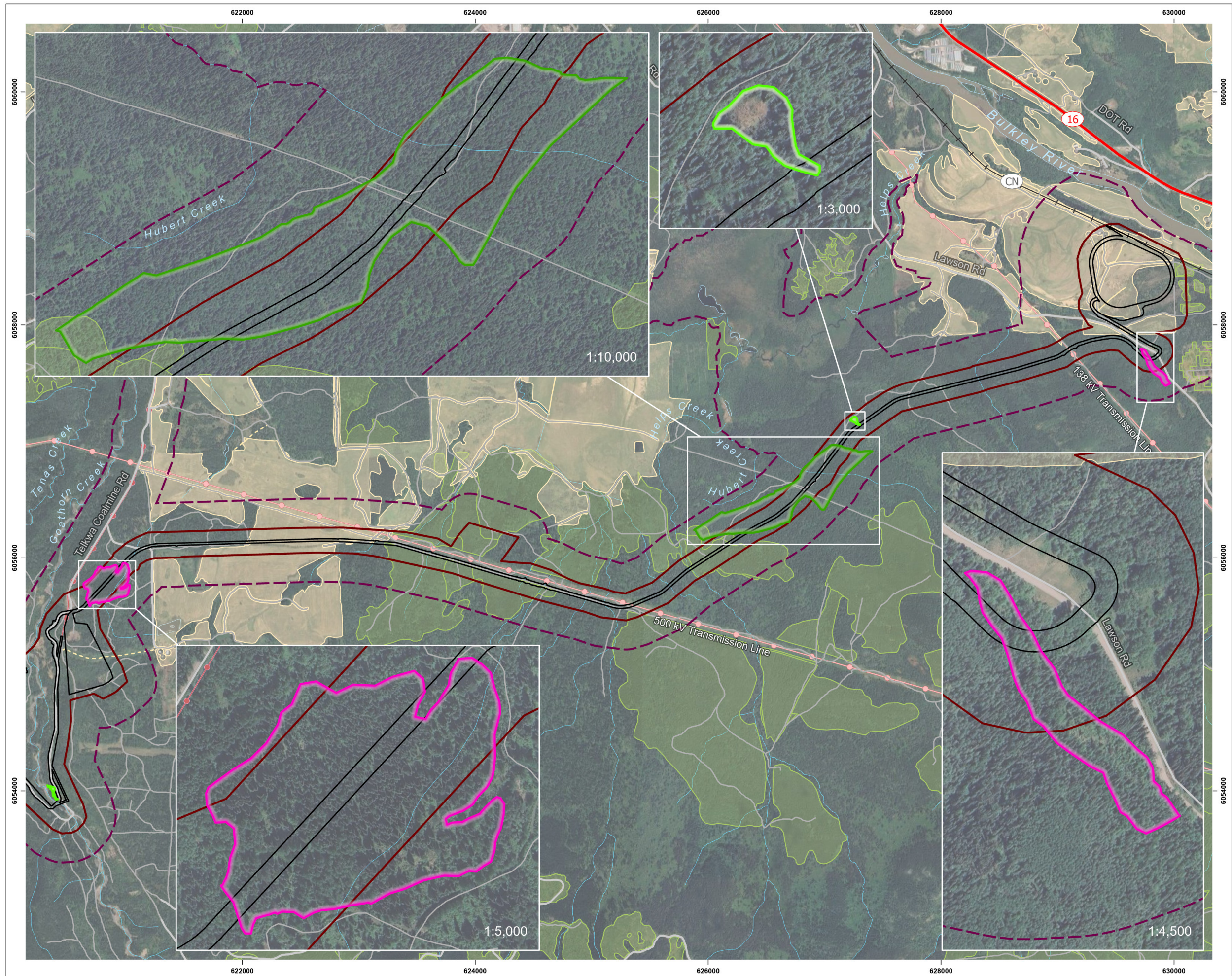
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Tenas Steelmaking Coal Project

Wetlands mapped within the Tenas Access Corridor and Rail Loop

Legend

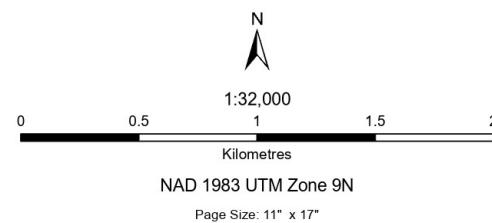
- Vegetation Local Study Area
- Project Area
- Project Footprint
- Marsh Ecosystems (% of Polygon)
 - 10 to 20%
 - 30 to 50%
 - >50%
- Swamp Ecosystems (% of Polygon)
 - 10 to 20%
 - 30 to 50%
 - >50%
- Watercourse
- Waterbody
- Disturbance
 - Highway
 - Primary Road
 - Road
 - Trail
 - Railway
 - Existing 25 kV Powerline
 - Transmission Line
 - Agriculture
 - Cutblock

Notes

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- Cutblocks. Government of British Columbia.
- Agriculture and Vegetation Local Study Area. EDI Environmental Dynamics Inc. 2020.
- Base Data. Government of British Columbia.
- Imagery. Google Earth. May 26, 2023.





The swamp wetland community anticipated to be most affected by the Project is the hybrid white spruce – horsetail swamp ecosystem (SBSdk/07b, SBSmc2/10b in Table 1), which corresponds to the Ws07 site association (MacKenzie and Moran 2004). The site series SBSdk/07 and SBSmc2/10 have the potential to be either wetland or upland ecosystems depending on soil drainage. Drainage conditions were not characterised within each polygon during baseline studies; therefore, sites with unclassified soil drainage were assumed to be Ws07 wetland so that wetland characterization was not under-represented in the effects analysis (Telkwa Coal Limited 2022a). This is expected to have resulted in a conservative over-estimate of Ws07 swamp wetland on the Project Footprint. The spatial extent of this wetland ecosystem will be verified within the Project Area during field assessments planned for completion during the Project permitting phase (see Section 7.1).

3.3.3 WETLAND FUNCTIONS

The wetland functions assessed include hydrological functions, biogeochemical functions, habitat functions, and climate functions, which are described in further detail below. In general, baseline wetland function scores were assessed as Moderate to High within the Vegetation LSA (Table 2).

3.3.3.1 Hydrological Functions

Hydrologic functions pertain to the capacity of a wetland to retain and moderate water, recharge groundwater, and stabilize sediment and provide erosion protection. The baseline study results indicate that wetlands provide Low to Moderate-High hydrological functions (Table 2). Bog, marsh, swamp, and open water wetlands are characterized by Low to Moderate water flow moderation and groundwater recharge functions, with erosion protection functions rated as low for bog and open water wetlands, moderate for swamp wetlands, and moderate to high for marsh wetlands.

3.3.3.2 Biogeochemical Functions

Biogeochemical functions relate to the capacity of a wetland to undertake water quality treatment, carbon storage, and nutrient and organic export. The baseline study results indicate that wetlands are variable, providing Low to High biogeochemical functions (Table 2). Marsh, swamp, and open water wetlands demonstrated Moderate to High water quality treatment function, whereas bogs demonstrated low to moderate water quality treatment function. Conversely, bogs and marshes demonstrated Moderate to High carbon storage and nutrient and organic export functions, with swamps characterized as Low to Moderate, and open water wetlands characterized as Low for these functions.

3.3.3.3 Habitat Functions

Habitat functions pertain to the ability of a wetland to contribute biological productivity and support biodiversity (Hanson et al. 2008). Overall, all wetland classes were observed to provide Moderate to High biological productivity and support for biodiversity functions (Table 2).



The effects of the Project on wildlife and avian species and their habitats, including the nature and magnitude of potential adverse Project-related effects related to changes in habitat, including direct habitat loss and indirect disturbance (i.e., habitat fragmentation, edge effects, and sensory disturbance), changes in mortality, and changes in movement patterns are assessed within Chapter 8 (Wildlife) and Chapter 9 (Avian) of Section 4.0 of the Project EAC Application (Telkwa Coal Limited 2022b, c). However, to provide more context related to habitat functions, the habitat use of each of the Wildlife and Avian VC subcomponents were reviewed in the context of the wetland classes mapped within the Project Footprint (Table 3).

Table 2. Wetland functions summary.

Wetland Function ¹	Bog	Fen	Marsh	Open Water	Swamp
Hydrological – Water Flow Moderation	Low to Moderate	Moderate-High	Low to Moderate	Low to Moderate	Low to Moderate
Hydrological – Groundwater Recharge	Low to Moderate	Low	Low to Moderate	Low to Moderate	Low to Moderate
Hydrological – Erosion Protection	Low	Low	Moderate to High	Low	Moderate
Biogeochemical – Water Quality Treatment	Low to Moderate	Moderate to High	Moderate to High	Moderate to High	Moderate to High
Biogeochemical – Carbon Storage	Moderate to High	Moderate to High	Moderate to High	Low	Low to Moderate
Biogeochemical – Nutrient and Organic Export	Moderate to High	Moderate to High	Moderate to High	Low	Low to Moderate
Habitat (Ecological) – Biological Productivity and Support for Biodiversity	Moderate to High	Moderate to High	Moderate to High	Moderate to High	Moderate to High
Climate – Maintenance of Current Climate	Low to Moderate	Moderate to Moderate-High	Moderate to Moderate-High	Low to Moderate	Low to Moderate

Notes:

¹ Source: (Ardea Biological Consulting 2022)

Table 3. Wetland habitat use summary for wildlife and avian subcomponents.

Avian/Wildlife Subcomponent	Species/Group	Federal/Provincial Listing	Marsh Wetland	Swamp Wetland	Bog Wetland	Open Water Wetland
Furbearers	American marten	Yellow listed (BC)	Foraging	Foraging	Foraging	-
	Wolverine	Blue listed (BC) Special Concern (SARA, COSEWIC)				
	Fisher – Columbian population	Red-listed (BC)				
Caribou	Northern mountain population – Telkwa Herd	Blue listed (BC) Special Concern (COSEWIC)	-	-	Foraging	-
Grizzly Bear	Western population	Blue listed (BC) Special Concern (SARA, COSEWIC)	Foraging	Foraging	-	-
Moose	Moose	Yellow listed (BC)	-	Foraging	-	-
Bats	Little brown myotis	Blue listed (BC) Endangered (SARA, COSEWIC)	Foraging	Foraging	Foraging	Foraging
	Northern myotis	Blue listed (BC) Endangered (SARA, COSEWIC)				
Western Toad	Western Toad	Yellow listed (BC) Special Concern (SARA, COSEWIC)	Breeding Living	Breeding Living	-	Breeding Living
Migratory Breeding Birds - Landbirds	Various	Various – listed birds assessed as separate subcomponent	Foraging	Foraging Breeding	Foraging Breeding	Foraging
Migratory Breeding Birds - Waterbirds	Various	Various – listed birds assessed as separate subcomponent	Breeding Foraging Migration	Breeding Foraging Migration	Foraging Migration	Breeding Foraging Migration
Listed Bird Species	Rusty blackbird	Blue listed (BC) Special Concern (SARA, COSEWIC)	Foraging	Foraging Breeding	Foraging Breeding	Foraging
	Bank swallow	Yellow listed (BC) Threatened (SARA, COSEWIC)	Foraging	Foraging	Foraging	Foraging
	Barn swallow	Yellow listed (BC) Special Concern (COSEWIC) Threatened (SARA)				
	Black swift	Blue listed (BC) Endangered (SARA, COSEWIC)				
Raptors	Short-eared owl	Blue listed (BC) Threatened (COSEWIC) Special Concern (SARA)	Foraging	Foraging	Foraging	Foraging

Notes:
- = Limited habitat use.



Overall, wetland classes within the Project Footprint provide foraging opportunities for a variety of wildlife species and groups, with marsh, swamp, and open water wetlands additionally providing breeding and living habitat for western toad and breeding habitat for migratory waterbirds. All wetland types can provide migration habitat for migratory waterbirds. Swamp and bog wetlands further provide breeding habitat for landbirds and the listed bird species Rusty Blackbird (Table 3).

With regard to fish and fish habitat, the only wetland disturbance anticipated with the potential to affect fish and fish habitat relates to the swamp/marsh complex (Ws02/Wm02) which has been mapped on the east side of Goathorn Creek (GT2). This wetland is anticipated to be disturbed by the access corridor. The existing crossing of this tributary consists of two (2) 600 mm non-embedded culverts that are perched at low flow and poorly oriented at the crossing location, which is causing erosion and creating blockages in the culverts. Fish have not been observed in this watercourse to be crossed by the TAC, and flow appears seasonal. Good rearing and spawning habitat was observed at the crossing location, with relatively limited over-wintering habitat (Telkwa Coal Limited 2022d). Fish habitat offsetting for harmful alteration, destruction, or disruption of fish habitats is planned for the Project, as described in Chapter 6 of Section 4 of the EAC Application.

3.3.3.4 Climate Functions

Climate functions relate to the ability of a wetland to provide carbon fixation, methane equilibrium and carbon dioxide balance, rainfall and humidity control, micro-climate influences, and climate regulation through evapotranspiration rates. Wetlands were evaluated for climate functions by wetland type and size, with larger wetlands and higher vegetation cover considered to provide greater climate functions. Of the wetlands assessed for wetland function in the field, bogs, swamps, and open water wetlands demonstrated Low to Moderate climate functions, with marsh wetlands providing Moderate to Moderate-High wetland functions (Table 2).



4 IMPEMENTATION OF THE MITIGATION HIERARCHY

The mitigation hierarchy is a structured approach designed to guide the selection of measures to address impacts on environmental values (BC Ministry of Environment 2014a, b). The hierarchy prioritizes actions in the following order:

- **Avoid:** The highest priority, which aims to fully avert potential impacts by adjusting a project's location, timing, or methods.
- **Minimize:** Partially avoids or reduces the scale and duration of impacts when full avoidance is not practicable.
- **Restore On-Site:** Involves recovering ecosystems within the project footprint that have been degraded or damaged.

The following sections document how all feasible measures have been considered at each level of the mitigation hierarchy to mitigate wetland disturbance at the Project.

4.1 AVOID

As described in Section 5.3 of Chapter 7 of Section 4.0 of the Project EAC Application, Telkwa Mining has actively attempted to avoid wetland disturbance throughout the Project design efforts by applying the following design criteria (Telkwa Coal Limited 2022a):

- investigating and implementing opportunities to reduce the Project Footprint around sensitive ecosystems, wetlands, and watercourses;
- aligning linear Project features (e.g. powerlines, roads, water distribution) within a common right-of-way and clustering project components;
- placement of Project features within existing or planned Project component footprints to limit the clearing of vegetation and the salvage of reclamation materials;
- reducing the length of haul roads, access roads, and rail line and using or improving existing roads;
- utilizing a loop design configuration for the rail that requires half the space and subsequent footprint compared to the standard teardrop shape;
- placing reclamation material (surface soil and woody debris) stockpiles within development areas;
- limiting the TAC to a single lane width for long distances and utilize existing Forest Service Roads (FSRs) or private roads;
- backfilling approximately 50 percent (%) of non-coal material back into the open pit; and
- placing processed rock from the CPP within the management ponds versus a separate permanent pile.

Wetland avoidance will continue to be prioritized throughout the process of detailed Project design.



4.2 MINIMIZE

Minimization will be achieved by implementing the mitigation measures and best management practices outlined in the EAC Application (Telkwa Coal Limited 2022a), the Project-specific Reclamation and Closure Plan (Telkwa Coal Limited 2022e) and the Vegetation Management Plan (Telkwa Coal Limited 2022f). These include but are not limited to:

General Minimization Measures

- **Footprint Reduction:** Investigate and implement opportunities to reduce the Project Footprint around sensitive ecosystems, wetlands, and watercourses.
- **Operational Controls:** Limit clearing and soil disturbance to defined Project Footprint boundaries, adhering strictly to construction plans and restricting machine use to these areas.
- **Siting and Scheduling:** Construct temporary workspaces or laydown areas within existing disturbances or previously compacted soils where practicable. Complete construction activities under dry or frozen conditions to reduce soil compaction and rutting.
- **Delineation:** Clearly delineate wetland boundaries with fencing, staking, or flagging prior to construction to prevent accidental encroachment.
- **Buffers:** Establish no-disturbance buffers around riparian and wetland ecosystems in accordance with recommendations under the *Forest and Range Practices Act*. Communicate the location and importance of these areas to all personnel via signage, maps, and pre-work meetings.
- **Restricted Maintenance:** Limit vegetation maintenance (e.g., clearing and slash placement) near wetlands and waterbodies.
- **Clearing Practices:** Avoid grubbing and maintain the vegetation root mat where only tree and shrub clearing is required to facilitate natural regeneration.
- **Training and Communication:** Establish "no-disturbance" buffers around sensitive features using high-visibility markers or fencing.

Hydrological Integrity

- **Maintain Hydrologic Connectivity:** Maintain hydrologic connectivity by providing unobstructed passage of water through fill materials using free-span bridges or culverts.
- **Drainage Management:** Repair or replace new and existing culverts as required to maintain existing natural drainage patterns.
- **Outlets:** Prevent the creation of outlets that would increase wetland drainage or constrict natural outlets.

Operational Controls

- **Seasonality:** Complete construction activities under dry or frozen conditions to avoid working in saturated soils and reduce potential soil disturbance.



- **Ground Protection:** Use low-ground-pressure or tracked equipment where saturated soils are encountered.
- **Soil Support:** Use matting or log corduroys where practical to prevent rutting and protect soil structure and vegetation.

Water Quality and Chemical Management

- **Herbicide Restrictions:** Avoid herbicide use within 100 m of wetlands and riparian areas.
- **Application Methods:** Restrict herbicide use to direct, spot application rather than broadcast spraying if use is unavoidable in these areas.
- **Spill Prevention:** Implement fuel management and spill response protocols (FMSCP) to prevent hydrocarbons or other contaminants from entering wetland habitats.

Dust and Trace Metals

- **Suppression:** Utilize dust suppression agents and watering on the TAC and rail cars to prevent the accumulation of trace metals on wetland vegetation.
- **Storage Piles:** Vegetate temporary growth media and overburden stockpiles to prevent erosion and subsequent sediment-related effects on wetland water quality.

Invasive Plant Management

- **Sanitation:** Verify all equipment and vehicles arrive at the site clean and free of soil, plant material, or seeds.
- **Early Detection:** Implement an Early Detection Rapid Response (EDRR) system to address new infestations while they are small and manageable.
- **Materials Inspection:** Inspect gravel, fill, and straw matting for invasive species seeds prior to use in erosion control.
- **Vegetation Stability:** Temporarily revegetate soil stockpiles as soon as practical to prevent them from becoming nurseries for invasive species.
- **Seed Standards:** Use only certified weed-free seed with a valid "Certificate of Seed Analysis" for all revegetation activities.

Debris Management

- **Slash Disposal:** Verify vegetation debris is not stored within wetlands, watercourses, or waterbodies.
- **Timber Salvage:** Fall trees into cleared areas or areas of existing activity to avoid damaging adjacent native forest. Avoid dragging salvaged logs through watercourses or wet areas.

With the implementation of these mitigation measures, adverse Project-related effects are anticipated to be minimized to the extent feasible.



4.3 RESTORE ON-SITE

Wetlands will be restored onsite through reclamation, with the goal of re-instating equivalent class and area of lost wetlands and wetland functions. The following sections describe planned wetland reclamation, including anticipated wetland types, areas, and functions.

4.3.1 RECLAIMED WETLAND TYPE AND AREA

Wetland ecosystems will be reclaimed throughout the Operation, and Decommissioning and Reclamation phases within areas previously used as water management ponds (Table 4, Figure 9). As described in the Reclamation and Closure Plan, the reclaimed management ponds are projected to support hygric-subhydric ecosystems, with subsurface water fluctuations of 0.5 m, expected to bring water within 0.3 m of the ground surface. These hydrologic conditions are conducive to the replacement of wetter, richer soils which generally rely on shallow groundwater inputs (Telkwa Coal Limited 2022e).

Table 4. Anticipated wetland replacement through reclamation

Area	Reclamation Year	Area of Wetland Reclamation (ha)			
		Open Water	Marsh	Swamp	Total
North Management Pond	5	6.3	0.7	3.0	10.0
East Management Pond	12	21.3	2.4	21.3	45.0
West Management Pond	21	24.3	2.7	7.6	34.6
Tenas Control Pond	25	-	-	10.5	10.5
Total		51.9	5.8	42.4	100.1

Progressive reclamation of 100.1 ha of wetland ecosystems is planned within the management ponds, including 51.9 ha of open water wetland, 5.8 ha of marsh, and 42.4 ha of swamp wetland (Table 4). The North, East, and West Management Ponds will be designed as wetland complexes, with open water wetlands with a maximum water depth of 2 m or less. The perimeter of these open water wetlands will be gradually sloped (e.g., 7:1 or gentler) to encourage the establishment of emergent species typical of marsh wetlands (e.g., cattails, sedges). Sloping upward, marsh wetlands will intergrade into swamp ecosystems dominated by woody vegetation (i.e., dominated trees and shrubs; Table 4). The Tenas Control Pond is expected to be comprised entirely of swamp wetland.

Wetland soils and organic materials will be salvaged to the extent practicable during Project construction and used proactively during progressive reclamation of wetland areas. Active revegetation of native plant species will also be undertaken as part of wetland reclamation, and native trees and shrubs will be planted within swamp areas, with native emergent vegetation species (e.g., sedges) planted around the margins of the reclaimed open water and marsh wetland areas.

The phased approach to wetland reclamation outlined in this Plan is designed to facilitate ongoing reclamation research and adaptive management throughout the Project's life cycle. The reclamation of the North Management Pond into wetland habitat by Year 5 provides an early, large-scale opportunity to evaluate the



effectiveness of the proposed design and revegetation strategies. Lessons learned from the North Management Pond will then be integrated into the design and implementation of larger-scale reclamation activities at the East and West Management Ponds in later Project years.

This iterative process provides opportunities to verify that the replacement strategy remains responsive to field-based performance and engagement feedback. Should monitoring of the early reclaimed areas identify deficiencies in vegetation establishment or the targeted "like-for-like" functional parity, adaptive management techniques will be applied to refine the approach for subsequent reclamation efforts. By utilizing the 20-year gap between the first and last reclamation phases, the Project can leverage long-term monitoring data to optimize wetland reclamation efforts.

Bog reclamation is excluded from the reclamation strategy due to the inherent technical complexity and extensive timeframes required to re-establish peatland ecosystems within disturbed areas. While peatland reclamation (comprising bogs and fens) has undergone rigorous study throughout North America and globally, significant operational challenges remain (Chimner et al. 2017, Convention on Wetlands 2021). A primary constraint is the difficulty in maintaining the specific hydrological regimes necessary for peat accumulation, alongside the multi-decadal to centurial timescales required to develop deep organic peat deposits characteristic of these wetland classes. Because these ecosystems represent a long-term peatland successional sequence where peat accumulates gradually over time, achieving functional parity in a post-disturbance landscape is not feasible within standard reclamation monitoring periods.

4.3.2 RECLAIMED WETLAND FUNCTIONS

Reclaimed swamp, marsh, and open water wetland areas are expected to provide hydrological, biogeochemical, habitat, and climate functions (Table 5). Designing reclaimed wetlands as functional complexes (i.e., including integrating multiple wetland classes) is expected to improve overall ecosystem performance. By incorporating diverse types such as swamps, marshes, and open water wetlands, these complexes are expected to create a range of water permanence levels, including temporary, seasonal, and semi-permanent regimes. This spatial and temporal variety has been designed to establish favorable plant and water conditions for various species throughout their lifecycles, resulting in higher species richness than single, isolated wetlands of an equivalent surface area. Furthermore, these clusters are expected to serve as a critical ecological "backup" during environmental shifts; while an isolated basin may dry out, a complex is more resilient and likely to retain functional areas that buffer the broader ecosystem. Because these larger, diverse complexes expand the breadth of available habitats and biochemical pathways, they provide increased opportunities for functions such as water flow moderation, carbon storage, and water quality treatment.

Reclaimed wetland areas have been designed to provide wetland function as soon as possible following reclamation. Hydrological functions such as water retention and flow moderation, sediment stabilization, and erosion protection are expected to commence within all reclaimed wetlands immediately following wetland reclamation. Similarly, micro-climate effects are expected to commence immediately following reclamation with the presence of surface water and resultant evaporation. Wildlife habitat including foraging habitat for bats, landbirds, listed bird species, and raptors; breeding and living habitat for amphibians; and breeding,



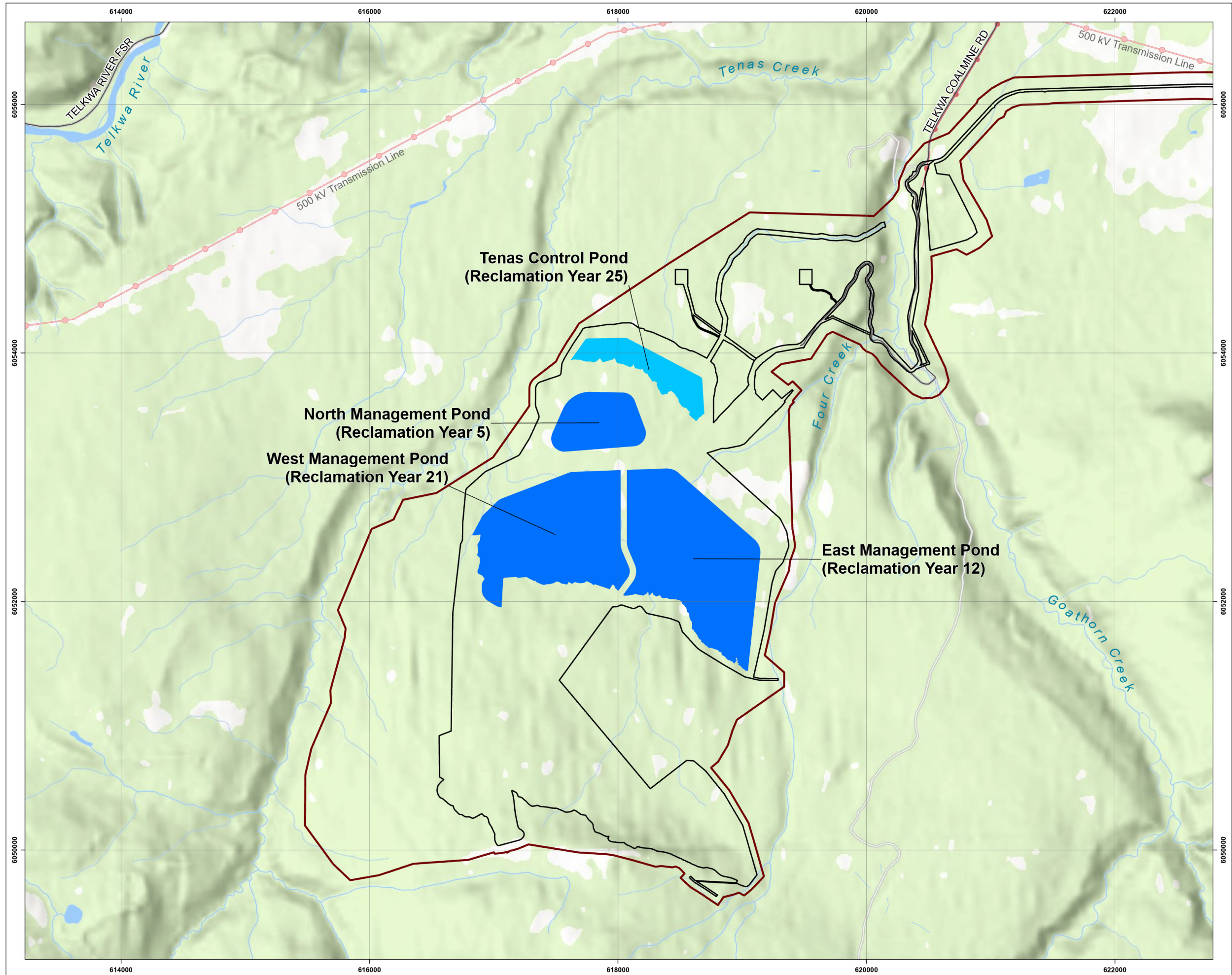
foraging, and migration habitat for waterfowl are also anticipated soon after reclamation within areas of open water wetland (Table 3).

Other wetland functions are expected to improve over time. Biogeochemical functions such as water quality treatment and carbon storage are expected to increase over the short- to medium-term (as early as 2 years after reclamation; Valach et al. 2021). Similarly, climate functions are expected to improve over the short term as vegetation is established and evapotranspiration increases. As planted vegetation matures within reclaimed wetland areas and trees and shrubs grow, habitat complexity is expected to improve and provide foraging habitat for moose with shrub establishment (estimated 3-10 years), and breeding habitat for other wildlife such as migratory landbirds and rusty blackbirds as swamp vegetation reaches tall shrub/sapling structural stage (estimated 15-20 years; Table 3).

Table 5. Predicted wetland functions within reclaimed wetland areas.

Wetland Function	Reclaimed Wetland Type		
	Swamp	Marsh	Open Water
Hydrological	Moderate – expected to retain and moderate water flow, stabilized sediment and provide erosion protection functions. These functions are expected to commence immediately following reclamation.		
Biogeochemical	Moderate – Water quality treatment functions are expected to develop over time, as early as 2 years following reclamation. Woody biomass volume is expected to increase carbon storage functions over time as trees and shrubs mature.	Low to Moderate – Water quality treatment and carbon storage functions are expected to develop over time, as early as 2 years following reclamation.	
Habitat (Ecological)	Moderate to High – Structural complexity within reclaimed swamp, marsh and open water wetlands will be designed to be similar to that observed prior to construction. Foraging habitat for bats, landbirds, listed bird species, and raptors; breeding and living habitat for amphibians; and breeding, foraging, and migration habitat for waterfowl are anticipated soon after reclamation within areas of open water wetland. As planted vegetation matures within reclaimed wetland areas and trees and shrubs grow, habitat complexity is expected to improve and provide foraging habitat for moose with shrub establishment (estimated 3-10 years), and breeding habitat for other wildlife such as migratory landbirds and rusty blackbirds as swamp vegetation reaches tall shrub/sapling structural stages and beyond (estimated 15-20 years).		
Climate	Low to Moderate – Reclaimed wetlands are expected to provide micro-climate influences immediately following reclamation, and climate regulation through evapotranspiration rates as vegetation establishes.		

Path: L:\PROJECTS\2018\BP0421_Tenas_Mine\2026\25P0200_Wetlands.aprx 25P0200_Fig9_WetlandReclamation_20260324



Tenas Steelmaking Coal Project

Wetland reclamation plan

Legend

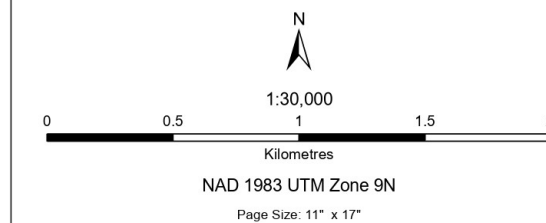
- Control Pond
- Management Pond
- Project Footprint
- Project Area
- Road
- Existing 25 kV Powerline
- Transmission Line
- Watercourse
- Waterbody

Notes

1. All mapped features are approximate and should be used for discussion purposes only.
2. This map is not intended to be a "stand-alone" document, but a visual aid of the information contained within the referenced Report. It is intended to be used in conjunction with the scope of services and limitations described therein.

Sources

- Project Footprint. Telkwa Mining Limited. March, 2026.
- Project Area. Telkwa Mining Limited. February, 2025.
- Ponds and Powerline. Telkwa Mining Limited. April 21, 2021.
- Roads, Transmission Lines, Waterbodies and Watercourses. Government of British Columbia.
- Basemap. World Topo Map.



25P0200

Production Date: Mar 24, 2026

Figure 9





5 PRELIMINARY HABITAT BALANCE

The preliminary wetland habitat balance (Table 6) quantifies the net area for each wetland class by Project year. A total of 66.0 ha of wetland habitat is predicted to be lost within the Project Footprint. Approximately 81% (53.4 ha) of this disturbance is expected by Year 5, encompassing all anticipated disturbance to bog, marsh, and open water wetlands. Subsequent disturbance to swamp wetlands is scheduled for Year 10 (9.7 ha), Year 15 (2.8 ha), and Year 20 (<0.1 ha).

On-site reclamation is projected to restore 100.1 ha of wetland habitat within and adjacent to the Project Footprint. This includes 10.0 ha at the North Management Pond by Year 5, 45.0 ha at the East Management Pond by Year 12, 34.6 ha at the West Management Pond by Year 21, and 10.5 ha at the Tenas Control Pond by Year 25. This progressive restoration results in an overall net increase of 34.1 ha of wetland habitat by the end of Year 25 (Table 6).

In alignment with a habitat-based replacement strategy, the Project anticipates a surplus of 51.9 ha of open water and 5.5 ha of marsh habitat, alongside a deficit of 17.1 ha of swamp and 6.1 ha of bog wetlands (Table 6). While bog and swamp ecosystems are characterized by elevated carbon storage and treed habitats, they share many habitat functions with marsh and open water classes, such as foraging for bats and furbearers and migration habitat for waterbirds.

Bog reclamation is excluded from the strategy due to inherent operational challenges and the lengthy timescales required for peat accumulation, which preclude achieving functional parity within standard monitoring periods. Instead, the Plan compensates for these losses by establishing diverse functional wetland complexes that integrate multiple classes to enhance ecosystem performance and resilience. The loss of functions from the 23.2 ha deficit of swamp and bog habitat is offset by a 57.4 ha surplus of marsh and open water habitats at a 2.5:1 ratio. This substantial surplus provides a breadth of biochemical pathways and habitat varieties—including breeding and living habitat for amphibians and waterfowl—intended to meet or exceed the ecological functions originally present within the Project Footprint, and account for the temporal lag between initial disturbance and full maturation of reclaimed wetland functions.



Table 6. Preliminary wetland habitat balance.

Year	Wetland Disturbance (ha)							Wetland Reclamation (ha)							Wetland Balance (ha)						
	Bog	Fen	Marsh	Open Water	Swamp	Year Total	Cumulative Total	Bog	Fen	Marsh	Open Water	Swamp	Total	Cumulative Total	Bog	Fen	Marsh	Open Water	Swamp	Total	Cumulative Total
5	6.1	0	0.3	<0.1	47.0	53.4	53.4	0	0	0.7	6.3	3.0	10.0	10.0	-6.1	0	0.4	6.3	-44.0	-43.4	-43.4
10	0	0	0	0	9.7	9.7	63.2	-	-	-	-	-	-	10.0	0	0	0	0	-9.7	-9.7	-53.2
12	-	-	-	-	-	-	63.2	0	0	2.4	21.3	21.3	45.0	55.0	0	0	2.4	21.3	21.3	45.0	-8.2
15	0	0	0	0	2.8	2.8	66.0	-	-	-	-	-	-	55.0	0	0	0	0	-2.8	-2.8	-11.0
20	0	0	0	0	<0.1	<0.1	66.0	-	-	-	-	-	-	55.0	0	0	0	0	-<0.1	-<0.1	-11.0
21	-	-	-	-	-	-	66.0	0	0	2.7	24.3	7.6	34.6	89.6	0	0	2.7	24.3	7.6	34.6	23.6
25	-	-	-	-	-	-	66.0	0	0	0	0	10.5	10.5	100.1	0	0	0	0	10.5	10.5	34.1
Total	6.1	0	0.3	<0.1	59.5	66.0	66.0	0	0	5.8	51.9	42.4	100.1	100.1	-6.1	0	5.5	51.9	-17.1	34.1	34.1

Note: Disturbance has been estimated at years 5, 10, 15, and 20; wetland reclamation has been estimated at years 5, 12, 21, and 25. Dashes represent a lack of estimated data.



6 VERIFICATION AND MONITORING

Verification and monitoring will be undertaken during planned reclamation monitoring as described in the Reclamation and Closure Plan to confirm that the Plan has been implemented, assess reclamation effectiveness, and verify Plan predictions related to wetland benefit balance. Should any deficiencies be noted during monitoring, adaptive management techniques will be implemented to address deficiencies affecting target wetland functions.

7 SUMMARY AND FOLLOW-UP ACTIONS

This Plan addresses the anticipated residual loss of 66.0 ha of wetlands within the Project Footprint. In accordance with the provincial mitigation hierarchy, the Project has prioritized the avoidance and minimization of impacts before addressing residual losses through a robust on-site reclamation strategy. The preliminary wetland habitat balance predicts a net increase of 34.1 ha of total wetland area by Year 25 through the progressive restoration of 100.1 ha within former water management ponds.

The core of this strategy involves intergrading open water, marsh, and swamp ecosystems into diverse functional complexes. Specifically, the loss of functions resulting from a 23.2 ha deficit of swamp and bog habitats will be offset by a 57.4 ha surplus of marsh and open water habitats. This 2.5:1 habitat offset ratio is designed to provide a breadth of biochemical pathways and habitat varieties that meet or exceed the original ecological functions while accounting for the temporal lag required for reclaimed vegetation to mature.

7.1 FUTURE STUDIES

As described in Chapter 7 of Section 4.0 of the Project EAC Application, the detectability of wetland ecosystems is reliant on mapping scale, and some ecosystems are less likely to be detected at coarse mapping scales (i.e., 1:10,000 to 1:20,000 scale; Telkwa Coal Limited 2022a). To address this, and to finalize the replacement strategy and verify ecological equivalency, the following actions are planned during the Project permitting phase:

- **Detailed Field Assessments:** Conduct detailed wetland identification, delineation, and functional assessments within the Project Area during the growing season to verify baseline TEM data and refine area calculations.
- **Collaborative Engagement:** Initiate validation of the proposed functional replacement strategies and the 2.5:1 offset ratio with Indigenous groups, regulatory agencies, and stakeholders.
- **Adaptive Management Pilot:** Utilize the reclamation of the North Management Pond in Year 5 as a primary research site to evaluate revegetation success and hydrological function, applying "lessons learned" to the design of subsequent pond reclamations.



- **Plan Updates:** As this Plan is intended to be a living document, it will be updated periodically to integrate additional field results, engagement outcomes, refined reclamation prescriptions, and learnings from the adaptive management pilot.
- **Integration with the Reclamation and Closure Plan:** Update the Project's Reclamation and Closure Plan to include specific technical details for wetland complex construction, long-term monitoring protocols, and adaptive management.



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