



R CAVANAUGH & ASSOCIATES

September 7, 2023

Ministry of Transportation and Infrastructure
310-1500 Woolridge
Coquitlam, BC, V3K 0B8

Attention: Fraser Valley Highway 1 Corridor Improvement Program

Dear Sir or Madam:

**Re: Fraser Valley Highway 1 Corridor Improvement Program (FVCIP) –
Public Engagement**

This letter is in response to the Ministry of Transportation and Infrastructure's (MOTI) invitation for comments from the public regarding proposed work along Highway 1 through the Fraser Valley including feedback on the scope and nature of improvements, and the FVCIP's program objectives. I have been retained by the West Creek Awareness Group (WCAG), which is comprised of residents who live and work in the area that will be impacted by the FVCIP, in order to provide engineering services related to preservation and restoration of West Creek, an environmentally significant waterbody that intersects Highway 1 (as shown in Photo #1, below). In addition, my work on this project is being supported by West Coast Environmental Law.



Photo #1: West Creek between the lanes of Highway 1



By way of introduction, my professional background is comprised of 35 years of practice as an Environmental Engineer with experience preparing environmental impact assessments and protection plans for construction projects including infrastructure development, monitoring construction, protecting riparian areas, and obtaining construction permits from all levels of government. In addition, I am a recipient of the Fellow of Engineers Canada award for outstanding contributions to the practice of engineering.

Downstream of Highway 1, West Creek is designated as a Class A Red waterbody, which is defined as being inhabited year-round or having the potential for year round fish presence (i.e., salmonid or endangered fish species). The Department of Fisheries and Oceans stated in a letter dated Feb. 19, 2019 (enclosed) that, "The West Creek watershed has historically been a productive coho, chinook, and chum salmon system, along with supporting cutthroat trout and steelhead populations and other finfish. Currently, juvenile and adult coho salmon are sighted in the area annually ... These coho are a natural (wild) stock, and natural salmon stocks from the many smaller streams and their tributaries in coastal BC are important contributors to the genetic diversity and overall wellbeing of salmon in BC. Therefore, West Creek, its headwaters, and its tributaries should be protected as much as possible in order to continue to provide suitable spawning and rearing habitat for salmon, and also be protected to help maintain all the other diversity of life that utilizes the watershed."

Because of industrial development in violation of *Riparian Areas Protection Regulation* (as shown in Photo #2, below), impediments to fish passage have been created that have resulted in the upper reaches of West Creek no longer having a Class A Red designation; however, downstream restoration work could remove these impediments and allow fish to once again inhabit the creek on either side of Highway 1.

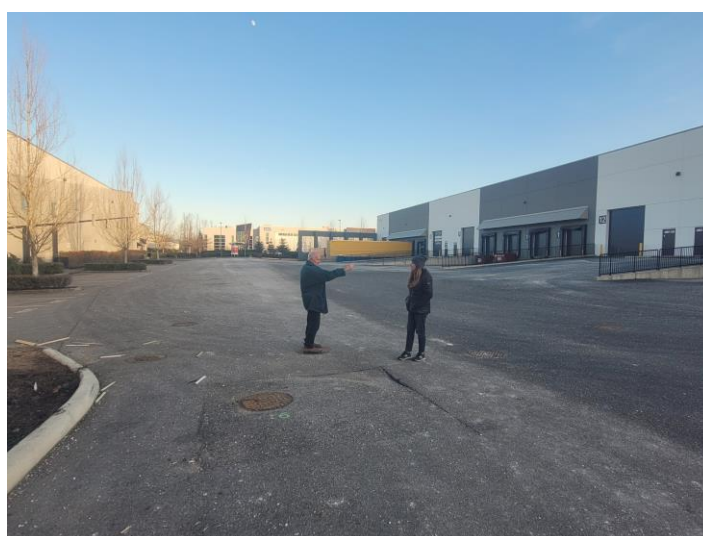


Photo #2: Manhole cover in foreground shows previous location of West Creek near 275th Street



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In keeping with the FVCIP's stated goals of environmental sustainability, fostering liveable communities, and addressing climate change, this letter contains two requests. The first is that engineering design documents for this project include a requirement to allow fish passage throughout the upper reaches of West Creek and any other fish-bearing streams that have similarly been impacted downstream of the highway. In that way, the highway itself does not become a barrier to fish passage, after downstream restoration has been completed. We understand that construction drawings may not include this requirement at present, because of West Creek's current fisheries designation at the intersection with Highway 1. The second request is that the MOTI consider including a line item in the construction budget to provide funding for creek restoration projects in the area, as part of the environmental impact mitigation plan for the FVCIP project.

I look forward to hearing back from you at your earliest convenience.

Sincerely,

Romilly Cavanaugh, PEng, FEC, MA, LEED AP
President

attachments:

Watercourses 4.0_OCP Map 11

DFO letter dated Feb. 19, 2019