

March 23, 2018

Alberta Energy Regulator
Suite 1000, 250 – 5th Street SW
Calgary, Alberta T2P 0R4

Attention: Anastasia Shukalkina
Via Email

Dear Ms. Shukalkina,

Re: White Spruce Pipeline Project
Decision 2018 ABAER 001
Condition Update - Condition 6 of the Decision

TransCanada PipeLines Limited (TransCanada) is providing this letter to update the Alberta Energy Regulator (AER) on compliance with Condition 6 of Decision 2018 ABAER 001 (Decision) for the White Spruce Pipeline Project (Project). Condition 6 of the Decision (Condition 6) states:

*TransCanada must prepare and submit a caribou habitat restoration plan to the AER for approval for PLA160532 and PLA160531. This plan must have the effect of restoring 2.0 times the area of new cut habitat affected in the West Side Athabasca Range by the project. **The goal or outcome of the plan is to ensure that there is, at a minimum, no net loss of caribou habitat from the project in the West Side Athabasca Range.** (Emphasis added) The restoration plan must be filed at least six months before operations for the White Spruce pipeline project begin and approved by the AER before operations start up. In addition to any measures that TransCanada determines should be included, the restoration plan must include:*

- *a list of specific restoration sites in the West Side Athabasca Range identified for restoration, including their location, area, description and site-specific restoration plans;*
- *specification drawings for implementation of restoration methods at each site;*
- *a quantitative and qualitative assessment of the total area of caribou habitat that will be restored and how these restoration sites are equivalent to the 2.0 times the new cut area disturbed by the White Spruce pipeline project within the West Side Athabasca Range;*
- *a schedule indicating when restoration measures will be initiated and completed;*
- *a process and timeline for completing an assessment of the effectiveness and value of the restoration plan; and*
- *a summary of TransCanada's discussions with Fort McKay about the restoration plan, including any concerns that Fort McKay raised and how or if these concerns were addressed.*

TransCanada understands the intent of Condition 6, and confirms that it will ensure that there is, at a minimum, no net loss of caribou habitat from the Project, in the West Side Athabasca Range. TransCanada's Caribou Habitat Restoration Plan (CHRP) will comply with all six bullets in Condition 6. Bullets 1, 2 and 4 will be addressed by the CHRP through the inclusion of the following:

Bullet 1 – a list of specific restoration sites identified for restoration

Bullet 2 – specification drawings for implementation of restoration methods at each site

Bullet 4 - a schedule indicating when restoration measures will be initiated and completed;

With respect to Bullet 3 of Condition 6, TransCanada believes it can achieve the 2:1 caribou habitat restoration requirement by undertaking:

- On-right-of-way (ROW) caribou habitat restoration (~20 ha) by using:
 - minimal disturbance construction techniques where grading is not required which limits grubbing on the ROW and promotes rapid regeneration and recovery of shrubs;
 - where grading is required in upland areas, planting of seedlings using forestry planting prescriptions
 - bank restoration techniques which include slope stabilization, willow staking and seeding on erosion prone slopes
- Off-ROW caribou habitat restoration (~42 ha), in consultation with *Alberta Environment and Parks* (AEP) and consistent with the draft provincial West Side Athabasca River (WSAR) Range Plan. *Alberta Parks and Environment* has directed TransCanada to prioritize TransCanada's legacy rights-of-way within the WSAR Caribou Range for caribou habitat restoration (pending selection of suitable areas). Legacy refers to sites that have not been previously subject to caribou habitat restoration.

Regarding Bullet 5 of Condition 6, consistent with Section 3.4 of the approved Caribou Habitat Restoration Plan TransCanada filed for the Grand Rapids Pipeline Project (Decision 2014 ABAER 012), TransCanada will complete an assessment of the effectiveness of the restoration plan as part of the post-construction reclamation monitoring program described in Section 9 of the project-specific Environmental Protection Plan. Periodic inspection and implementation of adaptive management measures will ensure restoration measures are functioning as designed.

For Bullet 6 of Condition 6, TransCanada will also include a summary of discussions with Fort McKay and describe how input received was considered and addressed in the development of the Caribou Habitat Restoration Plan.

Should the AER require additional information with respect to compliance with Condition 6 please contact the undersigned at (403) 920-8078 or Paige Dodd at (587) 933-3573 or email paige_dodd@transcanada.com.

Sincerely,



Dana Charlton, M. Sc., P. Biol.
Environmental Planning and Permitting
Environment, Land, and Indigenous Relations