



July 7, 2017

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CRD CALWMP

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Via email: lhutcheson@crd.bc.ca

Dear Ms. Hutchison:

RE: Receipt of Integrated Resource Management Work Plan for Beneficial Use of Biosolids

Thank you for your letter of May 31, 2017 addressed to AJ Downie, Director and submission of the Proposed Integrated Resource Management Work Plan (the Work Plan). As you are aware, I have taken on the role of providing dedicated support to the Capital Regional District (CRD) for implementation of the Core Area Liquid Waste Management Plan (CALWMP) and supporting the process for an advanced integrated resource management (IRM) facility.

The Ministers' letter of November 18, 2016 "required the CRD to develop a definitive plan for the beneficial reuse of biosolids that does not incorporate multi-year storage of biosolids within a biocell". I acknowledge that the Work Plan exceeds this Ministers' requirement, and the Work Plan is expanded to include development of a broader advanced IRM facility that potentially may include other waste stream resources.

The ministry distinguishes the implementation of the CALWMP and the advanced IRM facility initiative as two distinct projects. The first project is the implementation of the CALWMP including construction and commissioning of the wastewater treatment plant (WTP), conveyance line and residuals treatment facility, and the beneficial use of class A biosolids. This project is the subject of the Minister's approvals as they are included in the approved CALWMP and subsequent amendments. By the Minister requiring the 'Definitive Plan' for beneficial use of biosolids to be completed by June 30, 2019, it allows for implementation of the Definitive Plan to coincide with start-up of McLoughlin WTP on December 31, 2020 and subsequent production of sewage sludge into biosolids. The CRD is encouraged to continue First Nations and public consultation as it moves forward on finalizing the technical, social, economic and environmental details as it develops the 'Definitive Plan'.

Ministry of Environment

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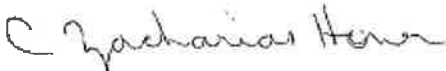
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I appreciate and commend the CRD Board for making advancement of IRM a strategic priority. The advanced IRM facility initiative is a longer term project where operation and commissioning is not dependent on the required timelines for implementation of the CALWMP. The ministry believes the Work Plan to be ambitious as it did not provide scope and associated details of types of IRM being contemplated, the CRD's decision making process, nor the authorization requirements including completion of First Nations and public consultation, if required. These considerations must be incorporated as the CRD finalizes the IRM Project Plan.

The ministry understands that, despite the beneficial use options selected for the advanced IRM facility, biosolids will still be produced at Hartland Landfill as per the Core Area and Saanich Peninsula LWMPs, and beneficially used as per the outcome of the Definitive Plan. As well, the Ministry concurs with the CRD that since the advanced IRM facility contemplates beneficial use of solid waste residuals, this initiative is better aligned with the CRD Solid Waste Management Plan process.

I look forward to working closely with the CRD on these two initiatives.

Kind regards,

A handwritten signature in cursive script, appearing to read "Christa Zacharias-Homer".

Christa Zacharias-Homer
Regional Director, CRD Project

cc: Mark Zacharias, Assistant Deputy Minister, Ministry of Environment
Barbara Desjardins, Board Chair, CRD
Robert Lapham, Chief Administrative Officer, CRD