

# **SEA-TO-SKY HIGHWAY IMPROVEMENT PROJECT ASSESSMENT REPORT**

## **APPENDIX 1B**

### **SOCIO-ECONOMIC ISSUES TRACKING**



## List of Acronyms Used in Appendix 1B

AR	Assessment Report
AIUS	Aboriginal Interest and Use Study
BCR	BC Rail
BMP	Best Management Practices
BTWG	Biophysical/Technical Working Group (established by the EAO)
CAG	Community Advisory Group
DoS	District of Squamish
EA	Environmental Assessment
EAO	Environmental Assessment Office
ELD	Electoral Area "D"
GVRD	Greater Vancouver Regional District
HC	Health Canada
LB	Village of Lions Bay
Mayors	Corridor Mayors (West Vancouver, Lions Bay, Squamish, Whistler, Pemberton)
OCR	Owner's Commitments and Responsibilities – Sea to Sky Highway Improvement Project (MoT)
RMOW	Resort Municipality of Whistler
SEWG	Socio-Economic Working Group (established by the EAO)
SLFN	Squamish and Lil'wat First Nations
SLRD	Squamish-Lillooet Regional District
TDM	Transportation Demand Management
TLC	Technical Liaison Committee
TWFN	Tsleil-Waututh First Nation
VCHA	Vancouver Coastal Health Authority
West Van	District of West Vancouver



COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>1. Project Design (General)</b>		
<p>The time horizon for the project should be extended beyond 2025 and employ a goal of minimizing potential negative impacts to each community, especially in the higher growth areas in the southern end of the corridor. A longer-term horizon such as 2050 may be more appropriate for planning purposes. The longer the horizon, the better we will be able to address traffic flows, and land use planning. (Mayors)</p>	<p>The planning horizon and scope of project was developed in consultation with corridor communities who asked that the original scope of the project (\$1.2 billion) be reduced to meet demand rather than promote growth. The planning horizon for the project includes short, medium and long-term planning. Improvements are to meet demand without promoting growth to levels that might exceed the region's ability to provide services (e.g. housing, infrastructure). Longer-term planning is underway to meet demands for the movement of goods and people beyond 2020.</p>	<p>Response satisfactory for the purposes of the EA review</p>
<p>The \$600 million allocated to this project may limit the MOT's ability to consider implementing appropriate measures such as the most efficient tunnel option. (Mayors)</p>	<p>Safety and reliability are the highest considerations. The MoT is currently considering three options for the alignment in West Vancouver and these will be further discussed with Mayor and Council, staff, affected neighborhoods, first responders and other stakeholders. This input will be carefully considered, along with technical and financial issues when selecting a preferred option. <i><b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in West Vancouver. The results are reported in the West Vancouver Clarification Report and were reviewed by the BTWG and the SEWG.</i></p>	<p>Response satisfactory for the purposes of the EA review</p>
<p>Current economic evaluation based on a 20-year horizon is gravely flawed because it diminishes safety, operational and land costs for an infrastructure investment which will have a lifecycle exceeding 50 and probably 100 years. (West Van)</p>	<p><i><b>EAO Note:</b> See above responses</i></p>	<p>Response satisfactory for the purposes of the EA review</p>
<p>Average travel time from Horseshoe Bay and Whistler may increase by 14 minutes, due to increased traffic and congestion in the southern portion of the corridor. Not clear that this level of congestion justifies the expenditure of more than \$600 million. Only through long-term, consistent, and effective land use and traffic management actions can growth of motor vehicle traffic be controlled. (SLFN)</p>	<p><i><b>EAO Note:</b> See above responses</i></p>	<p>Response satisfactory for the purposes of the EA review</p>
<p>Scarce resources should not be expended on highway improvements that are throw away following the Olympics. Timelines should be clearly established for subsequent upgrades or future alternate routes as part of the current planning process. (DoS)</p>	<p>The project team will endeavor to reduce or eliminate "throwaway" costs and optimize the value to the public with this project.</p>	<p>Response satisfactory for the purposes of the EA review</p>
<p>The "Olympic Solution" proposed is to build a third lane on the BC Rail right-of-way for the Olympic period and to dismantle this lane following the Olympics. In the minds of many, this is a waste of taxpayers' money that would be better applied to a more permanent solution. (ELD)</p>	<p>The project team shares the concern that provision of a temporary third lane on the BC Rail right of way, for the period of the Winter Olympic Games, may not represent the best value to the public. The MoT plans to retain a highway engineering consultant to study various options in this area, where improvements to the ultimate design standard have been deferred until some time after 2010.</p>	<p>Response satisfactory for the purposes of the EA review</p>

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>1. Project Design (General)</b>		
Proper highway upgrades must minimize negative impacts to the quality of life for each community. This would include consideration of integrating the highway upgrades into the long-term plan for the region, a mitigation plan that addresses consistent and well-communicated closure regimes, and community highway access. (Mayors)	MoT is committed to completing the improvements by 2009. There shall be no closures or scheduled delays during December, January and February. Daytime and nighttime closures will avoid June, July, August where possible with no disruption of traffic on Friday, Saturday and Sunday. (See also OCR 7.1 – 7.6)	Response satisfactory for the purposes of the EA review
Consideration of the Sea-to-Sky transportation plan should be done within the context of a fully integrated, multi-modal, sustainable transportation strategy that defines a future vision of transportation regionally and within a provincial context. (ELD)	<b>EAO Note:</b> This issue is beyond the scope of the EA review.	
The difference in community impacts between 60kph and 80kph operating speeds would be huge while the difference in travel time would be small. (DoS)	With respect to traffic calming, the MoT intends to work with the DoS to develop appropriate urban character into the highway, by applying CSD concepts.	Satisfactorily addressed for the purposes of the EA review
The section of the SEI dealing with travel to school (Section 2.6.1) would be better if the pedestrian and cyclist routes were documented so potential impacts on student safety could be identified. (SLFN)	<b>EAO Note:</b> Point of information. No response required.	
With respect to the proponent's statement that impacts of increased population will be controlled by planning, there is no record that "population control" is a goal of local planning in some communities along the proposed corridor. Need for an independent assessment of population growth impacts of the proposed project and other proposed economic development projects in the same region. (TWFN)	Generally, issues related to growth are controlled by land use planning mechanisms and are a function of local government initiatives and/or control. The MoT is of the view that this level of analysis is beyond the scope of potential project related impacts and the associated EA Review process. <b>EAO Note:</b> The study of induced population growth is beyond the scope of the EA review.	No further information required for the purposes of the EA review
Reporting out by the proponent on an annual basis on average transit times by month for peak travel periods between Whistler and downtown Vancouver, average travel times by month for peak travel periods between Squamish and downtown Vancouver and monthly vehicle accident rates. These figures will assist the public in assessing the return on the investment achieved by construction of the proposed project. (TWFN)	MoT will continue to track traffic volumes, accident rates, etc. as part of the relevant and applicable provincial programs. Issues related to project viability and satisfying the "public interest" have been addressed by the Treasury Board and provincial Cabinet.	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>1. Project Design (Specific Locations)</b>		
1.1 West Vancouver		
Complete a comprehensive analysis of the tunnel and couplet options from West Vancouver towards Lions Bay, including potential access impacts to Horseshoe Bay area residents in consultation with the District of West Vancouver. (Mayors)	The MoT is currently considering three options for the alignment in West Vancouver and these will be further discussed with Mayor and Council, staff, affected neighborhoods, first responders and other stakeholders. This input will be carefully considered, along with technical and financial issues when selecting a preferred option. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in West Vancouver. The results are reported in the West Vancouver Clarification Report and were reviewed by the BTWG and the SEWG.</i>	No further information required for the purposes of the EA review
A 3 kilometre tunnel from Westport Road (Eagle Creek) to Pasco Road represents the optimum solution in terms of safety, capacity, environmental impact, long term overall economic and functional performance. (West Van)	The MoT has no information to support this. A recent analysis by KPMG regarding the timeframe for benefit cost analysis, comparison of options, effects of land values and loss of incremental property taxes concluded the short tunnel couplet option better public value by a significant margin.	No further information required for the purposes of the EA review
Additional two-lane road with two-way functionality can provide all of the required capacity for 25 years and probably 50 years if a third lane is added. In this way all needs can be met and the overall safety and mobility will be superior to a couplet. (West Van)	Analysis concluded the couplet option, in comparison to the two-way operation, resulted in reduction in collision frequency ranging from 29% to over 40%, depending on the traffic split between the two two-way roadways. In terms of highway safety, the couplet option is clearly safer than the two-way option.	No further information required for the purposes of the EA review
Much of the traffic volume/safety/capacity analysis was undertaken with computer models. Safety implications of permanently detouring Sea-to-Sky northbound traffic from all points north of Caulfield Interchange (including ferry traffic) back through the Caulfield Interchange have been ignored. (West Van)	The concept illustrated in the Project Application has traffic diverted back to Caulfield Interchange and we definitely want to improve on this. We will continue to work with the District to identify means to mitigate the impacts to local traffic. For all three traffic split analyses completed, the LOS of the two-way tunnel, from present to the 2025 horizon year, was unacceptable. The couplet option performs significantly better. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in West Vancouver. The results are reported in the West Vancouver Clarification Report and were reviewed by the BTWG and the SEWG.</i>	No further information required for the purposes of the EA review
Two lanes northbound on a new alignment above the existing highway, from Nelson Creek to Ansell Place, and two lanes southbound on the existing highway will impact emergency response times (add 10 minutes) and severely affect accessibility to properties along this 6 kilometre section. (West Van)	The project team will make improvements to the couplet concept presented in the Project Application. The MoT wants to reduce the impacts to both emergency response and local mobility between Horseshoe Bay and the southern Howe Sound communities and is working hard to develop solutions, which will be discussed with the District. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in West Vancouver. The results are reported in the West Vancouver Clarification Report and were reviewed by the BTWG and the SEWG.</i>	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.2 Lions Bay		
A T-junction at Kelvin Grove will become a safety hazard due to unacceptable detours and pedestrian crossing (LB)	Current options being reviewed do not block left turns from Kelvin Grove. The options include a full movement intersection utilizing a below ground crossing of Highway 99 that would also accommodate east/west pedestrian crossings. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG</i>	Satisfactorily addressed for the purposes of the EA review
Intersection at Brunswick Beach Road: what happens to the residents who live on the east side of the highway? There are considerable safety concerns regarding residential traffic mixing with gravel and construction trucks. (LB)	Current options being reviewed at Brunswick Beach Road would consolidate east and west side accesses to one common intersection. The options include a full movement intersection utilizing a below ground crossing of highway 99 that would also accommodate east/west pedestrian movements. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG</i>	Satisfactorily addressed for the purposes of the EA review
Intersection at Detour 4 has such insufficient detail so resident access to homes, crossings of the detour during its use, and pedestrian safety difficult to assess. Leaving these details to CAG is not acceptable. (LB)	The BC Rail Construction Detour is no longer under consideration.	Satisfactorily addressed for the purposes of the EA review
Current plan to block left turns from lower Kelvin Grove would mean a 27 km. rather than a 1.4km drive for anyone taking their child to school, obtain mail, or go to the store in Lions Bay. (LB)	Current options being reviewed do not block left turns from Kelvin Grove. The options include a full movement intersection utilizing a below ground crossing of Highway 99 that would also accommodate east/west pedestrian crossings. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG</i>	Satisfactorily addressed for the purposes of the EA review
There is no plan for pedestrian crossings in Lions Bay. (LB)	<b>EAO Note:</b> <i>See Above Response</i>	
Too much of the planning for “safer community access across the highway” is related to highway on ramps and off ramps rather than intersections which would allow for multi-directional movement. (LB)	Options being proposed include new access configurations at Kelvin Grove and Brunswick Beach. Improvements to existing interchange to central Lions Bay. Brunswick Beach intersection include underpass connection across highway and realignment of highway at highest accident location. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG</i>	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.2 Lions Bay		
There are no details for access to and from Brunswick Beach across Detour 4, thus there is no mitigation considered for citizens of the Village. This is particularly problematic for plans during the Olympics when the detour is planned to be unsupervised (LB)	This BC Rail Construction Detour is no longer under consideration.	Satisfactorily addressed for the purposes of the EA review
The reduction to two lanes (going north) is after a curve, and includes an area designated for an intersection with Detour 4 and the Brunswick Pit (gravel and construction vehicles). This is a potential safety hazard, even beyond the construction phase. (LB)	This BC Rail Construction Detour is no longer under consideration.	Satisfactorily addressed for the purposes of the EA review
Emergency services in this Village will require full mobility at all intersections. (LB)	<b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG	Satisfactorily addressed for the purposes of the EA review
Increase in vehicular traffic may have a possible increase in accidents and possible increased cost for the Fire Department, on top of the social costs of highway expansion. The MoT should provide some direction for mitigating probable increased emergency response costs. (LB)	<b>EAO Note:</b> While this issue is beyond the scope of the EA review it will be reported in the Assessment Report.	No further information required for the purposes of the EA review
1.3 Lions Bay to Porteau Cove		
If blasting into or tunneling through the Porteau Bluffs is too expensive on the short term, perhaps moving the rail line over could enable construction of a permanent third lane. There should be safety improvements made to straighten curves and to improve the access and egress for Porteau Cove Provincial Park. A future tunnel solution at Porteau Bluffs is recommended. (ELD)	MoT plans to retain a highway engineering consultant to study various options in this area. One objective is to identify permanent improvements to the existing highway required to achieve ultimate design standard for the future one-way operation, as the future northbound couplet or southbound couplet.	Satisfactorily addressed for the purposes of the EA review
1.4 Porteau Cove to Furry Creek		
Prepare a long-term plan for the current 2-lane section between Lions Bay and Furry Creek that clearly shows how this section fulfills the project goals. (Mayors)	The project will improve the safety and reliability of the segment from Lions Bay to Furry Creek through improving site distance, widening and undertaking a large geotechnical stabilization program. This area will be subject to capacity constraints around 2020 and improvements will be required. The MoT would be pleased to review functional options for longer term construction (post 2020) with the corridor communities.	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.4 Porteau Cove to Furry Creek		
Construct the more permanent 3-lane option from Porteau Cove to Furry Creek. Placement of the third lane should consider the viewscape from uphill residences to mitigate or eliminate impact to the current visual quality. (ELD)	The MoT generally agrees with recommendation to construct a third permanent lane on the existing alignment, except that widening of the existing highway may only be feasible in the northerly part of this section, starting at about the Furry Creek sign at the highway/rail divergence. Third lane from this point to Porteau Cove will likely be on the BC Rail right of way.	No further information required for the purposes of the EA review
The assessment should include an analysis of the population, economic and commuter impacts of the proposed four laning of Lions Bay to Furry Creek in 2012-2015. Four lane highway access to Vancouver and the Lower Mainland from Squamish will likely produce major impacts on that community and the communities of Howe Sound. (SLRD)	The MoT studies indicate that the existing two lane highway will start to fail by 2017. Nevertheless, these are planning projections and the MoT can't say for sure when the four-lane improvements will be undertaken, or what other changes may have occurred by then that may also have influence. Therefore the socio-economic impact assessment was undertaken of the project scope included in this project	No further information required for the purposes of the EA review
If the 2-lane option, supplemented for the Olympics by a lane on the BC Rail right-of-way is required due to limited budget, the transition to the rail lane should be south of the Furry Creek Golf Course and the temporary lane should be removed ASAP following the Olympics. (ELD)	Construction of a third permanent lane on the existing alignment is the preliminary designer's preferred solution.	No further information required for the purposes of the EA review
Widen 2-lane bridge over Furry Creek to 3-lanes minimum or 4 lanes. Design should include a "shelf" under the bridge on the south bank of Furry Creek to enable the construction of a connecting pathway under the bridge for pedestrians to cross under the highway. (ELD)	The current preferred option is to construct a new two-lane bridge upstream of the existing bridges, retaining these bridges for southbound only.	No further information required for the purposes of the EA review
If, despite our recommendation, a 2-lane highway and the BC Rail Olympic solution is required between Porteau Cove and Furry Creek, the transition to the rail lane should be south of the Furry Creek Golf Course and the temporary lane should be removed ASAP following the Olympics. (ELD)	<b>EAO Note:</b> <i>Point of Information.</i>	
Establish a reduced speed limit at Furry Creek to recognize that the highway is passing through a community. Install some traffic calming features. Support increased enforcement. (ELD)	The MoT will continue to work with the community to identify practical solutions to mitigate their concerns with highway noise, aesthetics and excessive speed	No further information required for the purposes of the EA review
How were winter driving conditions considered in the calculations of reductions in accident rates and how will driving at higher speeds in snow and rain will affect highway safety?	Analysis was based on preliminary alignment level design and not intended as a detailed safety review. More detailed safety analysis will be done at subsequent levels of preliminary and detailed design. The project is expected to improve safety by providing geometric improvements to allow travel at or about the posted speed limit for the majority of the time; providing capacity improvements to reduce vehicle platooning and resultant aggressive driver behavior; and reducing speeds through creation of urban character within the communities.	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.5 Britannia Beach		
Upgrade the highway to 3 lanes through Britannia Beach close to the existing alignment. To accommodate 3 lanes through a narrow section between Mining Museum buildings and the rail, move a short section of the rail line marginally to the west. (ELD)	The MoT generally agrees with this recommendations for the area, and the preliminary designer's preferred solutions are consistent with this also. The MoT recognizes the issues with access, egress and connectivity at the northern end of the community as well, and design improvements will address these issues.	No further information required for the purposes of the EA review
Construct a standard T intersection with a "smart light" at Main Street (the location of an existing right-of-way) to allow safe access and egress to the community and also to the foreshore. School buses and coaches are using unprotected access and egress points close to this location. The new intersection will also provide connectivity for pedestrians to the foreshore. (ELD)	The MoT recognizes the issues with access, egress and connectivity at the northern end of the community as well, and design improvements will address these issues.  <b>EAO Note:</b> <i>These design detailed issues can be addressed post-EA.</i>	No further information required for the purposes of the EA review
Northbound right-in access to the businesses is desired, but may be difficult due to the short distance in relation to this interchange. If this is the case, signage is recommended to denote business access is via the interchange. (ELD)	<b>EAO Note:</b> <i>These detailed design issues can be addressed post-EA.</i>	No further information required for the purposes of the EA review
Install a second (bailey) bridge on the upstream side of the existing bridge to accommodate the third lane. This bridge could stay in place after the Olympics. In addition to enabling smooth traffic flow, this will allow for some straightening of the sharp curve immediately north of the existing bridge to provide additional sight distance for safety. Existing businesses should be protected, however the upstream bridge will result in reduced space for parking in the existing commercial area. Some noise mitigation requirement is recommended between the residences and the highway. (ELD)	<b>EAO Note:</b> <i>These detailed design issues can be addressed post-EA.</i>	No further information required for the purposes of the EA review
Install protected left turns to allow safe access and egress for the Ninety-Niner and Britannia restaurants and the Makin Lands entrance. (ELD)	<b>EAO Note:</b> <i>These detailed design issues can be addressed post-EA.</i>	No further information required for the purposes of the EA review
Longer term, the community supports a proposed bypass route east of Britannia Beach with the existing alignment used as an access road. A right of way has been negotiated for this future bypass. (ELD)	<b>EAO Note:</b> <i>Point of information.</i>	

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.6 Squamish		
There are several options for an alternative route to Squamish from the Lower Mainland including Indian Arm, Seymour and Capilano Watershed routes that warrant further consideration (ELD)	The alternate routes between Vancouver and Squamish, these are briefly discussed in Volume 1 of the Project Application. The ultimate improvements planned for the existing corridor will provide a good level of service for many years. When capacity beyond four lanes is required, the alternate routes will be reconsidered and may then be the best solution.	Satisfactorily addressed for the purposes of the EA review
Complete a detailed analysis of the proposed upgrades through Squamish, which adequately addresses the connectivity and livability of this community, in consultation with the District of Squamish. (Mayors)	The MoT intends to review its analysis of connectivity and livability issues with the District of Squamish to ensure the improvements enhance rather than detract from connectivity and livability.	No further information required for the purposes of the EA review
Widening of the highway through urban Squamish would tend to further sever the community and isolate pockets of development on either side of the highway and thwart the District's ongoing efforts to integrate these pockets into one community. Measures associated with east-west connectivity in the Squamish area require special attention. (DoS)	The project objective in this regard is to preserve and enhance, where possible, east-west connectivity across the highway. The designer will work closely with the District to address the bulleted points provide in the report from the DoS. <b>EAO Note:</b> <i>The MoT also commits to consult with the Project Technical Liaison Committee and work closely with key stakeholders, First Nations, and Community Advisory Groups to ensure that adverse impacts are identified and design features are developed to provide safe pedestrian, cyclist and vehicular movement to, from and across the Highway (OCR 8.3)</i>	Satisfactorily addressed for the purposes of the EA review
The District views amendments to the municipal road network, including frontage roads, to maintain and enhance east-west connectivity as STS Highway Project deliverables. (DoS)	The MoT recognize that improvements to the municipal road network will benefit community connectivity and will work with the District to identify how these improvements can be interfaced with the project. (See also above response)	Satisfactorily addressed for the purposes of the EA review
Squamish Valley Road, Paradise Valley Road and Ring Creek Road are key area access roads for recreation and rural communities. Safe connections to Highway 99 are required. (ELD)	<b>EAO Note:</b> <i>See above response.</i>	No further information required for the purposes of the EA review
Safe pedestrian passage at all bridges; a continuous, paved pedestrian/ bike path from Valleycliffe to Brackendale; and access and parking for significant trail heads such as the Mamquam Spawning Channel, the Malamute and other trails. (DoS)	<b>EAO Note:</b> <i>The MoT also commits to consult with the Project Technical Liaison Committee and work closely with key stakeholders, First Nations, and Community Advisory Groups to ensure that adverse impacts are identified and design features are developed to provide safe pedestrian, cyclist and vehicular movement to, from and across the Highway (OCR 8.3)</i>	No further information required for the purposes of the EA review
The DoS planning an Adventure Tourism and Visitors Centre on the east side of the Highway at Cleveland Avenue as a focal point. The Rock Climbing and Trails Communities ought to be involved as key stakeholders to the highway design process. (DoS)	<b>EAO Note:</b> <i>The MoT has created a recreation focus group that is looking at all highway-related issues from a recreational perspective that will be brought back to the TLC. (SEWG Meeting of 03-03-04)</i>	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.6 Squamish		
Access to industrial and commercial properties adjacent to the highway is a critically important design consideration. Access must be maintained or acceptable alternate means must be provided through the project. (DoS)	The project team will work closely with the District in identifying potential impacts to access, will seek solutions to mitigate these impacts and will ensure that temporary access during construction is considered in the development of traffic management strategies.	No further information required for the purposes of the EA review
Overhead Signage should be installed at strategic locations to notify travelers of Highway 99 construction delays and/or closures well in advance. An information station on the radio should be put into service and travelers should be referred to the radio station for the latest information. (ELD)	<b>EAO Note:</b> See OCR 7.1 – 7.6	Satisfactorily addressed for the purposes of the EA review
1.7 Pinecrest/Black Tusk		
Option 1 offers the best protection for the Pinecrest water supply and the safety improvement of a single smart light controlled intersection. Noise mitigation for the communities is a built-in benefit of this option which is the option preferred by the communities. If Option 1 is too expensive, Option 2 is recommended. (ELD)	A comparative analysis of the three options was done using the Multiple Account Evaluation (MAE) methodology to evaluate the overall costs and benefits of the alternatives, including safety, environmental impacts, community benefits, capital costs, maintenance costs and highway user benefits. <b>EAO Note:</b> On April 15, 2004 the MoT reported to the EAO that: “The MAE was presented to the Pinecrest/Black Tusk CAG on November 13, 2003. The MAE recommended Option 3, the re-engineering of the existing Highway 99 and expansion to 3 lanes. The CAG was to prepare minutes of the November 13 meeting and provide comments to the Project Team on the MAE. To date no minutes or comments have been received. The Project Team is committed to ongoing consultation with the community post-certification to address their concerns about safety and water quality. The Project Team recently met with the Pinecrest/Black Tusk CAG: on February 10 to provide an update on the Sea to Sky Project; and, on April 6 to discuss highway safety.” (See also OCR 10.7 and 10.8)	Satisfactorily addressed for the purposes of the EA review
1.8 Callaghan Valley Access/Egress		
Construct a new interchange. If traffic demand projections indicate, a split grade intersection may be required. Reposition the new access/egress point to the south of the current location and incorporate the minor access/egress points into a single safe access/egress solution. (ELD)	This intersection is currently being studied by other agencies. It is recognized that the intersection will need significant improvements, however since the ultimate traffic demand is currently unknown.	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>Project Design (Specific Locations)</b>		
1.9 Whistler		
Directional Signage, similar to the BC Ferry signs, should be implemented along routes to Whistler. Whistler banners along the routes would be a desirable or even preferred alternative. (ELD)	Signage will be reviewed on a corridor-wide basis as part of the project. The project team is interested in creating a corridor identity with corridor "branding" to help convey that identity to the traveling public.	No further information required for the purposes of the EA review
A minimum tire tread depth should be established and enforced for the winter months north of the salt sheds on the Sea-to-Sky Highway to increase safety and avoid delays and closures due to accidents or inability of vehicles to handle winter conditions. (ELD)	Regarding designating a part of the Sea to Sky Highway as a "mountain highway", this generally pertains to the winter and the designation does include enforceable regulations, including minimum allowable tire tread. Enforcement of these regulations is key. This recommendation will be considered.	No further information required for the purposes of the EA review
<b>2. Noise</b>		
Complete an analysis on mitigating highway noise and access issues within the Lion's Bay area in consultation with the Village of Lions Bay. (Mayors)	<b>EAO Note:</b> The MoT has committed to Work with the Lions Bay community to reduce current highway noise by 4 to 5 dB through mitigation measures, such as open graded asphalt and speed reduction. Further, MoT is prepared to work with the community to make best efforts to incorporate noise barriers and other noise mitigation efforts where effective, which could result in a further 5dB reduction. (OCR 9.4 and 9.5)	Satisfactorily addressed for the purposes of the EA review
The widening of the highway and Increasing traffic volumes have the potential of increasing ambient noise levels at properties adjacent to the highway. Baseline noise data should be collected throughout the urban portion of the corridor and measures such as speed control, pavement type and buffering should be enlisted to maintain or reduce from present base levels. (DoS)	<b>EAO Note:</b> The MoT has committed to further consultation as the Project moves to more detailed design and to reduce average noise levels in the noisier residential areas along the corridor (e.g., Lions Bay, IR#24 and urban Squamish) by specifying in contract documents the use of open graded asphalt that creates less tire noise. (OCR 9.4)	No further information required for the purposes of the EA review
All baseline readings were taken in October in the middle of the week (Tuesday, Oct. 22 and Wednesday, Oct.23, 2002). Within this application the MoT acknowledges that not only is October the next to the lowest vehicular volume (November is lower) but weekday volumes are lower than on weekends (Vol. 3, C 2.1.2.1). This means <u>all baseline readings</u> being used to determine noise levels are <b>not</b> representative of even average values for traffic noise. (LB)	Actual readings are calibrated and factored, taking into consideration the location and day of the week that the sample was taken, before they are used in modeling. An independent review of the noise data collection and modeling work by an internationally recognized authority was done in January 2004 and confirmed the methodology and data is reliable. <b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG	Satisfactorily addressed for the purposes of the EA review
The noise policy being used is a "guideline" in noise impact assessment only (LB)	Once MoT decides on a general design concept, it will continue to consult with the community throughout the phases of design development. <b>EAO Note:</b> The MoT has committed to Work with the Lions Bay community to reduce current highway noise by 4 to 5 dB through mitigation measures, such as open graded asphalt and speed reduction. Further, MoT is prepared to work with the community to make best efforts to incorporate noise barriers and other noise mitigation efforts where effective, which could result in a further 5dB reduction. (OCR 9.4 and 9.5)	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>2. Noise</b>		
With use of the railway bed at Brunswick Beach Rd. as a detour during the Olympics the threshold level of noise of 55dBA will be reached (Vol. 3B 8.1). Consideration that people should live with excessive noise levels at Brunswick Beach Rd. since it is “temporary” (Vol. 1, p. xxix) is unacceptable. (LB)	Once MoT decides on a general design concept, it will continue to consult with the community throughout the phases of design development. <b>EAO Note:</b> On May 12, 2004 the MoT advised the EAO that the MoT is no longer considering the access as in the original plan which required the usage of the BC Rail grade through the Brunswick Beach homes. Two alternative options are: o Leaving the highway just to the north of Magnesia Creek Bridge and connect to the rail bed north of the Brunswick Beach homes. o Leaving the highway just to the south of M Creek Bridge	Satisfactorily addressed for the purposes of the EA review
For queuing of traffic for scheduled night time closures, no definite mustering points have been identified. Traffic stopped for long periods of time have inherent problems, such as noise and sanitation, which must be addressed. (LB)	The MoT is developing the improvement options for the Lions Bay section of the highway. <b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG (See also OCR 7.1 – 7.6)	Satisfactorily addressed for the purposes of the EA review
The narrowing will produce extra noise as traffic backs up at the constriction and increased speed when drivers try to get ahead of others before the narrow road section. (LB)	<b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG	Satisfactorily addressed for the purposes of the EA review
Noise concerns where traffic opens up to four lanes as it enters a residential area with houses close to the road. Increased speed at this point as drivers pass will increase noise issues. (LB)	<b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG	Satisfactorily addressed for the purposes of the EA review
Proposed Detour 4 will likely have considerable congestion as traffic slows to make an unusual shift in roadway and has potential for major safety, traffic and noise issues within the Village. (LB)	The BC Rail Construction Detour is no longer under consideration	Addressed
Only the increase in noise levels due to the highway are considered when determining whether mitigation is needed. The noise generated by the existing highway is not considered. MoT mitigation guidelines apply only to freeways or expressways. The Highway 99 upgrade project is not covered by these standards. (SLFN)	<b>EAO Note:</b> Since this comment was provided, the MoT has committed to undertake additional analysis of the potential impact of highway noise within IR#24, in cooperation with the Squamish Nation, during the detailed design phase as the physical characteristics of the alignment become better known. In addition to the mitigative measures that have already been proposed (the use of open graded asphalt, traffic calming measures, etc.) the MoT will consider other viable options in consultation with the Squamish Nation. (OCR 9.7)	Satisfactorily addressed for the purposes of the EA review
The First Nations question whether the impacts of increasing noise levels through the Highway 99 upgrade – not to mention the existing noise effects of the highway – can be considered to have low consequence, low magnitude, and not result in adverse effects. The First Nations would like MoT to examine the use of other sound-reducing mitigation on I.R. #24. (SLFN)	The MoT has committed to Undertake additional analysis of the potential impact of highway noise within IR#24, in cooperation with the Squamish Nation, during the detailed design phase as the physical characteristics of the alignment become better known. In addition to the mitigative measures that have already been proposed (the use of open graded asphalt, traffic calming measures, etc.) MoT will consider other viable options in consultation with the Squamish Nation. (OCR 9.7)	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>2. Noise</b>		
In the socio-community section, when will MoT commit to using quieter pavement types in IR#24? Will there be a commitment to any other sound-reducing mitigation? (SLFN)	The MoT has committed to Undertake additional analysis of the potential impact of highway noise within IR#24, in cooperation with the Squamish Nation, during the detailed design phase as the physical characteristics of the alignment become better known. In addition to the mitigative measures that have already been proposed (the use of open graded asphalt, traffic calming measures, etc.) MoT will consider other viable options in consultation with the Squamish Nation. (OCR 9.7)	Satisfactorily addressed for the purposes of the EA review
Equipment and processes should be as quiet as practicable. Noise emission data and noise reduction practices should be requested from contractors during the bidding process and compared to reference data and practices described in Volume 3 Section C - Noise. Noise emission data and noise reduction practices should be requested from contractors during the bidding process. (HC)	<b>EAO Note:</b> The MoT has committed to specify in the contract documents, the procedures the Contractor is to follow to minimize noise emissions and to communicate effectively with the affected communities. The Contractor will be required to avoid or reduce construction noise at the source through the appropriate operation, modification or maintenance of construction equipment and processes. (OCR 9.3 and 9.12)	Satisfactorily addressed for the purposes of the EA review
Periodic noise monitoring will be needed to ensure compliance with construction noise requirements. The MoT must specify what actions will result from non compliance with noise requirements (e.g.modification of equipment, procedural changes, or fines) (HC)	The MoT will include language in the construction contracts that will clearly inform the contractors of the procedures they need to follow to minimize noise emissions and to communicate effectively with the affected communities. This will include daytime and nighttime noise level objectives and this, in turn, could necessitate periodic or ongoing noise monitoring at key noise-sensitive locations.	Satisfactorily addressed for the purposes of the EA review
A plan for community consultation, communication and reaction monitoring is essential to minimize impacts. The public should be provided with as much advance notice as practicable of construction activity and expected noise levels. (HC)	<b>EAO Note:</b> The MoT has committed to meet with representatives of the various municipalities affected to identify the noisiest construction activities that must be conducted within each community and discuss the extent to which these activities can be conducted during normal daytime working hours. For activities which must be done at night, the contractor will describe the measures to be taken to minimize the noise produced and will discuss whether work can be scheduled during the first few evening hours rather than between midnight and 5:00 am. (OCR 9.2)	Satisfactorily addressed for the purposes of the EA review
If practicable, the quietest possible type of pile driver should be employed for nighttime use near residences such as site #3 where construction noise Ldn is predicted at 86 dBA. (HC)	The Ministry of Transportation notes that there is not likely to be a great need for nighttime pile driving or rock drilling. As well; it is expected that such work could be scheduled for daytime hours when the active sites are near residential areas.	Satisfactorily addressed for the purposes of the EA review
As much as practicable, schedule the noisiest activities between 07:00 and 23:00, especially highly impulsive sources such as pile driving and rock drilling. (HC)	<b>EAO Note:</b> See above response. The MoT notes that there is not likely to be a great need for nighttime pile driving or rock drilling and expects that such work could be scheduled for daytime hours near residential areas.	Satisfactorily addressed for the purposes of the EA review
More data is needed to better assess the long term increase in traffic noise. (HC)	Substantial additional noise monitoring recently done in Lions Bay as part of the Kelvin Grove to M Creek functional/detailed design package. Noise monitoring will be conducted in other populated areas (such as Urban Squamish) where project-related traffic noise impacts have been projected to approach Ministry of Transportation policy mitigation thresholds. <b>EAO Note:</b> Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in Lions Bay. The results are reported in the Lions Bay Clarification Report and were reviewed by the BTWG and the SEWG	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>2. Noise</b>		
Sensitive sites such as the day care facility, school and IR #24 require more attention to determine the extent of mitigation needed. (HC)	There is one daycare located close to the project corridor at the Totem Hall on the Squamish First Nation's IR #24 in Squamish. Since Totem Hall was one of the sites included in the April 2003 baseline noise monitoring program on IR #24, the current noise environment there is known to be high - Leq(24) 69.7 dBA including BC Rail noise events and about 64 dBA due to highway traffic alone. <b>EAO Note:</b> <i>Since this response was provided the MoT has committed to assess, monitor and, if necessary, mitigate construction noise exposures at the Eagle Ridge School and the Stawamus Elementary School and will, as part of the Noise Control and Mitigation Plan, determine the layout, nature and schedules of any affected daycare facilities, including the facilities at Lions Bay and on the Squamish First Nation's IR #24, to develop strategies that will limit project-related construction noise exposures during nap times. (OCR 9.9 and 9.10)</i>	Satisfactorily addressed for the purposes of the EA review
Clarify whether any rural areas are affected. (HC)	No residential locations are very near the project corridor which have exceptionally low baseline noise levels. West of and below the highway elevation, baseline noise levels can, however, be moderately low (less than 50 dBA) due to the shielding effect provided by the highway shoulder. Since both highway construction and operation noise impacts have been based on project-related increases in daily average noise levels over measured baseline levels, the increased sensitivity of areas with low baseline noise levels has been taken into account.	Satisfactorily addressed for the purposes of the EA review
Notification of the communities using flyers, followed by consultation, will be essential to minimize impacts. For example, informing people of construction scheduling may allow them to avoid excessive noise exposure. (HC)	<b>EAO Note:</b> <i>Point of Information</i>	No further information required for the purposes of the EA review
A complaint phone line will be needed to respond to the community. (HC)	All of these general approaches to avoiding and mitigating construction noise impacts were identified in Volume 3, Section C, Sub-section 7.1 of the Application. It is Ministry of Transportation procedure to establish an info/complaints line for major projects such as Sea-to-Sky. <b>EAO Note:</b> <i>Point of Information</i>	No further information required for the purposes of the EA review
The number of people in each of the noise-exposed areas is required to evaluate impacts. (HC)	<b>EAO Note:</b> <i>The MoT provided additional information to Health Canada on February 26, 2004 in response to Health Canada's interest in calculations using the "% Highly Annoyed" approach to estimate construction noise impacts.</i>	Satisfactorily addressed for the purposes of the EA review
For schools the WHO Guidelines and Province of Alberta <i>Standards and Guidelines for School Facilities</i> (Alberta Infrastructure 2001) state a recommended limit level indoors of 35 dBA. This level depends on the acoustical properties of the classroom.	<b>EAO Note:</b> <i>The MoT has committed to and Noise Control and Mitigation Plan and to assess, monitor and, if necessary, mitigate construction noise exposures at the Eagle Ridge School and the Stawamus Elementary School. (OCR 1.2 and 9.9)</i>	Satisfactorily addressed for the purposes of the EA review
Provide an explicit statement that there are no hospitals or seniors residences, or, if there are, provide impact assessment.	There are no known senior's residences in close proximity to the STS alignment, however this will be confirmed during the detailed design phase of the Urban Squamish section. If any such facilities should exist, they will be treated as residential properties.	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>3. TDM (Transportation Demand Management)</b>		
<i><b>EAO Note</b> Recommended TDM measures, other than bicycle lanes on the highway shoulders, require the participation of many jurisdictions, are beyond the sole authority and control of the MoT and are beyond the scope of the environmental assessment for this Project. The MoT has committed to participate in future multi-jurisdictional discussions towards delivery of other TDM measures if a forum is assembled. TDM is discussed in the Assessment Report.</i>		
There is no funding consideration for sponsoring much needed transit and ferry services. Transit and ferry will improve access, mobility, and safety of the highway, and assist with meeting the project goals. (Mayors)	Study by TSi shows the corridor has relatively high bus ridership and low single occupant vehicle travel. Improvements to these alternatives do not preclude the need to make safety, reliability and mobility improvements to the highway. Provision of rail, and ferry services are generally the responsibility of regional transportation authorities and agencies responsible for ferry and rail service. The MoT does not have the authority or responsibility to provide these services.	No further information required for the purposes of the EA review
Commit to improving the livability and air quality of the corridor through implementing Transportation Demand Management measures. This would include facilitate a regional transit system (Whistler to Squamish, Squamish to the GVRD) and ferry service (GVRD to Squamish) component. (Mayors)	The MoT has lead a demand management study through the TLC represented by all the corridors communities. The MoT does not have authority or responsibility over transit, ferries, rail and land use but is committed to working with the organizations and agencies responsible to ensure that the highway improvements are integrated with other service improvements.	No further information required for the purposes of the EA review
Consideration needs to be given to bus terminals, park'n'ride facilities and connecting links to modes such as passenger rail and ferry services. (DoS)	TSi has recently completed a Transportation Demand Management report for the Sea to Sky Highway corridor. The project team will work with the local governments and responsible agencies as much as possible to facilitate the recommendations of the report.	No further information required for the purposes of the EA review
<p>Include an analysis of the benefits of TDM initiatives to improve transportation movements, community growth, and public health. Consider :</p> <ul style="list-style-type: none"> <li>o A Sea-to-Sky commuter and visitor transit service with potential links to Vancouver airport, Squamish and Whistler.</li> <li>o Bus or transit priority lanes between areas of strong commuter traffic demand such as Lion's Bay/Squamish and Lower Mainland.</li> <li>o Park'n'ride lots in Vancouver, North/West Vancouver, Squamish, and Whistler linked with ridesharing and carpooling programs already developing with the Jack Bell Foundation. (RMOW)</li> </ul>	The MoT led a TDM study with the TLC. The MoT is committed to working with the organizations and agencies responsible to ensure that Sea-to-Sky highway improvements are integrated with other service improvements. With regard to public health, the MoT wanted to first analyze the air quality impact assessment results before embarking on a public health impact assessment. An air quality impact assessment concluded overall project impacts on air quality would be positive, neutral or, worst case, low, compared to the baseline. The VCHA required no further assessment of public health impacts from incremental changes. Health Canada deferred to the views of the VCHA.	No further information required for the purposes of the EA review
<p>Sea-to-Sky Highway Improvements are necessary and applauded, however more focus should be placed on developing transportation alternatives to the automobile throughout the corridor. Squamish should be a hub in the integrated transportation plan.</p> <ul style="list-style-type: none"> <li>o Bus Transportation</li> <li>o Inter-Community Transit</li> <li>o Van Pool</li> <li>o Tourist Rail and Passenger Service</li> <li>o Regional Airport (Pemberton)</li> <li>o Marine Facilities (Vancouver to Squamish) (ELD)</li> </ul>	A number of studies have been undertaken over the last few years. Other transportation modes examined include commuter ferry, commuter rail, higher speed commuter rail and transit. The studies generally conclude that the various options would not divert sufficient ridership from the automobile to negate the need for the highway improvements. Improved bus service showed the highest potential to capture ridership. The objective of the recent TSi study is to develop a strategy that will lead to more effective utilization of the Sea to Sky Highway by encouraging multi-occupant vehicle usage for inter-regional travel. This study will be shared with local governments and the communities when it is finalized.	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>3. TDM (Transportation Demand Management)</b>		
<b>EAO Note</b> Recommended TDM measures, other than bicycle lanes on the highway shoulders, require the participation of many jurisdictions, are beyond the sole authority and control of the MoT and are beyond the scope of the environmental assessment for this Project. The MoT has committed to participate in future multi-jurisdictional discussions towards delivery of other TDM measures if a forum is assembled. TDM is discussed in the Assessment Report.		
The District of Squamish has expressed its interest in having the ferry terminal located at the southernmost tip of the estuary and just south of the downtown. (ELD)	The commuter ferry terminal and links to the existing highway are not part of the current project scope. This is part of the Olympic Transportation Plan which will involve the MoT, but timelines for this are unknown at this time.	No further information required for the purposes of the EA review
TSi identified the ferry as a strong transportation option from Squamish to downtown Vancouver. Given the expected cost efficiencies and ease of implementation, a ferry system from Squamish to Vancouver with stops at Britannia and Lion's Bay may be a strong transportation choice. (RMOW)	MoT is committed to working with the organizations and agencies responsible to ensure that Sea-to-Sky highway improvements are integrated with other service improvements.	No further information required for the purposes of the EA review
The socio-economic report does not detail how the highway upgrades will support or conflict with Whistler's and Vancouver's transportation plans. No discussion on the already congested Taylor Way and Lion's Gate Bridge, and the potential impacts to Whistler's guest experience from further increased congestion from the tourists point of entry (i.e. the airport) through Vancouver and within Whistler. (RMOW)	The MoT led a TDM study with the Technical Liaison Committee which represents all the corridor communities. The product is the recently completed Sea-to-Sky TDM Study by TSi Consultants. MoT is committed to working with the organizations and agencies responsible to ensure that Sea-to-Sky highway improvements are integrated with other service improvements.	No further information required for the purposes of the EA review
An integrated, sustainable regional transportation strategy for the corridor should be developed and implemented. More focus should be placed on developing transportation alternatives to the automobile throughout the corridor. Transportation modes must be integrated. (ELD)	<b>EAO Note:</b> This issue is beyond the scope of the EA review	No further information required for the purposes of the EA review
The MoT should not assume that the development cap will be lifted and Whistler will be able to support a permanent population of 18,981 persons by 2025. To provide a better forecast, we ask the MOT use the RMOW's Planning Department's estimates of 12,448 permanent residents at the development cap. (RMOW)	<b>EAO Note:</b> Point of information	No further information required for the purposes of the EA review
How will the proposed highway upgrades complement Whistler's and the Lower Mainland's transportation plans? (RMOW)	MoT is committed to working with the organizations and agencies responsible to ensure that Sea-to-Sky highway improvements are integrated with other service improvements.	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
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<b>4. Land Use</b>		
Need for a more comprehensive review of population projection inputs and impacts to be completed including extending the study area to Pemberton/Mount Currie. Key factors required for the assessment include a calculation of the total population allowed by current zoning in Squamish, Whistler, Pemberton and Mount Currie. A similar assessment of impacts is required regarding the total number of annual visitor days that will be supported by present and future developments in the corridor. (TWFN)	This level of analysis is beyond the scope of potential project related impacts ad the associated EA review process. MoT has initiated discussions with the Lil'wat Nation related to a range of issues in the Pemberton/Mt. Currie area.	No further information required as part of the EA review
Access to land, particularly hunting and gathering areas and sacred sites, is important to the Squamish Nation and Lil'wat Nation. Direct discussions must be held with the First Nations to identify ways in which access changes could affect their interests and to determine appropriate mitigation. (SLFN)	Specific access issues have also been raised by the Squamish Nation within the context of their AIUS discussions and related discussions are ongoing. It is also anticipated that the Squamish Nation will have specific access issues related to the highway alignment through IR#24 and the MoT has committed to addressing these in cooperation with the Nation.	No further information required as part of the EA review
Discussion and analysis of project impacts on SLRD electoral areas is virtually non-existent. (SLRD)	The Socio-Community Economic Assessment relied heavily on federal, provincial and local data sources for statistics such as population, economic activity and other matters, which are generally available at the municipal level but not for the unincorporated areas. The general impacts (positive/negative) of construction and operation of Highway on Electoral Areas C and D would be similar to those described for the Study Area as a whole. Effects are captured in the overall population forecasts and reflected in impacts such as traffic volume increases and increased demand for schools, hospitals, emergency and community services.	Satisfactorily addressed for the purposes of the EA review
No reference to the Area D or Area C OCPs, or the Howe Sound East Sub Area Plan. (SLRD)	Recognized that Electoral Areas C (surrounding Pemberton) and D (Howe Sound East) have resident populations and potential for future development. Relied on forecasts in <i>Sea to Sky Land and Resource Management Plan</i> and population projections developed by the provincial government. General impacts (positive and negative) of construction and operation of the project on Electoral Areas C and D would be similar to those described in the report for the Study Area as a whole.	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>5. Connectivity</b>		
Improvements are required in addition to the Sea-to-Sky Highway to improve connectivity to US border crossings, YVR and other major access routes. This will reduce overall drive times to Whistler. (ELD)	<b>EAO Note:</b> <i>Point of Information. Beyond the scope of the EA review</i>	No further information required as part of the EA review
Application deals only with crossings at three major intersections in Lions Bay and eight in urban Squamish. The effect of median barriers on people and vehicles wishing to cross the highway at locations other than intersections is not discussed. The effect of higher traffic volumes and speeds on pedestrian crossings also is not discussed. (SLFN)	The MoT team will continue to identify and discuss potential barrier related issues with the corridor communities, through the TLC and CAG's, and will develop solutions to mitigate potential impacts. Where this is a specific issue related to highway alignment through IR#24, the commits to work closely with Squamish First Nation to identify and mitigate potential impacts related to intra-community barriers within IR#24. (See also OCR 18.3)	Satisfactorily addressed for the purposes of the EA review
Increased volumes and speeds of traffic will not contribute to the safety or pleasantness of the highway for cyclists or pedestrians. Lil'wat Nation has concerns about safety for non-motorized travelers near Mt. Currie. (SLFN)	The MoT estimates that the incremental traffic north of Whistler is not expected to have a significant safety impact to non-motorized travelers in the Mount Currie area.	No further information required as part of the EA review
Section on community access could be integrated with Section 9.8, Intra-Community Travel, because both sections deal with barriers, changes in access, and safety. (SLFN)	<b>EAO Note:</b> <i>Point of Information</i>	
The report should note that the barrier effect of the highway is increased when roads are widened, accommodate greater traffic volumes, encourage higher vehicular speeds, and feature installation of median structures. Classifying the magnitude, extent, and significance of the barrier effect warrants discussion and assessment in the EA. (SLFN)	The MoT team will continue to identify and discuss potential barrier related issues with the corridor communities, through the TLC and CAG's, and will develop solutions to mitigate potential impacts. Where this is a specific issue related to highway alignment through IR#24, the commits to work closely with Squamish First Nation to identify and mitigate potential impacts related to intra-community barriers within IR#24. (See also OCR 18.3)	Satisfactorily addressed for the purposes of the EA review
Unclear whether the statistics on reduced accident rates include pedestrian and cyclist facilities or just motor vehicles. What will the effect be of greater traffic volumes in Lil'wat territory north of Function Junction, and particularly in the Pemberton Valley, where the highway will not be upgraded but will carry more traffic? (SLFN)	Accident statistics and estimates were not included for the area north of Function Junction, since these areas are outside the scope of work for highway improvements. The EA Application estimated that latent demand and additional population generated by the STS Highway improvements will result in a traffic increase of approximately 7.5 percent relative to the Base Case in the absence of the Project. This will add approximately 600 vehicles per day to the current average annual daily traffic (AADT) of 7,700 between Squamish and Whistler. If 20% of the induced traffic travels beyond Whistler and through Mount Currie, this will amount to an additional 120 vehicles per day or an additional 10 to 15 vehicles during the peak hour. The MOT used data from the Insurance Corporation of British Columbia to determine accident rates. The statistics used included all accidents involving vehicles, pedestrians and cyclists.	No further information required for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>6. Aesthetics</b>		
<p>Existing viewpoints should be enhanced and additional viewpoints developed.</p> <p>Opportunity to access natural attractions such as Murrin, Shannon Falls, Squamish Chief, Garibaldi Provincial Park and Alice Lake should be considered in the design of highway upgrades.</p> <p>A premium should be placed on aesthetics when considering elements such as street furniture, landscaping and signage. (DoS)</p>	<p>The MoT is currently selecting a design consultant for the urban Squamish section of the highway improvements. The District's objectives were captured in the Terms of Reference for this assignment and CSD guidelines will be used in the design development. The Project team will work closely with the District to ensure these objectives are addressed in the processes. <b>EAO Note:</b> <i>Since this response was provided the MoT has committed to commission a landscape design consultant to work closely with the District of Squamish on the urban Squamish section of the highway improvements, and with the Squamish Nation on Stawamus IR#24. The MoT has also committed to develop and implement detailed mitigative measures, in association with BC Parks, to minimize potential impact to recreation features and amenities at Porteau Cove Provincial Park, Murrin Provincial Park, Shannon Falls Provincial Park and Brandywine Falls Provincial Park. (OCR 11.5 and 15.7)</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>
<p>Squamish is a world renowned destination particularly for rock climbing and wind surfing. Important that these unique resources be fully understood in the design process and that the highway project enhance their exposure and usage. Safe access and ample parking for the Murrin, Malamute and Chief venues should be a design priority. (DoS)</p>	<p><b>EAO Note:</b> <i>The MoT has committed to Conduct further visual quality assessment as required to refine the list of important landscape features and to determine precisely how and if their use should be promoted. (OCR 15.2) (See also above response.)</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>
<p>The EA contains no description of the highway's impacts on the aesthetics of the corridor. Considering the substantial amount of blasting, bridging, and landscape alteration that will accompany the Highway 99 upgrade, this seems to be a substantial omission. The First Nations consider the aesthetics section to be incomplete. (SLFN)</p>	<p>The Application did not describe potential highway impact on the aesthetics of the corridor since design work was ongoing. A Context Sensitive Design document was prepared especially for this corridor and this approach took into account "the preservation of aesthetic resources". The document was developed using the principles of the MoT's <i>Manual of Aesthetic Design Practice</i>. There will be a very conscientious level of aesthetic treatment on this highway." <b>EAO Note:</b> <i>Since then, the MoT has committed to conduct further visual quality assessment as required to refine the list of important landscape features and to determine precisely how and if their use should be promoted. (OCR 15.2)</i></p>	<p>No further information required as part of the EA review</p>
<b>7. Recreation</b>		
<p>EA addresses "industrial tourism" or moving masses of people through an area, encouraging maximum expenditures, and sending them on their way. Unclear how Squamish Nation would benefit from increased number of skiers, golfers, snowmobile users, day-trippers, and other industrial tourists in the corridor. Tourism impacts on the Lil'wat Nation not discussed in Application. (SLFN)</p>	<p>To the extent that impacts on First Nations interests were to be identified, the MoT felt that these issues were more appropriately addressed within the context of the First Nations AIU Studies. Related issues have been identified in these reports and are currently under discussion between the First Nations and government.</p>	<p>No further information required as part of the EA review</p>
<p>To the extent that the Highway 99 upgrade encourages further recreational and industrial tourist use of the First Nations' traditional territory, First Nations consider these impacts significant and adverse. The recreation section lacks any reference to First Nations. (SLFN)</p>	<p>The recreation section is focused on recreational users generally. To the extent that impacts on First Nations interests were to be identified, the MoT felt that these issues were more appropriately addressed within the context of the First Nations AIUS. Related issues have been identified in these reports and are currently under discussion between the First Nations and government.</p>	<p>No further information required as part of the EA review</p>

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>7. Recreation</b>		
<p>There may be significant impacts on the recreational experience in the park. Residual adverse impacts on rock climbs could be avoided by altering the highway design so that blasting to accommodate three (or four) lanes would not be needed in the vicinity of Murrin Park. Did MoT consider eliminating the northbound left turn lane into the park during the Olympics to accommodate three lanes? (SLFN)</p>	<p>The MoT recognizes the recreation value of Browning Lake and the rock bluffs within Murrin Park. A recreational focus group has recently been established to exchange information, identify all recreation values along the corridor and develop solutions to enhance recreation values where feasible and mitigate impacts where unavoidable. These discussions are ongoing and will continue through to detailed design with the goal of minimizing impacts to the Murrin Park to the fullest extent possible. <b>EAO Note:</b> <i>The MoT has also committed to develop and implement detailed mitigative measures, in association with BC Parks, to minimize potential impact to recreation features and amenities at Porteau Cove Provincial Park, Murrin Provincial Park, Shannon Falls Provincial Park and Brandywine Falls Provincial Park. (OCR 11.5)</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>
<p>A clear commitment by MoT to conduct the recommended mitigation of impacts to upland recreation would be desirable, and should be contained in the recreation section itself. (SLFN)</p>	<p>An iterative design and review process serves to explore options to avoid impacts as a first goal, then to mitigate impacts as needed. The MoT is consulting further with BC Parks and other recreation stakeholders to address specific areas of concern as continuing design work provides more detailed information on possible options for impact avoidance and mitigation. Clear commitments will flow from these consultations. <b>EAO Note:</b> <i>See also above response.</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>
<p>Roadside (e.g., Shannon Falls), Front Country (Murrin Park), and backcountry areas (such as Garibaldi Lake) already face serious overuse and crowding problems during the summer season. The Application fails to examine the compounding affects of increased traffic and development on the (a) quality of the recreational experience, (b) the carrying capacity of these parks, or (c) ecological effects of overuse of the parks. Increased backcountry and frontcountry recreational use is a concern to the First Nations. (SLFN)</p>	<p>MoT's viewpoint is that these issues fall outside the scope of this review. The Upland Recreation Assessment does not address the potential impact of recreation activity on other values (e.g. ecological values, other land uses), nor does it discuss the associated concept of "carrying capacity". The study is focused on highway improvement-related effects on recreation values. <b>EAO Note:</b> <i>The MoT has also committed to develop and implement detailed mitigative measures, in association with BC Parks, to minimize potential impact to recreation features and amenities at Porteau Cove Provincial Park, Murrin Provincial Park, Shannon Falls Provincial Park and Brandywine Falls Provincial Park. (OCR 11.5)</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>
<p>The report should include the results of discussions between the MoT, BC Parks and private recreational groups regarding mitigation for impacts on Porteau Cove Provincial Park, Murrin Provincial Park, Shannon Falls Provincial Park, and Brandywine Falls Provincial Park and a commitment by the MoT to implement such mitigation measures. (SLFN)</p>	<p>Discussions have not yet concluded. Three meetings were held in the past nine weeks. Site-specific concerns can now be discussed with greater resolution given continuing design work and exchange of information with BC Parks. For example, encroachment on the Cypress Provincial Park boundary will be avoided at one location where there was previously an encroachment. The MoT also has initiated a direct consultation process with recreation stakeholder groups. MoT and BC Parks will be finalizing a letter of agreement on park issues and mitigation in December 2003. <b>EAO Note:</b> <i>Since this comment was provided, the MoT has committed to continue to consult with recreation industry and user representatives about issues that affect their interests, and ensure that, whenever feasible, adverse impacts are avoided or mitigated. (OCR 11.1)</i></p>	<p>Satisfactorily addressed for the purposes of the EA review</p>

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>7. Recreation</b>		
The possible impacts the proposed project will have on back-country recreation demand including an assessment of increased pressure that the higher corridor population will place on use of back-country areas that are currently stewarded by the TWFN. (TWFN)	This level of analysis is beyond the scope of potential project related impacts and the associated EA review process. Project related issues have been assessed in the Upland Recreation Assessment contained within the EA Application.	No further information required as part of the EA review
Commitment to mitigative measures to control potential for increased number of people living in the Squamish area accessing privately held TWFN land in the Indian River valley. Proposed measures include gating access to the Indian River valley, and provision of funding for patrolling sensitive cultural and fish habitat areas (TWFN)	It is not clear to the MoT how the proposed project will result in increased access or damage to the above noted areas. As such, MoT is of the view that the requested measures are related to impacts beyond the scope of the proposed highway upgrade. However, the MoT is willing to discuss this issue in more detail with the Tsleil-Waututh First Nation to better determine the need for, and appropriateness of the requested measures.	No further information required as part of the EA review
<b>8. Economic</b>		
The Application does not provide information on the economic impacts to visitor and tourist spending from the operations phase of the highway and states that highway upgrades could affect the quality of the resort experience and that “this issue is beyond the ability of the MOT to mitigate” (page 137). Should analyze the potential benefits of the improved highway access to Whistler and compare with potential negative impacts on traffic congestion in the Village and loss of tourism from overcrowding. (RMOW)	The implied concern with the observation in the draft report was that “congestion could affect the quality of the resort experience” and that “This is an issue that is beyond the ability of the Ministry of Transportation to mitigate.” The Application was revised to acknowledge that means of dealing with congestion and traffic volume increase will be addressed through the ongoing Whistler Resort Transportation Planning Study being undertaken jointly by the Resort Municipality of Whistler and MoT. This transportation planning study will further define how the transportation infrastructure will help to achieve community growth objectives.	No further information required for the purposes of the EA review
The economy and labour force sections of the assessment say nothing about conditions on First Nations reserves or about First Nations people. (SLFN)	It was felt that this information would be provided within the AIUS reports and would be more appropriately reflected therein.	No further information required for the purposes of the EA review
Project construction expected to generate \$183 million in government revenues. The EA does not discuss what proportion of these revenues, if any, would or could flow to First Nations. (SLFN)	The MoT is of the view that the environmental assessment Application is not the appropriate forum to address such issues. The MoT suggests that First Nations raise this issue in other forums as appropriate.	No further information required for the purposes of the EA review
The EA lacks a statement of MoT procurement policy and procedures. The First Nations would like a specific commitment to jobs and economic benefit from highway construction. (SLFN)	MoT is of the view that the EA Application is not the appropriate venue to discuss any such commitments. Discussions related to possible economic opportunities associated with construction of the highway are underway and will continue within the context of the First Nations AIUS submissions.	No further information required for the purposes of the EA review
No mention is made of First Nations and their aspiration to be involved in direct award or similar participation in the construction of proposed project route. (TWFN)	An EA Application is not the appropriate venue to discuss potential details of this nature. The interests of the Tsleil-Waututh First Nation in this aspect of the project are mentioned on numerous occasions within the First Nations Consultation section of the Application.	No further information required as part of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>8. Economic</b>		
The impacts of population growth—its location, demand for housing, services, jobs, resources—are not examined, even though the study presents the increase as an induced impact of the highway upgrade. (SLFN)		No further information required as part of the EA review
The project will put upward pressure on already high land and cost-of-living values in the corridor. An assessment is required of impacts this growth will have on access aboriginal people will have to housing, employment and other services in the corridor. (TWFN)	This level of analysis is beyond the scope of potential project related impacts and the associated EA review process.	No further information required as part of the EA review
How much of predicted \$297 million in increased economic activity between 2010 - 2025 might accrue to the First Nations? (SLFN)	<b>EAO Note:</b> <i>This issue has been resolved through accommodation discussions.</i>	No further information required as part of the EA review
The basis for statements about potentially significant and positive impact on the Sea-to-Sky University, Garibaldi Resort, and the 2010 Olympic Winter Games is not explained. Without an accommodation or other agreement with the First Nations for these other developments it is inappropriate to impacts “positive” for First Nations. (SLFN)	<i>EAO Note: Point of Information</i>	
Concerns about impact of highway construction on the local economy. A comprehensive and open consultation process should be undertaken well in advance of commencing major construction projects. (DoS)	The MOT design requirements include development of concepts that minimize traffic impacts during construction. Project team will consult with the communities to better understand the impacts and develop strategies that mitigate these impacts to the extent possible. Project team will also develop an effective communications plan to keep the public fully apprised of closures and delays. <b>EAO Note:</b> <i>Since this comment was provided, the MoT committed to develop and implement a pro-active overall communications strategy to coordinate construction work, communications and stakeholder dialogue. This will include liaison with First Nations, municipalities, businesses, Chambers of Commerce, and tourism associations about schedules for construction and special events and working with businesses to examine adjustments to work schedules during closure periods. (OCR 7.5)</i>	Satisfactorily addressed for the purposes of the EA review
Negative impact of closures and delays to workforce, tourism and economy. This concern includes multiple delays and/or closures. (ELD)	The RMOW is currently undertaking a joint planning study with the MoT to identify transportation improvements within the urban area. The municipality certainly strongly support travel demand management and alternate modes of travel. (See also above response)	Satisfactorily addressed for the purposes of the EA review
Increasing development in auto-dependent bedroom communities, where residents must drive long distances to and from work every day is inconsistent with the vision, policies, and goals of the Livable Region Strategic Plan adopted by the GVRD and all of its member municipalities, and of the Squamish Nation’s Xay Temixw (Sacred Land) – Land Use Plan and the Lil’wat Cultural, Heritage, Resource, Protection Plan. (SLFN)	<b>EAO Note:</b> <i>Point of Information</i>	No further information required as part of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>9. Surplus Rock</b>		
It has been suggested that ocean disposal of surplus rock is being contemplated. The District may have a number of uses for this rock as an option to ocean disposal. (DoS)	<i>EAO Note: Point of Information</i>	No further information required as part of the EA review
The First Nations have expressed an interest in obtaining surplus rock for a variety of uses in their territories, and request a right of first refusal for all surplus rock. (SLFN)	<b>EAO Note:</b> <i>This concern was assigned to accommodation negotiations.</i>	No further information required as part of the EA review
<b>10. Property Tenure</b>		
This brief section of the report notes that MoT is “assembling, quantifying and qualifying all of the property tenure documents for the Highway 99 corridor” (page 1). No impact assessment findings are presented in this section, nor are any mitigation measures stated. (SLFN)	<b>EAO Note:</b> <i>The reporting in the Application on Property tenure is satisfactory.</i>	No further information required as part of the EA review
<b>11. Property Acquisition Process</b>		
The MoT should not assume that the Squamish Nation will provide approval of the highway crossing of IR#24 under the First Nation Land Management Act land code. (SLFN)	The MoT is committed to working cooperatively with the Squamish Nation, and other government agencies as appropriate, to arrive at a timely and mutually satisfactory resolution to the right-of-way through IR#24.	No further information required as part of the EA review
<b>12. Archaeological Issues</b>		
The First Nations would be interested in obtaining any culturally modified trees that need to be cleared. The trees could be used for ceremonial and traditional construction purposes.	This issue has been raised within the context of the AIUS and related discussions are ongoing. <b>EAO Note:</b> <i>This concern was assigned to accommodation negotiations. (See also Nations OCR 12.4 and 12.8)</i>	No further information required as part of the EA review
The Ministry commits to “develop measures to minimize vandalism” where the highway provides improved access to known archaeological or historical sites. The First Nations would like to know what kinds of measures might be available, feasible, and acceptable to the Ministry. The MoT does not commit in this section to narrow the road right-of-way through Murrin Provincial Park to reduce blasting impacts on the slopes to the east of the highway. (SLFN)	The commitment in the Application reads “...where highway widening provides improved access to a site of known archaeological or historical significance, working cooperatively with the First Nation(s) that have an interest in the site, as well as the responsible government agencies, to develop measures to minimize vandalism”. Issue of protecting known sites has been raised in the context of the AIUS. The MoT has committed to further exploring options/opportunities to protect these sites from potential project related impacts. <b>EAO Note:</b> <i>Since this comment was provided the MoT has committed that where highway widening provides improved access to a site of known archaeological or historical significance, the MoT will work cooperatively with the First Nation(s) that have an interest in the site, as well as the responsible government agencies, to develop measures to minimize impacts related to over use and/or vandalism. The MoT will also facilitate discussion between the Province and the First Nations to identify steps that can be taken by BC Parks to protect the pictograph site in Murrin Provincial Park from impacts from rock climbing and vandalism. (OCR 12.3 and 12.5)</i>	Satisfactorily addressed for the purposes of the EA review

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>12. Archaeological Issues</b>		
The TWFN has prepared an independent assessment of impacts of project on cultural heritage resources titled "A Cultural Heritage Resource Study of the Sea-to-Sky Highway Corridor. The TWFN would like the Ministry to make a commitment of funding to implement the findings reported on page 67-68 of this study. (TWFN)	Based on a review of "A Cultural Heritage Resource Study of the Sea-to-Shy Highway Corridor", the MoT is of the view that the proposed project will have little bearing on the majority of the issues raised. However, MoT is willing to further discuss the Report's recommendations to determine whether there are appropriate means by which to address the issues raised.	No further information required as part of the EA review
<b>13. Process Issues</b>		
The EA has focused on the direct impact of the highway, and included indirect and induced benefits, but it has not included indirect and induced development impacts and their potential negative effect on the First Nations, the environment, utilities, services, and the livability of the Sea-to-Sky corridor. (SLFN)	<b>EAO Note:</b> <i>This issue is beyond the scope of the EA review. Regarding induced Project effects and the cumulative effects assessment, the Canadian Environmental Assessment Agency wrote to the SLFN on January 20, 2004 to advise that CEEA does not require assessment of induced growth unless the type of projects, the area of impact and the environmental components that would be affected could reasonably be identified and are likely to interact with the Project.</i>	No further information required as part of the EA review
Commit that public consultation with the Sea-to-Sky communities will continue as each stage of the project is permitted. (Mayors)	The MoT is committed to ongoing consultations with residents, businesses, tourism sector and corridor communities at key milestones throughout the project.	No further information required as part of the EA review
With compressed project timelines the processes for public and stakeholder consultation on substantive issues have not moved forward with a similar level of urgency. (DoS)	<b>EAO Note:</b> <i>Point of Information.</i>	No further information required as part of the EA review
The project submission for Environmental Assessment Certification is little changed from the initial concept proposed by the Project Team. (West Van)	Preferred option is a couplet operation with a short (1.0 km to 1.4 km in length) tunnel for northbound Highway 99 traffic, and existing Highway 99 for southbound traffic. Preliminary design has northbound lanes converging with existing highway near Pasco Road, provides opportunity for direct northbound opportunities to Pasco Road residents and avoids encroaching on Cyprus Provincial Park. This option was not included in the Application, but the MoT has provided this information to the District. <b>EAO Note:</b> <i>Since this comment was provided, the MoT undertook additional consultation and design work on options for the alignment in West Vancouver. The results are reported in the West Vancouver Clarification Report and were reviewed by the BTWG and the SEWG.</i>	No further information required as part of the EA review
It is unacceptable to have an agency of the BC government agency (BC EAO) assessing a project of BC MoT. The potential for conflict of interest is too high, especially with an EA Act that is open at several levels to Ministerial political intervention. Until the EA Act is revised to create independent project review panels the EA process in BC will remain fundamentally flawed. (TWFN)	<b>EAO Note:</b> <i>Under the EA Act, the EAO is responsible to establish the scope procedure and methods for an environmental assessment. During an environmental review, the EAO relies on technical advice from working groups to assess the impacts of a proposed development. The EAO does not decide whether to issue an environmental assessment certificate. This decision is made by provincial ministers.</i>	N/A

COMMENT/ ISSUE	MINISTRY OF TRANSPORTATION RESPONSE	EA STATUS
<b>13. Process Issues</b>		
Issues around Aboriginal Title and the need to provide information on the impacts that the Ministry considered the project will have on aboriginal title, as well as an outline of possible revenue sharing strategies that might be associated with the project that would compensate the TWFN for damage to present and proposed highway route has caused to TWFN traditional lands. (TWFN)	In preparing the Application, the MoT and the EAO have met the <i>Provincial Policy for Consultation with First Nations</i> (2002) as well as the EAO Guidelines regarding First Nation consultation.	No further information required as part of the EA review
<b>14. Other</b>		
The report states that “there are two First Nation communities located in the study area, Squamish IR Stawamus #24, which is in closest proximity to the highway, and Lil’wat (or Mt. Currie).” This statement ignores the other Squamish Nation reserves located in the Highway 99 corridor. Later in the report, however, Section 2.3.2 notes that “there are nine First Nation reserves located within the District of Squamish.” The report further states that “these reserves represent approximately four percent of the municipality’s land area” (page 15), even though the reserves are not part of the District of Squamish. (SLFN)	<b>EAO Note:</b> <i>Point of Information. This error is not repeated in subsequent reporting and is noted in the SEWG minutes of February 12, 2004</i>	No further information required as part of the EA review
Any future applications submitted within the BC <i>Environmental Assessment Act</i> process that are located within TWFN traditional territory include proposals for a significant level of economic participation by the TWFN. (TWFN)	<b>EAO Note:</b> <i>The environmental assessment process includes opportunities for any First Nations with asserted traditional territory in the vicinity of a project to participate in the environmental assessment review.</i>	No further information required as part of the EA review