

Memorandum



To: Angela Waterman
From: Cathy Mackay
Date: July 8, 2020
Project No: 18P0421
Re: Responses to Information Requests from Office of the Wet'suwet'en on Moose Mortality

The following information requests were asked of Telkwa Coal Limited (TCL) related to the Tenas Project in correspondence from Office of the Wet'suwet'en to the BC Environmental Assessment Office which was relayed to TCL on April 15. These topics were addressed during a Working Group session May 27, 2020. This memo summarizes TCL's responses.

The following general comments from Office of the Wet'suwet'en are followed by TCL's responses.

a. Comment from Office of the Wet'suwet'en:

"Due to the proposed increase in rail traffic by Telkwa Coal Ltd as mentioned in their May 2019 brochure. Telkwa Coal Ltd predicts an increase of rail traffic of one train (116 cars) per week; or 52 trains per year. This will increase rail traffic to Prince Rupert, BC. [...] We expect Telkwa Coal Ltd to have a greater increased impact and therefore we'd like the moose population monitored to give us an idea of where the population is at and what the project impact will be."

Response from Telkwa Coal Limited:

While the rail (and port) itself might be out-of-scope (CN Rail and Ridley Terminal jurisdiction, respectively), Telkwa Coal Limited's moose Environmental Assessment has an RSA that encompasses part of the rail line in proximity to our project. We will include a mortality section where we will report incidence rate of moose collisions and compare the additional potential for collisions due to the percentage of cars added. Also, our wildlife management plan will include moose monitoring within our project boundaries.

b. Comment from Office of the Wet'suwet'en:

"In response to heightened awareness and negative public reaction to increased levels of moose mortality in the winter along the Telkwa Subdivision of the CN rail line, a Moose Mortality Working Group (MMWG) was established between CN, the provincial government and stakeholders. Any information provided to/from this working group may shed light onto our concerns."



Response from Telkwa Coal Limited:

- During the Working Group meeting May 27, 2020 Heidi Schindler, Wildlife Biologist, BC Ministry of Forests, Lands, Natural Resource Operations and Rural Development indicated she is part of the MMWG. TCL has followed up with H.Schindler requesting how we can access these data.

Office of the Wet'suwet'en posed three specific requests in their memo that are copied into the table below and are accompanied by responses on behalf of Telkwa Coal Limited.

Office of the Wet'suwet'en (OW) question	Telkwa Coal Limited Response
<p>1) Information regarding CN's moose kill statistics associated with the increase in number of, and length of trains. This would include any CN comparison study regarding moose kill reports for the Skeena region (Upper Skeena; Lower Skeena).</p>	<p>TCL will be seeking this data to complete the analysis for the indicator "mortality" that will be included in the environmental assessment. Data including regional data from CN is preferred, and published data from other jurisdictions will be used as secondary if the regional data are not reliable. If OW has access to relevant information, we would appreciate if they would share data.</p>
<p>2) OW would like the moose population monitored to give us an idea of where the population is at and what the Telkwa Coal Ltd impact will be.</p>	<p>The effect assessment is habitat focussed, as populations are typically cyclical and linked to regional factors beyond the potential effects of construction/operation of a mine. The moose population is monitored by the Province of BC and the Province is doing moose research/inventory work in collaboration with Indigenous governments through the Environmental Stewardship Initiative.</p>
<p>3) Information by CN, and Moose Mortality Working Group (MMWG) regarding levels of moose mortality be supplied.</p>	<p>This is a source of information that TCL is seeking to complete the effect assessment for the indicator "mortality".</p>