Bulkley Valley Community Resources Board
PO Box 985 | Smithers, BC | V0J 2N0

April 28, 2014

Mark Amundrud
Community Coordinator
Canadian LNG
A unit of Spectra Energy
Suite 210 4716 Lazelle Ave
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Re: **BVCRB Comments on the Proposed Spectra Pipeline**

Dear Mark Amundrud,

Thank you for meeting with the Bulkley Valley Community Resource Board (BVCRB) on January 14th, 2014 in Smithers, BC. As identified during the meeting, a portion of the Spectra LNG pipeline is proposed to pass through the Bulkley TSA, and more specifically through the Upper Nilkitkwa River Landscape Planning Unit, defined under the Bulkley Land and Resource Management Plan (LRMP).

The Bulkley Valley Community Resources Board (BVCRB) is a collection of local citizens, with a range of value perspectives, which act as stewards of the LRMP. The LRMP was implemented in 1998 and is widely regarded as one of British Columbia's most successful land-use plans. Today, the BVCRB continues to play an important role in guiding land-use planning in the Bulkley TSA.

We have completed a preliminary review of the information that Spectra Energy presented at the meeting and are prepared to offer some initial comments. These comments are limited by several factors:

- We were not provided a map or spatial line work that indicated the specific pipeline location. Our comments are therefore general in nature;
- As a volunteer board we have limited resources available to us. These comments therefore reflect the knowledge and experience of those present on the Board;
- We operate on a consensus basis. These comments therefore reflect the common values of all members on the CRB; and
- We appreciated the expert knowledge that Spectra brought to our January 14th meeting. Our knowledge of the project is limited to the information provided at this meeting.

What follows are direct excerpts (*in italics*) from Bulkley LRMP document, followed by specific questions and comments regarding application of this management direction from the LRMP as it relates to the Spectra pipeline.

2.1.2.1 Circle Routes
Circular routes within the Bulkley Plan Area and connecting to adjacent districts can be potentially detrimental and should be discouraged wherever possible. This applies particularly when other values are paramount.

Examples of potential problems include:
• additional traffic and hunting pressures; and
• greater difficulty in hunting regulation enforcement.

Specific concerns have been identified in the following planning units: 2-2
Babine River (connector to Kispiox District)…

Our primary concern regarding Spectra's proposal is the new access created by this pipeline, particularly into areas that currently provide core secure habitat, and the associated potential for negative effects on sensitive wildlife species including wolverines, grizzly bears and mountain goats.

How would the pipeline affect motorized access (e.g., road type, length, density, distribution, level of use) over the short term during construction and long term for pipeline maintenance, both within the Bulkley TSA and into adjacent TSAs? What specific measures are proposed to control access? What is the likelihood of success associated with each measure? What specific measures are proposed if initial attempts fail? What specific measures are proposed to minimize sight lines along the pipeline and associated road infrastructure

2.1.4 Water Quality
Maintaining water quality in the Bulkley Plan Area is important for many reasons, including the maintenance of fish habitat…

Maintaining water quality is very important in light of the known fisheries values in this area including local fish populations in the tributaries to Nilkitkwa River, salmon within the Nilkitkwa River including a small sockeye run, and the downstream world-renowned fishery values within the Babine River.

In light of the many wetlands within the immediate vicinity of the proposed pipeline route, especially within the 2km area either side of Nilkitkwa River, what specific measures are proposed to maintain water quality when constructing the pipeline through this area? How

does Spectra propose to deal with the changes in hydrology, terrain stability and water quality associated with climate change?

2.1.1 Biodiversity

The maintenance of biodiversity is an underlying objective of land and resource management at all levels of management.

2.3.1.2 Landscape corridors

Landscape corridors are designed to maintain connectivity within the landscape, reduce habitat fragmentation, permit movement and dispersal of plant and animal species, and maintain, within a managed forest setting, forests dominated by mature tree cover and containing most of the structure, function, micro-climatic conditions and biota associated with old growth forests.

A Landscape corridor is located along Nilkitkwa River. It would be helpful to the BVRB if Spectra could expand on and explain what they understand those values to be. What specific practices (clearing widths, set-back from water edge, etc.) are Spectra proposing to manage the values associated with this Landscape corridor?

2.1.5 Fish and Wildlife Habitat

General management direction is designed to conserve the wide abundance of all fish and wildlife habitats and populations in the Plan Area.

Critical wildlife habitats will be managed to maintain habitat values including habitats currently identified through this LRMP process, and areas yet to be identified under the Forest Practices Code as wildlife habitat areas.

2.4.1 Planning Unit 1: Upper Nilkitkwa

Grizzly bears den in the subalpine areas of the mountains and forage in slides. They also use Nilkitkwa River as a travel corridor to the Babine River, which supports a provincially significant population of grizzly bears and black bears. In the Sub-Boreal Spruce biogeoclimatic zone, grizzlies typically utilize riparian and wet forest throughout their range during summer. Moose use this unit in the summer to fall months. Moose prefer areas of disturbance, particularly within riparian areas and forest habitats in early successional stages.

Mountain goats can be found in the Sicintine and Bait Ranges. The populations are reported to be stable...

Land-use planning did not provide grizzly bear habitat mapping for the Upper Nilkitkwa Landscape Unit, and no projects have provided better information to date. Has Spectra assessed habitat suitability and capability to identify important grizzly bear habitat and potential attractive sinks within the vicinity of its proposed pipeline or compressor station?

What mitigation measures are proposed to manage risk for grizzly bears, including the risk of human-bear interactions?

We have similar concerns for wolverines and mountain goats. Were high value habitats (including wolverine natal and maternal denning areas) identified and what mitigation measures are proposed?

A compressor station has been proposed within the Bulkley TSA. What specific measures are proposed to manage human-bear interactions?

Introduced clover, particularly red and white clover, is a major risk factor for bears. In general, attractive habitats are a major concern in areas that are accessible to people. How will Spectra manage ecological restoration and (re)vegetation to mitigate risk to grizzly bears?

Additionally, what measures are proposed to prevent the introduction of invasive weed species?

A key management tool for managing risk to wildlife is effective access control, especially where development creates access into previously unroaded areas that provide core security habitat for vulnerable species. We've posed several questions above under Circle Routes which will help us better understand the risk and associated uncertainties of the proposed pipeline on wildlife.

In addition to controlling access by humans, linear disturbances affect predator-prey movement dynamics. How do you propose to mitigate these effects on wildlife?

5.0 Monitoring and Amendment

The Board agrees that the effectiveness of the LRMP will hinge on monitoring.

How does Spectra propose to monitor and respond to potential residual effects to the values of the area?

All documents referred within this letter are available on the BVCRB web site (www.bvcrb.ca). In addition, we recommend the Babine Watershed Monitoring Trust (www.babinetrust.ca) as an essential source of information for this proposed project.

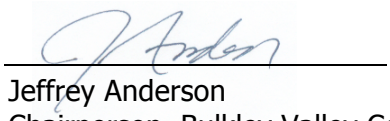
The comments contained within this letter assume that Spectra's proposed pipeline will only be used to transport natural gas. Would Spectra be willing to covenant this pipeline as a gas line?

This Letter may not be construed as support for Spectra's proposed pipeline.

Finally, we ask that if there is evidence, scientific or otherwise, to support the efficacy of Spectra's various proposed mitigation that full explanations and references to support the choice of a specific mitigation be provided for the BVCRB's review.

Thank you for the opportunity to comment. We look forward to your answers to the questions that we have posed within this letter.

Regards,



Jeffrey Anderson
Chairperson, Bulkley Valley Community Resources Board

cc.
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