



TECHNICAL MEMORANDUM

DATE September 19, 2024

Project No. CA0031261.8999-017-TM-Rev0

TO Michael Lockhart, Senior Biologist
Fisheries and Oceans Canada

CC Krista Englund, Regional Manager of Environmental Services for SCR, MoTI

FROM Mark Visser

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DFO FILE NUMBER 24-HPAC-00422 – MINI ROAD BANK REPAIR – SUPPLEMENTAL INFORMATION

1.0 PROJECT UPDATE

On behalf of the Ministry of Transportation and Infrastructure (MOTI), WSP submitted a Fisheries and Oceans Canada (DFO) Request for Review form for the Mini Road Bank Repair Project. On August 13, 2024, DFO requested a call to discuss measures required to avoid impacts to Pacific Sandlance habitat within the project footprint. WSP Canada Inc., MOTI, and DFO meet over teams on August 20, 2024, to discuss DFOs concerns with the timing of the Project activities. DFOs preference was to move the timing of the works to avoid impacts to Pacific Sandlance habitat. This memo provides an update on the proposed timing of the In-Water work activities to March 1, 2025, and a summary additional mitigation measure to minimize impacts to other sensitive species (i.e. herring and juvenile salmonids). In-water works are anticipated to occur over a two-month period. Land-based construction activities (i.e. vegetation clearing) is proposed to occur prior to March 1, 2025, within the least risk timing window for bird species. Mitigation measures listed in the Overview Environmental Assessment (OEA) for the Project will be implemented during clearing activities, including the implementation of erosion and sediment control measures prior to clear to minimize potential introduction of sediment to the marine environment.

2.0 POTENTIAL EFFECTS

Several fish species, including salmonids and herring, may occur within or adjacent to the Project Area. While salmonids are not expected to utilize the adjacent marine environment for any specific function other than migration, there are three historical herring spawning areas within the vicinity of the Project Area, with the nearest being ~4 km to the southeast. The last recorded herring spawn at this location was recorded in March 1986 (British Columbia Conservation Data Centre 2024).

The updated timing of the in-water components of construction to March 1, 2025, has the potential to cause the direct injury or mortality of herring and juvenile salmonids during a sensitive stage of their lifecycle. However, it is expected that the potential effects resulting from the change in timing of construction can be managed through the implementation of mitigation measures described below.

3.0 MITIGATION MEASURES

Potential effects on the marine environment can be mitigated through the implementation of the following mitigation measures:

- Adherence to the mitigation measures described in Section 6 of the OEA.
- An environmental monitor (EM) will be present during all in-water activities that may result in harm to fish and fish habitat. The EM will be responsible for monitoring construction activities, documenting compliance and communicating and providing recommendations on mitigation measures and best management practices which may be implemented during construction.
- Construction activities should not result in the trapping or stranding of fish. Excavations should not be left open such that they may be inundated over the tidal cycle.
- From 15 February to 1 July (based on the in-water work window and timing of historical spawning events in Herring Spawning Section 173), an EM will visually observe from the surface of the water for spawning herring (i.e., herring depositing eggs or releasing milt) and herring eggs within and adjacent to the Project Area.
 - Monitoring for spawning herring and herring eggs will be undertaken every day that in-water activities are occurring.
 - If herring eggs are found on equipment, the EM will inform the Project Manager, and work will be stopped and will not resume until after eggs have hatched.
 - If spawning is observed in or adjacent to work, the EM will inform MOTI, and work may be stopped to evaluate the risk to the spawning herring from the work.
- While salmonids are not expected to utilize the adjacent marine environment for any specific functions other than migration, monitoring for large aggregations of juvenile salmonids and signs of dead fish will be undertaken throughout the in-water work by an EM.
 - If large aggregations of juvenile salmonids are observed additional mitigation measures may be implemented including, but not limited to, avoidance of the juvenile salmonids, or halting work activities.
 - If dead/injured fish are observed, work will be suspended, and MOTI will be notified immediately and MOTI will notify DFO.

4.0 CLOSURE

The reader is referred to the study limitations section which follows the text and forms an integral part of this memorandum.

We hope this technical summary provides the information you require. Please contact the undersigned if you wish to discuss this further.

WSP Canada Inc.



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Study Limitations

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