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November 30, 2017

TOWNSHIP OF LANGLEY

20338 - 65 Avenue
Langley, BC
V2Y 3J1

Attention: Mr. Ramin Seifi, P.Eng., M.C.I.P.
General Manager
Engineering and Community Development

Dear Mr. Seifi,

RE: DEVELOPMENT PERMIT APPLICATION 100890
4825 - 275 STREET, LANGLEY - WATERCOURSE MAPPING CONCERN

We have reviewed the November 24, 2017 letter from the Langley Environmental Partners Society (LEPS). This letter is addressed to the Township of Langley Mayor and Council and is intended to bring to their attention an apparent omission of information regarding a watercourse on the subject property. The development permit application makes reference to the proposed modification of a statutory right-of-way (RoW) through the property. We were in attendance at the Council meeting on November 27, 2017 when this matter was raised and discussed.

The LEPS letter makes reference to a channelized stream that is a main branch of West Creek. While not explicitly stated in the letter, the assertion made by LEPS is that this stream flows through the subject property as an open channel. The letter indicates the stream is Class B habitat and that such streams require setbacks of 20 metres on each side. An attachment to the LEPS letter, citing the Township's Geosource web-map, is referenced in support of the Class B designation.

As you may be aware, Envirowest has been involved with environmental planning at Gloucester Industrial Estates since the early 1990s. We are extremely familiar with the watercourses of the area and in particular, the drainage system at the subject site. Relevant information is summarized below.

In 2000, Fisheries and Oceans Canada (DFO) issued an Authorization agreement to 161884 Canada Inc. (Gloucester) allowing the alteration of watercourses throughout the business park, subject to provision of compensatory habitats. Maps appended to the Authorization identified streams that existed when the agreement was executed (Existing Drainage) and streams that would ultimately exist at complete build-out of the industrial park (Ultimate Drainage).

Envirowest Drawing No. 655-55-01 (Attachment A) shows relevant portions of the two drawings. The map depicting existing drainage identified a stream flowing across the subject property. The map depicting ultimate drainage shows no stream on the subject property.

Aerial photography available on the Geosource web-map shows the subject site as generally undisturbed in 2005. The 2008 aerial image shows the property as cleared of vegetation with a roadway and storm sewer extending westward from 275 Street; the stream still exists at this point in time. The 2010 aerial image shows the property as almost completely filled and the stream completely eliminated. Storm sewers were installed to convey runoff from the south side of the property (including stormwater from Highway 1, local roads and lands south the highway) to a habitat pond at the north end of the property. The habitat pond is protected by a non-disturbance covenant registered on the title of the property. Storm sewers were installed through the property, within RoWs registered on the legal title of the property, in favour of the Township of Langley.

The Geosource map attached to the LEPS letter is consistent with the drainage condition described above. Blue lines on the map attached to the LEPS letter denote storm sewers conveying drainage across the site. This map does not show Class B stream habitat on the subject property; it correctly shows that no stream exists.

In allowing the enclosure of this stream in a storm sewer, the DFO Authorization acknowledged that fish habitat could be (and subsequently has been) eliminated from the property and that DFO would no longer have any interest in the property as habitat. The DFO Authorization ensured that replacement habitat would be (and subsequently has been) constructed elsewhere within the business park. Once the stream was diverted into the storm sewer, and a RoW was registered over the sewer corridor, all authority over this section of the drainage system transferred to the Township of Langley.

Storm sewers are not considered to be fish habitat (even in cases where fish migrate through them) and setbacks do not apply. Senior environmental agencies have no role in the modification of storm sewers within their RoWs, including realignment of sewers in modified RoWs. Approvals are required from these agencies only when proposed works affect the inlets and outlets (i.e. where they connect to open streams); such works are not proposed by the development permit application.

The proposed works involve replacement of a section of the existing storm sewer with a new storm sewer on a different alignment, accommodating a building that had not been designed when the sewer was first installed. The new sewer will connect to an existing manhole at one end, and will connect at a new manhole at the other end. No work is proposed near open stream habitat. Notwithstanding, the work has been carefully planned and will be monitored to ensure that indirect impacts to downstream habitat do not occur.

In conclusion, we confirm that there is no stream on the subject property and that the Township of Langley is entirely within their jurisdiction to allow the realignment of the storm sewer

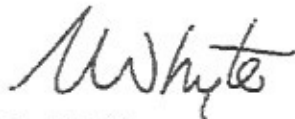
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through the property. The works will be closely monitored to ensure no indirect impacts to downstream habitat.

Please call me should this require clarification.

Your truly,
ENVIROWEST CONSULTANTS INC.

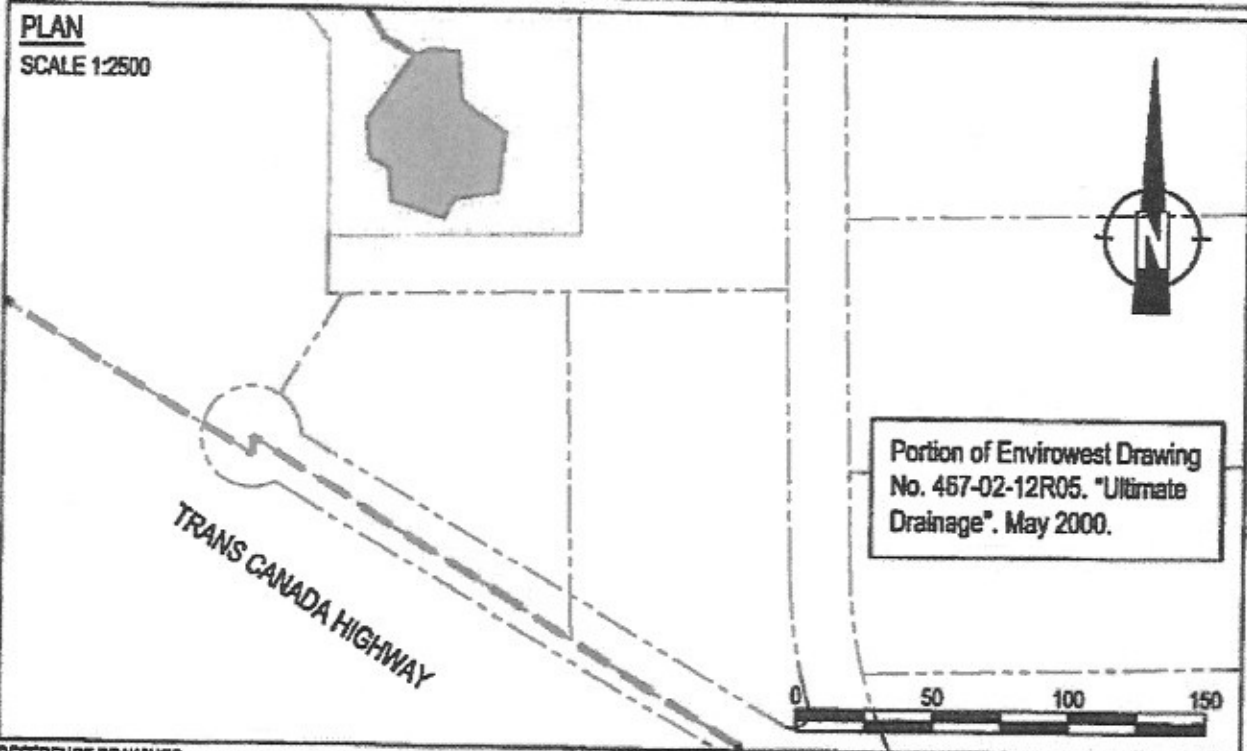
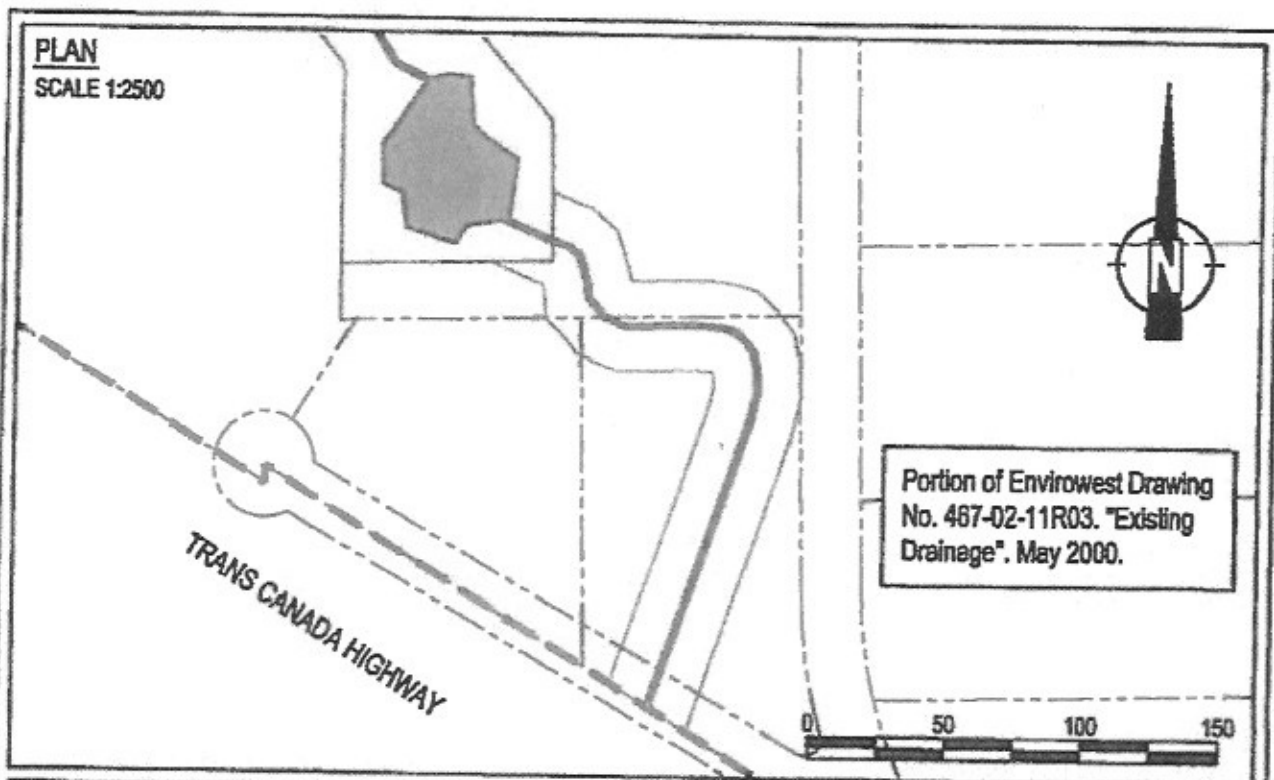


Ian W. Whyte, P. Eng
Senior Project Manager

IWW
attach.

ATTACHMENT A

**ENVIROWEST DRAWING No. 655-55-01
DFO APPROVED DRAINAGE PLANS**



REFERENCE DRAWINGS

1. Drawing No. 467-02-11. Rev.03. "Existing Drainage". May 2000. Envirowest Consultants Inc.
2. Drawing No. 467-02-12. Rev.05. "Ultimate Drainage". May 2000. Envirowest Consultants Inc.

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DFO - APPROVED DRAINAGE PLANS

DATE	BY	CHKD	APPD
As Shown			
Revised			
November 30, 2017			855-55-01