

[Correspondence November 29, 2007 to John Manson – city of Langford engineer and Ed Storm - Ministry of Transportation]

The Spencer Road Interchange - comments re. karst

Hi John/Ed,

As I indicated to Langford early on, the Spencer Road interchange project has the potential to impact karst resource features beyond Langford Lake Cave.

The construction phase of the interchange project and future highway maintenance activities have the potential to cause enduring changes to the physical, chemical and biological components of the karst in and adjacent to the projected right-of-way. The karst in the area may not be the most spectacular karst in BC -- but it's karst nonetheless.

Please don't misunderstand me: I can appreciate that the project may have demonstrated environment due diligence with respect to municipal, provincial and federal legal requirements. Indeed the project may have all of the necessary permits and authorizations. And I welcome a voluntary realignment of the right-of-way that will avoid direct impacts to the identified cave.

However, I suggest that it is also a due diligence responsibility to recognize and address the potential environmental impacts of the project on an inherently sensitive environment – the karst. Crown agencies in BC have recognized that karst has been greatly neglected and even maltreated by authorized or permitted development activities in the past, and thus demands more precautionary assessment in order to avoid, mitigate or lessen impacts.

The recently released Environmental Assessment report for the Spencer Road interchange project does not appear to identify or address the karst-related issues. There are, for example, no recommended site-specific measures identified to achieve environmental protection of the karst resources.

The RISC provincial protocols for karst inventory and vulnerability assessment procedures can provide guidance on how to assess the nature of the karst resources and their sensitivity. Karst-specific protocols and best management practices (BMPs) designed to be applicable for capital highway projects and highway maintenance can provide additional guidance. BMPs are available from a variety of sources including many of the professionals working with karst in BC and elsewhere. These professionals can also advise on the site-specific application of BMPs so that you can demonstrate their successful application.

It is my understanding that the Ministry of Transportation (MOT) is committed to demonstrating environmental stewardship and providing the public with the assurance that all highway capital projects and highway maintenance activities are undertaken in an environmentally responsible manner.

In my view, the MOT and Langford would be demonstrating responsible environmental stewardship and due diligence by undertaking the recommended karst evaluation (see my previous communications to Langford staff on this subject).

My previous recommendations were not intended to make the project more difficult or costly. Quite the opposite!

Feel free to give me a call to discuss.

Paul Griffiths