



28 November 2014

Gloria White  
Environment Canada – Canadian Wildlife Service  
5241 Robertson Road  
RR #1  
Delta, BC V4K 3N2

Project No.: 219.05112.00010  
Client Reference No.: DFRP # 16096, ARMS # 00394, FCSI # 16096079

Dear Ms. White,

**RE: REQUEST FOR PERMIT  
PROPOSED REMEDIATION ACTIVITIES  
WILMER MARSH UNIT, COLUMBIA NATIONAL WILDLIFE AREA  
NEAR WILMER, BC**

SLR Consulting (Canada) Ltd. (SLR) is submitting this letter to formalize our understanding of the conditions that will be imposed by Canadian Wildlife Service (CWS) in the final permit issued for the upcoming remediation project at the Wilmer Marsh Unit of the Columbia National Wildlife Area (NWA), near Wilmer, BC (the Site).

SLR's original permit request to CWS for the remediation project was submitted in October 2014. Subsequent telephone discussions with you on November 12, 2014, indicated that CWS could not issue the final permit for the project until the Remediation Contractor's name and equipment information (i.e. type of equipment to be used at the Site) were supplied to CWS. SLR cannot supply this information prior to Contract award; however, all permit conditions, and any other potential constraints on the Contractor's activities, must be known in advance of Contract award and included in the tender specifications for the project.

Based on our telephone conversation of November 12, 2014, it is SLR's understanding that the permit conditions which will be applied to the upcoming remediation project will be identical to the permit conditions listed in SLR's previous permit BC14-0041. Permit BC-14-0041 was issued under Section 4 of the Wildlife Area Regulations and Sections 73 and 74 of the Species At Risk Act. The permit conditions listed in BC14-0041 are the following:

***Pre-Conditions***

1. All reasonable alternatives to the activity that would reduce the impact on the species have been considered and the best solution has been adopted.
2. All feasible measures will be taken to minimize the impact of the activities on species at risk or the residences of their individuals.
3. The activity will not jeopardize the survival or recovery of species at risk.

### ***General Terms and Conditions***

1. Permit must be signed to be valid.
2. Any additional work to be carried out in accordance to permit application.
3. The issuance of this permit does not supersede the necessity to meet other legal requirements to acquire any federal, provincial or municipal licenses, permits or other authorizations required by law.
4. This permit is not transferable to any other person(s) or organisation(s).
5. Upon completion notify Courtney Albert so an inspection of site may be conducted.
6. This permit becomes invalid if SARA Terms & Conditions described in these Appendices are not respected.
7. Any SARA-listed species collected (i.e., incidental mortalities) shall remain the sole property of the Federal Crown and shall not be traded, sold, or bartered.

### ***Standard Terms & Conditions***

1. Only qualified personnel, experienced in the identification and life cycle of the target Species at Risk and familiar with the specific locations, will monitor and oversee the timing of the activities.
2. All reasonable alternatives to this activity have been considered, all feasible measures will be taken to minimize the impact of the activity on the species, and the activity will not jeopardize the survival or recovery of the species
3. The survey methods to be implemented are non-invasive. Invasive survey methods will not be employed and those include, but are not limited to, trapping, handling, and/or marking. No animals will be killed, injured or removed. No biophysical attributes of survival, recovery, or critical habitat will be destroyed or damaged. Additional threats will not be introduced.
4. Prior to exercising the activities subject to the SARA compliancy Terms & Conditions in these Appendices, the Columbia National Wildlife Area's manager(s) is (are) to be notified relative to survey procedures, times and locations of studies.
5. These Terms & Conditions are only valid for the activities described above. They (or a copy) must be carried by the applicant or a member of the field crew and be made available to a Wildlife Enforcement Officer upon request.
6. A report shall be provided to CWS, prior to the commencement of works, outlining in detail the survey methods and results, and any observations of SARA-listed species or their residences. Submission of the SARA-specific report should also detail observed impacts of survey activities, including (as applicable) the number of individuals possessed, collected, captured, harmed, harassed, taken, or killed, and the number and location of residences, and the total area and location of habitat impacted.
7. Species at Risk occurrence data must be reported to the Province of British Columbia through the Conservation Data Centre (<http://www.env.gov.bc.ca/cdc/contribute.html>) or Species Inventory Database.

### ***Specific Terms & Conditions for SARA compliancy***

1. A qualified biologist will inform and oversee surveys for species at risk and will advise on biophysical attributes of habitat; Environment Canada will be provided the opportunity to approve the qualifications of the participating QP.
2. SAR surveys must adhere to non-invasive methods described in taxa- or species-specific BC RIC Inventory Methods.

3. Concurrent with surveys, specific RIC survey methods being used must be submitted to CWS explaining how these methods optimize surveying for target species given the time of year, such that most surveys are optimally conducted during and immediately following breeding periods; in September-October, target species may be in or preparing for dormancy/torpor/hibernation.
4. Mitigation measures developed must address wildlife dormancy, torpor, and/or hibernation during work that may possibly disturb hibernacula/shelters.
5. Identification of potential wildlife trees (active and inactive) that may be impacted by remediation works must be buffered as "no-work" zones; surveys should include observations of existing nests, nest boxes, and cavities suitable, for example, for nesting Williamson's Sapsucker or Lewis's Woodpecker; any nest sites encountered are to be left undisturbed and permanently left in place along with neighbouring vegetation.
6. Work should be avoided during the highest-risk seasonal time frame, approximately the end of March to the end of September/beginning of October (i.e., when seasonally active SAR and migratory birds are least likely to be using biophysical attributes within the project area and in order to minimize any incidental (transitory) SAR occurrence).
7. Pre-project surveys: any sign/identification of SAR (i.e. badger dens, Western Toad sightings, and/or observations of unanticipated SAR) should be reported immediately to CWS and Recovery Teams for advice; advice to be used prior to project commencement.

Please advise immediately if you foresee the imposition of any permit conditions outside of those listed above or if you foresee the removal of any of the above permit conditions.

Finally, it is our understanding that once the Remediation Contractor's name and equipment information has been supplied to CWS, the final permit can be issued in a matter of days (i.e. within a turnaround time of 1 to 5 days). This will be imperative once the Contract has been awarded as the work window to complete the project will be very short in length.

Thank you in advance for your assistance in this matter. If you have any questions or concerns, please do not hesitate to contact the undersigned.

Yours sincerely,  
**SLR Consulting (Canada) Ltd.**

  
*Lindsay Paterson*  
*Nov. 28/2014*  
**Lindsay Paterson, MSc, PAg**  
Soil Scientist

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