NI TI MOUNTAIN WIND PROJECT

Social and Economic Impacts Report

Energy Resource Activities Act Permit Application

November 2026



List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
BC	British Columbia
BCER	BC Energy Regulator
CMHC	Canadian Mortgage and Housing Corporation
EMF	Electromagnetic Fields
EPA	Electric Purchase Agreement
ER	Emergency Room
ERAA	*Energy Resource Activities Act*
GBA+	Gender-Based Analysis Plus
GHG	Greenhouse Gas
ILA	Indigenous-led Assessment Memorandum
IR	Indian Reserve
MW	Megawatt
O&M	Operations and Maintenance
OFA	Occupational First Aid
RAA	Regional Assessment Area
RCMP	Royal Canadian Mounted Police
RDBN	Regional District of Bulkley-Nechako
RDFFG	Regional District of Fraser-Fort George
REPR	Renewable Energy Projects Regulation
SEV	Social and Economic Value
UHNBC	University Hospital of Northern BC

Glossary

Term	Definition
SEV	Social and economic values are components of the human environment that are considered important by the Proponent, the public, Indigenous groups, and technical specialists.

List of Symbols and Units of Measure

Symbol/Unit of Measure	Definition
ha	Hectare
km	kilometre
kV	kilovolt
m	metre

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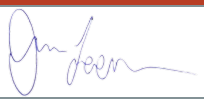
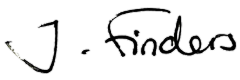
Social and Economic Assessment	Jack Leevers, B.A.	
	Jessica Finders, M.Sc.	
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Executive Summary

This Social and Economic Impacts Report for the proposed Ni Ti Mountain Wind Project (the Project) has been prepared to evaluate potential interactions between the selected social and economic values of local housing and local infrastructure and services with expected Project activities, and describe differential adverse impacts of the Project to distinct human populations. Innergex Renewable Energy Inc. and Stellat'en First Nation, together through the Ni Ti Mountain Power General Partnership are proposing to construct and operate the 200-megawatt wind energy project in the Regional District of Bulkley-Nechako, BC. Ni Ti Power is the owner and developer of the Project. Ni Ti Managing Partner Inc. is the managing partner of Ni Ti Power and is the applicant and permit-holding entity for the *Energy Resource Activity Act* application and associated authorizations, acting in its capacity as managing partner of Ni Ti Power.

This assessment identifies potential impacts and proposes mitigation measures to reduce potential impacts. It was carried out to support the Project's permit application for renewable energy projects to the BC Energy Regulator, under the *Energy Resource Activities Act* and the mandate for fostering community well-being.

To refine the evaluation of potential interactions and the selected social and economic values, a Regional Assessment Area, consisting of municipalities and rural areas surrounding the Project, was established. Methods for establishing the likelihood of impacts relied on online resources such as census data and municipal websites. The assessment shows the Project is expected to have minor to no impacts on the social and economic values studied in the report. Where expected to occur, minor impacts and interactions will be managed through proposed mitigation measures, engagement with the community and service providers, and detailed planning.

Ni Ti Power is confident that through the application of the proposed mitigation measures and continued engagement, the Project can bring a positive contribution to the region while avoiding placing undue pressure on services upon which the local population relies. As the results show, this thereby aligns with BC Energy Regulator guidance and mandates.

1.0 Introduction

The Ni Ti Mountain Wind Project (the Project) is a 200-megawatt Indigenous-majority-owned wind energy project being developed by Ni Ti Mountain Power General Partnership (Ni Ti Power), which is comprised of Stellat'en First Nation (Stellat'en) and Innergex Renewable Energy Inc. (Innergex). Ni Ti Power is the owner and developer of the Project. Ni Ti Managing Partner Inc. is the managing partner of Ni Ti Power and is the applicant and permit-holding entity for the *Energy Resources Activities Act* application and associated authorizations, acting in its capacity as managing partner of Ni Ti Power.

Stellat'en participates in the Project as both a rights-holder and equity partner, and expects Project planning, assessment, construction, operations, and reclamation activities to align with the principles of free, prior, and informed consent and meaningful Indigenous participation and stewardship governance.

This social and economic impacts report (SEIR) has been prepared to support the permit application for the Ni Ti Mountain Wind Project (the Project), a proposed wind energy project located in the Regional District of Bulkley-Nechako, BC. This report forms part of the permit application being submitted to the BC Energy Regulator (BCER) under the *Energy Resource Activities Act* (ERAA) to construct and operate the Project. It is prepared in accordance with section 13 of the Renewable Energy Projects Regulation (REPR) to identify and evaluate the nature and extent of potential adverse impacts of the Project on local housing, local infrastructure and services, and of differential adverse impacts to distinct human populations. In the Draft Interim Guidance for Renewable Energy Permit Applications, the BCER emphasizes its regulatory mandate to foster community and social well-being, noting that renewable energy projects can bring positive and adverse impacts to the communities and regions where they take place (BCER, 2026). The purpose of this report, therefore, is to identify, assess, and mitigate potential adverse impacts that the Project could have on communities and population groups in the region. By identifying potential adverse impacts early and proposing mitigation measures, Ni Ti Power supports the BCER's mandate to foster social well-being and bring a positive contribution to the region.

Ni Ti Power engaged professionals to establish a Regional Assessment Area (RAA) surrounding the Project to be the subject of social and economic analysis, determine the current conditions for the social and economic values (SEVs) being examined, and to subsequently assess adverse impacts to current conditions that could arise as a result of the Project's development. Where adverse impacts were determined or if it was determined adverse impacts were at an increased risk, mitigation measures to avoid and reduce impacts are proposed. Potential impacts were assessed using publicly available data, through internal planning discussions on Project logistics, and by the professional judgement of the specialists who prepared this report. As required under REPR s.13(2), this report is informed by the best available science and Indigenous knowledge, including the socio-economic studies conducted by Stellat'en and Nadleh Whut'en with Firelight Research Inc. (Stellat'en First Nation and Firelight Research Inc., 2025; Nadleh Whut'en First Nation and Firelight Research Inc., 2026) and the Indigenous-led Assessment Memorandum (ILA) (Stellat'en First Nation, 2026). The resulting report identifies the Project's impacts to the values identified under REPR s.13 and proposes mitigation measures to be implemented by Ni Ti Power and its contractors during construction and operation.

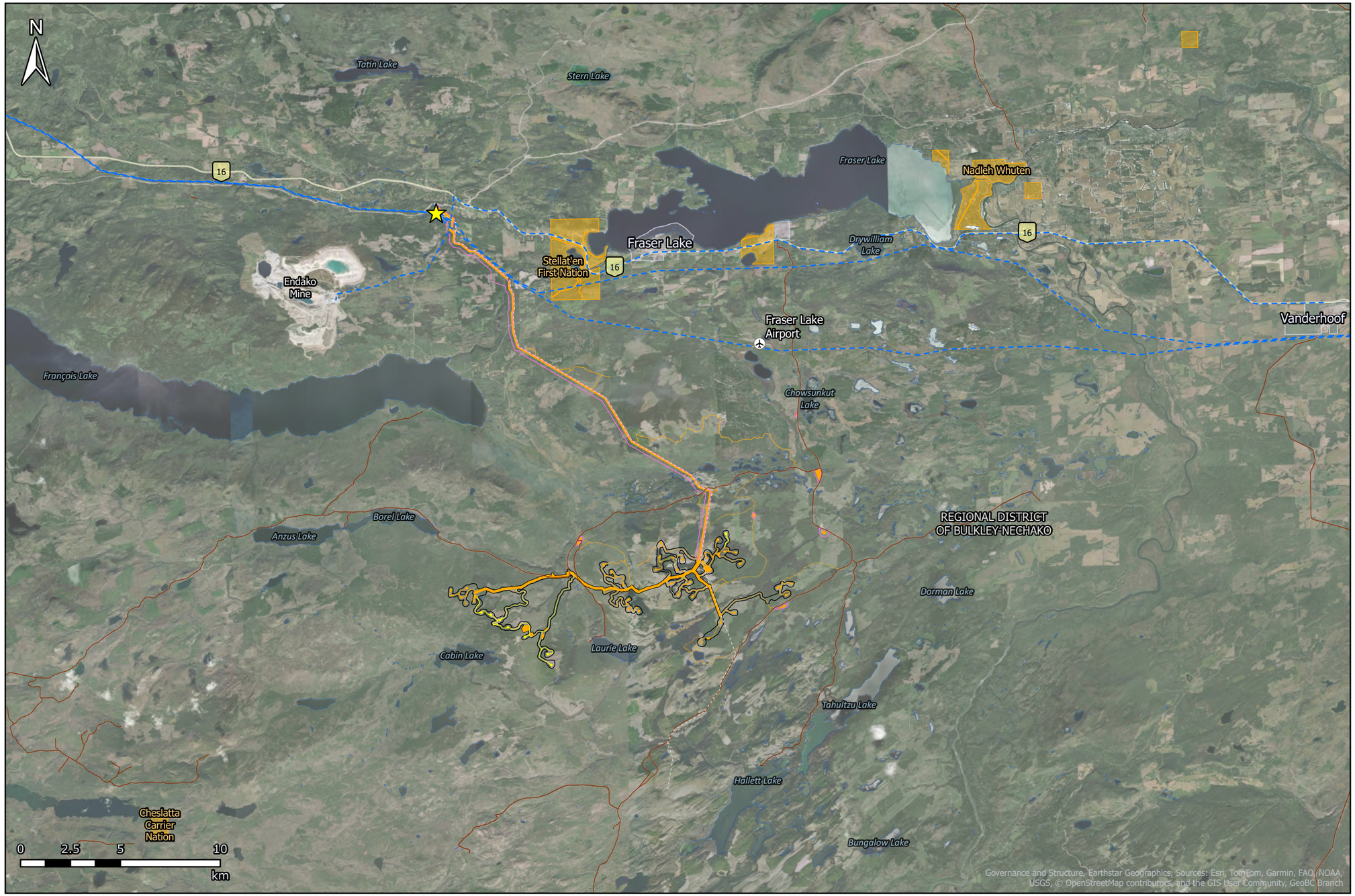
2.0 Project Overview

This section provides context on the Project's location and regional context, the expected Project components, and phases of the Project lifecycle considered in this SEIR. Further details on the Project's location, status, and components and technology can be found in the Project Description report. Details on anticipated Project activities and timelines can also be found in the Project Description.

2.1. Project Location and Regional Context

Ni Ti Power is proposing to construct, operate, and maintain the Project, which is located approximately 14 km south of Fraser Lake in the unceded territories of Stellat'en, Nadleh Whut'en and neighbouring nations: Skin Tyee Nation, Nee Tahi Buhn Indian Band, and Saik'uz First Nation. Ni Ti Power has engaged with these First Nations and will continue to engage as Project development progresses. See the First Nations Pre-Engagement Report for more details. Stellat'en's main reserve is located at the west end of Fraser Lake (Stellaquo 1). Nadleh Whut'en's main reserve is at the east end of Fraser Lake (Nautley 1).

The Project is sited on provincial Crown land within the Regional District of Bulkley-Nechako (RDBN), who are the acting regional governmental body. The Project will be accessed using Holy Cross Forest Service Road (FSR) south from Highway 16, an important east-west link for northern BC. A network of existing forestry roads will provide internal access, and smaller access roads, both existing and newly constructed, will lead to turbine locations. The closest municipalities to the Project site are the Village of Fraser Lake (approximately 14 km), the Village of Burns Lake (70 km west on Highway 16 from Fraser Lake), and the District Municipality of Vanderhoof (60 km east of Fraser Lake on Highway 16). The City of Prince George, the largest urban centre in northern BC, is located 160 km east of Fraser Lake on Highway 16. Figure 2-1 provides further context for the Project's location and the surrounding municipalities and landmarks.





LEGEND

- Point of Interconnection (Glenannan Substation)
- Blackwater Transmission Line - Orthophoto Delineated
- Existing BC Transmission Lines
- Forest Service Road
- Highway
- Project Footprint - Alternate
- Project Footprint - Primary
- Operating Area
- Construction Corridor
- First Nation Reserve
- Municipal Boundary

NOTES & SOURCES:

- THIS FIGURE IS FOR ILLUSTRATIVE PURPOSES ONLY AND SHOULD BE INTERPRETED IN THE CONTEXT OF THE ACCOMPANYING REPORT.
- THIS LAYOUT INCLUDES ALTERNATE TURBINE LOCATIONS. AT COMPLETION, THE PROJECT WILL HAVE A MAXIMUM OF 30 TURBINES
- PUBLIC DATA: PROVINCE OF BRITISH COLUMBIA

Projection: NAD 1983 BC Environment Albers	Project: NI TI MOUNTAIN WIND PROJECT	Figure: 2-1
Scale: 1:200,000	Prepared for: NI TI MANAGING PARTNER INC.	
Dated: 2026-11-12		
LEGACY ENVIRONMENTAL	Title: **REGIONAL OVERVIEW**	

2.2. Summary of Project Components and Activities

This section provides an overview of Project components and activities, which will help inform the assessment of potential impacts to local housing, local infrastructure and services, and distinct populations. A more detailed description of the Project components and Project activities can be found in the Project Description.

The Project will consist of:

- Up to 30 utility-scale wind turbines, with a maximum capacity of 7.2 MW, maximum hub height of 120 m and a rotor diameter of up to 175 m;
- Associated overhead and buried collector lines to convey electricity to a Project substation;
- An approximately 25 km, 230 kV transmission line bringing the electricity to the point of interconnection with BC Hydro's existing Glenannan Substation;
- Two long-term meteorological towers;
- Temporary and permanent laydown, batch plant, and borrow areas;
- New and upgraded access roads for construction and operations;
- An operations and maintenance (O&M) facility and associated infrastructure; and
- Groundwater well to service construction needs and the O&M facility.

The following lists highlight the key activities expected for the Project, by phase:

Construction:

- Vegetation clearing and grubbing
- Soil grading and site levelling
- Establishing laydown areas, worksite borrow pits, and temporary batch plant
- Upgrading existing access roads
- Construction of new access roads
- Delivery of equipment, construction materials, aggregate, and concrete supplies
- Excavation and construction of turbine foundations
- Turbine assembly, tower erection, and blade installation
- Installation of overhead and buried collector lines
- Construction of on-site substation and O&M facility
- Construction of 25 km transmission line to Glenannan Substation
- Progressive restoration activities of temporarily disturbed areas

Operations:

- Turbine power generation
- Routine, preventative, and reactive turbine maintenance
- Maintenance of collector and transmission lines
- Road maintenance and snow clearing
- Periodic turbine refurbishment
- Ongoing meteorological monitoring

Decommissioning:

- Removal of turbines and above ground infrastructure, and transportation to off-site recycling or disposal facility

- Removal of underground infrastructure to 1 m below from ground surface
- Internal road decommissioning as required in consultation with BCER
- Regrading and site reclamation
- Re-vegetation of disturbed areas

3.0 Scope and Methodology of the Assessment

When building and later operating a renewable energy project, it is important that any adverse effects from the Project are not felt unequally by the residents of the region where it is located. The scope of this SEIR is defined by Social and Economic Values (SEVs) selected for the subject of study and the assessment methods that determined the likelihood of potential adverse interactions between these SEVs and Project activities.

3.1. Methodology & Social and Economic Values (SEVs)

This SEIR has been completed in accordance with section 13 of the REPR, to support BCER permitting decisions by demonstrating how potential impacts to the Project's surrounding environment can be avoided, minimized, or mitigated (BCER, 2026).

To conduct the assessment, Ni Ti Power applied the following approach:

1. Describe the current conditions for each identified SEV. This was conducted through a desktop review of publicly available data and documents, such as census information and planning documents for municipalities in the RAA and establishing the presence, or lack of, local resources and housing.
2. With current conditions established, identify potential Project interactions with SEVs across Project construction, operations, and decommissioning. A rationale for the occurrence or non-occurrence of impacts is offered. In the instances where the risk of impacts was identified, mitigation measures are then proposed.
3. Propose mitigation measures and provide a rationale for their adequacy to reduce or eliminate the expected impact.

Under REPR s.13, enabled by the ERAA, three specific social and economic themes have been identified to form the basis of the assessment, which this report further breaks down into sub-themes. The selected SEVs are:

1. Local Housing;
2. Local Infrastructure or Services, including landfills, hospitals and emergency services; and
3. Differential adverse impacts of the Project to distinct human populations.

An increase in the demand for housing in the region surrounding the Project was considered in the assessment, particularly during the construction phase. Census and municipal data for median rents and population growth were used.

Large-scale industrial developments, like wind energy projects, have the potential to increase the demand for goods and services in the region where they are situated over the course of their lifecycle. The assessment considered how the project workforce could impact the demand on healthcare facilities and emergency response services and how Project construction and decommissioning could impact the municipal services of waste management and landfills within the chosen RAA.

Distinct populations who could experience differential adverse impacts were identified as groups who may have challenges accessing critical goods and services or rely on these more, relative to the general population. The Gender-Based Analysis Plus (GBA+) tool considers factors such as age, disability, education, ethnicity, economic status, geography (including rurality), language, race, religion, gender and sexual orientation (Women and Gender Equality Canada, 2025). Among these factors, five distinct populations were identified that may experience differential adverse impacts and are therefore the subject of this assessment:

- Indigenous peoples[1], given the Project's location on their traditional territories and Stellat'en's co-ownership of the Project;
- Rural and remote residents within the RAA, given their proximity to the Project, their more limited access to housing and services, and their smaller population base;
- Women, given the documented higher rates of core housing need (Employment and Social Development Canada, 2019) and the increased safety risks associated with temporary work camps, particularly for Indigenous women (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019);
- Seniors, based on the documented higher rates of core housing need and difficulty accessing suitable, affordable housing as their needs change (Employment and Social Development Canada, 2019); and
- Low-income residents, given the established relationship between lower household income and higher rates of core housing need.

While the REPR s.13 focuses on identifying potential adverse impacts to housing, infrastructure and distinct populations, the Project is also expected to deliver a range of positive social, economic, and environmental outcomes for Stellat'en, the Bulkley-Nechako region, and the Province of BC, across a variety of values. These benefits, including employment, training, contracting opportunities, and Indigenous equity ownership, fall outside the scope of this assessment and have not been evaluated as part of it. Project benefits are summarized below to provide context for the Project as whole.

3.1.1. Project Benefits

The electricity generated by the Project will be sold to BC Hydro under a 30-year Electricity Purchase Agreement (EPA) and will supply low-carbon renewable energy to the BC grid and in the process support the growth and transition to low-carbon energy sources. Benefits of the Project include development of an economically sustainable and low environmental impact business that is co-owned by the Stellat'en. The Project is aligned with BC Hydro's strategic objective of reducing greenhouse gas (GHG) emissions through clean and efficient electrification[2], as well as BC's broader climate goals under the *Clean Energy Act*. In advancing these goals, the Project creates other additional lasting public, environmental, and Indigenous-led benefits that go beyond power generation to the Bulkley-Nechako region and the Province of BC including:

[1] An Indigenous person is anybody identifying as an Indigenous person, a member of an Indian Band/First Nation, or a Treaty Indian or Registered Indian, as defined by Stellat'en First Nation with assistance from Firelight Research Inc. (2025).

[2] BC Hydro's Electrification Plan

Clean Local Power Delivery

- Adds 200 MW of new renewable wind energy to the BC grid under a 30-year EPA;
- Strengthens regional electricity reliability and reduces dependence on imported power;
- Supports BC's growth and transition to a low-carbon economy by providing clean energy where demand is growing;
- Protects energy affordability and reduces energy poverty through the provision of a reliable and fixed price new source of electricity.

Indigenous Equity and Governance

- Delivers long-term revenue and decision-making power to Stellat'en through majority ownership;
- Advances reconciliation with Indigenous peoples by realizing the economic opportunity created by Stellat'en;
- Embeds Indigenous values into environmental design, permitting and land use;
- Creates business, governance, and technical training opportunities that build capacity for future generations;
- Enables Stellat'en to enhance its cultural/ceremonial, economic, environmental, and social well-being;
- Promotes education and capacity building in environmental management and monitoring for Indigenous nations through participation in field surveys, monitoring, compliance and information sharing.

Local Economic Resilience

- Promotes sustainable economic growth that utilizes the resources, skills, and knowledge of the local community by creating construction, operation and maintenance jobs in a region affected by recent industry closures;
- Generates annual provincial and local government tax revenue;
- Accommodates projects that have a demand for electricity, in an area with few other sources of clean and renewable electricity generation;
- Offers contracting opportunities to Indigenous and local businesses;
- Aligns with Stellat'en's economic development strategy and regional economic renewal efforts.

Low-Impact and Respectful Development

- Minimizes land disturbances by reusing existing roads, clearings, and transmission corridors;
- Minimizes impacts to culturally sensitive sites and old-growth forests;
- Use silviculture practices that promote growth of high-quality food sources and other vegetation that supports ungulates, birds, and other wildlife;
- Supports regional air and water quality by providing a local non-polluting source of electricity;
- Promotes completion of archaeological, environmental, socio-economic, and technical studies, surveys, analysis, and monitoring programs.

Community and Cultural Benefits

- Supports of local and Indigenous environmental stewardship (conservation) and cultural preservation programs/initiatives, including contributing to the Endako Chinook Strategic Enhancement Project (salmon enumeration and stocking program) to address potential watershed interactions with the Project;
- Provides hands-on environmental monitoring and learning opportunities for Indigenous youth;
- Creates a foundation for long-term community well-being and resilience by providing a long-term clean energy generation project.

3.2. Spatial and Temporal Boundaries

To conduct the assessment of where the Project could potentially impact nearby communities and populations, the RAA was established. The selected RAA extends 90 km west from the Project site on Highway 16 to the Village of Burns Lake, and 131 km north to the District Municipality of Fort St. James, as shown on Figure 2-1. The City of Prince George, 180 km east of the Project site, was included in the assessment of use of local resources, as it is the largest urban centre in the region and offers more services relevant to this assessment, such as hospitals. Prince George was not assessed for impacts for SEV 1 (local housing) and SEV 3 (distinct human populations) due to its distance from the Project site, as it is unlikely workers on the Project will be based there. The selected RAA is within the RDBN and the Regional District of Fraser-Fort George (RDFFG).

The temporal boundaries were aligned with the start of the construction phase, anticipated to begin in fall 2027. Construction and commissioning will take place over three years, with most activities occurring spring through late fall. If weather allows, the construction schedule may extend into December. The current schedule anticipates commercial operations starting in November 2029. During 2027 and 2028, construction will occur over a five-day week, with Saturdays being a contingency workday that might be used to maintain schedule. During turbine erection work in 2029, nighttime and seven-day work will occur to take advantage of all available low-wind periods for the necessary high elevation work. The operations phase is expected to last 30 years (to 2059) and the decommissioning phase two years.

3.3. Information Sources & Use of Baseline Information

Ni Ti Power used the following housing and demographic statistics and online resources to establish current conditions for the selected SEVs:

- Statistics Canada
- 2016 Census of Population
- 2021 Census of Population
- iMapBC 2.0 (DataBC 2017)
- Health Data BC
- BC Ministry of Health
- Regional District of Bulkley-Nechako Website
- Housing Needs Report for the Regional District of Bulkley-Nechako and regional municipalities
- Other discipline studies for the Project

Several Indigenous-led assessments were completed. Stellat'en and Nadleh Whut'en commissioned Cultural Rights Assessments, Indigenous Knowledge and Land Use Studies, and Socio-Economic Studies. Please refer to the Indigenous-led Assessment Memorandum (ILA) prepared by Stellat'en for additional information. The studies reviewed potential impacts that the Project may have on identified cultural values and suggested mitigation measures. The findings of the Socio-Economic Studies, particularly as they relate to housing, infrastructure, and economic development, have been incorporated into this report and have informed the assessment of impacts to selected values and the proposed mitigation measures. Stellat'en view the values of housing, infrastructure, and economic development as interconnected, where actions taken to influence these values will impact each other and future generations experience of them (Stellat'en First Nation and Firelight Research Inc. 2025).

Nadleh Whut'en, with assistance from Firelight Research Inc., also conducted a Socio-Economic Study for the Project. The methodology consisted of analyzing previous data and studies related to community well-being and Nadleh Whut'en interaction with other major projects that have been proposed or developed in the region. Findings and recommended mitigation measures have been incorporated into this report (Nadleh Whut'en First Nation and Firelight Research Inc., 2026).

The Project area is known to have cultural values important to Indigenous peoples. Values in this report related to traditional use, cultural health and cultural heritage, as well as proposed mitigation have been incorporated into the First Nations' Cultural Heritage Plan. Stellat'en's assessment was informed by Bah'lats principles, which are the central social, political and economic lens through which the Carrier people (of which Stellat'en and Nadleh Whut'en are a part) organize their communities. The First Nations' Cultural Heritage Plan was developed with further input from the Stellat'en and Nadleh Whut'en.

This report is not a forecast or model related to increases in housing demand, changes in demographic trends, or the future use of local resources independent of the Project's development. Specific studies or surveys were not carried out for each SEV; rather, assessments are supported by reviewing publicly available data, stakeholder engagement, and the opinions of the professionals who developed this report.

3.4. Characterization of Interaction Between the Project and SEVs

Potential interactions between the Project activities described in Section 2.2 and SEVs were screened and assessed to determine whether they could result in adverse impacts.

Following identification, interactions were given the following classifications:

- None or negligible – No interaction or impact is anticipated, or the interaction is beneficial. Negligible interactions are defined as no measurable change beyond the natural variance of the value being studied.
- Minor interaction – A low-level minor interaction may occur; however, with the application of standard mitigation measures, risks are expected to be negligible.
- Carried forward – The interaction has potential to result in adverse effects and is 'carried forward' for further assessment.

4.0 Social and Economic Assessment

Mitigation measures are identified by a code that combines the abbreviation of the SEV they address with a sequential number: Local Housing (LH), Local Infrastructure and Services (LIS), and Distinct Human Populations (DHP) (e.g., LH-1). Measures originating from the ILA (Stellat'en First Nation, 2026) show the corresponding ILA measure number (e.g., ILA - 6.1).

4.1. Local Housing

The availability and affordability of housing is a pressing issue in British Columbia, with many municipalities and regions in the province experiencing housing shortages in recent years. The communities within the RAA are small and a sudden influx of temporary workers arriving for the construction of a large capital project could place strain on the availability of housing in the region.

Overall, the Project is expected to rely primarily on local and regional (i.e., between Prince George and Terrace) workers. Specialized positions to be filled from outside the local or regional workforce are expected to represent a small portion of the overall labour supply. Ni Ti Power will also procure temporary camp accommodation services from Nadleh Whut'en, with the camp owned and operated by Nadleh Whut'en on reserve land north of Highway 16 (see Section 4.1.2). The accommodation will be re-instated on the site of a previous camp, and Ni Ti Power will be procuring these services. Other project owners, such as BC Hydro (North Coast Transmission Line), may also procure services from this camp.. Through these planning decisions, demands on regional housing and accommodation are anticipated to be minimal, and the potential for adverse effects is considered low.

4.1.1. Current Conditions

This section provides an overview of the current housing conditions in the RAA, including in municipalities and in First Nation communities. Indicators used include the change in population between the most recent censuses and median monthly rented dwelling costs, as shown in Table 4-1 (Statistics Canada, 2021).

Table 4-1 Population Change and Housing Costs for some areas of the RAA

Jurisdiction	Population (2016)	Population (2021)	Change 2016 to 2021 (%)	Median Monthly Rented Dwelling Cost (2021)
British Columbia	4,648,055	5,000,879	+7%	$1,370
Regional District of Bulkley-Nechako	37,896	37,737	-0.4%	$870
RDBN Electoral Area B	1,885	1,706	-9.5%	$930
District Municipality of Fort St. James	1,598	1,386	-13.3%	$850
RDBN Electoral Area D	1,472	1,607	+9.2%	$750
Village of Fraser Lake	988	965	-2.3%	$830
RDBN Electoral Area E	1,593	1,512	-5.1%	$705
Village of Burns Lake	1,779	1,659	-6.7%	$770
RDBN Electoral Area F	3,665	3,517	-4.0%	$960
District Municipality of Vanderhoof	4,434	4,346	-2.0%	$1,120
Nautley 1	192	227	+18.2%	Not Available
Stellaquo 1	202	189	-6.4%	Not Available

Vacancy rate data for municipalities in the RAA were not readily available as the Canada Mortgage and Housing Corporation (CMHC) does not gather data on rental market conditions or vacancy rates for any municipality in the RDBN due to their size (RDBN, 2021). However, housing needs reports commissioned by the RDBN stated that there is a lack of available housing and in particular rental housing (RDBN, 2021). Although population is decreasing across municipalities, the reported lack of rental housing suggests that rental supply remains constrained. A 2021 RDBN housing policy discussion paper found that suitable rental supply is lacking across all municipalities in the RDBN, within which the RAA is located (RDBN, 2021). This discussion paper also found that demand for rental housing can fluctuate substantially by season based on employment opportunities in the region. A housing needs report for rural areas in RDBN Electoral Areas D, E, and F (those within the RAA and outside of municipalities) found there was a need for new housing supply in these areas, and the RDBN Housing Discussion Paper documents a low level of housing starts for municipalities in the RAA between 2016 and 2021.

Median monthly rent in the RAA pay is below the provincial median of $1,370 (Stats Canada, 2021), suggesting a more affordable cost of living in the region is experienced by existing residents. Overall, the housing sector for municipalities in the RAA appears to be characterized by a stagnant or declining population and a stagnant housing construction sector, with continued limited rental housing.

Socio-economic studies conducted by Stellat'en and Nadleh Whut'en identified existing housing challenges for their members, such as suitability, long wait times and affordability (Stellat'en First Nation and Firelight Research Inc., 2025; Nadleh Whut'en First Nation and Firelight Research Inc., 2026).

4.1.2. Assessment of Impacts to Housing

The number of workers on the Project during construction is expected to peak at approximately 260 during Year 3, the final year, when the majority of turbine installation is set to occur. Given the large number of workers required for the Project relative to the population of surrounding municipalities, Ni Ti Power has opted to procure camp accommodation services to house most workers for the duration of the construction period, as adequate housing near the Project site was anticipated to be difficult to source, and sourcing it could adversely affect housing availability within the RAA. Additionally, due to the cold winter temperatures experienced in the region, only a limited amount of construction work is anticipated to be advanced from December to early March each year of construction, making construction, and therefore worker accommodation needs, seasonal, which would make rental accommodation more challenging.

Procuring camp services avoids pressure placed on local housing, as the majority of construction workers will stay at the camp. As such, the impact to housing demand in the RAA is expected to be negligible. The camp will be located on Nadleh Whut'en's IR Seaspunkut 4, at a location previously used by Nadleh Whut'en to operate another project, on the north side of Highway 16 and adjacent to the main access road (Holy Cross FSR). The camp is not a Project component; Ni Ti Power will procure camp accommodation services from Nadleh Whut'en. Camp services are anticipated to include water supply, sewage disposal, a kitchen and eating area, a medical centre and a recreation area. A small number of Project engineers and managers may stay outside the camp; however, this is unlikely to affect housing demand in the RAA and the expected impact remains negligible. Locally based workers and contractors would commute to site from home for work, whereas regional workers would likely stay in the camp rather than commute longer distances to the Project site.

During the operational phase, 5 to 10 staff will be required, who are expected to live in nearby communities, such as in Fraser Lake. This is not expected to have an impact on housing demand in the RAA. The number of workers required for the decommissioning phase is unknown; however, efforts will be made to procure services required (crane and equipment operators, labourers) from within the RAA over a two-year decommissioning period, which would reduce potential impacts to housing.

To avoid adverse impacts to local housing in the RAA, mitigation measure LH - 1 is proposed in Section 4.1.3. Ni Ti Power commits to securing a contract for camp accommodation services in advance of the construction start date to ensure that the modular structures can be transported and assembled at the camp before the construction start date to avoid any temporary effects to housing availability in the RAA. Both Stellat'en and Nadleh Whut'en have raised concerns regarding increased pressure that an influx of workers to the region could place on housing; however, the future camp services are expected to alleviate this pressure and not result in competition for limited housing resources with First Nation members.

4.1.3. Proposed Mitigation Measure

LH - 1

Ni Ti Power will procure camp accommodation services from Nadleh Whut'en to house the construction workforce for the duration of the construction period. Ni Ti Power will secure the contract for these services before the construction start date so that the camp is operational before construction workers arrive on site.

ILA – 5.5

Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to facilitate transportation between a designated pick-up location and the Project site for locally based Project workers not staying at the construction camp.

4.2. Local Infrastructure and Services

The use of local infrastructure and services is the second SEV. Two main sub-themes were chosen for further assessment: (i) health care and emergency services (hospitals, police, fire, ambulance), and (ii) essential municipal services (landfills, waste management, water and wastewater).

Impacts from an influx of workers during construction on demand for health care services and emergency services (police, fire, ambulance) within the RAA were important to capture, especially given the rural composition of the RAA, where these services are typically less readily available than near urban centres. Essential municipal services could be impacted by large amounts of material being sent to landfills or a large increase in the demand for water or wastewater services.

Adverse impacts to local infrastructure and services from the Project are expected to be minor with the implementation of the proposed mitigation measures. Adequate planning, which is expected to be continually updated throughout the Project's lifecycle, and coordination with local authorities, will minimize the risk of overwhelming any of the services assessed in this section.

4.2.1. Current Conditions

4.2.1.1. Health Care Facilities and Emergency Services

The nearest emergency department to the Project is the Fraser Lake Community Health Care Centre, which holds emergency room hours Monday to Friday from 8:30am to 4:00pm. This is located approximately 35 km from the Project site. The nearest hospital is St. John Hospital in Vanderhoof, located approximately 85 km from the Project site, approximately an 80-minute drive. The next closest hospital is the Lakes District Hospital and Health Centre in Burns Lake, approximately 92 km and an 82-minute drive from the Project site. For this section, the University Hospital of Northern British Columbia (UHNBC) in Prince George was included in the analysis when examining current conditions and assessing possible impacts. This is due to UHNBC acting as a major health care centre for northern BC, with the largest acute care department in the region (Northern Health). UHNBC is located 183 km from the Project site, approximately a 140-minute drive.

In fiscal year 2021/22, the most recent year for which data were available, the inpatient occupancy rate at UHNBC was 102%. For St. John Hospital in Vanderhoof, the inpatient occupancy rate was 72% and at Lakes District Hospital 90% (BC Ministry of Health). The inpatient occupancy rate is a metric that shows how full hospital beds are by comparing how often hospital beds were used relative to how many beds were available for acute care. While this does not provide a complete picture of a hospital's overall capacity and specifically their emergency room capacity, which is most relevant for this assessment, it indicates that hospitals serving the RAA are operating at 72% to 102% of inpatient capacity.

Unplanned emergency room (ER) closures have become a salient issue in BC in recent years, including for facilities in the RAA. Between January 2023 and April 2025, unplanned ER closures for Fraser Lake Health Care Centre totaled 179 hours across 88 total occurrences. Lakes District Hospital totaled 1,454 hours across 110

occurrences and St. John Hospital totaled 208 hours across 17 occurrences (Roseman, 2025). Staff shortages are the reason most cited for these closures (Roseman, 2025). In the RAA, the closures suggest that emergency care is becoming less reliable and residents may sometimes be forced to forgo care or travel further to receive care.

The emergency response services relevant to the Project are police, fire, and ambulance. There is an RCMP detachment, an ambulance station, and a fire hall in Fraser Lake, the nearest municipality to the Project. There is also an ambulance station in Fort Fraser and all three services in Burns Lake and Vanderhoof.

4.2.1.2. Municipal Services

The RDBN is responsible for water and wastewater services for rural and unincorporated areas within the Regional District. The closest RDBN-managed landfill to the Project is Clearview Landfill, located 28 km north of Vanderhoof, which was designed to be a minimum 100-year landfill (RDBN, 2016). This facility does not accept hazardous waste. It is not facing capacity issues and has approximately 80 years remaining in its projected lifespan. Foothills Boulevard Regional Landfill is the next closest landfill to the Project, located 5 km north of Prince George in the RDFFG.

4.2.2. Impact to Infrastructure and Services Assessment

4.2.2.1. Health Care Facilities and Emergency Services

Section 4.2.1.1 showed that ERs and hospitals serving the RAA are generally experiencing high occupancy rates and staffing shortages, which may be causing challenges in providing adequate care to current residents. This pressure may be increased by non-local workers, who represent an additional population that health care facilities and emergency services will have responsibility for. In accordance with the Occupational Health and Safety Regulation (Part 3, Schedule 3-A), an appropriately trained first aid attendant will be on-site during construction activities, which will allow for initial response to be performed by that attendant and result in only serious cases being transported to hospital for further treatment. This attendant will also have the mandate and responsibility to transport an injured worker to a medical facility in the event that an ambulance is unavailable to travel to site or the situation demands immediate transport. In the event of an incident where emergency services such as fire or ambulance are required, the Project's remote location could occupy the time for these services should another incident occur elsewhere. Discussions with emergency service providers in Fraser Lake are ongoing, and suggestions from the service provider include providing detail on access requirements / restrictions prior to construction start to aid any response. An air ambulance from Prince George, in the event of a serious accident, is another possibility.

During recent large construction projects in northern BC, health care providers have noted that "the typical worker presenting to Northern Health emergency departments was on average about 55 years old with multiple co-morbidities and a history of chronic disease risk factors for things such as type two diabetes, high blood pressure or heart disease. Many of the healthcare needs were consequently related to the management of chronic illness, rather than high risk behaviours or injuries associated with industrial activity" (Oke and Wilson, 2024). The study respondents also noted that "Projects with effective worker accommodation strategies providing a full spectrum of on-site primary and public health services with established collaborative partnerships with Northern Health were quite effective at reducing undue burdens on the local system, especially from non-urgent care pressures" (Oke and Wilson 2024).

Although not part of the Project, it is expected that the construction camp, a service which will be procured by Ni Ti Power, will be permitted by Nadleh Whut'en following the requirements for industrial camps regarding water supply, sewage and kitchen, as well as guidance such as the Health and Medical Services Plan Best Management Guide for Industrial Camps (Northern Health 2015) and the Communicable Disease Management Guide (Northern Health 2023).

During engagement at the Fraser Lake Open House, the local deputy fire chief advised Ni Ti Power to engage early with emergency service providers, through the municipality, and share information on new access roads, potential helipad locations (e.g., laydown areas), equipment requirements and staffing numbers, and eventually introduce the Prime Contractor's paramedics. This information would help emergency service providers understand Project-related risks and the level of service that may be required.

Overall impacts to health care facilities and emergency services from the Project are expected to be minor and temporary in nature. As is further described in the proposed mitigation measures, construction personnel will be trained in emergency response and spill prevention to reduce accidents, and an on-site attendant will have the medical proficiency to provide initial emergency care and endorsement for transportation if an accident were to occur. Ni Ti Power will engage Northern Health and emergency services prior to construction to collaborate on health care services during construction, and incorporate further mitigation measures and safety procedures if needed.

The operations phase is not anticipated to have impacts on health care and emergency services, as the number of employees will be limited to 5 to 10; however, emergency response procedures will be in place during the operations phase to reduce the risk of accidents.

4.2.2.2. Municipal Services

The Project will require a groundwater well and a septic field for the operations and maintenance facility but will not require municipal water or sewer connections. During construction, the only wastewater anticipated is from the on-site concrete batch, which will be treated before release; therefore, no demand is expected on municipal water and wastewater services, or of the Stellat'en Community. At the end of the Project's operational life, the Project will be decommissioned. Infrastructure (turbine components, electrical cabling, foundations at and near surface level, etc.) will be decommissioned as defined in the Decommissioning and Restoration Plan. Recycling of Project components will occur to the extent possible and will be based on the latest industry best practices for decommissioning wind energy projects. It is likely that some material will be required to be sent to either of the landfills identified in the RAA.

The Project is committed to maximizing waste diversion from landfills throughout the Project's lifecycle. At the end of the Project's operational life, all saleable components will be either sold or redeployed. Materials such as metal, wood and plastic, including those from towers and nacelles, will be recycled. With regard to the blades, the blade recycling industry in Canada and British Columbia is still in its infancy and is an emerging field. Ni Ti Power is working closely with industry partners to advance innovative technologies and explore new opportunities for the beneficial reuse of blades. Actions include a position as a key partner in the Circular Innovation Challenge, partnering with researchers at local universities using the blades as additives and base materials for new polymers, providing blades for trials using blades as additives for cement manufacturing, and providing blades for trials as a fuel source for cement and concrete manufacturing. Given the growth and expansion of wind energy across North America, Ni Ti Power anticipates that a viable recycling option will be in place by the end of the Project's lifespan.

Ni Ti Power is developing a Decommissioning and Restoration Plan for the Project, which will be submitted to the BCER before notice of construction start is given (REPR s.38(4)(a)). The Decommissioning and Restoration Plan will be shared for input with the RDBN, which will continue to be engaged throughout the operational phase of the Project as the plan must be reviewed and, if necessary, updated at least once every five years (REPR s.38(3)). This will allow for the most up-to-date methods for recycling and responsibly disposing of Project components and materials. With continuous refinement to the Decommissioning and Restoration Plan and engagement with local governments, adverse impacts to regional landfills are expected to be minor, as potential constraints will be identified in advance of the date where material may be transported to landfills.

4.2.3. Proposed Mitigation Measures

4.2.3.1. Health Care Facilities and Emergency Services

To reduce pressure on health care, hospitals and emergency services in the RAA, Ni Ti Power proposes the following mitigation measures:

ILA – 6.1

Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to coordinate with local emergency response services (police, ambulance, fire, and Stellat'en First Nation and Nadleh Whut'en wildfire teams) and incorporate relevant feedback into the Traffic Management Plan and the Emergency Response Plan during construction.

ILA – 6.2

Ni Ti Power will coordinate with local emergency response services (police, ambulance, fire, and Stellat'en First Nation and Nadleh Whut'en wildfire teams) and incorporate relevant feedback into the Access Management Plan and Operational Emergency Response Plan.

ILA – 6.3

During construction, Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to have on-site first aid personnel in alignment with WorkSafe BC criteria to alleviate pressures on local healthcare services.

LIS - 1

In accordance with REPR s.18(b) and s.33, Ni Ti Power will develop and subsequently implement a Safe Storage and Spill Prevention Plan for Hazardous Materials and an Emergency Response Plan, and will submit the Emergency Response Plan to the BCER before giving notice of construction start. The procedures in these plans will be part of the site orientation in place for contractors working on the site during construction, as will providing information on site-specific risks. This training will make workers familiar with injury prevention measures for construction activities specific to the construction of wind energy projects, reduce the risk of accidents on site, and allow for personnel to more effectively respond in an emergency, both of which will reduce the demand on local health and emergency services. The Emergency Response Plan will be developed in consultation the local authority responsible for emergency response, with Stellat'en and Nadleh Whut'en.

LIS - 2

Ni Ti Power (or Prime Contractor) will provide on-site first aid in adherence with the requirements outlined in Schedule 3-A of the Occupational Health and Safety Regulation Part 3. Based on the Project being classified as a Class 2 workplace with a high hazard rating, appropriate first aid facilities, equipment, trained attendants, and emergency transportation resources will be maintained throughout construction and operations. The provision of on-site first aid services is expected to reduce reliance on local health care and emergency response services for routine workplace incidents and injuries.

LIS - 3

Ni Ti Power (or Prime Contractor) will provide safety and security services, and basic fire fighting equipment and trained personnel on-site to reduce reliance of local and regional police detachments and firefighting departments. Wildfire mitigations will be outlined in the Project's Wildfire Mitigation and Management Plan, as required under REPR s. 21.

4.2.3.2. Municipal Services

Impacts to municipal services are expected to be negligible. To account for potential impacts to regional landfills, the following mitigation measure is proposed:

LIS - 4

Ni Ti Power will develop, implement, and maintain a Decommissioning and Restoration Plan. Ni Ti Power will review and, if necessary, update the Decommissioning and Restoration Plan at least once every five years during the Project's operation, ensuring the latest standards and techniques for recycling, reuse and disposing of Project components in an environmentally responsible way are upheld and ultimately realized. Further, Ni Ti Power will engage with the RDBN at the time of these updates for input and concerns that can be further incorporated into the plan. This long lead time to the decommissioning date will allow for adequate planning, working with the operators of regional landfills in the RAA to minimize effects.

4.3. Differential Adverse Impacts of the Project to Distinct Human Populations

As described in Section 3.1, distinct populations were identified, using the GBA+, as groups who may have challenges accessing critical goods and services, or who rely on these more, relative to the general population (Women and Gender Equality Canada, 2025). Populations identified by Ni Ti Power who may be more likely to experience adverse impacts from the Project are Indigenous peoples, rural and remote residents, women, seniors, and low-income residents. The extent of these groups presence within the RAA was used as to assess potential impacts.

Project impacts on identified populations are expected to be negligible with the implementation of the proposed mitigation measures. As discussed in Sections 4.1.2 and 4.2.2, adverse impacts to housing or health care services, two basic necessities where adverse impacts would be strongly felt, are expected to be minor. Where other risks have been identified, mitigation measures are proposed in Section 4.3.3.

4.3.1. Current Conditions

To establish current conditions for distinct populations in the RAA, the assessment considered the prevalence of low-income households, demographic indicators (age), and population distribution. The interests of Indigenous peoples were also considered in the instances where they differed from those of other distinct population groups in the assessment.

4.3.1.1. Distinct Human Populations

Table 4-2 shows that the prevalence of low-income households is above the provincial average of 10.8% in Fraser Lake and Burns Lake. The median income, however, is also above the provincial average of $40,800 (Statistics Canada, 2021) in municipalities in the RAA except from Fraser Lake. This suggests uneven income distribution in some RAA communities, notably Burns Lake, where both the median income and the prevalence of low income exceed the provincial figures. The prevalence of higher-than-average low-income households suggests that these groups may be more sensitive to changes in access and cost for other SEVs in this report. The proportion of seniors (age 65 or over) in the RAA are consistent with the provincial average of 20.3%, except for Vanderhoof, which is below at 16.6% (Statistics Canada, 2021). The rural population in RDBN Electoral Area F (Vanderhoof rural) saw a 22% increase in population from 2006 to 2016. Electoral Areas D (Fraser Lake rural) and B (Burns Lake rural) both saw decreases over that period (RDBN, 2021). Rural populations are more sensitive to disruptions in health care and emergency services due to longer response time and the required time to travel to facilities in urban areas.

Table 4-2 Median Income and Poverty Levels in the RAA

Jurisdiction	Population (2016)	Population (2021)	Median Income ($) in 2021	Prevalence of Low Income Households (%) in 2021[3]
British Columbia	4,648,055	5,000,879	40,800	10.8
Regional District of Bulkley-Nechako	37,896	37,737	41,600	11.7
RDBN Electoral Area B	1,885	1,706	44,400	9.8
District Municipality of Fort St. James	1,598	1,386	45,600	8.4
RDBN Electoral Area D	1,472	1,607	36,000	15.7
Village of Fraser Lake	988	965	40,400	13.0
RDBN Electoral Area E	1,593	1,512	37,600	17.0
Village of Burns Lake	1,779	1,659	42,800	16.0
RDBN Electoral Area F	3,665	3,517	40,400	14.0
District Municipality of Vanderhoof	4,434	4,346	44,400	8.9
Nautley 1	192	227	Not available	Not available
Stellaquo 1	202	189	Not available	Not available

[3] Low-income measure, after tax, refers to a fixed percentage (50%) of median adjusted after-tax income of private households

4.3.1.2. Indigenous Peoples

The percentage of the RDBN population that identifies as Indigenous was 19.9% in 2021, which is higher than the provincial average of 5.9% (StatsCan, 2021). Indigenous people made up 21.0% of the population of Fraser Lake, 20.1% of Burns Lake and 11.2% of Vanderhoof. The Project is within the traditional territory of Stellat'en and Nadleh Whut'en, and the ability for them to exercise their right to access the natural resources within their territory is one of the purposes of the Project. The Project is also neighbouring Skin Tyee Nation, Nee Tahi Buhn Indian Band, and Saik'uz First Nation. It is therefore important to assess whether the Project could have the potential to impact these rights and the ability to use the land.

The main reserve of Stellat'en is Stellaquo 1 which is located at the west end of Fraser Lake. Stellat'en currently has 624 registered members, with 210 living on reserve as of October 2024 (Stellat'en First Nation and Firelight Research Inc. 2025). Nadleh Whut'en has 630 registered members, with 252 living on Nadleh Whut'en's reserve Nautley (Fort Fraser) 1, which is located at the east end of Fraser Lake. First Nations reserves within the RAA are shown in Figure 2-1.

The socio-economic studies conducted by Stellat'en and Nadleh Whut'en document existing social, economic and health challenges experienced by members living both on and off reserve, including loss of access to traditional practices and medicines (Stellat'en First Nation and Firelight Research Inc. 2025, Nadleh Whut'en First Nation and Firelight Research Inc., 2026). These baseline conditions informed the assessment of the Project's potential effects.

4.3.2. Assessment of Impacts on Distinct Human Populations

The RAA is an area largely characterized by its rural nature with small villages and towns. As was described in Section 4.1, while the region does have a more affordable cost of living for housing compared to the provincial average, new housing construction is very limited and Housing Needs Reports for several municipalities within the RAA describe the need for new supply to be built to ease shortages. Similarly, Section 4.2 describes the challenges of providing health care in the RAA due to overcapacity in hospitals and staffing shortages. These are two areas where distinct population groups (Indigenous peoples, rural and remote residents, women, seniors and low-income residents) may be more likely to experience impacts if the Project increased demand for these services.

The assessments above found that impact to these services will be negligible as there will be no material increase in housing demand, and mitigation measures will be applied to reduce impacts to health care services. Impacts on seniors and low-income residents are therefore not expected.

The Project will procure camp accommodation services to house temporary workers during the construction period. These accommodation arrangements, which see a large influx of temporary workers relative to the regions where they are often situated, have been known to cause adverse impacts to local communities. On other projects, typically in resource extractive industries, this has been experienced through increases in violence and crime by transient workers against local populations, particularly towards Indigenous women (National Inquiry into Missing and Murdered Indigenous Women and Girls, 2019). An increase in substance use (drugs and alcohol) has also been associated with work camp accommodations, which may contribute to increases in violence and crime nearby.

As described in Section 4.1.2, the camp will be located on Nadleh Whut'en's IR Seaspunkut 4, on the north side of Highway 16 adjacent to Holy Cross FSR, approximately a 35-minute drive from Vanderhoof and a 50-minute

drive from Burns Lake. Although the camp will include meals, it is located close to the Village of Fraser Lake, which has limited restaurants that may be used by temporary workers, and interactions between the community and Project workers are therefore likely. Since there is a risk of interaction, mitigation measures to reduce the possibility of impacts to distinct population groups are proposed in Section 4.3.3.

For impacts specific to Indigenous peoples, construction activities may temporarily restrict access to areas important to Indigenous peoples for traditional use. Vegetation clearing disturbances could also reduce wildlife habitat for species important to Indigenous peoples for hunting. Impacts to these values and others, and avoidance and mitigation measures, are further discussed in the First Nations' Cultural Heritage Plan, which has been developed in consultation with Indigenous peoples who have potential to be impacted by the Project. Additional details on engagement can also be found in the First Nations Pre-Engagement Report.

Stellat'en and Nadleh Whut'en member participants in the Firelight socio-economic studies raised concerns about work camp accommodations, based on experiences with previous large industrial projects, particularly regarding community safety. Participants expressed a clear desire for separation between future work camps and the community (Stellat'en First Nation and Firelight Research Inc. 2025, Nadleh Whut'en First Nation and Firelight Research Inc., 2026).

Both socio-economic studies also raised concerns regarding the perceived potential effects of electromagnetic field emissions (EMF) from the Project's transmission line, including associated stress (Nadleh Whut'en First Nation and Firelight Research Inc., 2026; Stellat'en First Nation and Firelight Research Inc., 2025). The transmission line proposed to be constructed for the Project will be in compliance with Canadian EMF guidelines and there is not anticipated to be a risk of EMF exposure to the public.

These studies also cite the opportunity the Project presents to address social and economic outcomes for members and proposes mitigation measures to realize this opportunity (Nadleh Whut'en First Nation and Firelight Research Inc., 2026), which have been integrated into Section 4.3.3. While the Prime Contractor has not been selected yet and therefore the hiring of labour and subcontractors has not yet been confirmed, mitigation measures commit Ni Ti Power to using commercially reasonable efforts to make opportunities available for Stellat'en and Nadleh Whu'ten.

4.3.3. Proposed Mitigation Measures

The following measures are proposed to reduce potential impacts to distinct population groups, including Indigenous peoples:

ILA – 1.3

Ni Ti Power shall commission Stellat'en First Nation and Nadleh Whut'en specific Indigenous-led assessments and incorporate findings into project design and mitigation measures.

ILA – 1.5

Applicable Project documents will clearly describe how Indigenous Knowledge has been incorporated into the applicable sections.

ILA – 5.1

Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to incorporate cultural awareness training during the on-site orientation program to inform workers of appropriate on-site conduct that respects the cultural activities of and culturally sensitive areas within Stellat'en First Nation and Nadleh Whut'en's territory.

ILA – 8.1

Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to incorporate cultural awareness training into the on-site orientation during construction.

ILA – 8.2

Ni Ti Power will incorporate cultural awareness training into the on-site orientation for all new workers during operations.

DHP - 1

Ni Ti Power will use commercially reasonable efforts to institute a zero drugs and alcohol policy for workers staying at the camp accommodation during construction. This will reduce substance use on-site and is likely to limit overall consumption. This will help reduce concerns that Stellat'en and Nadleh Whut'en have expressed regarding work camps and the problems associated with them and address the desire expressed by Stellat'en to enforce a no drugs and alcohol policy. This mitigation is expected to reduce the potential for impacts to women.

DHP - 2

Ni Ti Power, in consultation with Stellat'en and Nadleh Whut'en, will develop and implement cultural sensitivity training for employees and contractors staying at the camp. Co-developing this strategic training directly aligns with Nadleh Whut'en suggestions on ways to mitigate adverse impacts to SEVs. The details of this training are yet to be developed; however, it could take the form of member First Nations speaking to workers at a kick-off meeting/site orientation, the creation of a short video and/or PowerPoint slides used for orientation that is required to be viewed by workers using the camp for accommodation. This will highlight to workers previous issues that have occurred with work camps and First Nation communities and demonstrate respectful behaviour that should be followed. It will also establish expectations for worker behaviour that will apply while on site, at camp, and while transiting through communities.

DHP - 3

Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to hire construction workers from within the RAA. If realized, this could have the effect of boosting local employment and the economy more broadly. As stated, some rural areas and municipalities in the RAA have seen a shrinking population in recent years, possibly due to a lack of economic opportunities available. With Fraser Lake 35 km away and Stellat'en and Nadleh Whut'en communities not much further, residents could travel daily to site for work. New contracting opportunities could enhance the economic outlook for some in the RAA, including rural and low income residents, Stellat'en and Nadleh Whut'en members. However, this will mainly apply to the construction phase, with the operations phase requiring approximately 5 to 10 full-time employees.

DHP - 4

Ni Ti Power is committed to prioritizing hiring and procurement strategies that offer preferential treatment to Stellat'en and Nadleh Whut'en members. Ni Ti Power will select a Prime Contractor that is aligned with this commitment. In order to facilitate the economic opportunities for partner Nations, the instructions for bidders note that Proponents are expected to provide a technically robust and commercially competitive Proposal that supports the Project schedule, risk allocation, First Nations participation objectives, and overall execution requirements. The First Nation participation objectives will be defined and reviewed under the quality of participation plan, the use of the business directory provided by partner Nations, the creation of credible employment and training opportunities, and reporting and due diligence models. This hiring policy is likely to result in greater numbers of First Nations employees on the Project, which could have the effects of reducing stigma and barriers towards First Nations.

DHP - 5

Ni Ti Power will engage and meaningfully involve Stellat'en and Nadleh Whut'en when selecting a Prime Contractor. Related to proposed mitigation measure DHP - 4, this will allow for the selection of contractor that will prioritize local hiring practices generally and Indigenous peoples specifically. Providing economic development opportunities for Nation members will contribute to better social and economic outcomes through increased access to suitable housing, increased employability through skills training, and reduced social barriers through greater visibility of First Nations on the Project site. However, as stated this is contingent on economic benefits being realized through the selection of a Prime Contractor who is aligned with Ni Ti Power on providing these opportunities. Engaging with Stellat'en and Nadleh Whut'en on selection will therefore be important on this issue.

ILA – 2.3

Ni Ti Power will prepare an Electromagnetic Frequencies (EMF) Frequently Asked Questions (FAQ) document and materials to address the topic of EMF with First Nation community members.

5.0 Summary of Social and Economic Commitments and Mitigation Measures

Table 5-1 below provides a summary of the mitigation measures proposed in Section 4.0.

Table 5-1 Summary of Proposed Mitigation Measures

Impacted SEV(s)	Potential Effects	Mitigation Number	Proposed Mitigation Summary
Local Housing	Additional workers in the area could overburden housing capacity in the region	LH - 1	Procure camp accommodation services from Nadleh Whut'en, secured before construction start.
		ILA – 5.5	Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to facilitate transportation between a designated pick-up location and the Project site for locally based Project workers not staying at the construction camp.
Local Infrastructure and Services	Additional workers in the area or an emergency incident on-site could place pressure on healthcare and emergency services and their ability to respond	ILA – 6.1	Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to coordinate with local emergency response services (police, ambulance, fire, and Stellat'en First Nation and Nadleh Whut'en wildfire teams) and incorporate relevant feedback into the Traffic Management Plan and the Emergency Response Plan during construction.
		ILA – 6.2	Ni Ti Power will coordinate with local emergency response services (police, ambulance, fire, and Stellat'en First Nation and Nadleh Whut'en wildfire teams) and incorporate relevant feedback into the Access Management Plan and Operational Emergency Response Plan.
		ILA – 6.3	During construction, Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to have on-site first aid personnel in alignment with WorkSafe BC criteria to alleviate pressures on local healthcare services.
		LIS - 1	Implement a Safe Storage and Spill Prevention Plan for Hazardous Materials and an Emergency Response Plan, prior to construction and orient workforce with procedures contained within.
		LIS - 2	Provide on-site first aid services during construction in accordance with the first aid requirements of Schedule 3-A, Part 3 of the Occupational Health and Safety Regulation.
		LIS - 3	Provide on-site safety and security services, basic firefighting equipment and trained personnel.
	Additional pressure on municipal services (regional landfills)	LIS - 4	A Decommissioning and Reclamation Plan will be developed as part of the REPR requirements. This plan will be reviewed and, if necessary, update Decommissioning and Reclamation Plan at least once every five years during operations, with input from the RDBN.

Impacted SEV(s)	Potential Effects	Mitigation Number	Proposed Mitigation Summary
Distinct Human Populations	Inclusion of Indigenous-led assessments and Indigenous Knowledge in Project design and documents	ILA – 1.3	Ni Ti Power shall commission Stellat'en First Nation and Nadleh Whut'en specific Indigenous-led assessments and incorporate findings into project design and mitigation measures.
		ILA – 1.5	Applicable Project documents will clearly describe how Indigenous Knowledge has been incorporated into the applicable sections.
	Potential increases in crime, violence and other adverse impacts to local communities from presence of work camps.	ILA – 5.1	Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to incorporate cultural awareness training during the on-site orientation program to inform workers of appropriate on-site conduct that respects the cultural activities of and culturally sensitive areas within Stellat'en First Nation and Nadleh Whut'en's territory.
		ILA – 8.1	Ni Ti Power will use commercially reasonable efforts to cause the Prime Contractor to incorporate cultural awareness training into the on-site orientation during construction.
		ILA – 8.2	Ni Ti Power will incorporate cultural awareness training into the on-site orientation for all new workers during operations.
		DHP - 1	Use commercially reasonable efforts to cause to institute a zero drugs and alcohol policy for workers staying at the camp during construction.
		DHP - 2	Develop and implement, in consultation with Stellat'en and Nadleh Whut'en, cultural sensitivity training for employees and contractors staying at the camp.
	Lack of economic development opportunity and participation in the Project for Indigenous peoples	DHP - 3	Use commercially reasonable efforts to cause the Prime Contractor to hire construction workers from within the RAA.
		DHP - 4	Hiring strategies that prioritize define and prioritize First Nations participation objectives in contractor proposals and bid evaluation. The Nations will be leading the camp provider selection process.
		DHP - 5	Engage and meaningfully involve Stellat'en and Nadleh Whut'en when selecting a Prime Contractor.
	Real and perceived mental and human health effects from EMF.	ILA – 2.3	Ni Ti Power will prepare an Electromagnetic Frequencies (EMF) Frequently Asked Questions (FAQ) document and materials to address the topic of EMF with First Nation community members.

6.0 Closure

Through determining current conditions and assessing potential interactions with Project activities, this report found that potential impacts to local housing, local infrastructure and services, and distinct human population groups are expected to be negligible to minor from the development of the Project. It is anticipated that where interactions could occur, proposed mitigation measures and adequate planning, most notably engagement with municipal governments and service providers, will reduce the adverse effects and result in negligible impact. Possible impacts relating to values important to Indigenous peoples are further discussed in other reports that form part of this application, including the First Nations' Cultural Heritage Plan. The findings of the assessment are in alignment with the BCER mandate of fostering community and social well-being, as stated in the Draft Guidance for Renewable Energy Permit Applications, the REPR, and with the objectives for social and cultural assessments in the Oil and Gas Processing Facility Regulation.

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