

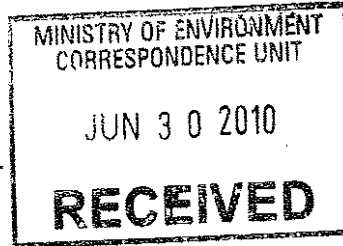


Making a difference...together

25 June 2010

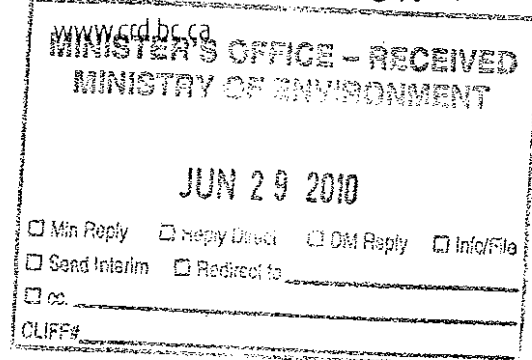
The Honourable Barry Penner
Minister of Environment
PO Box 9047 Stn Prov Govt
Victoria, BC V9W 9E2

Capital Regional District
625 Fisgard Street, PO Box 1000
Victoria, BC, Canada V8W 2S6



T: 250.360.3000
F: 250.360.3234

ERV1



CLIFF#
Xref 119340 + 118392

Dear Minister Penner:

RE: CAPITAL REGIONAL DISTRICT CORE AREA LIQUID WASTE MANAGEMENT PLAN – AMENDMENT NO. 8

On behalf of the Capital Regional District (CRD) it is my pleasure to submit Amendment No. 8 (binder attached) to the Core Area Liquid Waste Management Plan. Amendment No. 8 builds on information submitted to you in Amendment No. 7 and addresses all of the issues raised in your letter dated 09 February 2010, including the following:

1. *Identify the site(s) for treatment of Westshore wastewater*

A site was identified for a wastewater treatment plant on the Westshore on Wishart Road in Colwood, adjacent to the Colwood City Hall. The site was evaluated through an environmental impact study (EIS) and a public consultation process was conducted, as described in Sections 8 and 10 of the Amendment. It was concluded, however, that a treatment plant at this location could be deferred to a second phase of the project when capacity at the McLoughlin plant was no longer sufficient to accommodate growth on the Westshore. The EIS and public consultation reports referred to above are available on request.

2. *Identify site(s) for biosolids processing*

Two sites have been evaluated for biosolids processing, one at upper Victoria Harbor and one at Hartland landfill. As agreement could not be reached regarding the acquisition of the Upper Victoria Harbour site, Hartland landfill continues to be the proposed site for biosolids processing. An environmental impact study for the proposed McLoughlin Point treatment plant and Hartland biosolids processing facility is appended to Section 8 of the Amendment.

3. *Environmental impact studies for the selected sewage treatment facility sites*

An environmental impact study (EIS) has been completed for the proposed facilities at McLoughlin Point and Hartland landfill and the EIS document is appended to Section 8 of the Amendment.

4. *A progress report on marine environmental impact assessment work carried out on the selected new outfall locations*

Section 9 of the Amendment includes an update on the marine environmental impact assessment work being carried out on potential outfall locations at the Westshore and Saanich East. This work is being modified to take account of the deferment of treatment plants at these locations.

5. *The final draft operational certificates for selected sewage treatment facilities*

A draft operational certificate for the selected sewage treatment facility at McLoughlin Point is provided in Section 12 of this Amendment.

6. *An updated public and First Nations consultation summary report*

The requested report is provided in Section 10 and in Appendix H to Section 10.

7. *A copy of the business case, submitted by the CRD to the Ministry of Community and Rural Development, including the results of the assessment of public/private partnerships and procurement details*

As indicated in Section 11, the business case in support of the application for provincial funding was submitted to the Honourable Bill Bennett, Minister of Community and Rural Development on 31 March 2010. A copy of the business case was also provided to the Honourable Barry Penner, Minister of Environment. A revision to the provincial business case is currently being prepared to incorporate the changes resulting from Amendment No. 8.

Your letter also requested the CRD to "reconsider the opportunities to beneficially use biosolids as a fertilizer and soil amendment product" and to "develop an emergency contingency plan to handle biosolids." As Amendment No. 7 contained a commitment to complete and submit to the ministry by the end of 2010 a "Resource Recovery and Use Plan" it is proposed to respond to the above request in this document.

You also noted the need for "investigating priorities and opportunities to phase the project components." This is addressed in Amendment No. 8 as follows:

Clover Point Wet Weather Treatment Plant

Stantec Consulting Ltd. carried out a comprehensive review of the benefits and costs of a wet weather treatment plant at Clover Point. The main finding was that, by diverting flows of up to 3 times the average dry flow from Clover Point to McLoughlin Point for treatment, the annual solids loading discharged at Clover Point would be reduced by about 99%. It was therefore concluded that a Clover Point wet weather treatment plant that would remove the last 1% loading at a capital cost of \$27 million and an annual operating cost of \$600,000 would not provide good value for money. Amendment No. 8 therefore removes from the LWMP the commitment to provide a wet weather treatment plant at Clover Point until such time as there is a demonstrated environmental need for this facility

Westshore Treatment Plant at Wishart Road in Colwood

Amendment No. 7 proposed construction of a treatment plant in the Westshore. Subsequently CRD staff worked with Colwood and Langford to determine the location and required size of such a treatment plant. It was concluded that the plant should be at Wishart Road in Colwood and have a capacity of 7 ML/d with an additional 7 ML/d capacity to be provided at the proposed central treatment plant at McLoughlin Point. Further analysis has concluded that the McLoughlin plant can be modified to provide sufficient capacity to accommodate all sewage generated on the Westshore until about 2030, depending on the population growth rate, the rate at which existing homes and businesses are connected to the sewer system and the rate at which per-capita water consumption continues to decline.

Saanich East-North Oak Bay Treatment Plant

Amendment No. 7 proposed construction of a treatment plant at Saanich East-North Oak Bay. Further analysis has concluded that the McLoughlin Plant can be modified to provide sufficient capacity to accommodate all sewage generated in Saanich East for the foreseeable future. However, wet weather flow attenuation tanks will be required at this location to ensure the transmission of all Saanich East flows to McLoughlin Point for treatment.

In summary, the system configuration proposed in Amendment No. 8 includes a treatment plant at McLoughlin Point with biosolids processing at Hartland landfill. This configuration results in a reduced system capital cost of \$782,685,800 and a reduced annual operating cost of \$14,571,200.

The CRD remains committed to pursuing the following project goals:

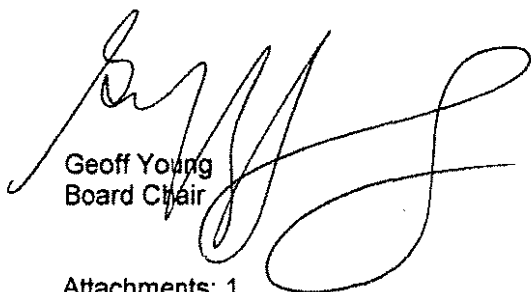
- Meet the regulatory requirements for wastewater treatment.
- Optimize the beneficial reuse of resources and the integration of solid and liquid waste planning.
- Ensure that all sludge generated by the proposed facilities is appropriately treated and managed in accordance with the Municipal Sewage Regulation and the Organic Matter Recycling Regulation.
- Implement a strategy for the management of wet weather flows that includes a cost effective combination of flow reduction, storage and treatment.
- Minimize the total project cost to taxpayers.
- Aggressively pursue opportunities to minimize the generation of greenhouse gases and achieve a net negative carbon footprint for the entire system.
- Complete all works by the end of 2016 on the premise of one-third capital funding of eligible costs from both the federal and provincial governments.

The CRD will continue to explore options to further improve the proposed system configuration to ensure that it is the most cost effective solution that will meet environmental and social needs and comply with provincial and federal regulations.

In the meantime, your approval of Amendment No. 8 to the Capital Regional District Core Area Liquid Waste Management Plan would be appreciated.

Should you or your ministry staff have any questions about the attached documents, please have your staff contact Jack Hull, General Manager, Integrated Water Services by telephone at 250-360-3092 or by e-mail at jhull@crd.bc.ca.

Yours sincerely,



Geoff Young
Board Chair

Attachments: 1

cc: CRD Board of Directors
Honourable Ben Stewart, Minister of Community and Rural Development
Randy Alexander, Regional Environmental Protection Manager, Ministry of Environment
Kelly Daniels, Chief Administrative Officer, CRD
Jack Hull, General Manager, Integrated Water Services, CRD



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xref: 127603, 125559
125340
COPY

25 June 2010

The Honourable John Baird
Minister of Transport, Infrastructure and Communities
Tower C, 330 Sparks Street
Ottawa, Ontario, K1A 0N5

Honourable Minister Baird:

MINISTER'S OFFICE - RECEIVED
MINISTRY OF ENVIRONMENT

JUL 05 2010

☐ Min Reply ☐ Reply later ☐ Did reply ☒ None

☐ Send Interim ☐ Redirect to _____

☐ cc: _____

CLIFF# _____

**RE: BUSINESS CASE IN SUPPORT OF APPLICATION FOR FEDERAL FUNDING -
MCLOUGHLIN OPTION - CAPITAL REGIONAL DISTRICT CORE AREA AND WESTSHORE
WASTEWATER TREATMENT PROGRAM**

The Capital Regional District (CRD) submitted to you the final details of the business case in support of the CRD application for federal funding for the Core Area and Westshore wastewater treatment program in April of this year.

The CRD has since been in the process of revising the wastewater treatment to reduce project costs.

The CRD Board, at its meeting of 23 June 2010, approved the following recommendation:

1. *the business case in support of federal funding submitted 10 December 2009 and amended 31 March 2010 be further amended as outlined in the Summary of Eligible and Ineligible Costs (Appendix A) and the Detailed Cost Estimates (Appendix B - Not publically released), as detailed in the Liquid Waste Management Plan Amendment No. 8; and*
2. *that the amended plan be submitted to the Minister of Transport, Infrastructure and Communities for federal funding consideration.*

The federal government's ongoing support has been critical in getting us to where we are today. It will continue to be critical in reaching our final goal of completing this important environmental project on schedule and within budget by the end of 2016.

We look forward to your review of our application and to a positive response.

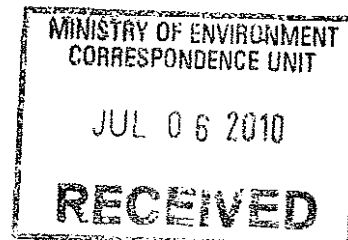
Should you or your ministry staff have any questions about the attached documents, please have your staff contact Jack Hull, Interim Project Director, Core Area Wastewater Treatment, by telephone at 250-360-3092 or by e-mail at jhull@crd.bc.ca

Yours sincerely,

Geoff Young
CRD Board Chair

Attachments: 1

c ~~Honourable Barry Penner, Minister of Environment~~
Honourable Ben Stewart, Minister of Community and Rural Development





Making a difference...together

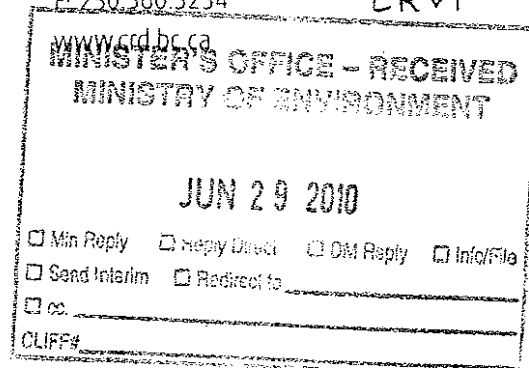
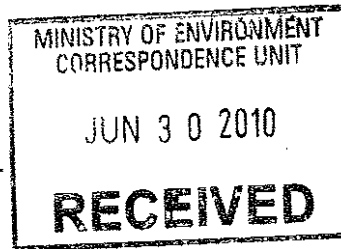
Capital Regional District
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ERV1

25 June 2010

The Honourable Barry Penner
Minister of Environment
PO Box 9047 Stn Prov Govt
Victoria, BC V9W 9E2



☐ Min Reply ☐ Reply Direct ☐ DM Reply ☐ Info/File
☐ Send Interim ☐ Redirect to
☐ cc
CLIFF#

119340 + 118392

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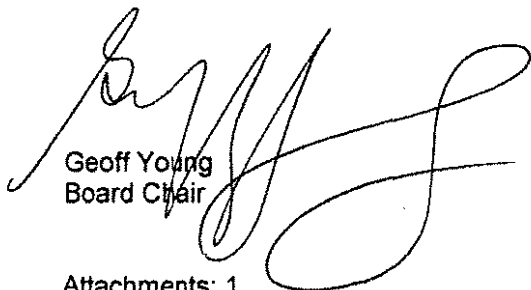
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The CRD will continue to explore options to further improve the proposed system configuration to ensure that it is the most cost effective solution that will meet environmental and social needs and comply with provincial and federal regulations.

In the meantime, your approval of Amendment No. 8 to the Capital Regional District Core Area Liquid Waste Management Plan would be appreciated.

Should you or your ministry staff have any questions about the attached documents, please have your staff contact Jack Hull, General Manager, Integrated Water Services by telephone at 250-360-3092 or by e-mail at jhull@crd.bc.ca.

Yours sincerely,



Geoff Young
Board Chair

Attachments: 1

cc: CRD Board of Directors
Honourable Ben Stewart, Minister of Community and Rural Development
Randy Alexander, Regional Environmental Protection Manager, Ministry of Environment
Kelly Daniels, Chief Administrative Officer, CRD
Jack Hull, General Manager, Integrated Water Services, CRD

**REPORT TO CORE AREA LIQUID WASTE MANAGEMENT COMMITTEE
MEETING OF WEDNESDAY 23 JUNE 2010**

SUBJECT **REVISED BUSINESS CASE IN SUPPORT OF FEDERAL FUNDING – MCLOUGHLIN
OPTION – CORE AREA WASTEWATER TREATMENT PROGRAM**

PURPOSE

To amend the business case in support of federal funding for the Core Area Wastewater Treatment Program as outlined in the Core Area Liquid Waste Management Plan (LWMP) Amendment No. 8.

BACKGROUND

The business case in support of the application for federal funding of the Core Area and Westshore Wastewater Treatment Program was submitted 10 December 2009 to the Honourable John Baird, Minister of Transport, Infrastructure and Communities. An amendment to that application was submitted 31 March 2010 to include the proposed Westshore treatment plant.

It is now proposed to provide the federal Ministry of Transport, Infrastructure and Communities with the updated wastewater treatment strategy as outlined in the LWMP Amendment No. 8. This revised information for the business case in support of federal funding document is included in the *Summary of Eligible and Ineligible Costs* (Appendix A).

ALTERNATIVES

1. That the CALWMC recommend to the Board that the business case in support of federal funding submitted 10 December 2009 and amended 31 March 2010 be further amended as outlined in the *Summary of Eligible and Ineligible Costs* (Appendix A) and the *Detailed Cost Estimates* (not publicly released), to match the system configuration detailed in the LWMP Amendment No. 8; and that the amended plan be submitted to the Minister of Transport, Infrastructure and Communities for federal funding consideration.
2. That the CALWMC not amend the business case in support of federal funding.

FINANCIAL IMPLICATIONS

The most recent version of Option 1A as outlined in the existing federal application has a total capital cost of \$960.8 million. The Option 1A has been revised in LWMP Amendment No. 8 to defer the Westshore wastewater treatment plant (WWTP) for about 15 years, to construct storage tanks in Saanich East-North Oak Bay instead of a WWTP, and the Clover Point wet weather facility has been eliminated, pending approval from the Provincial Ministry of Environment. This treatment strategy, the McLoughlin Option, will result in a reduction in cost for both the core area and the Westshore for a total project cost of \$782.7 million.

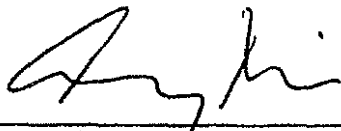
SUMMARY

As the LWMP Amendment No. 8 is now the selected wastewater treatment strategy, a revision is required to the business plan submitted to the Government of Canada on 10 December 2009 and amended 31 March 2010.

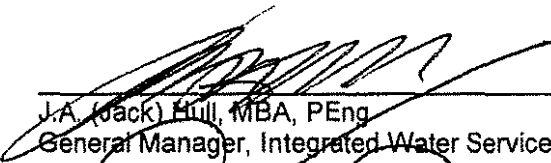
RECOMMENDATIONS

That the Core Area Liquid Waste Management Committee recommend to the Board that:

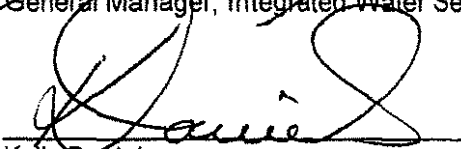
1. the business case in support of federal funding submitted 10 December 2009 and amended 31 March 2010 be further amended as outlined in the *Summary of Eligible and Ineligible Costs* (Appendix A) and the *Detailed Cost Estimates* (not publicly released), to match the system configuration detailed in the Liquid Waste Management Plan Amendment No. 8; and
2. that the amended business case be submitted to the Minister of Transport, Infrastructure and Communities for federal funding consideration.



Tony Brcic, PEng
Project Manager, Core Area Wastewater Treatment



J.A. (Jack) Hull, MBA, PEng
General Manager, Integrated Water Services



Kelly Daniels
CAO Concurrence

COMMENTS

TB:jta
Attachment: 1

B. SUMMARY OF ELIGIBLE AND INELIGIBLE COSTS

The Section B, *Summary of Eligible and Ineligible Costs*, submitted with the business case in support of funding, dated 09 December 2009, and amended 31 March 2010, is replaced with the following. The revised configuration includes a centralized treatment facility at McLoughlin Point in Esquimalt, a separate biosolids treatment facility at the Hartland landfill, storage tanks at Saanich East-North Oak Bay instead of a wastewater treatment plant and deferral of the Westshore wastewater treatment plant.

The Capital Regional District (CRD) engineering advisors, Stantec Consulting Ltd., have prepared cost estimates for the Core Area Wastewater Treatment Program, McLoughlin Option. The cost estimates are deemed to be at the Class "C" level and include contingences which will be clarified in coming weeks and months as due diligence continues on the Programs.

B.1 TOTAL COMBINED PROGRAM ELIGIBLE COSTS

Description	Core Area Program Costs
Design/Engineering and Construction	\$631,250,000
Administration, Program Management and Miscellaneous	\$43,912,900
Preliminary Inflation Estimate	\$67,516,300
Total Eligible Costs	\$742,679,200
Land Purchase	\$13,000,000
Interim Financing Estimate	\$27,006,600
Total Ineligible Costs	\$40,006,600
TOTAL COSTS (Eligible and Ineligible)	\$782,685,800

* Costs exclude impact of HST which may add a further 1.75% (non-refunding component) or +/- \$16 million

B.2 ASSUMED FUNDING SOURCES

This table summarizes the requested funding contribution from the BCF-MIC. CRD assumes two-thirds of Eligible Costs will be funded by the Province of BC and Government of Canada, with the CRD funding the remaining one-third Eligible Costs plus all Ineligible Costs. Ineligible Costs included in this calculation include interim financing costs during construction plus land acquisitions.

	Core Area Program Costs
CRD Contribution (1/3 Eligible Costs + Ineligible Costs)	\$287,566,332
Provincial Contribution (1/3 Eligible Costs)	\$247,559,734
Government of Canada Contribution (1/3 Eligible Costs)	\$247,559,734
Total Contributions	\$782,685,800

Appendix A – Summary of Eligible and Ineligible Costs
Page 2

B.3 ANNUAL FUNDING REQUIREMENTS AND CONTRIBUTIONS

This table illustrates preliminary estimates of annual spending on each major component of the Combined Programs. For the purposes of this Business Case, it is assumed all funding contributions will occur during the construction phase of the Combined Program.

Fiscal years ending March 31

	2010	2011	2012	2013	2014	2015	2016	2017	TOTALS
Construction and Engineering									
Saanich East Storage		\$1,400,000			\$210,000	\$10,187,000	\$10,187,700		\$21,984,700
Clover Point Conveyance	\$500,000	\$1,682,000	\$4,000,000	\$16,031,000	\$21,850,000	\$13,153,800	\$500,000		\$57,716,800
McLoughlin Point WWTP	\$3,000,000	\$9,642,000	\$10,642,000	\$83,974,000	\$83,974,000	\$83,974,000	\$47,878,100		\$323,084,100
Biosolids Facility	\$1,500,000	\$8,433,000	\$29,797,000	\$69,029,000	\$69,029,000	\$48,654,000	\$2,022,400		\$228,464,400
Administration, Project Management and Miscellaneous	\$2,300,000	\$7,200,000	\$8,000,000	\$8,000,000	\$8,000,000	\$6,000,000	\$4,412,900		\$43,912,900
Inflation Estimates	\$100,000	\$1,298,000	\$3,146,000	\$14,166,000	\$18,485,000	\$19,496,000	\$10,825,300		\$67,516,300
TOTAL ELIGIBLE COSTS	\$7,400,000	\$29,655,000	\$55,585,000	\$191,200,000	\$201,548,000	\$181,464,800	\$75,826,400		\$742,679,200
Land	\$7,000,000	\$6,000,000							\$13,000,000
Interest Costs	\$135,000	\$540,000	\$4,051,000	\$5,455,000	\$4,807,000	\$5,752,000	\$6,266,600		\$27,006,600
SUB-TOTAL INELIGIBLE COSTS	\$7,135,000	\$6,540,000	\$4,051,000	\$5,455,000	\$4,807,000	\$5,752,000	\$6,266,600		\$40,006,600
TOTAL COSTS	\$14,535,000	\$36,195,000	\$59,636,000	\$196,655,000	\$206,345,000	\$187,716,800	\$82,093,000		\$782,685,800

Annual Contributions

	2010	2011	2012	2013	2014	2015	2016	2017	TOTALS
CRD share	\$9,601,666	\$16,425,000	\$22,579,334	\$69,188,334	\$71,989,666	\$66,240,266	\$31,542,066		\$287,566,332
Province of BC share	\$2,466,667	\$9,885,000	\$18,528,333	\$63,733,333	\$67,182,667	\$60,488,267	\$25,275,467		\$247,559,734
Government of Canada share	\$2,466,667	\$9,885,000	\$18,528,333	\$63,733,333	\$67,182,667	\$60,488,267	\$25,275,467		\$247,559,734
TOTAL	\$782,685,800								

B.4 COST OF EACH MAJOR COMPONENT OF THE COMBINED PROGRAM

This table illustrates the cost of each wastewater treatment plant (WWTP) and the biosolids facility, as well as the cost sharing assumed for each major component:

Description	Saanich East Storage	Clover Point Conveyance	McLoughlin Point WWTP	Biosolids Facility	TOTAL PROGRAMS
Design/Engineering and Construction	\$21,984,700	\$57,716,800	\$323,084,100	\$228,464,400	\$631,250,000
Administration, Program Management and Miscellaneous	\$1,529,300	\$4,015,100	\$22,475,300	\$15,893,200	\$43,912,900
Preliminary Inflation Estimates	\$2,351,400	\$6,173,200	\$34,555,900	\$24,435,800	\$67,516,300
TOTAL ELIGIBLE COSTS	\$25,865,400	\$67,905,100	\$380,115,300	\$268,793,400	\$742,679,200
Land Purchase	\$7,000,000	-----	\$6,000,000	-----	\$13,000,000
Interim Financing Estimates	\$940,600	\$2,469,300	\$13,822,400	\$9,774,300	\$27,006,600
Total Ineligible Costs	\$11,719,900	\$2,406,600		\$9,774,300	\$40,006,600
TOTAL COSTS (Eligible and Ineligible)	\$33,806,000	\$70,374,400	\$399,937,700	\$278,567,700	\$782,685,800

* Costs exclude impact of HST which may add a further 1.75% (non-refunding component) or +/- \$16 million.

Pages 13 through 15 redacted for the following reasons:

s.16, s.17

130413
130473 ERVI-FYI

O'Brien, Kellie ENV:EX

X-REF: 105625

From: localmla [localmla@uniserve.com]
Sent: Tuesday, June 29, 2010 1:39 PM
To: Minister, ENV ENV:EX
Subject: FW: Sewage Treatment

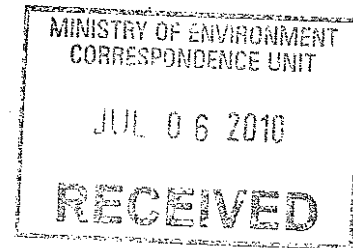
-----Original Message-----

From: s.22
Sent: June-29-10 12:48 PM
To: barry.penner.mla@leg.bc.ca
Subject: Sewage Treatment

It's time your government paid attention to scientists and health professionals who say that Victoria does not need sewage treatment. A billion dollars will be flushed down the drain in an effort to gain a few cheap political points. The money has to be spent on eroding infrastructure before our sewers and roads cave in.

As for the choice of McLoughlin Point by the CRD for the treatment plant is ludicrous to say the least. There was no consultation with the residents, just simply dumped on them because the up-scale neighbourhood in Saanich didn't want it. No rational person would want the treatment plant in the first place because it is a total waste of money and a huge tax burden on homeowners.

s.22





The Best Place on Earth

Reference: 126957

JUN 29 2010

s.22

Dear ^{s.22}

Thank you for your letter of June 4, 2010, responding to my letter of May 27, 2010, regarding the Capital Regional District (CRD) plan for sewage treatment at Haro Woods.

I appreciate your comments regarding the Liquid Waste Management Planning process currently underway by the CRD. The Honourable Barry Penner, Minister of Environment, has directed the CRD to provide a schedule to treat its sewage and a schedule has been approved. It is now the responsibility of the CRD to develop the details supporting the wastewater management strategy using qualified professionals and to provide the details in a liquid waste management plan amendment on or before June 30, 2010. I encourage you to direct any questions and concerns about the qualified professionals retained by the CRD and the technology being chosen to Mr. Jack Hull, Acting Project Director, at 250 360-3192.

You may be aware that in a recent amendment to the wastewater management strategy, the CRD is proposing to eliminate a sewage treatment facility in Saanich East and instead convey all sewage to a new sewage treatment facility at MacLoughlin Point. I encourage you to visit CRD's website at <http://www.wastewatertomadeclear.ca/>, which provides details on the updated strategy.

Thank you again for sharing your concerns.

Yours truly,

Doug Konkin
Deputy Minister

pc: Honourable Ben Stewart, Minister of Community and Rural Development
Jack Hull, Capital Regional District, Acting Project Director

129690
Marshall, Sheena ENV:EX

From: s.22
Sent: Wednesday, June 30, 2010 1:55 PM
To: Minister, ENV ENV:EX ~ written & received
Subject: Sewage treatment plant

ERV1-F41
129690
MINISTRY OF ENVIRONMENT
CORRESPONDENCE UNIT

AUG 05 2010

RECEIVED

Why was Esquimalt not given the same opportunity as Saanich East and Oak Bay communities to engage in plant location discussions before decisions were made? These communities received 14 days of open houses, neighborhood workshops, community validation sessions and special meetings with the Core Area Liquid Waste Management Committee to voice their concerns with a Saanich East plant. Esquimalt residents received 3 day of mainly information sessions. Esquimalt residents were not given the opportunity to seek directly to the Core area Liquid Waste Management Committee. **This is completely unfair and an insult to our community.**

It is unacceptable that the CRD has not sought ANY input from the public regarding this new plan for a single centralized treatment facility. This plan is a complete change of direction from any of the plans previously considered. This is a flawed consultation process.

- We do not consider the open houses on July 6 and July 8 to constitute adequate consultation with Esquimalt residents, especially when considering the magnitude of this plan and the definite impact it will have on our community.
- **A single centralized liquid processing facility to service the entire Capitol Region cannot be built to maximum potential at McLoughlin Point.** Experts have assessed the site as too small and inflexible. The maximum site treatment capacity (108 ML/day) will not be sufficient to deal with the sewage from the expected population in 2030 (124 ML/day). This means the site will reach its operating capacity far before its 14 year design envelope.
- According to CRD documents, the number 1 concern expressed by Esquimalt residents at the last open house was the "McLoughlin site size restrictions". Why is the CRD ignoring the concerns of our community?
- **According to CRD documents, the number 1 ranked general comment received at the last open house in Esquimalt was that "Resource recovery is a priority and requires a proactive approach".** The current plan does not support significant resource recovery and it is not consistent with the directives from the Minister of Environment in this regard. Although the CRD says "opportunities for resource recovery exist for the future", McLoughlin Point can never satisfy resource recovery to the extent that a single larger site, or a more distributed system could provide. This plan represents a huge opportunity lost for not just Esquimalt, but for the entire Capitol Region.
- **The CRD is still contemplating the trucking of sludge through Esquimalt.** Contrary to CRD language, there is no guarantee that sludge will not be trucked, and once the plant is built we will no longer have a voice in this regard. We must insist on specific guarantees now to protect our community in the future.
- **Contrary to CRD language, there is no solid plan for biosolids siting and processing.** Without a detailed plan for biosolids, Esquimalt residents can not even begin to consider the significant impact this centralized treatment facility will have on our community, or engage in mitigation and amenity discussions. On July 6 and July 8 we will be asked to comment on unknown factors that represent a major part of this plan. This is unreasonable.

- **Resource recovery with full integration of liquid, solid and organic wastes would result in large cost savings and significantly supports greater regional sustainability. It is completely irresponsible, and shameful that the CRD even consider embarking on a path that does not maximize resource recovery.**
- **This is the wrong plan for the region. The driving force behind this plan is a deadline to secure provincial and federal funding. Please halt this faulty process and create a plan that makes sense.**

Thank you,

s.22

120401
O'Brien, Kellie ENV:EX

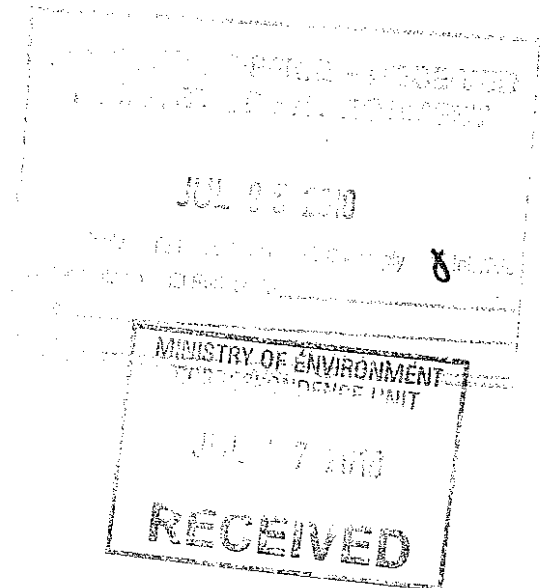
From: s.22
Sent: Wednesday, June 30, 2010 9:14 PM
To: Minister, ENV ENV:EX
Subject: Sewage Treatment.

Dear Sir:

I am SO disappointed in the decision to go with one old-fashioned treatment plant at McLaughlin Point. We have a chance to do it right and surely no one believes that this is the right option. After spending all that time and money studying the possibilities, how could the committee look the citizens of this region in the eyes and say that this is the best way to go? How can trucking the sludge or piping it all the way to the Hartland facility be considered green or sustainable or in any way a solution? It just moves the problem from the sea to the land. Please use whatever powers you possess to stop this option from becoming a reality and insist that a modern, healthy, wise, long-term sewage system be built for Victorians.

Yours truly,

s.22



130486
O'Brien, Kellie ENV:EX

From: s.22
Sent: Wednesday, June 30, 2010 5:18 PM
To: Minister, ENV ENV:EX
Subject: All the sewage in Esquimalt

Dear Minister,

As an Esquimalt resident: I accept that it may be necessary to have the waste come only to Esquimalt but I am sad to see that other and better solutions have been rejected because of pressure from the Federal and Provincial Governments. Forward-looking water treatment has been abandoned for short-term convenience. The Esquimalt population was consulted less than other municipalities and will be the most impacted.

s.22

MINISTRY OF ENVIRONMENT
CORRESPONDENCE UNIT

JUL 07 2010

RECEIVED

MINISTER'S OFFICE - RECEIVED
MINISTRY OF ENVIRONMENT

JUL 05 2010

THANK YOU FOR YOUR LETTER
DATED 2010-06-30

Environmental Protection

By: D. A. McLaren, AScT

MOE-2013-00281
Page 22

- identify site(s) for biosolids processing;
- the environmental impact studies for the selected sewage treatment facility sites;
- a progress report on marine environmental impact assessment work carried out on the selected new outfall locations;
- the final draft operational certificates for selected sewage treatment facilities;
- an updated public and First Nations consultation summary report; and
- a copy of the business case, submitted by the CRD to Ministry of Community and Rural Development, including the results of the assessment of public/private partnerships and procurement details.

The letter also advises CRD that the need or lack of need for the assessment of sediment transport mechanisms at Macaulay Point and Clover Point will be evaluated by MOE Regional Environmental Protection staff in consultation with Environment Canada.

The Minister's letter encourages the CRD to reconsider the opportunities to beneficially use biosolids as a fertilizer and soil amendment product as options for use. The letter also points out that some specific regulatory requirements need to be addressed in greater detail related to the production and use of reclaimed water and effluent blending requirements at Clover Point.

This report provides the results of the MOE Environmental Protection regional office review of the plan amendment request. The Technical Report for Amendment #7 dated January 18, 2010 provides most of the assessment by MOE for the wastewater management strategy. This report addresses any changes to the strategy and the outstanding information required by the Minister.

2. HISTORY

In a letter to the CRD dated December 14, 2007 Minister Penner approved Amendment #6, which includes a schedule to provide treatment, subject to the following requirement: "In accordance with Section 24(3) (b) of the *Environmental Management Act*, a business plan, demonstrating how to achieve the above objectives, shall be submitted to me no later than June 30, 2008." The business plan was to demonstrate how the CRD expected to achieve the following 6 objectives:

- Meet regulatory standards for liquid waste;
- Minimize total project cost to the taxpayer by maximizing economic and financial benefits including beneficial reuse of resources and generation of offsetting revenue;
- Optimize distribution of infrastructure based on above;
- Aggressively pursue opportunities to minimize and reduce greenhouse gas emissions (e.g., reduced requirement of energy for pumping purposes, and beneficial reuse of energy);
- Optimize 'smart growth' results (e.g., district services, density, 'Dockside Green' like innovation);
- Examine the opportunity to save money, transfer risk and add value through public partnership.

The December 14, 2007 letter also states that the "CRD shall submit a LWMP amendment on or before December 31, 2008, which shall include, but not be limited to, the following:

- Decisions on the infrastructure model, resource recovery options, and P3 approach;
- Identifying site locations for sewage treatment facilities;
- Results of an Environmental Impact Study for each facility;

- Results of an Environmental Impact Study for each new discharge location;
- Draft Operational Certificates for each new treatment facility/discharge location;
- Capital and operating costs and costs per user with and without government funding;
- Consultation summary reports (public and First Nations)."

The letter also advised the CRD to work with the Ministry of Community and Rural Development to address the provincial business case requirements including the assessment of public private partnerships, procurement planning and project implementation

On June 17, 2008 the CRD submitted a business plan report requesting an extension of the deadline for an amendment to December 31, 2009.

On July 8, 2008, the Minister approved the request for an extension.

On December 10, 2009 the CRD submitted Amendment #7 to the Minister for approval. The amendment did not include all of the information required by the Minister. The assessment of Amendment #7 is contained in the MOE technical report dated January 18, 2010. The outstanding information was requested in a letter from the Minister dated February 9, 2010 which approved Amendment #7 and directed the CRD to submit another amendment to the plan containing outstanding information to support the wastewater treatment strategy (see Section 1 above for the details of the Ministers request).

On June 25, 2010 the CRD submitted Amendment #8 for approval, which is the subject of this technical report.

3. DISCUSSION

3.1 GENERAL

Following the Ministers approval of Amendment #7 the CRD proceeded to gather the information requested by the Minister and has provided the following as part of Amendment #8 (Minister's request is in italics). Note that the primary purpose of Amendment #8 is to provide the information requested by the Minister:

- *Identify a site(s) for treatment of Westshore wastewater:* A site has been identified for the Westshore sewage facility adjacent to the Colwood city hall, and an environmental impact study (EIS) and public consultation has been carried out, however it has been concluded that this facility will not be required at this time. Capacity for Westshore sewage will be provided at the McLoughlin Point facility for a number of years (up to 2030) until the capacity is exceeded at which time a facility at the Colwood city hall site will be constructed.
- *Identify a site(s) for biosolids processing:* Hartland landfill continues to be the site for biosolids processing although the CRD are actively looking for an alternate industrially zoned site closer to the McLoughlin Point liquid only treatment facility which could shave up to \$30 million off the costs. Hartland Road landfill poses some challenges as it is 18 km away and the biosolids slurry would need to be pumped via pipeline to the facility. The EIS for the Hartland landfill biosolids processing site has been provided.
- *The environmental impact studies for the selected sewage treatment facility sites:* The EIS's for McLoughlin Point sewage treatment facility, Clover Point grit removal facility, Macaulay Point grit removal facility and Hartland biosolids processing have been

completed and are submitted as part of the amendment. The CRD has now decided to eliminate a sewage facility at Saanich East and will instead provide a 12,000 m³ wastewater storage facility at this location to equalize the flows entering the downstream collection system.

- *A progress report on marine environmental impact assessment work carried out on the selected new outfall locations:* A progress report has been provided as required. Work is underway by Worley Parsons on the proposed outfall at the Westshore site as an outfall at this location is still a possibility in the future and the CRD have retained a consultant to carry out plume modelling for the twinned Macaulay Point outfall. Environmental assessment work will be carried out to determine the best outfall alignment. No further work on the Finnerty Cove outfall is necessary given that this sewage treatment facility and outfall has been eliminated from the strategy.
- *The final draft operational certificates for selected sewage treatment facilities:* The amendment provides a draft operational certificate for the McLoughlin Point facility based on a template provided to the CRD by MOE.
- *An updated public and First Nations consultation summary report:* The update is provided as required.
- *A copy of the business case, submitted by the CRD to the Ministry of Community and Rural Development, including the results of the assessment of public/private partnership and procurement details:* The business case report was submitted to Minister Bill Bennet on March 31, 2010 with a copy provided to Minister Barry Penner.

The CRD will follow up on the Minister's request to "reconsider the opportunities to beneficially use biosolids as a fertilizer and soil amendment product" and to "develop an emergency contingency plan to handle biosolids that are surplus to the uses identified" during the development of their Resource Recovery and Use Plan. The plan will be submitted to the ministry by the end of 2010.

It is concluded that the information requested by the Minister has been provided in Amendment #8.

3.2 LIQUID WASTE MANAGEMENT PLAN CHECKLIST

A ministry checklist has been prepared (copy attached) that allows comparison of the submitted plan amendment with the provisions of the ministry's *Guidelines for Developing a Liquid Waste Management Plan*. Note that most of the criteria have been met by the previous submissions and that this amendment is focused on providing the information as requested by the Minister. Comments on the checklist are provided below:

A1: This amendment is a follow up to Amendment #6 in which the municipal approval process was provided. The CRD board approved the plan amendment. The board is comprised of mayors from each of the core area municipalities.

B4: The location for a future treatment facility for the Westshore has been established in Amendment #8 as required by the Minister.

B9: The environmental impact studies for the a future outfall in the Westshore has not

been completed and work is ongoing, to be completed in early 2011. An EIS is being carried out for the Macaulay Point outfall twinning.

C2: Amendment #8 provides a draft operational certificate for the central sewage treatment facility at McLoughlin Point as required by the Minister. The OC has been presented to the public as part of the consultation process. The CRD have committed to amend, by the end of 2010, the bylaw that provides the legal authority for implementing the project.

3.3 PUBLIC AND FIRST NATIONS CONSULTATION

A Technical and Community Advisory Committee (TCAC) was continued from Amendment #7 consisting of representation from technical advisors, stakeholder groups and members of the community. The TCAC was provided with the draft amendment #8 and all of the technical and consultation information.

The CRD have done extensive work to consult and engage the public and First Nations in the planning of the project and the siting of treatment facilities and outfalls. The CRD commissioned an Ipsos Reid research report to determine how to carry out public consultation. The communication plan is based on the results of the report and consisted of:

- an interactive website;
- paid media (newsprint);
- earned media;
- meetings and presentation to the public and stakeholders;
- open houses;
- information brochures and materials.

The amendment includes documentation of the consultation process and provides the brochures, media releases, minutes of meetings and web based information sources.

The affected First Nations bands have been engaged on interests related to use of federal crown land, impacts on the foreshore, protection of natural resources, outfall locations and effects on marine species, affects on archaeological sites and affects on discharges into inland water bodies. Agreements on consultation activities have been reached with Beecher Bay, Esquimalt, and Songhees First Nations bands and an agreement with the Tsawout is being worked out. Compensation has been provided for their time and efforts to provide input.

The consultation activities have been superior for this plan amendment and focussed on establishing a site for the Westshore, moving the Saanich East site to an adjacent property owned by the Municipality of Saanich (open house and neighbourhood evaluation meeting) and procurement planning (two open houses) and implementation stages of the project.

There is strong opposition by the Municipality of Esquimalt politicians and residents to having a site at McLoughlin Point and there is a perception that the community was not adequately consulted. The CRD will carry out further consultation, albeit, after the fact. Meetings scheduled for July 6th and 8th. It is important to note that amendment #7 approved the McLoughlin WWTP site.

3.4 ENVIRONMENTAL IMPACTS

The Minister's directive was a result, in part, of the concern over impacts occurring at the end of the outfalls at Clover Point and Macaulay Point. Amendment #8 provides specific details on the implementation of the strategy to upgrade discharges to meet the MSR. The CRD is also working with Environment Canada to address new federal regulations for municipal sewage discharges.

The Minister required the CRD to include the results of EIS's for sewage facility sites as well as new discharge locations as part of this amendment. The EIS's for the sewage facilities have been provided but the marine EIS work is still underway and will be complete in 2011.

A report by Stantec entitled "Core Area Liquid Waste Management Program TSS and BOD Loading at Macaulay Point" dated June 29, 2010 assesses relative contaminant loadings through the McLoughlin Point outfall, comparing TSS loadings from a continued raw sewage discharge versus providing treatment. The loadings are reduced 72% for 2017 and 74% for 2030.

In a report entitled "Core Area Liquid Waste Management Program – Management of Wet Weather Flow at Clover Point" dated May 13, 2010, Stantec has carried out an analysis of the relative suspended solids loadings that will be discharged through the Clover Point outfall under the new strategy compared to the loadings from screened only raw sewage in the year 2030. The following is a summary of the findings for the option that has been selected by the CRD (pumping 3 X ADWF to McLoughlin Point):

- annual loadings of solids discharging through the outfall are reduced by 99%;
- the duration of overflow for 5 year return storm events would be 110 hours per year;
- the volume discharged per year would be 202,000 m³/year for 5 year return storm events.

The report also assess future microbiological impacts based on plume modelling at Clover Point and draws the following conclusion:

- "during wet weather periods the discharge of excess flows directly to the sea will result in trapping of the plume for a significant period of the year at depths of 5 to 20 metres. Infrequently and for short periods that occurs during slack tide and the wet weather storm discharge events, surface fecal coliforms will exceed the body contact recreational standard of 200 cfu/100ml and reach into the 1,000 CFU/100 ml range. However these excursions will be infrequent and will only last a short time. **The MSR, which specifies a limit of 200 CFU/100ml based on a geometric mean of 5 samples per month, is expected not to be exceeded.**"

An ongoing wastewater and marine receiving environment monitoring program will be used to assess the affect of upgrading to secondary sewage treatment at McLoughlin Point and discharging screened wet weather flows at Clover Point.

In approving the current LWMP, former Minister Murray was not satisfied that the marine monitoring program would be effective in identifying all potential impacts and accordingly required the continued involvement of the Marine Monitoring Advisory Group (MMAG) in the

program review process. As a result of collaboration between CRD and MOE, the former review process has been replaced with a more rigorous regime of environmental investigation. The CRD will continue to seek external objective advice, however the formal group, the MMAG, is no longer required to review the program. In approving Amendment #7 the Minister approved the disbanding of the MMAG.

3.5 PLAN COSTS

The Minister requires the CRD to submit Class B detailed capital and operating costs per user. The costs of implementing the treatment plan have been developed based on capital and life cycle costs. Updated costs were developed in June 2010 and are as follows:

- The capital costs to implement the project are \$782,686,000 (estimated cost at time of construction)
 - The annual operational and maintenance costs is \$14,571,000 (2010 dollars)
 - The annual cost per household (with grants) varies amongst municipalities and ranges from \$210 to \$500 and the estimated weighted cost per household is \$300. Cost sharing agreements with the participating municipalities will be worked out by the end of 2010.
- The Federal and Provincial governments have committed to provide grant dollars to fund 1/3 of the capital costs each.

The costs are considered to be equivalent to Class B estimates as described in the liquid planning guideline. The Ministry of Community and Rural Development have had a key role in addressing the provincial business case requirements, assessment of public and private partnership, procurement planning and project implementation and will determine the provincial share of costs for the project. The project business case was submitted to Minister Ben Bennet on March 31, 2010 with a copy provided to Minister Barry Penner.

3.6 ASSESSMENT

The approved wastewater management strategy comprised of a distributed system with sewage facilities located in various parts of the community has now been replaced with a centralized sewage treatment system. Also, the elimination of reclaimed water production, are major changes in the strategy. The site at McLoughlin Point, which was considered to be too small to treat all liquid wastes, becomes the central wastewater treatment location. This is made possible by eliminating the side stream reclaimed water plant and moving the grit removal facilities to Macaulay Point and Clover Point. Amendment #8 proposes the following wastewater management strategy:

(Option 1A Prime 2) Wastewater from the Westshore as well as present contributions to the Macaulay Point collection system plus the Clover Point collection system (up to 3 X ADWF) will be conveyed to McLoughlin Point where it will receive secondary treatment for up to 2 X ADWF and primary treatment for flows in excess of this up to 4 X ADWF. Flows up to 4 x ADWF entering the Macaulay Point pumping station will be pumped over to the McLoughlin Point facility for treatment. Flows entering the Macaulay Point pumping station that exceed 4 x ADWF will be fine screened and discharged through the existing outfall. Effluent from the new McLoughlin Point sewage facility will flow by gravity to a new outfall. By 2030 there will be no flows exceeding 4 X ADWF. The construction of a side stream reclaimed water plant at

McLoughlin Point has been shelved as there is no viable market for the reclaimed water at this time. The grit removal facilities previously planned for McLoughlin Point will be established at Clover Point and Macaulay Point to create more space. The Saanich East sewage treatment facility has been deferred and replaced with a 12,000 m³ storage facility that will equalize storm flows to avoid sanitary sewer overflows downstream. A biosolids processing facility will be located at Hartland Road landfill. There will be no additional treatment facility at Clover Point other than grit removal. Flows greater than 3 X ADWF will be fine screened and released through the outfall..

The information required by the Minister has been provided in Amendment #8; however, the treatment schedule approved by the Minister in Amendment #6 has been revised such that there is no commitment to provide a reclaimed water plant by 2013. There will also be no side stream reclaimed water plant at McLoughlin Point which is a major departure from the commitments to resource recovery made by the CRD in previous amendments. Studies were carried out to determine the viability of using reclaimed water beneficially at the University of Victoria and using the heat value in the sewage to heat buildings in James Bay. It was concluded that there was no demand for the reclaimed water due to the low cost of city water and the payback period to construct a heating system for James Bay makes it not economically viable.

Outstanding Issues from Amendment #7:

Clover Point

One outstanding issue with Amendment #7 was that CRD have not provided the technical support for not blending primary and secondary effluent at Clover Point in accordance with the MSR Schedule 1 Condition 17 (2) (b) (iii). The CRD are now proposing that wastewater up to 3 x ADWF entering the Clover Point facility be pumped to the McLoughlin Point facility, with volumes exceeding this to be treated in a grit removal device and a fine screen before discharging through the outfall at Clover Point. The original strategy was to pump up to 3XADWF over to McLoughlin Point for treatment and to provide a wet weather flow advanced primary treatment plant at Clover Point to treat flows from between 3X ADWF and 4XADWF. A primary treatment plant at Clover Point would see infrequent, intermittent use, posing serious operation and maintenance challenges. This strategy was re-assessed by Stantec in a report entitled "Core Area Liquid Waste Management Program – Management of Wet Weather Flow at Clover Point, dated May 13, 2010, to determine the relative costs and environmental benefits. The report concludes " Providing advanced primary treatment to those wet weather flows in excess of 3 X ADWF would make only a small incremental improvement of about 1% in reduced load and at a cost of \$27 million for capital expenditure, and an annual O&M cost of \$0.6 million." See Section 3.4 Environmental Impacts (above) for a discussion of the relative net improvement in total solids loadings using this strategy. This strategy turns Clover Point outfall into a sanitary sewer overflow point which is not subject to the blending requirements of Schedule 1 Condition 17 (2) (b) (iii). Primary and secondary treated sewage will be blended at the McLoughlin Point facility in accordance with the MSR.

Sanitary Sewer Overflows:

The CRD will install wastewater storage at the Saanich East facility to reduce peak wet weather flows. This, in combination with a commitment to separate combined sewers in Oak Bay by 2015, and continue with an inflow and infiltration reduction program, will result in the elimination of many of the sanitary sewer overflows that presently occur. The target is to eliminate all wastewater flows that exceed 4 X ADWF by 2030. All overflows to sensitive receiving environments will be eliminated. There will still be overflows at Macaulay Point (for > 1 in 25 year storm events) and Clover Point (for > 1 in 5 year events).

The Municipal Sewage Regulation Schedule 1 Condition 16 (1) states that no person shall allow sanitary sewer overflows to occur during a storm or snowmelt event with less than a 5- year return unless a liquid waste management plan is developed such that sanitary sewer overflows are eliminated. ^{s.14}

s.14

It is unknown at this time how successful the initiatives will be to reduce flows in the collection system, and what the impact will be of releasing effluent at Clover Point during > 5 year return storm events. The CRD strategy is to eliminate primary treatment for Clover Point on the basis that the facility will rarely be used and with little improvement to the amount of solids released. The volumes of discharge during various storm events have not been estimated. The Spill Reporting Regulation requires that sanitary sewer overflows be reported as spills and the quantity be reported. The approval of Amendment #8 should be on the condition that the CRD continue to carry out monitoring of the discharge volume and quality through the Clover Point outfall and assess the impact of the discharge on the receiving environment and whether or not more treatment is required. The need or lack of need for treatment at Clover Point can be reassessed on the basis of this information,

Reclaimed Water Systems:

The design of the reclaimed water system did not include emergency storage as required in Schedule 2 of the MSR. The CRD has now eliminated the production of reclaimed water as part of the strategy, so this issue has been addressed. An amendment to the MSR is being proposed that would eliminate the requirement for emergency storage. If reclaimed water production occurs in the future it will be carried out in accordance with the MSR.

Combined Sewers:

Amendment #7 has a commitment to complete the separation of combined sewers in Oak Bay by 2015. This commitment is retained in Amendment #8.

Conclusions:

The CRD has provided the outstanding information required by the Minister in his letter dated February 9 2010.

The wastewater management strategy will result in significant reductions in solids loadings discharged through the outfalls. Ongoing monitoring will determine the environmental benefits over time but it is anticipated that existing contamination will abate with the improvement in contaminant levels being discharged.

Wet weather flow management is a significant issue in the core area and the strategy being proposed reduces the need to build larger conveyance works through a combination of water conservation, inflow and infiltration reduction, elimination of combined sewers and storage of peak flow at Saanich East to reduce SSO's. It is noted that discharges > 4xADWF will be eliminated by 2030 and SSO's occurring during storm events with less than 5 year return will be eliminated with a goal of complete elimination. The strategy being proposed is supportable.

Studies carried out by qualified professionals have determined that the economics do not support the cost of production of reclaimed water at this time due partly to a lack of demand and the low cost of local water supply. Other resource recovery initiatives identified in Amendment #7 will still be pursued.

The consultation activities carried out by the CRD satisfy the requirements for public and stakeholder consultation for the plan amendment.

4. RECOMMENDATIONS

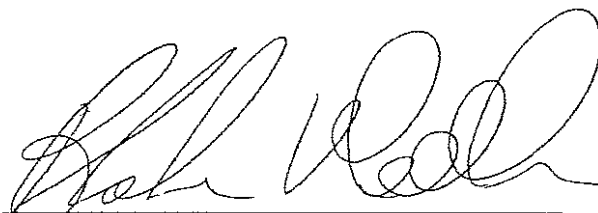
It is recommended that, pursuant to Section 24 (5) of the Environmental Management Act, the Minister of Environment approve Amendment #8 to the CRD – Core Area Liquid Waste Management plan. The approval should be subject to the following:

- 1) Acknowledge that the strategy has shifted from a distributed wastewater system to a centralized system with no reclaimed water production.
- 2) Express concern that the commitment to bring a reclaimed water plant into production by the end of 2013 has been eliminated contrary to the approved treatment schedule. It is noted that CRD could not find a demand for the reclaimed water as the economics of fulfilling this commitment have proven to be unviable. The CRD should reassess the viability of producing reclaimed water in the future, hopefully within 10 years.
- 3) Accept the proposal by the CRD to reconsider the opportunities to beneficially use biosolids as a fertilizer and soil amendment product and to develop an emergency contingency plan to handle biosolids that are surplus to the uses identified during the development of their Resource Recovery and Use Plan.

4) Direct the CRD to monitor the quality and volume of effluent discharged at Clover Point and assess the impact of the discharge on the receiving environment and whether or not additional treatment should be provided in the future.

D. A. McLaren
Environmental Protection Officer

Vancouver Island Region



(I agree with these recommendations)
Blake Medlar
Head, Government and Compliance
Section
Vancouver Island Region

2010/07/07

LIQUID WASTE MANAGEMENT PLAN SUBMISSION CHECKLIST

Capital Regional District – Core Area Liquid Waste Management Plan –Amendment #8

This standard checklist is being used to evaluate the Capital Regional District request for approval of Amendment #8 to the Core Area Liquid Waste Management Plan. Several questions on the checklist are applicable to the original plan (and amendment #6 and #7) which has already undergone a detailed review and are not applicable to the amendment request. Such sections are marked N/A.

EVALUATION QUESTIONS	PRIORITY	GUIDE SECTION	Y/N
A. Plan submitted for approval of Minister			
1. Does the package include documentation of the municipality's approval process?	M	5	N/A
2. Does the package include documentation of the municipality's public review and consultation process (PRCP)?	M	5.5	Y
3. Does the package include documentation of the municipality's consultation with other municipalities and First Nations within the plan area?	M	Ministry Policy	Y
4. Has the municipality followed an adequate PRCP?	M	5.5	Y
5. Does the package include commitments from other parties (municipalities, First Nations, other governments) to undertake measures identified in the plan?	M	Regional Policy	Y
6. Does the package include a description of the plan implementation schedule?	M	4	Y
7. Does the plan include a description of the plan monitoring committee?	O	Regional Policy	N/A
B. Plan Content - General			
1. Does the plan contain a schedule to upgrade all liquid waste discharges to ministry standards?	M	1.1, 1.2, 1.3	Y
2. Does the plan contain a schedule and means to address all municipal liquid wastes sewage discharges combined sewer overflows urban stormwater runoff management municipal sludge management	M	1.3	Y Y N/A Y

LIQUID WASTE MANAGEMENT PLAN SUBMISSION CHECKLIST
Capital Regional District – Core Area Liquid Waste Management Plan –Amendment #8

EVALUATION QUESTIONS	PRIORITY	GUIDE SECTION	Y/N
pump station overflows			N/A
on-site disposal (areas outside municipal collection system)			N/A
inflow and infiltration			N/A
management of trucked liquid waste (including septage)			N/A
source control programs			N/A
effluent specified by a manager to be included in a waste management plan			N/A
3. Does the plan include management strategies for each component of the liquid waste stream?	O	1.5	N/A
4. Does the plan identify the location of treatment facilities and conveyances?	M	1.6, 2.8	Y
5. Does the plan describe the area covered by the plan including existing and future conditions and official community plan, zoning bylaws and growth management plan?	M	1.4, 2.1	N/A
6. Does the plan project the population and industrial growth for sewerred and unsewerred areas?	M	2.2	N/A
7. Does the plan contain provisions for liquid waste volume reductions, waste recycling and utilisation?	M	2.3, 2.4, 3.2, 3.3	N/A
8. Does the plan estimate waste quantities as per growth projections?	M	2.5	N/A
9. Does the plan assess the capacity of water bodies and land to accept liquid waste?	M	2.6, 3.1	Y/N
10. Has the plan considered options for treatment and disposal of liquid waste?	M	2.7, 3.4	Y
11. Has the plan considered site location options for facilities and conveyances?	M	2.8	Y
12. Does the plan depict the capital and operating costs of the plan?	M	2.9, 3.5	Y
13. Does the plan address any other relevant aspects?	O	2.10	N/A
14. Does the plan identify a recommended course of action including rationale for selection, anticipate impact and benefits of plan components?	M	2.11	Y
15. Does the plan include a plan monitoring committee?	M	Regional Policy	N/A
16. Does the plan include a plan for public education?	M	Ministry Policy	N/A

LIQUID WASTE MANAGEMENT PLAN SUBMISSION CHECKLIST
Capital Regional District – Core Area Liquid Waste Management Plan –Amendment #8

EVALUATION QUESTIONS	PRIORITY	GUIDE SECTION	Y/N
C. Plan Content - Implementation Provisions			
1. Does the plan identify implementation provisions in sufficient detail to enable those affected by or required to carryout the provisions to determine their impact?	M	5.6	N
2. Have all implementing bylaws, fees, draft OCs and other provisions been presented to the public through an adequate PRCP?	M	1.4, 5.5, 5.7, 5.8, 5.9	Y
3. Does the plan provide sufficient information to enable preparation of OCs for all sites which require them?	M	5.9, 6	Y

DATE REVIEWED: June 22, 2010

REVIEWED BY: D. A. McLaren , ASCT - Environmental Protection Officer



Reference: 128428

JUL 04 2011

His Worship Mayor Christopher M. Causton
and Councillors
District of Oak Bay
2167 Oak Bay Avenue
Victoria BC V8R 1G2

Dear Mayor Causton and Council:

Thank you for your letter of July 20, 2010, addressed to the Honourable Barry Penner, former Minister of Environment, regarding reconsideration of Oak Bay's sewer séparation commitments under Amendment #8 of the Capital Regional District (CRD) Core Area Liquid Waste Management Plan (LWMP). Further to Minister Penner's acknowledgement letter sent to you August 11, 2010, as the newly appointed Minister of Environment, I am pleased to respond. I understand that you also had the opportunity to meet with Mr. Murray Coell, former Minister of Environment, and representatives of the CRD on this matter on January 11, 2011.

On June 23, 2010, the CRD Board approved Amendment #8 to the Core Area LWMP and submitted it to Minister Penner for consideration. As outlined, the plan proposes to defer the need for treatment at Clover Point by the elimination of flows greater than four times the average dry weather flow. This will be achieved in part through reduction of inflow and infiltration into the sanitary sewer system. Separation of sewers in the District of Oak Bay is a critical component of the CRD strategy.

From the perspective of human health and the environment, sanitary sewer overflows represent a significant risk as they result in the uncontrolled discharge of raw sewage, in many cases near shorelines and beaches with significant potential for human contact.

The commitment to separate combined sewers in the District of Oak Bay has been an integral part of the CRD LWMP since it was first submitted by the CRD Board in 2000. In the years that have followed, the District of Oak Bay and the CRD have worked to establish a plan that meets municipal and regional needs and provincial requirements. I consider the elimination of combined sewers to be an important component of the wastewater management plan.

...2

On July 25, 2010, Minister Penner approved Amendment #8 to the CRD LWMP. The current LWMP process provides adequate opportunity for the District of Oak Bay and the CRD to work together to establish an acceptable plan that meets the needs and objectives of all parties. I encourage you to continue to work with your colleagues at the CRD to further refine the plan as the CRD moves forward in its implementation. Regional ministry staff are available to assist in the planning process.

Thank you again for writing and sharing your concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Lake', written in a cursive style.

Terry Lake
Minister of Environment

cc: Jack Hull, General Manager, Integrated Water Services, Capital Regional District

128566
ERV1-FY1

O'Brien, Kellie ENV:EX

From: s.22
Sent: Sunday, July 4, 2010 4:23 PM
To: Minister, ENV ENV:EX
Subject: Sewage Treatment in the Greater Victoria Region

RECEIVED
JUL 05 2010
CLERK

ENVIRONMENT
RESPONSE UNIT
JUL 07 2010

Dear Mr. Penner,

I have been following developments since the start of this process and have been fully supportive of your six objectives for sewage treatment in Victoria, especially regarding resource recovery.

As a resident of Esquimalt I am supportive of our municipality to act responsibly, hence we offered the possibility of McLoughlin Point as part of a distributed system, however, no other municipality has stepped up to support a truly distributed, thoughtful or innovative system for greater Victoria.

The CRD and the CALWM Committee have only been promoting a centralized system, right from the start. They have been dressing up the information to look like a distributed system. Their superficial message is all about being responsible, sustainable, innovative...but, if one scratches the surface you find a different story.

IRM has been considered, without proper assessment, and summarily dismissed. Over 22 million dollars have been spent on reports by peer reviews and professional companies. THE CALWMC picks and chooses which advise it would like to use and dismisses the rest. These reports say that the McLoughlin is too small and has a high risk for construction.

Now the CALWMC has approved Amendment 8.

Gone is the pretense of a distributed system, gone are the opportunities for any resource recovery, and all for a grab at securing government funding. This is not acceptable.

No money over the years have been spent on any pilot projects that could provided concrete data about IRM.

To add insult to injury, Esquimalt is bearing the brunt of this, and they have had no voice in this unilateral process. Here is a table summarizing the public input. Esquimalt has had 3 opportunities to provide feedback, Saanich-Oak Bay has had 14 opportunities, Victoria has had 6 opportunities and Westshore 5 opportunities.

I do not want another Halifax scenario, where all that can be said is "The job got done, on time and within budget".

We all know the consequences of such decision making.

I support you in your bid to make where we live a better place, one that has a vision and looks towards forward thinking responsible decision making.

Please step in to correct a process that has gone side-ways.

Sincerely,

s.22

128567
ERV1-FY1

O'Brien, Kellie ENV:EX

From: s.22
Sent: Sunday, July 4, 2010 8:29 PM
To: Minister, ENV ENV:EX
Subject: Sewage treatment in Esquimalt

Dear Mr. Penner,

There has been a major injustice occurring in the Greater Victoria region. There has been no meaningful or balanced community consultation. Esquimalt is currently slated to take the sewage from the entire greater Victoria region, but, it has never been consulted.

Esquimalt was given 3 opportunities to receive information from the CRD regarding a different configuration. Our feedback has been ignored and our presentations to the CALWMC have been ignored.

Saanich-Oak Bay were given 14 opportunities to provide input.

They were given the opportunity to speak directly to the CALWMC.

Esquimalt has not been treated with respect nor has it been allowed to have a voice.

How can this outrage be condoned?

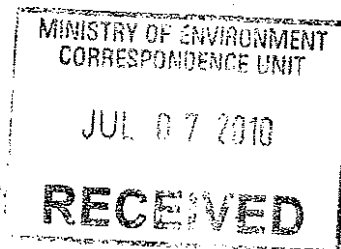
In addition, the plan of one plant at McLaughlin Point eliminates the possibility of integrated resource management current technology or other value recovery which may be developed in the future. The science is changing rapidly. Smaller plants, or one plant on a larger sight, would allow for future developments.

BC should be setting world standards, not making backward decisions that will limit us into the foreseeable future.

Please step in and direct the CRD.

Yours Sincerely,

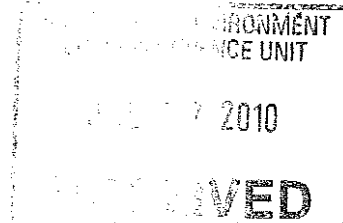
s.22



129106
ERV1-FY1

O'Brien, Kellie ENV:EX

From: s.22
Sent: Monday, July 5, 2010 1:50 PM
To: Minister, ENV ENV:EX
Subject: Sewage treatment



Dear Mr. Penner,

You should be made aware of the CRD,s choice of words that are misleading the public into thinking the CRD is making good decisions. On the CRD website the talk is focused on resource recovery, innovation, protection of the environment. "Simply put, a distributed wastewater management approach will provide the best foundation for water reuse and resource recovery in the decades to come." The CRD, at the last minute, has unilaterally changed the plans to a centralized facility.

Now the CRD utilizes the following language:

"is exploring" "is researching" "is considering" "will" "can still be included"

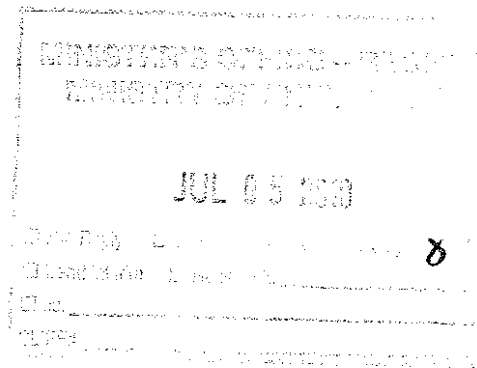
What they don't tell the public is that the current centralized plan is inadequate, and that sustainable resource recovery will not be possible. (The CRD complicity extends to the numbers they are quoting. For example, half of the possible \$3.1 million in resource recovery by 2030 is based on water reclamation - which has now been pulled from the plan.)

"We have no choice to move ahead" says Judy Brownoff, chairwoman of the CALWMC. We may need to move ahead, but, we do not need to compromise on good decision making.

Minister Penner, please step in and direct the CRD.

Sincerely,

s.22



July 5, 2010

Honourable Barry Penner
BC Minister of Environment
Provincial Legislature
Victoria, BC, V8V 1X4

Dear Minister Penner,

RE: Serious Public Concerns with Amendment #8 CRD Waste Water Treatment Plan

We are writing to convey our deep and ongoing concerns with the Capital Regional Districts (CRD's) proposed Amendment #8 to the Core Area Liquid Waste Management Plan. Our community group (Sewage Treatment Action Group) has spent several years reading technical reports, attending meetings and providing constructive input to enhance the sewage treatment plans for our city. We also fully support the directives you gave to the CRD to guide sewage planning. However, we feel that this project is now seriously off-the-rails and we hope that you will be able to redirect the CRD to make substantial improvements to the plan. We have also shared our concerns with the CRD board and the Core Area Liquid Waste Management Committee (CALWMC) in a letter dated June 21, 2010 (see Attachment), however to date we have not received a reply.

While our concerns are many, there are several key areas that we believe the CRD's efforts have been an absolute failure. These include a lack of meaningful public consultation and a failure to incorporate significant beneficial reuse of resources into the current configuration.

Public Consultation

The move to a centralized configuration represents a whole-scale change to the direction of sewage planning. It is a very significant departure from many of the cornerstones of the CRD's Wastewater Management Program (namely a distributed system that supports optimal resource recovery) and runs contrary to public information sessions and educational materials presented over several years by the CRD. There has been absolutely no consultation with the public on this new configuration. This is the biggest and most expensive project the CRD has ever undertaken and the public deserves an opportunity for meaningful input into the plans, before decisions have been made. This has not occurred and this represents a significant failure of due process.

We understand that this will likely be a concern to you, as there are strong regulatory requirements for consultation under the Environmental Management Act and under the Guidelines for Developing a Liquid Waste Management Plan.

The table below outlines the CRD's record of community engagement and further illustrates the significant lack of consultation, especially for the community of Esquimalt. Note that all of the sessions listed were based on a more distributed waste water treatment system.

CONSULTATION HISTORY*	ESQUIMALT	SAANICH EAST/ NORTH OAK BAY	VICTORIA	WESTSHORE
Community Dialogue 2 one-hr sessions Interactive community dialogues looking at the triple bottom line – social, environmental and economic	April 20, 2009	April 22, 2009 April 16, 2009	April 21, 2009	April 15, 2009
Community Validation 3 hr sessions Opportunity to confirm that public opinion and concerns had been heard residents were asked to fill out questionnaire	<u>NONE</u>	May 7, 2009 May 12, 2010	May 4, 2009	May 5, 2009
Open Houses 3-8 pm drop-in information sessions Residents were invited to learn about proposals presented by CRD	March 31, 2009 Oct 19, 2009	April 2, 2009 April 7, 2009 June 16, 2009 June 17, 2009 June 19, 2009 April 20, 2010	April 1, 2009 April 6, 2009 Oct 20, 2009	March 30, 2009 Jan 26, 2010 Jan 28, 2010
Neighbourhood workshops 2 ½ hr sessions	<u>NONE</u>	June 22, 2009 July 7, 2009 July 9, 2009	None – since no treatment plant in the plans	None – unknown at the time if there would be a plant
Direct Dialogue with CALWMC (The committee making the decisions)	<u>NONE</u>	August 19, 2009 5 minutes per resident	Aug 12, 2009 5 minutes per resident	None

*Source CRD website www.wastewatermadeclear.ca

On April 20, 2009, residents of Esquimalt received two “one hour” sessions of community dialogue which were rushed and poorly facilitated. As a result of this session, we conveyed our concerns with the consultation process directly to the CALWMC through an analysis of the CRD’s Public Consultation dated May 3, 2009, which we copied to you at that time. In the response we received from Chairperson Judy Brownoff (dated May 6, 2009; also copied to you), we were presented with a copy of the CRD’s Community Engagement Framework, which outlined a series of Community Dialogues, Community Validation Sessions and Neighbourhood Workshops. However, the CRD has not even followed its own framework for engagement with Esquimalt. Even though our community was identified as a host site, we were never given the opportunity to validate community input or participate in siting discussions or Neighbourhood workshops before decisions were made. And even after voicing our significant concerns in writing to the CRD on May 3, 2009, we were only given a single other opportunity for input (October 19, 2009) on a generalized configuration that is no longer representative of the current plan.

To highlight, in total Esquimalt residents were given only **3** opportunities for generalized input, with no Community Validation or Neighbourhood Workshops, whereas the communities of Saanich East/North Oak Bay were given **14** opportunities for generalized and focused input, including direct presentations to members of the CALWMC, all before decision making. Victoria received 6 opportunities for input and the Westshore received 5 opportunities for community input. The potential host community of Esquimalt has had the least opportunity of any community for meaningful input to the plans, and is now slated to take the brunt of the impacts. This is completely unfair and unacceptable for residents.

This week (July 6 and 8), the CRD is planning 2 further open houses in Esquimalt to engage residents in mitigation and community benefits discussions. However, residents have still not been provided with the opportunity to review and have meaningful input on the development, amendment and final content of the wastewater treatment plan. And now we are expected to participate in workshops on mitigation, even when a very significant part of the plan is missing (i.e biosolids management location and details) and the full potential impacts to our community are unclear. We believe this is a blatant failure by the CRD to engage in meaningful public consultation.

Resource Recovery

We observe that one of the objectives you have emphasized repeatedly to the CRD in your letters is for the beneficial reuse of resources to generate offsetting revenue and minimize cost to taxpayers. Esquimalt residents have been very supportive of maximizing opportunities for resource recovery, and believe this can be best achieved through the integration of processing liquid, solid and organic waste streams. Our community initially identified McLoughlin Point as a site worthy of investigation for a distributed waste water treatment system that was focused on resource recovery. However, we have now learned that in addition to concerns of experts with the sites size limitations, inflexibility for design modification and expansion, susceptibility to incursion from tsunami, storm surge and sea level rise from climate change, the current configuration for McLoughlin Point does not support significant opportunities for resource recovery. CRD commissioned studies (Stantec, 2010) assessed that heat extraction opportunities now appear very limited at the McLoughlin site. The reality is that the CRD has merely deferred the majority of resource recovery to some unknown time in the future, and at some other biosolids facility that lacks details or definitive plans for waste integration.

Recent quotes by CRD staff and Judy Brownoff state that resource recovery estimates of \$3.1 million annually could be reached by 2030. This is contrary to the potential value of resources that could be recovered with a different system configuration as evidenced by other jurisdictions in Canada and throughout the world. The lost focus on resource recovery as an overriding objective is a failure by the CRD that will mean a lost opportunity for responsible waste management, greater regional sustainability, and lower costs to taxpayers. We strongly believe this is the wrong plan for the capital region.

We understand and appreciate the pressure the CRD is facing to acquire funding assurances by the provincial and federal governments. Yet it is imperative that the funding not be used to fund the wrong wastewater treatment plan for the capital region. The significant failures by the CRD to engage in meaningful consultation before decision making and to implement any significant integrated resource recovery highlight the need for significant changes to Amendment #8. If the CRD is now wishing to examine a centralized model, we believe this should include a more fulsome analysis of larger single sites in the capital region that could accommodate the integration of solid, liquid and organic wastes to allow the full capitalization of revenues and environmental benefits of resource recovery, while meaningfully engaging the public.

In your deliberations on the Draft Amendment #8 of the CALWM plan, we ask that you please consider mandating further changes to the current plans to address the failures of the CRD to engage the public in meaningful consultation and to incorporate substantial resource recovery from the outset, for the benefit of all taxpayers in the Capital Region.

Respectfully,

s.22

On behalf of Sewage Treatment Action Group

Attachment

cc. Randy Alexander, MOE, Nanaimo
CALWM Committee
Esquimalt Mayor and Council

Attachment

June 21, 2010

Geoff Young, Chairperson
CRD Board
Capital Regional District
625 Fisgard Street
Victoria, BC, V8W 1R7

Dear Mr. Young and CRD Board Members:

Re: Serious Public Concerns with Draft Amendment No. 8 of CALWM Plan

On Wednesday June 23, 2010, the CRD board will be voting on the Draft Amendment No. 8 of the Core Area Liquid Waste Management Plan. We are writing this letter to make you all aware of significant public concerns with this proposed amendment and the overall direction of sewage treatment planning. We strongly believe this is the wrong plan for the Capital Region and we ask that you not approve this amendment and seriously consider this input to find better solutions. Our concerns are as follows:

Whole-Scale System Changes - The new configuration consists of a centralized liquid plant at McLoughlin Point with biosolids processing at Hartland Landfill. This represents a very significant departure from the previous plan and runs completely contrary to several of the key cornerstones of the CRD's Wastewater Management Program, namely a distributed treatment system that supports optimal resource recovery. As well, this centralized system has not been vetted by peer experts or the public.

Process - Details on how the amended proposal meets the overall objectives for sewage planning and the provincial regulatory directives are unclear. Equally unclear is the process for how recent decisions were made by the CALWMC/CRD since much of the information was kept in-camera without the opportunity for public knowledge and input. This is the biggest and most expensive project the CRD has ever undertaken and due process has not been followed.

Consultation - All of the public engagement and consultation to date has been based on a distributed sewage system. There has been absolutely no consultation with the public on a centralized treatment system or explanation as to how this is a better solution compared to previous plans and other options brought forward by the public. The public deserves an opportunity for meaningful engagement and to know the details of how and why such significant changes are considered supportable. In addition there has been no meaningful consultation with Esquimalt (the host community) over the proposed use of McLoughlin Point. The community has never been involved with the Triple Bottom Line assessment, or has had the opportunity for input into the Environmental Impact Study. Decisions have been made without meaningful consultation.

McLoughlin Point - Centralized liquid processing is the wrong use for McLoughlin Point. Experts have noted that the site is too small and difficult, and one Peer Review expert commented on the similarities between McLoughlin Point and the recent and colossal failure of the waste water treatment plant in Halifax, Nova Scotia, citing inflexibility and size constraints. Esquimalt citizens strongly supported the use of McLoughlin Point for a distributed wastewater treatment plant within a resource recovery model. The current plan is not consistent with the strong and very proactive public input around the use of McLoughlin Point.

Hartland Landfill – Plans for biosolids processing at Hartland Landfill are only at a very conceptual level. Engineering studies have not been conducted at Hartland or along the conveyance route that demonstrate this is a technically and economically feasible solution for biosolids management. In fact on several occasions, CRD engineers have told the public that piping and pumping of biosolids to Hartland would be prohibitively expensive. We believe it is not responsible to approve a treatment plan that is missing a viable site and plan for biosolids management.

Business Case – The business case for the new configuration does not include detailed costs and cost comparisons between previous options and the centralized system. The real costs of piping and pumping of all biosolids to the Hartland Landfill for processing are likely very high, meaning the overall costs of this system could be significantly underestimated. Significant opportunities to minimize costs to tax payers still exist and need to be brought to fruition.

Resource Recovery – The proposed treatment system in Amendment 8 does not support optimum resource recovery. Resource recovery at the liquid plant is now very limited. The CALWMC should be asked to provide details for resource recovery at the Hartland Landfill. If a centralized approach is going to be pursued in the capital region, it would make far more sense to do this in an alternate location that supports both solid and liquid processing together to enable the best possible resource recovery with an energy centre. This would result in significant revenues/cost savings that are far beyond those currently achieved with Amendment 8. Locating both solid and liquid waste components at Hartland has not been considered.

GHG reduction – It appears that the proposed centralized system will not achieve significant reductions to GHG's. We believe that the proposed purchase of carbon credits by the CRD to achieve a negative GHG balance sheet seriously misses the intent of the directive to reduce GHG's.

Regional Sustainability – The CRD is moving forward with development of a Regional Sustainability Strategy, yet the current sewage planning does not dovetail with these goals. We believe that the CRD cannot achieve significant regional sustainability without the full-system integration of liquid, solid, organic waste with resource recovery and water management planning. This appears to be a significant opportunity that is being missed.

We recognize the pressure on the CRD Board to approve this plan for the purpose of securing federal and provincial funding. However, approving and implementing the wrong plan is simply not an acceptable option. The lack of due process, transparency and community consultation, the problems with McLoughlin Point, the lack of a concrete site and plans for biosolids management, the absence of a convincing business case, and the inconsistency of the plan with resource recovery, GHG reduction and broader regional sustainability goals, clearly demonstrate this is the wrong plan for the Capital Region. It is currently a system concocted out of constraints and perceived necessity and not founded in proper planning.

We ask that the CRD Board not approve Amendment 8 for the reasons noted and that a much-improved plan be pursued, one that is supported by proper planning and an accountable public consultation process. Considering the significant tax dollars at stake every year for every single household in the Capital Region, we believe the public deserves no less.

Thank-you for your consideration. We will be sharing these concerns with the BC Minister of Environment and other stakeholders in the Capital Region.

Sincerely,

s.22

On behalf of Sewage Treatment Action Group
s.22

cc: CALWMC
Esquimalt Mayor and Council
Maureen Karagianis, MLA
Dr. Keith Martin, MP
Esquimalt Residents Association
Kim Westad, Times Colonist

O'Brien, Kellie ENV:EX

From: s.22
Sent: Monday, July 5, 2010 8:09 AM
To: Minister, ENV ENV:EX
Subject: Water

RECEIVED

Dear Mr. Penner,

"the site (McLoughlin) became feasible because of a key decision by the provincial government concerning water reuse. Residents, inspired by the CRD'S demand management programs, are demonstrating exemplary water conservation efforts. With the purchase of the Leech watershed lands, water resources are extensive enough to accommodate projected growth."

Judy Brownoff, Times Colonist

June 29, 21010

Yes, the CRD has done excellent work on conservation of water, however, **this should not be used as an excuse to make the wrong decision about sewage treatment for the Greater Victoria Region.**

Assessments have shown that due to the poorer quality water of the Leech River and concerns associated with higher turbidity, colour and nutrients, **full diversion of the Leech will require advanced water treatment such as construction of a treatment plant using dissolved air flotation and filtration.**

Comment from a member of the Peer Review: "the diversion of water from the Leech watershed...is a **very high risk to the provision of high quality water**...Using the Leech to augment the drinking water supply would represent a significant risk to the water supply."

http://www.crd.bc.ca/reports/water_/2001_/leech489/LEECH489.pdf

Costs of utilizing the Leech watershed: \$64.7 million for the land, pipeline to Sooke Reservoir (2001 costs) \$8.2 mill, Filtration plant \$150 million, \$3million annual operating costs. Plus costs of restoration of the Leech watershed.

AND no opportunity for a revenue stream to be developed.

Is not the logical step after conservation water reclamation/reuse and as a last step utilization of the Leech watershed?

Please step in and direct the CRD and the CLWMC.

Their current plan, amendment 8 is not acceptable and one that is not supported by the public.

Dear Mr. Penner,

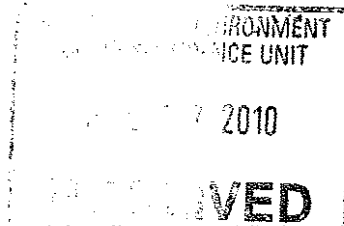
Sincerely,

s.22

Penner, Kellie ENV:EX

129106
ERV1-FY1

m: s.22
nt: Monday, July 5, 2010 1:50 PM
o: Minister, ENV ENV:EX
Subject: Sewage treatment



Dear Mr. Penner,

You should be made aware of the CRD's choice of words that are misleading the public into thinking the CRD is making good decisions. On the CRD website the talk is focused on resource recovery, innovation, protection of the environment. "Simply put, a distributed wastewater management approach will provide the best foundation for water reuse and resource recovery in the decades to come." The CRD, at the last minute, has unilaterally changed the plans to a centralized facility.

Now the CRD utilizes the following language:

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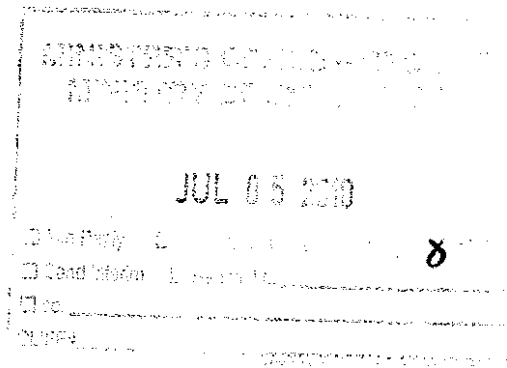
What they don't tell the public is that the current centralized plan is inadequate, and that sustainable resource recovery will not be possible. (The CRD complicity extends to the numbers they are quoting. For example, half of the possible \$3.1 million in resource recovery by 2030 is based on water reclamation - which has now been pulled from the plan.)

"We have no choice to move ahead" says Judy Brownoff, chairwoman of the CALWMC. We may need to move ahead, but, we do not need to compromise on good decision making.

Minister Penner, please step in and direct the CRD.

Sincerely,

s.22



O'Brien, Kellie ENV:EX

From: Alvin Epp [alvin@pointnexus.ca]
Sent: Monday, July 5, 2010 10:16 AM
To: O'Brien, Kellie ENV:EX
Subject: mtg with Barry Penner

attached.

Hi Kellie....

thanks for taking the time to chat

I will send you specifics on what we need to talk to Minister Penner about

you will have the info in your email this afternoon

the 2 areas of discussion will involve the waste mgt strategy (Metro).... we met with Minister Penner in early February on the issue and had a very productive meeting....

the second issue of discussion is on the CRD plan for waste water treatment plant.....

Thanks

--

Alvin Epp
Partner, Point Nexus Consulting
#145 - 33771 George Ferguson Way
Abbotsford, BC V2S 6H1
O | 866.213.5825 Ext 2

s.22

alvin@pointnexus.ca
www.pointnexus.ca

O'Brien, Kellie ENV:EX

From: Alvin Epp [alvin@pointnexus.ca]
Sent: Tuesday, July 6, 2010 8:16 AM
To: O'Brien, Kellie ENV:EX
Subject: meeting with Minister Penner

Kellie Obrien,

RE: Capital Regional District's New Sewage Treatment Plant Announcement

I'd like to set up a meeting with Minister Penner. The meeting would be to introduce Jon O'Riordon, former BC Deputy Minister of Sustainability. This is to be a frank discussion and the purpose to bring a greater measure of clarity to why CRD's recent decision to build a large Waste Water Treatment Plant in Esquimalt is a mistake. And, what legitimate options there are to take it in a better, more sustainable direction.

Mr O'Riordon will quietly, graciously give his analysis of the CRD decision, relative to a more proactive and sustainable integrated resource management strategy. The end game is to show how IRM really can save very, very significant dollars.

We feel the content of this meeting is critical to the "entire gamut" of current waste related decisions currently being wrestled with by every municipality and I trust Mr Penner will find an available time slot for this important discussion.

Finally, we want to best fit into Mr Penner's schedule. We could meet in Victoria or Chilliwack. If in Victoria, Mr O'Riordon could meet your personally and others could potentially call in. If in Chilliwack, Mr. O'Riordon could call in (from Victoria) and others could meet personally at your office. Those others would be Alvin Epp, Richard Shatto (works with Alvin Epp) and Bob Laurie (works with Sequel IRM and Mr O'Riordan).

Respectfully,

--

Alvin Epp
Partner, Point Nexus Consulting
#145 - 33771 George Ferguson Way
Abbotsford, BC V2S 6H1
O | 866.213.5825 Ext 2

s.22

alvin@pointnexus.ca
www.pointnexus.ca

July 8, 2010

Judy Brownoff
Chair of the CRD Core Area Liquid Waste Management Committee
c/o CRD
625 Fisgard Street, PO Box 1000
Victoria, BC V8W 2S6

Re: Sewer Treatment Plant

I read with some concern the response that you gave to the media, "McLoughlin Point is the obvious choice".

I would respectfully request that you reconsider this position, for what is the largest municipal project ever undertaken in this province at a cost of up to \$500.00 per household.

1. The site is located at the entrance to one of the world's still pristine harbours. All cruise ship passengers, harbour air, US ferry service and recreational boaters will have to pass this sewage treatment plant to enter our city. Are we offering this as our alternate as an attraction to say the Sidney Opera House?
2. The proposed plant is upwind of the Capital City of the Province, so all odours produced will be blown towards our gem of a city.
3. It is my understanding that the facility is being put on a site that can just contain it and will be undersized for the community needs in less than 20 years.
4. It is proposed to spend just short of \$100 million dollars to pump the sludge to the Hartland landfill, which I understood was already starting to near capacity. Even so, consideration is being given to transporting some of the sludge by truck.

I am told that the Board is going to hold some open houses to get the citizens input to this proposal, but as the decision seems to have already been made, they are but just gilding on the cake, with no real purpose.

I am writing to at least say my piece and hopefully get an insight as to why we would propose this on a site that is too small for future growth, could adversely affect the economy of this jewel of a city by affecting tourism, its life blood.

It will certainly be a bad day for our wonderful pristine city.

Yours sincerely,

Wilson, Marie L ENV:EX

From: Minister, ENV ENV:EX
Sent: Tuesday, July 13, 2010 03:32 PM
To: Correspondence Unit ENV:EX
Subject: FW: Concern for Sewage Treatment Plans in Victoria

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Orange Category

Min sig

Kellie O'Brien
Administrative Assistant
to the Honourable Barry Penner
Minister of Environment
Ph: 250-387-1187
Fax: 250-387-1356
Email: Kellie.Obrien@gov.bc.ca

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-----Original Message-----

From: localmla [<mailto:localmla@uniserve.com>]
Sent: Monday, July 12, 2010 4:46 PM
To: Minister, ENV ENV:EX
Subject: FW: Concern for Sewage Treatment Plans in Victoria

-----Original Message-----

From: s.22
Sent: July-12-10 4:45 PM
To: barry.penner.mla@leg.bc.ca; env.minister@gov.bc.ca
Cc: ida.chong.mla@leg.bc.ca; Maurine Karagianis.MLA; Martin.K@parl.gc.ca
Subject: Concern for Sewage Treatment Plans in Victoria

Dear Mr. Penner,

We are writing you about the serious concerns we have regarding the new CRD plans for placing a centralized sewage treatment plant on McLoughlin Point.

What happened to the millions of dollars spent studying the options for a distributed/decentralized plan and strong resource recovery options?

It seems like suddenly this location is the only piece of land that the CRD can find that's available for purchase so now it becomes a large centralized plant that totally is contrary to a forward

thinking, minimal impact treatment plant. Where are the other community's contributions? Why are the expert's opinions being ignored by Judy Brownoff? The CRD are not experts in sewage treatment, but repeatedly the voices of experts in this field fall on deaf ears.

This is one of the largest projects ever undertaken in this city, yet there has been almost no public consultation with Esquimalt, James Bay, downtown and tourism related businesses in our harbour. These are the areas that will be most affected by odors, noise, visuals, and any malfunctions that may result from this plant. We believe once these details have been laid out for all to see, there is going to be a large number of citizens that will come forward with the same concerns that many in Esquimalt now have. The fact that our entire council is unanimously against this, is yet another big signal that there are real and valid problems with this approach.

How is piping and driving sewage sludge produced at this plant over land an improvement to the current system? All this money is going to something that in the end is more hazardous and negatively impacts the environment than the current small problem on the seabed. Now we are going to pipe our sewage to land adjacent to one of one Canada's most beautiful harbours, concentrate it, pipe this sludge through our streets and then spend more energy treating it with little opportunity for efficient resource recovery. It seems like a big piece of the so called plan is missing.

We are very disappointed in the CRD and hold every member who voted for this so called "option" personally responsible. An "option" that was made behind closed doors. The CRD has not had meaningful consultation with Esquimalt and are not seriously addressing the concerns made regarding the limitations of the McLoughlin Point location. It appears that this is the only location they have been able to secure so now they are proceeding come hell or high water (pun intended).

We are now looking to you Mr. Penner to send the CRD back to consider a solution that is based on scientific research, future-facing, has all communities caring their fair load and is not a 15 year stop gap measure.

Thank you for your attention to this very important and urgent matter. We look forward to hearing your response.

Sincerely,

s.22

O'Brien, Kellie ENV:EX

129605
ERV1-FY1

From: s.22
Sent: Wednesday, July 14, 2010 10:18 AM
To: Minister, ENV ENV:EX
Subject: Sewage

Dear Mr. Penner,

There has been a major injustice occurring in the Greater Victoria region. There has been no meaningful or balanced community consultation. Esquimalt is currently slated to take the sewage from the entire greater Victoria region, but, it has never been consulted.

Esquimalt was given 3 opportunities to receive information from the CRD regarding a different configuration. Our feedback has been ignored and our presentations to the CALWMC have been ignored. Saanich-Oak Bay were given 14 opportunities to provide input.

They were given the opportunity to speak directly to the CALWMC.

Esquimalt has not been treated with respect nor has it been allowed to have a voice.

How can this outrage be condoned? In addition, the plan of one plant at McLaughlin Point eliminates the possibility of integrated resource management current technology or other value recovery which may be developed in the future. The science is changing rapidly. Smaller plants, or one plant on a larger sight, would allow for future developments.

BC should be setting world standards, not making backward decisions that will limit us into the foreseeable future.

Please step in and direct the CRD.

Yours Sincerely,

s.22

MINISTER'S OFFICE - REGIONS MINISTRY OF ENVIRONMENT			
JUL 15 2010			
<input type="checkbox"/> Min Reply	<input type="checkbox"/> Long Lead	<input type="checkbox"/> CM Reply	<input checked="" type="checkbox"/> Info Only
<input type="checkbox"/> Send Interim	<input type="checkbox"/> Redirect to		

s.22

MINISTRY OF ENVIRONMENT CORRESPONDENCE UNIT
JUL 15 2010
RECEIVED

O'Brien, Kellie ENV:EX

129606
ERV1-F41

From: Mahoe Group of Companies [mahoe@shaw.ca]
Sent: Wednesday, July 14, 2010 10:31 AM
To: Minister, ENV ENV:EX
Cc: barb.desjardins@esquimalt.ca
Subject: FW: McLoughlin Sewage Treatment, Victoria, BC
Attachments: judy brownoff re sewage.doc

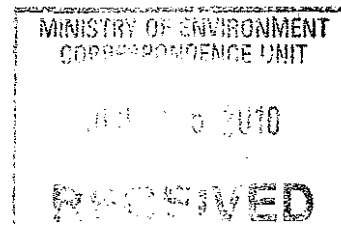
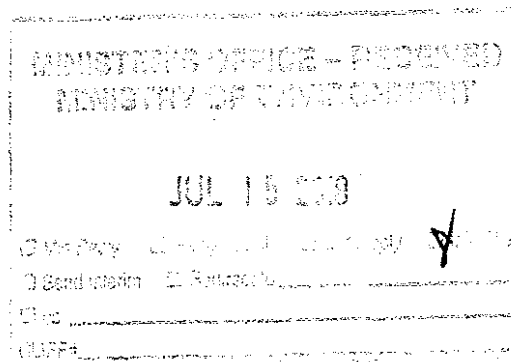
Honourable Barry Penner
Minister of Environment

I am extremely concerned with the process and haste with which this proposal is being handled. I have attached a letter to the Chair of the Committee with some of my concerns, for your information.

Sincerely,

Michael Marley

cc: Barb Desjardins, Mayor of Esquimalt



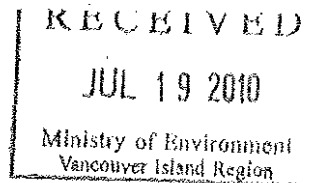


Making a difference...together

Environmental Sustainability
625 Fisgard Street, PO Box 1000
Victoria, BC, Canada V8W 2S6

T: 250.360.3078
F: 250.360.3079
www.crd.bc.ca

July 15, 2010



File: 5400-20.01

Mr. Randy Alexander
Regional Environmental Protection Officer
Ministry of Environment
2080-A Labieux Road
Nanaimo, BC V9T 6J9

Dear Mr. Alexander:

RE: AUDIT OF CORE AREA LIQUID WASTE MANAGEMENT PLAN

When the original Core Area Liquid Waste Management Plan (LWMP) was approved on March 26, 2003, one of the requirements set by the then Minister of Environment, the Honourable Joyce Murray, was as follows:

On or before March 31, 2006 and, thereafter, every five years, a report shall be prepared that provides the results of an independent audit on the commitments contained in the plan. Within two months of the publication of the audit report, the CRD shall notify the public of the existence of the report and receive comments and submissions from the public. The CRD shall forward a copy of the audit report and copies of any submissions from the public to the manager.

The first audit was completed in February 2006 and was submitted to the Ministry of Environment and posted on the CRD website for public comment.

To comply with the above requirement, the next audit is due by March 31, 2011. However, as major changes have been made to the LWMP in the past few years to incorporate the provision of sewage treatment, and as further changes are possible in the coming months, it may be appropriate to postpone completion of the next audit.

Your approval is therefore requested to defer completion of the next LWMP audit by one year, to March 31, 2012.

Please call me at 250-360-3085 if you wish to discuss this.

Yours truly,

Larisa Hutcheson, PEng
General Manager, Environmental Sustainability

DT:hr

cc: Dan Telford, Senior Manager, Environmental Engineering, CRD

Chalmers, Jennifer CD:EX

ERV 128418

From: Karagianis.MLA; Maurine [Maurine.Karagianis.MLA@leg.bc.ca]
Sent: Thursday, July 15, 2010 3:04 PM
Subject: Letter to Environment Minister Penner Regarding Sewage Treatment
Attachments: 2010.07.15 - Letter to Minister Penner re Sewage Treatment.pdf

Good afternoon,

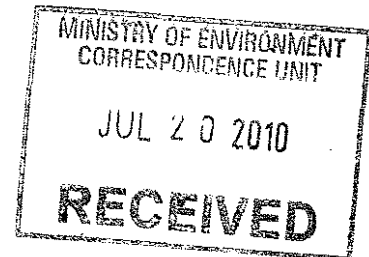
Please see the attached letter sent to BC Minister of Environment, Barry Penner, from MLA Maurine Karagianis regarding the Capital Regional District's proposed sewage treatment site for McLoughlin Point in Esquimalt.

If you have any questions, comments or concerns please do not hesitate to contact the office.

From the office of,

Maurine Karagianis, MLA
Esquimalt-Royal Roads

A5-100 Aldersmith Place,
View Royal, BC V9A 7M8
Phone: (250) 479 8326
maurine.karagianis.mla@leg.bc.ca



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CORRESPONDENCE BRANCH
Received JUL 16 2010
Sent: JUL 16 2010
ASSIGN TO: LGD (Tom)
<input type="checkbox"/> INFO/FILE
<input type="checkbox"/> COMMENTS/ADVICE
<input checked="" type="checkbox"/> NECESSARY ACTION
<input type="checkbox"/> REPLY DIRECT
<input type="checkbox"/> PREM. BULLETS
<input type="checkbox"/> MIN. RESPONSE
<input type="checkbox"/> DM. RESPONSE

MINISTRY OF COMMUNITY AND RURAL DEVELOPMENT MINISTER'S OFFICE		
RECEIVED		
JUL 15 2010		
ROUTE TO: _____		
CC	FNA	FYI
DRAFT REPLY <input type="checkbox"/>	FILE <input type="checkbox"/>	DM <input type="checkbox"/>
REPLY DIRECT <input type="checkbox"/>		

Maurine Karagianis, M.L.A.
(Esquimalt – Royal Roads)
Room 201, Parliament Buildings
Victoria, B.C. V8V 1X4
P: (250) 387 3655
F: (250) 387 4680

Community Office
A5, 100 Aldersmith Place
Victoria, B.C. V9A 7M8
P: (250) 479 8326
E: maurine.karagianis.mla@leg.bc.ca



Maurine Karagianis, M.L.A.
(Esquimalt-Royal Roads)

July 15, 2010

Hon. Barry Penner
Minister of Environment
Room 28 Parliament Buildings
Victoria, B.C. V8V 1X4

Dear Minister Penner,

I am writing on behalf of the Township of Esquimalt to reiterate their concerns regarding the Capital Regional District's (CRD) new plan to construct the region's one sewage treatment facility at McLoughlin Point in Esquimalt.

Esquimalt Council believes that the Core Area Liquid Management Plan (CALMP) as it currently stands does not comply with Ministry of Environment directives for community review and consultation, maximized resource recovery and green house gas reductions.

The community has stood up and voiced loud and clear their outrage at the lack of public consultation regarding the McLoughlin Point site. The CRD has only held one general open house in the area regarding the CALMP, while significant consultation processes were undertaken in Oak Bay and Saanich East when sewage treatment sites were being proposed for those areas.

The CRD now plans to consult with the public concerning only mitigation and benefits to the community for hosting the McLoughlin Point site. These meetings do not allow public input and review of the facility itself, instead treating the decision as a done deal.

/...next page

You have clearly stated that liquid waste management in the area must maximize the reuse of resources to reduce costs to tax payers. The local community feels that there is no evidence to show that these requirements have been met by the current plan. Even more, there is no indication that the CALMP will significantly reduce green house gas emissions to help meet future reduction targets.

I trust that you sympathize with the people of Esquimalt and I urge you to take action to address their concerns.

Sincerely,

A handwritten signature in cursive script that reads "Maurine Karagianis". The signature is written in black ink and is positioned below the word "Sincerely,".

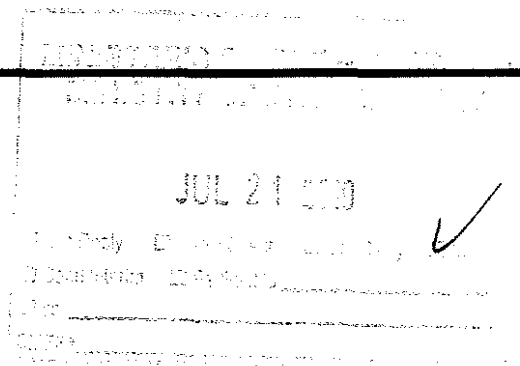
Maurine Karagianis, MLA
Esquimalt-Royal Roads

cc Hon. Ben Stewart - Minister of Community and Rural Development
Township of Esquimalt - Mayor and Council
Sewage Treatment Action Group (STAG)

ERV1 129903

O'Brien, Kellie ENV:EX

From: s.22
Sent: Sunday, July 18, 2010 1:26 PM
To: Minister, ENV ENV:EX
Subject: sewage treatment plant



Dear Mr. Penner,

There has been a major injustice occurring in the Greater Victoria region.

There has been no meaningful or balanced community consultation on the up coming sewage treatment plant. Esquimalt is currently slated to take the sewage from the entire greater Victoria region, but, it has never been consulted.

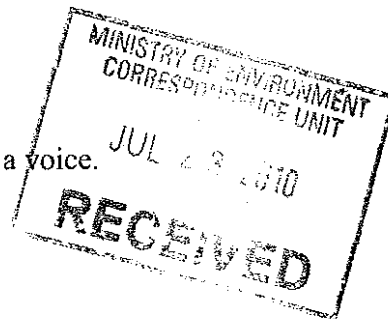
Esquimalt was given 3 opportunities to receive information from the CRD regarding a different configuration. Our feedback has been ignored and our presentations to the CALWMC have been ignored as well.

Saanich-Oak Bay were given 14 opportunities to provide input.

They were given the opportunity to speak directly to the CALWMC.

Esquimalt has not been treated with respect nor has it been allowed to have a voice.

How can this outrage be condoned?



Please take the time and step in to direct the CRD.

Yours Sincerely,

s.22



128428

THE CORPORATION OF THE DISTRICT OF OAK BAY
MUNICIPAL HALL – 2167 OAK BAY AVENUE – VICTORIA, B.C. V8R 1G2
PHONE 250-598-3311 FAX 250-598-9108 WEBSITE: www.oakbay.ca

OFFICE OF THE MAYOR

July 20, 2010

The Honourable Barry Penner
Minister of Environment
PO Box 9047 Stn Govt
Victoria, BC V8W 9E2

Dear Minister Penner:

Re: Capital Regional District Core Area Liquid Waste Management Plan – Amendment No. 8

I understand that the above-noted Amendment No. 8 has been submitted for your approval. I would ask, however, that there be a reconsideration of Oak Bay's commitments under the amended plan, namely in regards to the separation of the Humber and Rutland combined sewers. These are collectively referred to as the Upland sewers, although they only serve a portion of the Uplands area (approximately 400 homes).

The Humber and Rutland sewers feed into the East Coast Interceptor, which was under-designed and allows overflows in periods of heavy rain. More recently Oak Bay has been advised that there must be no overflows, even though there is no evidence that there is any environmental degradation as a result of these overflows. As you can see from the attached chart, the amount of overflow is minimal.

Furthermore, Oak Bay continues to be advised that it must separate the Uplands sewers, even though it is our understanding that the system would be able to handle the current flow, that there would be no significant impact on the cost of downstream treatment plants, and that there is no wet weather plant required at Clover Point. Therefore, it is unclear why overflows cannot be dealt with using other options, such as small treatment plants or storage tanks.

The separation of the Uplands sewers would come at a huge cost. In Table 5.5 of Amendment No. 8 it indicates that the cost would be \$12 million. That figure is erroneous, and we have asked CRD staff to amend it. The actual cost would be more like \$30 million to \$40 million. The CRD advises us that the municipality would have to bear the entire cost. It is hard justify this huge burden to our taxpayers given the questionable benefits, and given that this is to address the flow from a mere 400 homes.

MINISTER'S OFFICE – RECEIVED
MINISTRY OF ENVIRONMENT

JUL 21 2010

☒ Min Reply ☐ Reply Direct ☐ Reply ☐ Interim
☐ and Interim ☐ Redirect to

MINISTRY OF ENVIRONMENT
CORRESPONDENCE UNIT

JUL 23 2010

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min-Sig

In summary, I would ask that you require a reconsideration of Amendment No. 8 because it is Oak Bay's position that the overflows from the Uplands sewers are not a significant problem and therefore separation of the sewers is unnecessary.

Alternatively, if it is deemed that the overflows must be addressed then we would propose that the same approach be used as with the Haro Road sewers, i.e. the installation of wet weather flow attenuation tanks. CRD staff have stated that these tanks are necessitated by the under-design of the East Coast Interceptor, which serves portions of Saanich as well as Oak Bay. As with Haro Road, the project in Oak Bay should be cost-shared with the CRD and the Province.

Thank you for your attention to this matter. I trust we can reach a resolution that is beneficial to all participants and the community at large.

Yours very truly,

A handwritten signature in black ink, appearing to read 'C. Causton', written over a horizontal line.

Christopher M. Causton
Mayor, District of Oak Bay

Enclosure

cc: Premier Gordon Campbell
Minister Ida Chong

					For the year						
	Rutland Sewer Overflows						Humber Sewer Overflows				
	2009	start	stop	duration		2009	start	stop	duration	time	
	16-Oct	2327	31	1hr 44min	early morning		6-Jan	1620	28	4hr 48min	
	17-Oct	1046	1225	2hr 59min	late night		7-Jan	1809	215	8hr 20min	
	23-Oct	426	449	23 min	early morning		2-Apr	1717	1746	29min	
	9-Nov	832	847	15 min	morning		16-Oct	2339	15	1hr 16min	late night
	16-Nov	1214	1300	1hr 26 min	day time		17-Oct	1134	1146	12 min	
	16-Nov	1742	1825	1hr 23 min	afternoon		16-Nov	2315	2359	44 min	late night
	16-Nov	2051	2152	1 hr 41 min	late evening		16-Nov	1221	1304	1hr 22min	
	17-Nov	2240	4	2 hr 41 min	late night		16-Nov	2106	2141	35min	late night
	17-Nov	32	201	2 hr 49 min	early morning		17-Nov	42	208	2hr 46min	late night
	19-Nov	145	229	1 hr 24 min	early morning		19-Nov	805	1021	3hr 36min	
	19-Nov	805	1049	4 hr 4 min	morning						
	19-Nov	1630	1645	15 min	afternoon						
	26-Nov	56	214	2 hr 38 min	early morning	Note there is a duplicate overlap of time of time on April 2 which has been omitted.					
	1422 min	23.7hr	For the year				1448min	24.13hr	For the year		

July 20, 2010,
Premier Gordon Campbell
Office of the Premier
PO Box 9041 STN PROV GOVT
Victoria BC V8W 9E1
RE: BROWNE-OFF over CRD Sewage Plan

Dear Sir,

You can see from my heading I am very browne off with this whole sewer talk and rhetoric. It might have been going on for 3 years but as a resident of Esquimalt I am disgusted with our so called CRD in the way they have handled the whole thing. ^{s.22} I have been to many a meeting in our community as well as others and every time ^{s.22} have stated that each community should look after their own excrement. Why in God's name would the CRD wish to place it on one of the smallest pieces of land, in one of the smallest communities in our area and in our lovely harbour. An important topic this big should be placed on a site and in a community with the most LAND base to accommodate our needs and future needs of those to come. I do not like the way the CRD rushed this vote through just to get the Fed's money. Because that is what they did; there was a time line so yes let's put it in Esquimalt. This is a prime piece of real estate with wonderful water views and looks over to the Olympic Mountains and is seen by many in boats and ships as they enter Victoria Harbour. Welcome to B.C.'s Capital City. Yes remember we are the capital city of B.C. though no one would know it in this day and age. What a sight to be- hold a sewage plant. BIG AND UGLY no wonder all the other communities did not want it. Does not say much for our politicians sitting in the big house in the inner harbour that have not done anything to stop this very big eye-sore. And if you think this whole thing is only going to cost the price tag the CRD said, believe me it will be over the top much, much more. All I can say to everyone out there that if we do get this on our land that Esquimalt taxpayers DO NOT have to pay one red cent on our home taxes and that every municipality in the area will have to pay a very big price to Esquimalt for having it here. There has to be some compensation to us for all this MESS.

^{s.22}

^{s.22}

CC Geoff Young Chair, CRD Board,
Judy Brownoff, Chair, CALWMC
✓The Honorable Barry Penner, Minister of Environment
Barbara Desjardins, Mayor, Township of Esquimalt

Add to 128436

MINISTER'S OFFICE	
MINISTRY OF ENVIRONMENT	
JUL 23 2010	
<input type="checkbox"/> Min Reply	<input checked="" type="checkbox"/> Reply
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<input type="checkbox"/> cc	
CLIFFS	

MINISTRY OF ENVIRONMENT CORRESPONDENCE UNIT
JUL 26 2010
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O'Brien, Kellie ENV:EX

From: s.22
 Sent: Tuesday, July 20, 2010 8:52 AM
 To: Minister, ENV ENV:EX
 Subject: CRD Sewage Treatment Plans

MINISTRY OF ENVIRONMENT
 CORRESPONDENCE UNIT

JUL 23 2010

RECEIVED

JUL 21 2010

Dear Minister Penner,

I'd like to state that I am in favour of treating our sewage.

Having said that, this recent decision by the CALWMC to put a giant centralized plant at the mouth of the Victoria Harbour, separated by 18km from the biosolids processing plant, is an impending disaster.

The site at McCloughlin Pt was studied and found to be too small and too constraining for a sewage treatment plant. At the very most, this plant will serve residents for 14 years. Until 2030. The mandate set out by your government was for sewage treatment to be able to serve the populace until 2065.

The various members of the CALWMC are not competent enough to handle a project of this magnitude. I'd like to say in that case that we could rest on the strength of the CRD staff. Unfortunately, they have shown their incompetence in numerous ways.

Your government granted the CRD a year long extension to explore the abilities to incorporate integrated resource management (IRM) into their plants. To that end, they have wasted the extension and actually gone backwards, separating the two processing plants from each other, and abandoning resource recovery all together.

Not only that, they have no redundancy systems in place, which will leave odour and noise levels at "significant" according to the recent Environmental Assessment report done by Westland.

The tax burden to the voter will be enormous as we know there will be significant cost overruns, unless this job is done properly it should not be done at all. I urge you to step in as a voice of calm reason and deny funding to the CRD until they have proven that they can fulfill your mandate for sewage treatment in the CRD.

Sincerely,

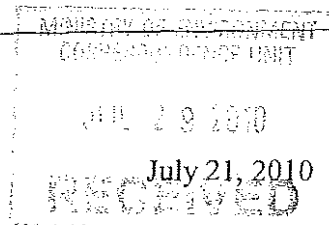
s.22

1101-201
Constituency Office:
409 - 545 Clyde Avenue
West Vancouver, B.C.
V7T 1C5
Phone: 604 981-0050
Fax: 604 981-0055
e-mail: ralph.sultan.mla@leg.bc.ca



RALPH SULTAN, M.L.A.
Member of the Legislative Assembly
West Vancouver-Capilano

Legislative Office:
Parliament Buildings
Victoria, B.C.
V8V 1X4
Phone: 250 356-9495
Fax: 250 952-0222
website: www.ralphsultanmla.ca



Honourable Ben Stewart
Minister of Community and Rural Development
Parliament Buildings
Victoria, BC V8V 1X4

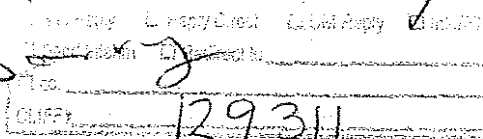
ERLM + ERVI

MINISTER'S OFFICE - RECEIVED
MINISTRY OF ENVIRONMENT

Honourable Barry Penner
Minister of the Environment
Parliament Buildings
Victoria, BC V8V 1X4

JUL 28 2010

Dear Ministers: *Ben*



Re: Amazingly Profitable Distributed Processing Systems for Waste Water Treatment in West Vancouver and Victoria

As a ^{s.22} and as a politician with a fiduciary obligation to my constituents on the North Shore, I have an obligation to speak up when governments seem poised to invest a lot of taxpayer money in truly dumb technical solutions.

I refer to the reputed amazingly profitable new distributed processing systems proposed for waste water treatment in Vancouver and Victoria; in other words, for dealing with the sewage which we humans discharge daily in abundance.

The Victoria Metro area has been foot-dragging for years about moving beyond its raw sewage "dump it in the sea" philosophy, whilst senior civil servants living there impose ever tighter environmental controls on those of us who live elsewhere. The irony of this is not lost on those of us who live elsewhere.

Meanwhile, in West Vancouver-Capilano ^{s.22} my office is less than half a mile but fortunately upwind of a primitive, aging, single-stage sewage facility which adorns the First Narrows Channel entrance to Vancouver's harbour. It has always been a source of wonderment to me that our friends of the Squamish Nation, on whose land this smelly embarrassment is located, do not make more of a fuss about Metro Vancouver's relaxed timetable to relocate it.

It develops that one of the reasons our timetables to replace both the Victoria and West Vancouver facilities are monstrously delayed (and for that matter the Iona Island facilities which serve a large part of Metro Vancouver), is the conundrum facing municipal and metro leaders who are offered tantalizing new "out of the box" thinking with respect to sewage disposal; namely, amazingly profitable distributed processing systems for waste water treatment.

Faced with the accusation that the fusty old tradition-bound professional engineers who normally design, build and operate our sewage treatment facilities, are not capable of offering the most creative "out of the box" new ideas, any municipal politician will proceed slowly and with caution.

Here is what one of my friends, an expert in the sewage treatment field, has to say:

A new consulting company appears to have the ear of senior politicians in Victoria and elsewhere. The principals of the firm are drawn from the ranks of retired Victoria environmental bureaucrats, persons experienced in greenhouse gas calculations, and others educated in marine biology.

They managed to get the Ministry of Community Development to fund a non-competitive sole-source study for the Victoria Capital Region District which concluded that CRD could make a huge profit from selling the resources recoverable from sewage.

Their numbers are totally bogus and they have had to back down, but they have nevertheless managed to obtain a second sole-source contract with Metro Vancouver for the North Shore which has come up with similar nonsense.

The problem is that they have no background in sewage system design or operation, and go around poor-mouthing professional engineers who "can't think out of the box."

Now, let us concede that their basic ideas are good in principle. They are in fact already incorporated where feasible in wastewater projects. Their key thrust is to build many small wastewater treatment plants in each small community and recycle the effluent, recover the heat from the sewage, generate power from the processed biosolids and use it all locally.

The big problem is that many small plants are so much more difficult to operate than a few or even one big one because of shock loads. Small plants are also much more expensive per unit of flow than much bigger plants.

Small community treatment plants are hardly new, having been tried all over the world (e.g. Sweden). They have been abandoned in favour of established larger plants for good reason. In addition, finding sites acceptable in a community for many sewerage treatment facilities is all the more difficult. I am worried that the Provincial, Regional, and Municipal governments are being seriously misled. Urgent projects are delayed as politicians insist that these marvelous new ideas must be incorporated.

Ministers, I have been around ^{s.22} long enough to learn that you learn by doing, not by building castles on paper. Also, as a taxpayer ^{s.22} I am alarmed to discover that I am the funding target for the proposed nonsense project in my neighbourhood. While politicians scratch their heads in confusion, while municipal planners are not sure whom to believe, bad smells continue to foul the air and the poop continues to float out to sea.

Let's get on with it, using our world-famous roster of professional engineering talent and experience.

Yours very truly,



Ralph Sultan, P. Eng.
MLA - West Vancouver-Capilano

s.22

The Honourable Barry Penner
Minister of Environment

MINISTER'S OFFICE - RECEIVED			
MINISTRY OF ENVIRONMENT			
JUL 27 2010			
<input type="checkbox"/> Min Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> Info Reply	<input checked="" type="checkbox"/> Info File
<input type="checkbox"/> Spec Interim	<input type="checkbox"/> Referral to		
CLIPPA			

Add to 128470

July 23, 2010

I am writing to express my **adamant** opposition to the CRD's decision to locate the Liquid Waste Management Plant at McLoughlin Point.

Most importantly, the CRD has not complied with the Minister's directives to:

- Hold appropriate public consultation
- Reuse resources
- Generate offsetting revenue to reduce costs to taxpayers, and
- Aggressively reduce greenhouse gas emissions.

McLoughlin Point DOES NOT meet these requirements.

There are many others factors of which I know you are aware.

I am of the opinion that a "time-out" is needed....a clear headed approach is required.

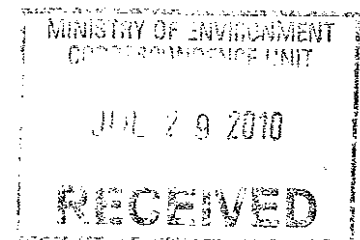
After reading this mornings article in the Times Colonist "New Laws may end need for Land-based treatment" I am convinced that CRD needs to "go back to the drawing board"

What is proposed is, in my opinion totally irresponsible and I will definitely do everything I can to support those who are opposed to this. This is not a NIMB statement but one for the whole region.

I respectfully ask you to direct the CRD to readdress the Minister's directives and to take a responsible, much needed review of this whole situation.

With thanks.

s.22



ERV1 129929

July 25, 2010

The Honourable Barry Penner
 Minister of Environment
 PO Box 9047, Stn Prov Gov't
 Victoria BC V8W 9E2

Dear Mr. Penner:

Proposed Sewage Treatment Plant

MINISTER'S OFFICE - RECEIVED			
MINISTRY OF ENVIRONMENT			
JUL 28 2010			
<input type="checkbox"/> Via Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> DM Reply	<input checked="" type="checkbox"/> Minister's File
<input type="checkbox"/> Send Internat		<input type="checkbox"/> Redirect to _____	
<input type="checkbox"/> cc: _____			
CLIFF# _____			

As a concerned citizen of the Capital Regional District I would like to register my opposition to the most recent decision by the CRD Board for the treatment of the sewage from the various municipalities within the CRD.

MINISTER'S OFFICE
CORRESPONDENCE UNIT
JUL 28 2010
RECEIVED

My opposition is based on the following:

1. The decision appears to have been made without due consideration of the scientific evidence (not the public image) supporting the lack requirement for such a facility.
2. The rushed decision appears to have been made to receive funding without regard for whether or not the right decision is being made.
3. The location for the facility... where is the room for expansion as the population density of the communities that feed into the system increase?
4. The lack of consideration for will happen if and when the municipalities with combined sewer systems modernize their infrastructure (as they should).
5. The "pumping of bio-solids" to Hartland Road Landfill. The energy required to pump the bio-solids uphill to a location would adversely contribute to our "carbon footprint". Further, the bio-solids would have to be liquefied in order to be pumped, which means there will be a requirement for another treatment facility at Hartland Landfill to treat the pumped bio-solids before the bio-solids can be disposed of.
6. The money for these facilities would be better utilized to support a more effective means of source control for Greater Victoria's sewage and making the necessary improvements to the existing infrastructure.

Trusting someone will do the right thing and listen to the science behind this issue instead of Mr.

Floatv and his misinformed followers. I remain



July 28, 2010

s.22

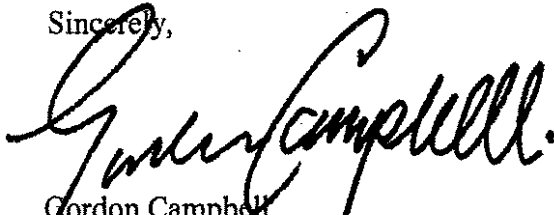
Dear s.22

Thank you for your letter regarding sewage treatment in the Capital Regional District (CRD).

I see that you have shared a copy of your correspondence with the Honourable Barry Penner, Minister of Environment. I have asked Minister Penner to review your comments and to respond to your concerns directly, on my behalf. You will be hearing from the Minister's office in this regard at the earliest opportunity.

Again, thank you for writing. I appreciate the time that you have taken to share your thoughts with me on this issue.

Sincerely,



Gordon Campbell
Premier

pc: Honourable Barry Penner

Please add to 128436 as "Premier response"

MINISTER'S OFFICE - RECEIVED			
MINISTRY OF ENVIRONMENT			
JUL 29 2010			
<input checked="" type="checkbox"/> Min Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> DM Reply	<input type="checkbox"/> Info/File
<input type="checkbox"/> Send Interim		<input type="checkbox"/> Redirect to _____	
<input type="checkbox"/> cc. _____			
CLIFF# _____			

MINISTRY OF ENVIRONMENT	
CORRESPONDENCE UNIT	
AUG 03 2010	
RECEIVED	

Wilson, Marie L ENV:EX

From: WWW ENVMail ENV:EX
Sent: Thursday, July 29, 2010 01:54 PM
To: s.22
Cc: OfficeofthePremier, Office PREM:EX
Subject: 128436i -s.22 Interim - Sewage Treatment system in Esquimalt.

Reference: 128436i

July 29, 2010

s.22

Dear s.22

Thank you for your letter of July 20, 2010, addressed to the Honourable Gordon Campbell, Premier, regarding the proposed placement of a sewage treatment system in Esquimalt.

This email is to acknowledge the receipt of your correspondence and to assure you that a detailed response will be provided once Ministry staff have had the opportunity to review the issues you have raised.

Thank you again for taking the time to write.

Sincerely,

"Original Signed By"

Barry Penner
Minister

pc: Honourable Gordon Campbell, Premier

Wilson, Marie L ENV:EX

From: WWW ENVMail ENV:EX
Sent: Thursday, July 29, 2010 02:02 PM
To: s.22
Subject: 128304i - s.22 Interim RE: Serious Public Concerns With Draft Amendment #8 CALWM Plan

Reference: 128304i

July 29, 2010

s.22

Dear s.22

Thank you for your email of July 5, 2010, regarding the proposed Amendment #8 to the Capital Regional District's Waste Water Treatment Plan.

This email is to acknowledge the receipt of your correspondence and to assure you that a detailed response will be provided once Ministry staff have had the opportunity to review the issues you have raised.

Thank you again for taking the time to write.

Sincerely,

"Original Signed By"

Barry Penner
Minister

From: s.22
To: Penner, Barry ENV:EX
Cc: Alexander, Randy ENV:EX
Sent: Mon Jul 05 22:00:28 2010
Subject: Serious Public Concerns With Draft Amendment #8 CALWM Plan

Please see attached letter from concerned citizens regarding Draft Amendment #8 of the CALWM Plan.

Regards,

s.22

Wilson, Marie L ENV:EX

From: WWW ENVMail ENV:EX
Sent: Thursday, July 29, 2010 01:59 PM
To: s.22
Subject: 128198i -s.22 Interim - RE: Concern for Sewage Treatment Plans in Victoria

Reference: 128198i

July 29, 2010

s.22

Dear s.22

Thank you for your email of July 12, 2010, regarding the Capital Regional District's sewage treatment plans.

This email is to acknowledge the receipt of your correspondence and to assure you that a detailed response will be provided once Ministry staff have had the opportunity to review the issues you have raised.

Thank you again for taking the time to write.

Sincerely,

"Original Signed By"

Barry Penner
Minister

-----Original Message-----

From: s.22
Sent: July-12-10 4:45 PM
To: barry.penner.mla@leg.bc.ca; env.minister@gov.bc.ca
Cc: ida.chong.mla@leg.bc.ca; Maurine Karagianis.MLA; Martin.K@parl.gc.ca
Subject: Concern for Sewage Treatment Plans in Victoria

Dear Mr. Penner,

We are writing you about the serious concerns we have regarding the new CRD plans for placing a centralized sewage treatment plant on McLoughlin Point.

What happened to the millions of dollars spent studying the options for a distributed/decentralized plan and strong resource recovery options?

It seems like suddenly this location is the only piece of land that the CRD can find that's available for purchase so now it becomes a large centralized plant that totally is contrary to a forward thinking, minimal impact treatment plant. Where are the other community's contributions? Why are the expert's opinions being ignored by Judy Brownoff? The CRD are not experts in sewage treatment, but repeatedly the voices of experts in this field fall on deaf ears.

This is one of the largest projects ever undertaken in this city, yet there has been almost no public consultation with Esquimalt, James Bay, downtown and tourism related businesses in our harbour. These are the areas that will be most affected by odors, noise, visuals, and any malfunctions that may result from this plant. We believe once these details have been laid out for all to see, there is going to be a large number of citizens that will come forward with the same concerns that many in Esquimalt now have. The fact that our entire council is unanimously against this, is yet another big signal that there are real and valid problems with this approach.

How is piping and driving sewage sludge produced at this plant over land an improvement to the current system? All this money is going to something that in the end is more hazardous and negatively impacts the environment than the current small problem on the seabed. Now we are going to pipe our sewage to land adjacent to one of one Canada's most beautiful harbours, concentrate it, pipe this sludge through our streets and then spend more energy treating it with little opportunity for efficient resource recovery. It seems like a big piece of the so called plan is missing.

We are very disappointed in the CRD and hold every member who voted for this so called "option" personally responsible. An "option" that was made behind closed doors. The CRD has not had meaningful consultation with Esquimalt and are not seriously addressing the concerns made regarding the limitations of the McLoughlin Point location. It appears that this is the only location they have been able to secure so now they are proceeding come hell or high water (pun intended).

We are now looking to you Mr. Penner to send the CRD back to consider a solution that is based on scientific research, future-facing, has all communities caring their fair load and is not a 15 year stop gap measure.

Thank you for your attention to this very important and urgent matter.
We look forward to hearing your response.

Sincerely,

s.22

Wilson, Marie L ENV:EX

From: WWW ENVMail ENV:EX
Sent: Thursday, July 29, 2010 02:05 PM
To: s.22
Subject: 127881i Interim - RE: CRD sewage plan is a mistake

Reference: 127881i

July 29, 2010

s.22

Dear s.22

Thank you for your email of July 8, 2010, regarding the Capital Regional District's sewage treatment plans.

This email is to acknowledge the receipt of your correspondence and to assure you that a detailed response will be provided once Ministry staff have had the opportunity to review the issues you have raised.

Thank you again for taking the time to write.

Sincerely,

"Original Signed By"

Barry Penner
Minister

From s.22
To: Penner, Barry ENV:EX
Sent: Thu Jul 08 00:19:07 2010
Subject: CRD sewage plan is a mistake

Dear Mr. Penner:

Please find an attached letter detailing some concerns I have about the new sewage plan adopted by the CRD in Victoria.

Sincerely,

s.22

Dear Mr. Penner:

I would like to voice my displeasure with the current plans for sewage treatment within the Greater Victoria area. The current proposal recently put forth by the Capital Regional District is an entirely new configuration that does not follow several of the guiding principles that you directed the CRD to follow in designing a new sewage system for the region. Specifically:

- There is little or no opportunity for maximizing recovery of resources from the processed sewage so as to lower operating costs and lessen the impact on the environment.
- There has been no consultation with the communities of Esquimalt and Victoria on this new plan prior to its adoption.

As a resident of Esquimalt, I am very upset at not having been properly consulted about this sewage plan prior to it being accepted by the CRD. The CRD has failed in its responsibility to adequately consult with residents in and around the chosen site prior to adopting the plan.

I urge you not to approve the current plan being presented to you by the CRD and that you ask the CRD to design a better system which properly incorporates all your directives. I also urge you to direct the CRD to spend sufficient time and effort consulting with residents about this new plan prior to its adoption.

Sincerely,

s.22

129673

Minister of Transport,
Infrastructure and Communities



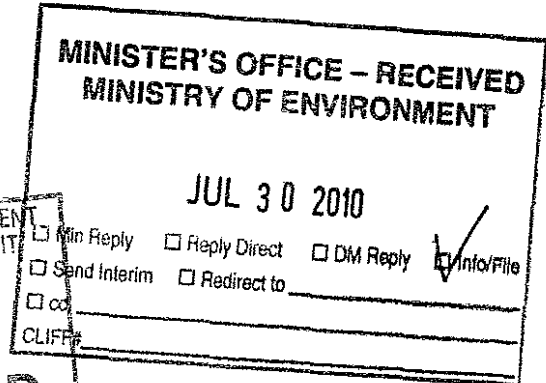
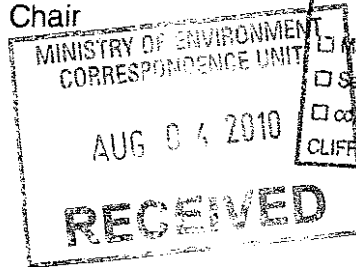
129673.
FYI-ERV1
Baird/Young, G

Ministre des Transports,
de l'Infrastructure et des Collectivités

Ottawa, Canada K1A 0N5

JUL 23 2010

Mr. Geoff Young
Capital Regional District Board Chair
Environmental Services
625 Fisgard Street
P. O. Box 1000
Victoria, British Columbia
V8W 2S6



Dear Mr. Young:

Thank you for your correspondence of March 31, 2010, and for providing additional information regarding a wastewater treatment project in the Capital Regional District. I have shared this information with my officials.

We are continuing to discuss with representatives of both the Capital Regional District and the Government of British Columbia the best way to advance this project.

Thank you again for your letter and for the updated information.

Sincerely,

John Baird, P.C., M.P.

c.c. The Honourable Barry Penner, M.L.A.
The Honourable Bill Bennett, M.L.A.

Canada



Reference: 128470i

AUG 03 2010

s.22

Dear s.22

Thank you for your letter of July 23, 2010, regarding the Capital Regional District's sewage treatment plans, addressed to the Honourable Gordon Campbell, Premier. As the issue you raised falls under the purview of the Ministry of Environment, Premier Campbell has asked that I respond on his behalf.

This letter is to acknowledge the receipt of your correspondence and to assure you that a detailed response will be provided once Ministry staff have had the opportunity to review the issues you have raised.

Thank you again for taking the time to write.

Sincerely,

Barry Penner
Minister

pc: Honourable Gordon Campbell, Premier



Reference: 128377i

AUG 03 2010

Larisa Hutcheson, PEng
General Manager, Environmental Sustainability
Capital Regional District
625 Fisgard St
PO Box 1000
Victoria BC V8W 2S6

Dear Ms. Hutcheson:

Thank you for your letter of July 15, 2010, addressed to Mr. Randy Alexander, Regional Manager with the Environmental Protection Division of the Ministry of Environment, regarding the audit of the Capital Regional District's Core Area Liquid Waste Management Plan.

This letter is to confirm the receipt of your letter and to inform you that it has been shared with Ministry of Environment staff in the Vancouver Island regional office for their review and recommendations.

Staff will review and provide recommendations as quickly as possible.

Thank you again for your submission.

Sincerely,

Barry Penner
Minister

pc: Randy Alexander, Regional Manager, Environmental Protection Division, Ministry of Environment

VANCOUVER / VICTORIA / CHILLIWACK

Date Booked:

Pre:

Mtg:

138661

AG 4TH

11:00AM

Meeting to be schedule with Minister

Date Requested:

Person Requested:

Name: Alvin Epp - PantNexus Consulting

Contact Info: 604.855.1372

Organization: _____

Topic: CRD Waste Water ^{man} Waste Strategy (Metro.)

Urgency/to be scheduled by: _____

☒ Attend

☐ Regrets

☐ No Response

☐ Refer MOE staff

☐ Refer MOS

☐ DMO Advice _____

☒ MO staff _____

☐ MOE staff _____

☐ Other attendees to invite _____

☐ Briefing note _____

☐ Schedule Pre-brief _____

Additional Comments:

* Email w available dates

129804

ERLMY
ERV1

F41

(Pls. send copy to
both branches)

129804

MINISTER'S OFFICE - RECEIVED
MINISTRY OF ENVIRONMENT

AUG 09 2010

☐ Min Reply ☐ Reply Direct ☐ DM Reply ☒ Info/File
☐ Send Interim ☐ Redirect to _____
☐ cc _____
CLIFF# _____

MINISTRY OF ENVIRONMENT
CORRESPONDENCE UNIT

AUG 12 2010

RECE s.22

August 5, 2010

s.22

The Honourable Barry Penner
Minister of the Environment,
Parliament Buildings
Victoria BC V8V 1X4

Dear Mr. Penner:

I note from the press that you are being called upon to approve or reject the plan by Metro Vancouver to construct a garbage incinerator.

It has been urged upon you by the press that you make your decision based upon scientific evidence.

I earnestly wish to urge you to do so.

While you are at it, you could also act upon the scientific evidence presented by Drs. Christopher Garrett and Jack Littlepage of the University of Victoria and accept the use of long outfalls as the proper means of sewage disposal from the Core Area of the Capital Regional District.

s.22 Best regards

s.22



Reference: 128428i

AUG 11 2010

His Worship Mayor Christopher M. Causton
District of Oak Bay
2167 Oak Bay Ave
Victoria BC V8R 1G2

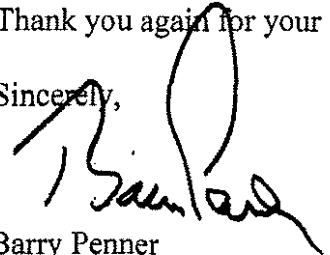
Dear Mayor Causton:

Thank you for your letter of July 20, 2010, requesting a reconsideration of Amendment No. 8 of the Capital Regional District's 2010 Core Area Liquid Waste Management Plan.

This letter is to confirm the receipt of your letter and to inform you that it has been forwarded to Ministry of Environment staff in the Vancouver Island regional office for their review.

Thank you again for your submission.

Sincerely,



Barry Penner
Minister

MINISTRY OF ENVIRONMENT INFORMATION NOTE

Date: August 13, 2010
File: 76780-30 CRD Core
CLIFF/tracking#: 128951 VI-10-18

- I. **PREPARED FOR:** Honourable Barry Penner, Minister of Environment.
- II. **ISSUE:** August 18, 2010, Meeting with Colwood Mayor David Saunders regarding the Capital Regional District (CRD) Liquid Waste Management Plan (LWMP).
- III. **BACKGROUND:**
- The CRD has submitted LWMP Amendment #8 to the Minister for approval:
 - McLoughlin Point treatment plant; Saanich East Storage Tanks; Clover and MacAulay Point Grit Chambers.
 - Westshore treatment plant in 2030.
 - Capital cost: \$ 782,686,000; Operating cost: \$ 14,571,000 per year.
 - The CRD has refined their strategy by deferring construction of a West Shore treatment plant by 14 years (to 2030). A proposed water reclamation plant at Haro Woods has been replaced by surge tanks to manage wet weather flows. Cost savings \$185 million capital, \$14.5 million/yr operating.
 - Colwood Mayor David Saunders meeting request states:
 - *the West Shore thinks it more efficient and effective to treat its own effluent, it is working with the CRD as it is part of the Regions Liquid Waste Management Plan and does not wish to jeopardize any senior government funding possibilities.*
 - *As a result of a Colwood Council of 2010-05-25, the CRD was subsequently made aware of the In Camera motion which stated that:
... the City of Colwood support "in principle" a regional sewage treatment and resource recovery facility on City owned land with the expectation that amenities will accrue to Colwood, and that the facility will be aesthetically pleasing and generate no noise and no smell.*
 - *Of concern to the City is the possibility that the Ministry of Environment was not advised at the time of the recent CRD sewer treatment plant location presentation to the Province of Colwood's motion. The implications of the motion suggest a willingness to explore a treatment facility in Colwood, which includes solid waste handling and the capacity for future expansion.*
 - *Although Colwood siting has been talked about previously, the new council motion relates to taking the entire Regional District's sewage with room for expansion if needed and it is City owned land that has been identified, not private. The CRD is assuming that with the new plan submitted, that Colwood's land would be made available in the future for sewage treatment expansion. That is not necessarily the case as the City is currently looking at several other options for city owned properties and more importantly this current council can't encumber a future council.*

IV. DISCUSSION:

- The current CRD strategy defers construction of a West Shore facility until needed (to 2030 - approximately 14 years). It avoids unnecessary capital and operating costs before the capacity is needed, and provides flexibility to incorporate future improvements in treatment technology and resource recovery opportunities.
- Many of the homes in the West Shore are not sewered (served by on-site systems, and/or septic systems) and demand for sewer capacity is expected to increase over time with increasing population.
- The option of one large treatment plant on the West Shore was considered in the CRD evaluation. The costs were significantly higher due primarily to the need to tunnel under the harbor to reach the West Shore.
- Tunneling is a potentially high risk activity. CRD is currently undertaking geotechnical studies into the option.
- The CRD continues to evaluate opportunities for facilities on the West Shore and other locations.
- The CRD board passed Amendment #8 by a strong majority (14 for, 3 against - Desjardins, Derman and Hill). The Mayor of Colwood voted in favour.

Potential Questions:

- Attached are three questions that may be received at the meeting and information to support a response.

V. MINISTRY POSITION:

- The CRD strategy provides a practical, cost effective system that incorporates currently viable resource recovery opportunities (including biogas generation, heat recovery, phosphorus fertilizer recovery, and generation of offsetting revenues), and facilitates future resource recovery opportunities.
- The plan outlined in Amendment #8 represents a reasonable evolution and refinement of the CRD strategy that takes advantage of staging opportunities to establish the best, lowest cost configuration to meet treatment objectives.
- The CRD has been conducting a public involvement program since 2006. City of Colwood and other CRD communities have been engaged through public meetings, mail-outs, media and internet. The CRD recognizes the need to continue to engage CRD communities as they proceed.
- A LWMP is intended to be a living plan that evolves as opportunities arise. A decision on Amendment #8 now does not preclude further refinement of the plan should new opportunities be identified. Mayor Saunders is encouraged to continue to engage his colleagues at the CRD to further refine the plan as the CRD moves forward in implementing treatment.

Attachment: Potential Questions and Supporting Information

Contact:

*Lynn Bailey
Assistant Deputy Minister
Environmental Protection
Phone: 250 387-1288*

Alternate Contact:

*Jim Standen
Director
Regional Operations
Phone: 250 387-9990*

Prepared by:

*Randy Alexander
Regional Manager
Coast Region
Phone: 250 751-3176*

Approved	Initials	Date
DMEO	JG	Aug 17/10
ADM	LB	Aug 16/10
Dir./Mgr.	CZH	Aug 16/10
Author	RA	Aug 13/10

Potential Questions and Supporting Information

Q: The new plan does not take into account the resource recovery directions that you previously gave to the CRD – will you send them back to do more work?

- The CRD strategy provides a practical, cost effective system that incorporates currently viable resource recovery opportunities (with generation of offsetting revenues) and facilitates future resource recovery opportunities.
- The Minister granted a one year extension to complete the LWMP primarily to allow the CRD to fully explore resource recovery opportunities. The CRD reports they have undertaken 15 major resource recovery studies. The results of the IRM study were considered in studies including:
 - Detailed mapping of energy recovery opportunities leading to identification of 39 specific “opportunity areas” within the CRD Core;
 - Triple bottom line evaluation of a range of options for decentralization (from centralized to widely distributed). McLoughlin Point was a key component of all configurations;
 - Detailed studies of opportunities at University of Victoria, James Bay, and downtown Victoria.
- The CRD have already committed to the following resource recovery innovations:
 - Produce biogas/bio-methane (enough to heat 100 homes) through anaerobic digestion of sludge. Utilize digested biosolids for use as fuel in industrial and/or waste to energy facilities.
 - Recover phosphorus fertilizer from digester process (Struvite process).
 - Recover heat from digesters and effluent to provide heating for:
 - Treatment plant buildings.
 - Potential district heating options for the University of Victoria, Department of National Defense, James Bay/Downtown.
 - McLoughlin site provides opportunities for Esquimalt to utilize effluent heat.
 - Saanich East tanks provide an opportunity for heat recovery.
 - A carbon neutral operation, due largely to the use of wastewater resources to replace fossil fuels. Carbon offsets equivalent to 1,200 personal vehicles emissions per year.
 - Continuing successful water conservation programs to further reduce per capita water use (and reduce future treatment requirements).
 - Programs to reduce sewer system inflow and infiltration in order to prevent sewer system overflows and reduce future treatment requirements.
- The CRD have committed to continuing to develop resource recovery opportunities:
 - By the end of 2010, complete a comprehensive Resource Recovery and Use Plan for optimizing the management of resources from waste. Specific opportunities in the James Bay, Victoria core, Westshore, Saanich East are being explored.
 - By the end of 2011, complete business cases for specific resource recovery facilities, and engaging resource use agreements with prospective customers and partners.
 - Assess integration with solid waste management strategies (facilitated by co-location of sludge processing at Hartland Landfill).

- The potential for reclaimed water production remains, and can be incorporated as users are identified.

Q: Isn't the McLoughlin site too small and subject to earthquake/tsunami damage?

- **Earthquake:** The facility will be designed to withstand a 1 in 2,000 year earthquake. Soil conditions are suitable for seismic considerations. Backup power will maintain treatment and pumping capability.
- **Tsunami and Sea Level Rise:**
 - The ground elevation at the McLoughlin Point plant will be a minimum of 5.2 m. Design will consider tsunami risk.
 - In Victoria, a 4 meter swell defines areas potentially affected by a major tsunami.
 - A 1.5 metre sea level rise is anticipated through the life of the facility (December 2008 Climate Action Secretariat report estimates 93 cm rise by 2100).
- **McLoughlin site suitability:** The site size is suitable for the planned facility, which utilizes innovative, small footprint treatment technology Biological Aerated Filtration (BAF). The site will be fully utilized by the facility.

Pros:

- Economically redevelop brownfield site.
- Remote from residences, minimizing disruption.
- High design and finish of facility can address visual aesthetic concerns.
- Minimal effects on vegetation, wildlife, or archaeological features.
- Site size limitation means no future expansion impacts on neighborhood.
- Cost advantages.

Cons:

- High truck traffic during construction.
- Sludge pipeline construction will disrupt traffic.
- Traffic during operation (less than 10 trucks per month).

Q: This is a new plan that the public has not been consulted on. Will you send the CRD back to do more consultation before making your decision on Amendment #8?

- The plan outlined in Amendment #8 represents a reasonable evolution and refinement of the CRD strategy that takes advantage of staging opportunities to establish the best, lowest cost configuration to meet treatment objectives.
- The CRD has been conducting a public involvement program since 2006. A sewage treatment facility at either McLoughlin or MacAuley Points has been contemplated throughout the consultation process, and was approved by the CRD Board and Minister in Amendment #7.
- In 2009, two community dialogue sessions and two open houses were held in Esquimalt. Two more public meetings were held in Esquimalt in July 2010. Regular Wastewater Updates have been made available to Esquimalt, and input has been sought through media, internet, mail outs and newspaper inserts. Meetings of Esquimalt Council and Residents Association have been attended by CRD staff.
- The CRD recognizes the need to continue to engage the public in Esquimalt and other communities as they move forward.
- Other consultation efforts undertaken by the CRD include:

- In 2009 and 2010 the CRD has held open houses in communities, including Esquimalt, to provide information on siting options in those communities.
- 54 public engagement/consultation sessions were held throughout the region.
- Feedback has been received at open houses, by mail, and on-line. The CRD has also communicated through mail outs, media advertisements, and internet.
- Hosting a comprehensive website; where close to 33,000 visitors have logged more than 600,000 page views.
- Extensive, ongoing consultation with First Nations.



CORPORATION OF THE TOWNSHIP OF ESQUIMALT

Municipal Hall, 1229 Esquimalt Road, Esquimalt, B.C. V9A 3P1
Website: www.esquimalt.ca Email: info@esquimalt.ca

Voice: (250) 414-7100
Fax: (250) 414-7111

Office of the Mayor

August 13, 2010

Honourable Ben Stewart
Minister of Community and Rural Development
PO Box 9056, Stn Prov Govt
Victoria BC V8W 9E2

Dear Minister Stewart:

Thank you and Deputy Dale Wall for meeting with me and my staff on July 16, 2010. I regret that our first meeting was over this particular issue and I regret expressing my frustrations publicly. This is an important issue for the Capital Region and I apologize for my public comments, however, I am grateful for your time and your desire to be informed. I write today to bring clarity to the purpose and content of the discussion to help us both find comfort in the important decisions that are being made regarding the investment of \$800-million in a sewage treatment solution for the Provincial Capital.

The opportunity to receive the support of the provincial government in this regional undertaking is critical and we are grateful. I respect immensely that there are many competing demands for these dollars, and my ultimate desire is to ensure that your investment is a wise one, and yields successful outcomes for the taxpayers in the Capital Region as well as the Province.

In my opinion, your investment is not going to be spent wisely and as the guardian of the tax payer, I am strongly urging you to become fully informed. Colwood is a viable option that would better meet your government's environmental and development objectives, and this option has not been fully considered. Finding the right location and making the right investment in land for growth and expansion of the Provincial Capital's waste water treatment is the most important long-term investment decision we can make.

As the consultation process has been gravely inadequate, I feel strongly that this information needs to be shared with residents of the Capital Region. My perspective is an informed one and I strongly believe that the selection of McLoughlin Point is simply the path of least resistance and a risk to the reputations of the provincial and federal governments.

Thank you for your consideration and for acknowledging my concerns.

Sincerely,

Barbara Desjardins
Mayor



FYI - ERVI
And add as x-ref in 128744

CORPORATION OF THE TOWNSHIP OF ESQUIMALT

Municipal Hall, 1229 Esquimalt Road, Esquimalt, B.C. V9A 3P1
Website: www.esquimalt.ca Email: info@esquimalt.ca

Voice: (250) 414-7100
Fax: (250) 414-7111

August 16, 2010

Honourable Barry Penner
Minister of Environment
PO Box 9047, Stn Prov Govt
Victoria BC V8W 9E2

Dear Minister Penner:

MINISTER'S OFFICE - RECEIVED		
MINISTRY OF ENVIRONMENT		
AUG 17 2010		
<input type="checkbox"/> Min Reply	<input type="checkbox"/> Reply Direct	<input type="checkbox"/> DM Reply
<input type="checkbox"/> Send Interim	<input type="checkbox"/> Redirect to	<input checked="" type="checkbox"/> Info/File
<input type="checkbox"/> CC		
CLIFF# 129676		

Office of the Mayor

X-Ref: 128744

Thank you and your staff for meeting with me and my staff on August 4, 2010. I am grateful for your time and your desire to be informed. I write today to bring clarity to the purpose and content of the discussion to help us both find comfort in the important decisions that are being made regarding the investment of \$800-million in a sewage treatment solution for the Provincial Capital.

The opportunity to receive the support of the provincial government in this regional undertaking is critical and we are grateful. I respect immensely that there are many competing demands for these dollars, and my ultimate desire is to ensure that your investment is a wise one, and yields successful outcomes for the taxpayers in the Capital Region as well as the Province.

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As the consultation process has been gravely inadequate, I feel strongly that this information needs to be shared with residents of the Capital Region. My perspective is an informed one and I strongly believe that the selection of McLoughlin Point is simply the path of least resistance and a risk to the reputations of the provincial and federal governments.

Thank you for your consideration and for acknowledging my concerns.

Sincerely,

Barbara Desjardins
Mayor

BD/dk

130631

FYI - ERVI

130631



Making a difference...together

Wastewater Made Clear
625 Fisgard Street
Victoria, BC, Canada V8W 2S6

T: 250.360.3192
F: 250.360.3079
www.crd.bc.ca

www.wastewatermadeclear.com

MINISTRY OF ENVIRONMENT
CORRESPONDENCE UNIT

SEP 01 2010

RECEIVED

18 August 2010

s.22

MINISTER'S OFFICE - RECEIVED
MINISTRY OF ENVIRONMENT

AUG 30 2010

☐ Min Reply ☐ Reply Used ☐ DM Reply ☒ Info/Files
☐ Send Interim ☐ Redirection
☐ cc
CLIFF#

COPY

File: 5330-30.0206.67

Dear s.22

RE: LETTER OF 20 JULY 2010 TO PREMIER GORDON CAMPBELL

I received a copy of your letter of 20 July 2010 to the Premier and I thank you for the opportunity to respond to your concerns.

The configuration for core area wastewater treatment calls for a series of locations and facilities to be constructed in our region. A total of five sites are included in the system configuration. Attenuation tanks are proposed for a location in East Saanich, screening and grit removal is planned for Clover Point in Victoria and Macaulay Point in Esquimalt. McLoughlin Point in Esquimalt will host a liquids-only plant. An additional site, currently identified as the Hartland landfill, will host the biosolids facility. Future capacity will be achieved through the development of new treatment facilities in the region.

The selected system configuration, with the McLoughlin site as the central facility, has many advantages. Estimated capital costs for the system have decreased by more than \$185 million and annual operating costs have decreased by \$5.2 million, savings that will result in reduced household tax increases for core area residents. By choosing an industrial site removed from residential neighbourhoods, the facility will have fewer social effects.

The McLoughlin site provides a good solution to extremely limited siting options. Resource recovery opportunities have been explored. Opportunities are available using the McLoughlin configuration with recovery of heat, biogas, biosolids and phosphate included in the plan. In addition, the McLoughlin configuration reduces the number of continuously operated outfalls from four to one and flow management eliminates overflows up to a five year storm event for the east coast overflow outfalls.

For most viewers entering or exiting the harbor, a wastewater treatment facility at McLoughlin Point may be considered a neutral or positive visual effect, because it replaces an unattractive vacant industrial lot with modern, well-designed buildings and landscaping. The McLoughlin facilities will be designed to be attractive and suitable in a waterfront urban setting. The treatment processing equipment will be enclosed in buildings and the facility will be fenced and landscaped. Architectural building features, vegetation screens and landscaping will be seen along the east and south shorelines of the site to partially screen the facility and to blend the site with the surrounding landscape. Viewers near sea level looking at the site will see partially screened and architecturally treated industrial and office buildings against a treed background.

The CRD will be hosting meetings in Esquimalt, starting in the fall. As with other public engagement efforts, the purpose has not been to ask the public if it supports a core area liquid waste facility in their community, but rather to get feedback on the implications for the community and to provide the opportunity for comment on mitigation.

Re: Response to Letter of 20 July 2010 to Premier Campbell
18 August 2010

Page 2 of 2

Thank you again for your interest in the project and the opportunity to respond to your comments. We look forward to further dialog with residents in the near future.

Should you be interested, more information is available on our website at www.wastewatertomadeclar.ca.

Sincerely,



Geoff Young
Chair
Capital Regional District Board

copy The Honourable Gordon Campbell, Premier, Province of British Columbia
The Honourable Barry Penner, Minister of Environment
Judy Brownoff, Chair, CALWMC
Barbara Desjardins, Mayor, Township of Esquimalt
Kelly Daniels, CRD Chief Administrative Officer
Jack Hull, CRD GM Integrated Water Services / Interim Project Director, Core Area Wastewater Treatment



Making a difference...together

Wastewater Made Clear
625 Fisgard Street
Victoria, BC, Canada V8W 2S6

T: 250.360.3192
F: 250.360.3079
www.crd.bc.ca
www.wastewatermadeclear.com

bcc Andy Orr,
 Tony Brcic
 Tara Mills
 Treace Alton



Aug 25/10

**MINISTRY OF ENVIRONMENT
DECISION NOTE**

Date: July 12, 2010
Date of previous note: Jan 21, 2010
X- Reference: 118626/76780-30
CRD Core
CLIFF/tracking : 127860 VI-10-13

- I. PREPARED FOR: Honourable Barry Penner, Minister of Environment**
- II. ISSUE: Capital Regional District (CRD) submission of the Core Area Liquid Waste Management Plan (LWMP) Amendment #8 to the Minister for approval.**
- III. RECOMMENDATION OPTION:**
Option #1: Approve Amendment #8.
- IV. BACKGROUND:**
- In June 2007, the CRD submitted Amendment #6 to their LWMP committing to implementing treatment by the end of 2016 (see Appendix 1: History).
 - The Minister's response to the amendment, and subsequent communication directed the CRD to submit a further amendment to the plan by December 31, 2009 which meets six specific objectives in developing the wastewater treatment program and provides specific information. Amendment #7 was submitted in December 2009 and provided some but not all of the outstanding information.
 - The Minister responded on February 9, 2010, approving Amendment #7. The response requested that a further amendment be submitted by June 30, 2010 that contains all outstanding information to support the wastewater management strategy. (See Discussion: Amendment #7 approval requirements)
 - In June 2010 the CRD submitted Amendment #8 to the Minister for approval.
- V. DISCUSSION:**

Wastewater Strategy

- The wastewater treatment strategy has been revised such that the CRD are proposing one sewage treatment plant at McLoughlin Point in Esquimalt to treat all wastewater in the core area till 2030 (at which time a Westshore plant would be constructed). A combination of reasons has led to the change in strategy including strong public opposition to the use of the site chosen for the Saanich East facility, the lack of demand for reclaimed water from a distributed treatment system and the substantial cost savings achieved through having one central treatment facility. The McLoughlin Point site size constraints required eliminating the side stream reclaimed water plant and moving the grit removal facilities to Macaulay Point and Clover Point. The Minister should encourage the CRD to maintain a wastewater strategy that will take advantage of the production and use of reclaimed wastewater in the future.

The proposed system configuration:

- McLoughlin Point will treat all wastewater from the Macaulay Point collection system including the Westshore, and up to 3 x average dry weather flow (ADWF) from the Clover Point collection system.
- After 2030 a Westshore facility will be located in Colwood;
- The Saanich East sewage treatment facility has been deferred and will be replaced with a storage tank to equalize peak storm sewage flows;
- Flows not pumped from Clover Point to McLoughlin Point will be fine screened and discharged through the Clover Point outfall;
- A biosolids processing facility (energy centre) will be constructed at the Hartland landfill.

Clover Point Wet Weather Flow Strategy

- The original strategy to provide primary treatment for Clover Point flows between 3 and 4 x ADWF was re-assessed as part of Amendment #8 to determine the relative costs and environmental benefits of providing primary treatment. The report concludes:
"Providing advanced primary treatment to those wet weather flows in excess of 3 x ADWF would make only a small incremental improvement of about 1% in reduced load and at a cost of \$27 million for capital expenditure, and an annual O&M cost of \$0.6 million."
- Amendment #8 removes the wet weather treatment plant at Clover Point "until such time as there is a demonstrated environmental need for this facility". Under the new strategy, Clover Point flows above 3 x ADWF will be screened prior to discharge. Annual loadings of solids discharging from Clover Point will be reduced by 99% compared to continuing to discharge raw sewage. The duration of overflow will be about 110 hours per year for one in five year storm events;
- The Minister should require the CRD to monitor quality and volumes of wastewater discharged through the Clover Point outfall and to continue to assess the impact of the discharge on the receiving environment to determine the need for treatment in the future.

Schedule

- The approved treatment schedule committed to having a reclaimed water plant in production by 2013, with remaining treatment facilities in operation by 2016. The reclaimed water plant will not be constructed due to reasons identified above, however the central wastewater treatment facility will be completed and in operation by the end of 2016 in accordance with the approved schedule.

Cost Estimates

- The annual cost per household for the Amendment 8 strategy (includes grants) varies amongst municipalities and ranges from \$210 to \$500, and the estimated weighted cost per household is \$300.
- Cost sharing agreements with the participating municipalities will be worked out by the end of 2010.

- **Cost Comparison:**

	Facilities	Capital Cost Estimate	Annual operational/ maintenance cost
Amendment 8 Strategy	<ul style="list-style-type: none"> • McLoughlin Point treatment plant • Saanich East Storage Tank • Clover and MacAulay Point Grit Chambers • Westshore treatment plant in 2030 	\$ 782,686,000	\$ 14,571,000
Amendment 7 Strategy	<ul style="list-style-type: none"> • McLoughlin Point treatment plant • Saanich East treatment plant • Clover Point treatment plant • Westshore treatment plant 	\$ 967,500,000	\$19, 800,000

Amendment # 7 Approval Requirements

The outstanding information required by the Minister has been provided as follows:

- ***Identify a site for treatment of Westshore wastewater:***
A site for the Westshore facility has been identified but will not be developed at this time. Wastewater from the Westshore will be treated at the new McLoughlin Point sewage treatment facility until such time as there is no spare capacity at McLoughlin Point after which a Westshore facility will be constructed.
- ***Identify a site for biosolids processing:***
Biosolids from the McLoughlin Point liquid treatment facility will be conveyed by pipeline to Hartland landfill, where a biosolids processing facility (energy centre) will be constructed. CRD are searching for an alternate site closer to the liquid treatment facility to save costs (\$30 million) to convey the sludge 18 km to the landfill site. If another site is found a further plan amendment will be required.
- ***Environmental impact studies (EIS) for selected sewage treatment facilities:***
The EIS has been provided for the McLoughlin Point sewage treatment facility, Clover Point grit removal facility, Macaulay Point grit removal facility and Hartland Road biosolids processing facility. An EIS has also been completed for the future Westshore site.
- ***A progress report on marine environmental assessment work carried out on the selected outfall locations:***
Work on the Finnerty Cove outfall that was to serve the Saanich East sewage treatment facility has been suspended due to the change in strategy that will eliminate this outfall. Work will continue at the Albert Head outfall location because this outfall will be required in the future when the Westshore facility is constructed. The Macaulay Point outfall will most likely be twinned to accommodate the discharge from the McLoughlin Point treatment plant. Environmental assessment work will be carried out to determine the best outfall alignment. The Minister should require the completion of an EIS for the new outfall proposed for Macaulay/McLoughlin Point.

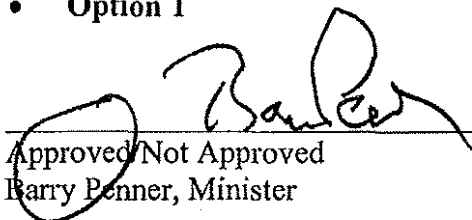
- ***Final draft operational certificates for selected sewage treatment facilities:***
The draft operational certificate for the McLoughlin Point sewage treatment facility has been provided.
- ***An updated public and First Nations consultation summary report:***
CRD has undertaken extensive public consultation, and continues to do so, particularly with regard to the selection of McLoughlin Point for the central sewage treatment facility. More consultation with Esquimalt residents is planned. The amendment submission has adequately documented the consultation activities and public responses to date. Consultation to date is considered to be adequate, especially when consideration is given to the recent changes made to the wastewater strategy. The CRD has been actively engaging local First Nations, and continues to do so. Memorandums of Understanding regarding consultation protocol have been developed with three potentially affected First Nations bands. Recently, First Nations have expressed concern regarding any potential impacts on their shellfish harvesting practices. CRD is pursuing this matter with the First Nations, Fisheries and Oceans, and through facility design considerations. The Minister should require the submission of an updated public and First Nations Consultation summary report to be submitted by December 31, 2010.
- ***A copy of the business case including an assessment of public/private partnerships and procurement details:***
The business case has been provided to the Minister of Community and Rural Development (MCD) with a copy to MoE. The business case includes an assessment of public/private partnerships and procurement details as required. The CRD should be directed to continue to work with MCD to address provincial requirements for the business case and for assessment of public-private partnerships, and to clarify procurement planning and project implementation.
- ***Develop an emergency contingency plan for biosolids use and reconsider opportunities to beneficially use biosolids for fertilizer and soil amendment products:***
The CRD requests that these issues be addressed in the Resource Recovery and Use Plan that will be submitted to the Ministry at the end of 2010.

VI. OPTIONS:

s.13

VII. RECOMMENDATION OPTION:

- **Option 1**


 Approved Not Approved
 Barry Penner, Minister

Aug 25 2010
 Date

Additional information is attached:

Appendix 1 – History

Appendix 2- Resource recovery, conservation, and innovation

Contact:

Lynn Bailey
 Assistant Deputy Minister
 Environmental Protection
 Phone: 250 387 1288

Alternate Contact:

Randy Alexander
 Regional Manager
 Coast Region
 Phone: 250 751 3176

Prepared by:

Duncan A. McLaren & Blake Medlar
 EPO/Section Head
 Coast Region
 Phone: 250 751 3183

USE FOR NOTES FOR MINISTER

	Initials	Date
Approved		
DM	DK	July 14/10
ED /ADM	JH	July 14/10
A/Dep Dir	D Prpich	July 14/10
Mgr.	BM/RA	Jul 7/10 Jul 12/10
Author	DM/BM	Jul 7/10 Jul 12/10

APPENDIX 1: HISTORY

- In a letter to the Capital Regional District (CRD) dated July 21, 2006, the Minister directed the CRD board to submit an amendment to the CRD Core Area Liquid Waste Management Plan (LWMP) detailing a fixed schedule for the provision of sewage treatment by June 30, 2007. The amendment was to include options related to the type, number and location of facilities as well as preliminary costs of treatment and a proposed implementation schedule.
- On June 27, 2007 the CRD submitted Amendment # 6 to the Core Area LWMP that provided a fixed schedule for sewage treatment by December 31, 2016.
- In a letter to the CRD dated December 14, 2007, the Minister accepted Amendment #6 subject to the following requirement: "In accordance with Section 24(3) (b) of the *Environmental Management Act*, a business plan, demonstrating how to achieve the above objectives, shall be submitted to me no later than June 30, 2008." The business plan was to demonstrate how the CRD expected to achieve the following six objectives:
 - Meet regulatory standards for liquid waste.
 - Minimize taxpayer cost by maximizing economic and financial benefits including beneficial reuse.
 - Optimize distribution of infrastructure.
 - Pursue opportunities to minimize and reduce Green House Gas emissions.
 - Optimize smart growth.
 - Evaluate a P3 partnership to transfer risk and add value.

The December 14, 2007 letter also states that the "CRD shall submit a LWMP amendment on or before December 31, 2008, which shall include, but not be limited to, the following:"

- Decisions on the infrastructure model, resource recovery options, and P3 approach.
 - Identifying site locations for sewage treatment facilities.
 - Results of Environmental Impact Study for each facility.
 - Results of Environmental Impact Study for each new discharge location.
 - Draft Operational Certificates for each new treatment facility/discharge location.
 - Class B capital and operating costs and costs per user with and without government funding.
 - Consultation summary reports (public and First Nations).
- On June 17, 2008, the CRD submitted a business plan report with a request for an extension of the deadline for an amendment to December 31, 2009.
 - On July 8, 2008, the Minister approved the request for an extension.
 - On June 26, 2009, the CRD submitted the second of two progress reports to the Minister as requested in a letter to the CRD from the Minister on July 8, 2008. The progress report provides information on how the CRD is moving forward to address six key

objectives of the plan amendment process the Minister identified in a letter to the CRD dated December 14, 2007.

- On August 26, 2009, the Minister responded to the CRD's progress report by encouraging the CRD to minimize costs to the taxpayer and establish resource recovery opportunities. It was noted that consultation and marine environmental assessment work will continue into 2010, however this work should not delay site selection and providing detailed capital and operating costs for the sewage facilities. The Minister identified the need for the CRD to work with MoE staff to address regulatory requirements, sludge management, wet weather flow management strategies including the schedule to implement the Clover Point wet weather treatment plant. The Minister acknowledged that a portion of the work surrounding the business case requirements, assessment of public/private partnership and procurement planning will occur after the LWMP amendment submission. The CRD should work with the Ministry of Community and Rural Development on these issues.

APPENDIX 2: RESOURCE RECOVERY, CONSERVATION, AND INNOVATION

The CRD strategy provides a practical, cost effective system that incorporates currently viable resource recovery opportunities (with generation of offsetting revenues), and facilitates future resource recovery opportunities. The CRD have committed to the following resource recovery innovations:

- Anaerobic digestion of sludge to produce biogas
- Upgrade biogas to high quality biomethane for vehicle use and/or injection into natural gas pipeline
- Recover phosphorus fertilizer from digester process
- Recover waste heat from digesters
- Utilize digested biosolids for use as fuel in industrial and/or waste to energy facilities
- Use effluent heat pumps to provide cost effective heating for:
 - treatment plant buildings
 - existing developments with compatible heating infrastructure
 - New developments using district heating systems
- A design that will be carbon neutral in operation, due largely to the use of wastewater resources to replace fossil fuels
- By the end of 2010, the CRD will submit to MOE, a comprehensive Resource Recovery and Use Plan for optimizing the management of resources from waste. Specific opportunities in the James Bay, Victoria core, Westshore, Saanich East are being explored.
- By the end of 2011, the CRD have committed to completing business cases for specific resource recovery facilities, and engaging resource use agreements with prospective customers and partners.
- Augmenting the successful water conservation programs to further reduce per capita water use (and reduce future treatment requirements).
- An aggressive program to reduce sewer system inflow and infiltration in order to prevent sewer system overflows and reduce future treatment requirements.



The Best Place on Earth

Reference: 127731

AUG 25 2010

Geoff Young, Chair
and Directors
Capital Regional District
PO Box 1000
Victoria BC V8W 2S6

Dear Chair Young and Directors:

Thank you for your letter of June 25, 2010, and the supporting information comprising Amendment #8 to the Capital Regional District (CRD) Core Area Liquid Waste Management Plan (LWMP).

Thank you also for providing me with the information I requested as a condition of approval of Amendment #7. The CRD LWMP Amendment #8 is hereby approved.

In my letter of February 9, 2010, I encouraged you to reconsider the opportunities to beneficially use biosolids as a fertilizer and soil amendment product as options for use. Further, I directed you to develop an emergency contingency plan to handle biosolids that are surplus to the uses identified. I am satisfied with your proposal to address these issues in the Resource Recovery and Use Plan that you intend to submit to the Ministry of Environment on or before December 31, 2010.

Ministry staff believe that the current strategy provides a practical, cost effective system that incorporates current resource recovery opportunities (with generation of offsetting revenues) and facilitates future resource recovery opportunities. Examples include your commitment to produce biogas and fuels from sludge, to recover phosphorus from biosolids and to recover heat in the treatment process. Please ensure that the Resource Recovery and Use Plan is developed to optimize the further recovery of resources from wastes.

I recognize your efforts to reduce waste flows at source through your aggressive water conservation programs, plans to eliminate sewer overflows and reduce storm-water infiltration to the sanitary sewer system. I consider the elimination of combined sewers to be an important component of the wastewater management strategy.

...2

I note the wastewater management strategy no longer proposes a primary treatment plant to address high flows discharging through the Clover Point outfall. The plan is to eliminate discharges at Clover Point greater than four times the average dry weather flow by 2030 as a result of the inflow and infiltration reduction plan, combined sewer separation in Oak Bay and wastewater storage at Saanich East. However, you are directed to monitor the quality and volumes of effluent discharged through the Clover Point outfall and continue to assess the impact of the discharge on the receiving environment, to determine whether or not additional treatment shall be provided in the future.

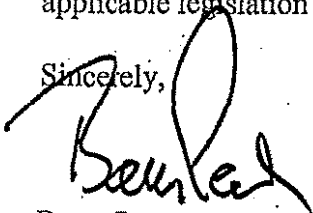
Please continue to work with my colleague, the Honourable Ben Stewart, Minister of Community and Rural Development, and his staff, to address provincial requirements for the business case and for assessment of public-private partnerships, and to clarify procurement planning and project implementation.

I also ask you to continue to work with Ministry of Environment Regional Environmental Protection staff on the implementation stage of the wastewater strategy, monitoring details associated with the Clover Point discharge and on the requirements for a marine Environmental Impact Study (EIS) for Macaulay and/or the McLoughlin outfall. Please submit a progress report for the EIS by December 31, 2010.

Finally, please continue to consult with the public and First Nations to ensure they are fully informed of the wastewater strategy. An updated public and First Nations consultation summary report is requested by December 31, 2010.

Approval of Amendment #8 to the LWMP does not authorize entry upon, crossing over or use for any purpose of private or Crown lands or works, unless and except as authorized by the owner of such lands or works. The responsibility for obtaining such authority shall rest with the local government. This amendment is approved pursuant to the provisions of the *Environmental Management Act*, which asserts it is an offence to discharge waste without proper authorization. It is also the regional district's responsibility to ensure that all activities conducted under this plan amendment are carried out with regard to the rights of third parties and comply with other applicable legislation that may be in force.

Sincerely,



Barry Penner
Minister

...3

pc: Honourable Ben Stewart, Minister of Community and Rural Development
Randy Alexander, Regional Manager, Environmental Protection Division, Ministry of
Environment
Kelly Daniels, Chief Administrative Officer, CRD
Jack Hull, Acting Project Director, Wastewater Treatment, CRD



Reference: 129798

AUG 25 2010

His Worship Mayor David Saunders
Colwood City Hall
3300 Wishart Road
Colwood, BC V9C 1R1

Dear Mayor *David* Saunders:

Thank you for meeting with me on August 18, 2010, to discuss the Capital Regional District (CRD) Liquid Waste Management Plan (LWMP). I appreciated the opportunity to discuss this matter with you.

On June 23, 2010, the CRD Board approved Amendment #8 to the Core Area LWMP and submitted it to me for consideration. The plan outlined in Amendment #8 is intended to be an evolution and refinement that takes advantage of staging opportunities to optimize costs and configuration in meeting the overall treatment objectives. It is also intended to provide a practical, cost-effective system that incorporates currently viable resource recovery innovations and facilitates future resource recovery opportunities.

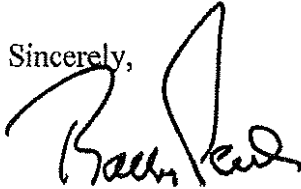
The design and environmental impact assessment studies carried out by the CRD conclude that the McLoughlin Point site is suitable for the proposed use. The site size has been determined by engineering studies commissioned by the CRD to be adequate for the proposed treatment equipment. There is no present intent to increase the facility capacity in the future. The plan provides an opportunity to economically re-develop an existing industrial site, minimizing the potential for disruption of natural and archaeological resources. The site is relatively buffered from commercial and residential developments. The CRD recognizes the need to ensure that potential noise and odour concerns are addressed in design and that the facility be designed to visually complement its location. Indeed, there are tangible examples of facilities meeting these objectives. The CRD also recognizes the need for the design and elevation of the facility to address any potential issues related to storms, tsunamis, earthquakes and sea levels rising.

While I understand and respect your concerns, the selection of McLoughlin Point by the elected officials of the CRD follows over four years of planning, engineering, consultation and environmental assessments. The CRD reports they have investigated over 114 sites through seven communities and undertaken 15 major studies into resource recovery opportunities at an estimated cost of \$12.94 million. As such, I believe that after four years of planning and study, it is time to move forward on the basis of the plan as presented rather than await further study.

.../2

The intention of a LWMP is that it be a living plan that evolves as opportunities arise. A decision on Amendment #8 now does not preclude further refinement of the plan should new opportunities be identified. I encourage you to continue to engage your colleagues at the CRD if you believe it is appropriate to propose further refinements to the plan as the CRD moves forward in implementing treatment.

Sincerely,

A handwritten signature in black ink, appearing to read "Barry Penner". The signature is stylized with a large, sweeping initial "B" and a long, horizontal stroke extending to the right.

Barry Penner
Minister



Reference: 128744

AUG 25 2010

Her Worship Mayor Barbara Desjardins
Township of Esquimalt
1229 Esquimalt Rd
Esquimalt BC V9A 3P1

Dear Mayor ~~Desjardins~~ Barb:

Thank you for meeting with me on August 4, 2010, to discuss the Capital Regional District (CRD) Liquid Waste Management Plan (LWMP). I appreciated the opportunity to discuss this matter with you.

On June 23, 2010, the CRD Board approved Amendment #8 to the Core Area LWMP and submitted it to me for consideration. The plan outlined in Amendment #8 is intended to be an evolution and refinement that takes advantage of staging opportunities to optimize costs and configuration in meeting the overall treatment objectives. It is also intended to provide a practical, cost-effective system that incorporates currently viable resource recovery innovations and facilitates future resource recovery opportunities.

The design and environmental impact assessment studies carried out by the CRD conclude that the McLoughlin Point site is suitable for the proposed use. The site size has been determined by engineering studies commissioned by the CRD to be adequate for the proposed treatment equipment. There is no present intent to increase the facility capacity in the future. The plan provides an opportunity to economically re-develop an existing industrial site, minimizing the potential for disruption of natural and archaeological resources. The site is relatively buffered from commercial and residential developments. The CRD recognizes the need to ensure that potential noise and odour concerns are addressed in design and that the facility be designed to visually complement its location. Indeed, there are tangible examples of facilities meeting these objectives. The CRD also recognizes the need for the design and elevation of the facility to address any potential issues related to storms, tsunamis, earthquakes and sea levels rising.

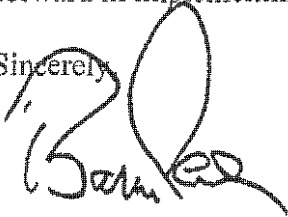
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.../2

With respect to consultation, the CRD has been conducting a public involvement program since 2006, and a sewage treatment facility at either McLoughlin or McCauley Point has been contemplated throughout the process. In addition to the engagement with Esquimalt residents to date through public meetings, mail outs, media and internet, the CRD recognizes the need to continue to engage the residents of Esquimalt and other Core Area communities as they move forward in the coming months.

The intention of a LWMP is that it be a living plan that evolves as opportunities arise. A decision on Amendment #8 now does not preclude further refinement of the plan should new opportunities be identified. I encourage you to continue to engage your colleagues at the CRD if you believe it is appropriate to propose further refinements to the plan as the CRD moves forward in implementing treatment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Barry Penner', written over the word 'Sincerely,'.

Barry Penner
Minister