



July 13, 2021

Alex Ramos-Espinoza
 Director of Engineering Services, District of Kitimat
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Re: Scope of Services for Third Party Review - Sandhill Development Application

Dear Alex:

Thank you for requesting Hatfield Consultants LLP (Hatfield) to conduct a third-party review of the Sandhill Waste Soil Storage Environmental Assessment authored by McElhanney. Hatfield has reviewed all documents related to the assessment and identified the following gaps in the table below. Please note, Hatfield has not assessed the geotechnical studies during this review.

Topic of Concern	Description of Concern	Proposed Mitigation
Grizzly Bear Habitat	Given the potential for high value Grizzly bear (<i>Ursus arctos horribilis</i>) habitat within the area and the potential for project activities interacting with Goose Lake wildlife corridor, further habitat assessment should be considered given that Grizzly bears are a Species of Concern.	Confirmation of presence of wildlife in the area using wildlife cameras and additional field surveys to determine potential environmental impacts.
Absence of Identification of Known Owl Species	There is an absence of an assessment of owl species within the environmental assessment. Specifically, Northern Saw whet Owl (<i>Aegolius acadicus</i>) and Western Screech Owl (<i>kennicottii</i> subspecies <i>Megascops kennicotti kennicottii</i>). These owls prefer the Biogeoclimatic Ecosystem zone of the proposed expansion area (Coastal Western Hemlock) and have been documented in the Kitimat area within the last year.	Confirmation of presence/ absence of Northern Saw whet Owl and Western Screech Owl in the area. Recommendation to conduct a point count night survey or walkthrough of the area, with a focus on Goose Lake. Further mitigations required if presence of owls confirmed.

Topic of Concern	Description of Concern	Proposed Mitigation
Mitigation Measures	Mitigation measures are not prescriptive within the document for effective implementation to provide certainty of protection to the environment.	<p>Given the interaction with environmentally sensitive areas, further mitigation measures should be considered such as a 30 m riparian buffer around the proposed haul road sections and any nearby water bodies. Consideration of this buffer should also take into account Grizzly bear movement, and other species at risk in the area.</p> <p>At minimum, a Qualified Environmental Professional should be on-site at time of project construction, and a Construction Environmental Management Plan should be developed to guide construction activities.</p>
Cumulative Effects in the Local Area	The current level of development in the Kitimat area to the south and east of this site and the added pressure of development in this area near the established wildlife corridor was not fully assessed. Wildlife in the area may potentially find refuge from current construction activity.	<p>A few suggested studies to ensure mitigation for cumulative impacts are considered include:</p> <ul style="list-style-type: none"> ▪ Complete a wildlife baseline study to determine active environmentally sensitive areas (e.g., grizzly bear impacts, owls, other species at risk). ▪ Complete water quality assessments to consider for downstream resources and potential cumulative impacts to fish and aquatics. ▪ Complete visual quality assessment to mitigate the possible impacts to tourism and local recreation. <p>In general there are few mitigation measures proposed in the assessment that account for cumulative impacts. The area is close to water, is within a known wildlife corridor, is within known local recreational areas, and is adjacent to a multitude of large industrial activities.</p>

Sincerely,



Amber Ashenhurst, MSc, PBIol, RPBio
 Environmental Manager & Associate Partner
HATFIELD CONSULTANTS LLP