



Wastewater Treatment Project

Treated for a cleaner future

CRD Wastewater Treatment Project

Quarterly Report

Reporting Period: December 25, 2016- March 24, 2017

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1. Executive Summary

The Wastewater Treatment Project (the “WTP” or the “Project”) includes three main components: the Residuals Treatment Facility (the “RTF”), the McLoughlin Point Wastewater Treatment Plant (the “WWTP”) and the Conveyance System (which includes the pump stations and pipeline). The Project scope will be delivered through a number of contracts with a variety of contracting strategies.

The Project has recently made an important transition from the planning phase, which has been underway for many years, to the construction phase. As the construction phase of the Project progresses, this report will provide more detail on the status of each contract and their progress. This report covers the period from December 25, 2016 to March 24, 2017.

The dashboard below indicates the high level status of each contract with regards to the six Key Project Indicators (“KPI”) that were defined within the Project Charter. Currently all Project components are progressing as planned; further details on each Project component progress is included within Section 6 of this report.

Table 1- Monthly Project Status Dashboard

Monthly Project Status (March 2017)												
Engagement Metrics	WTP Project Overall	WWTP	RTF	Residual Solids Pipes and Pump Stations	Macaulay Point Pump Station and Forcemain	Clover Forcemain	Clover Point Pump Station	Currie Pump Station	Currie Forcemain/ECL	Trent Twinning	Arbutus Attenuation Tank	Comments
Cost	●	●	●	●	●	●	●	●	●	●	●	
Schedule	●	●	●	●	●	●	●	●	●	●	●	
Safety	●	●	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	WWTP is the only contract where construction has started.
Regulatory Requirements	●	●	●	●	●	●	●	●	●	●	●	
Environment	●	●	●	●	●	●	●	●	●	●	●	
Stakeholders	●	●	●	●	●	●	●	●	●	●	●	Two Community Information Meetings to be held in April.

Note: Refer to Appendix 1 for definitions of metrics contained within the above dashboard.

2. Purpose

In order to meet federal and provincial regulations, on May 25, 2016 the Regional Board of the CRD (the “CRD Board”) established the Wastewater Treatment Project Board (the “Project Board”) under Bylaw 4109 (the “CRD Core Area Wastewater Treatment Board Bylaw No. 1, 2016”) for the purposes of administering the Wastewater Treatment Project. The CRD Board adopted by resolution terms of reference (“Terms of Reference”) for the Project Board for the purposes of establishing principles governing the WTP. The Terms of Reference are attached as Schedule “A” to the CRD Core Area Wastewater Treatment Board Bylaw No. 1, 2016.

The CRD Core Area Wastewater Treatment Board Bylaw No. 1, 2016 requires, amongst other things: that the Project Board establish a Project Team that will provide the Project Board with a comprehensive quarterly report describing the status of the Project and that specifically addresses the scope, budget and schedule of the Project; and that the Project Board provide quarterly status reports to the CRD Board on the scope, budget and schedule of the Project. This report is intended to cover both requirements.

3. Safety

As part of the development of the Project Charter, a safety KPI of '*Delivering the Project safely with zero fatalities and a total recordable incident frequency (TRIF¹) of no more than 1*' was defined. Performance against this KPI will be monitored, tracked, and reported throughout the Project's execution phase.

The following safety management activities have been completed during the reporting period:

- Personal Protective Equipment has been purchased for the Project Team; and
- The Safety KPI has been established.

The following safety management activities were initiated during the reporting period and are scheduled to be completed within the next month:

- The Safety Management Plan is currently under development; and
- Recruitment for the Project's Safety Manager role is ongoing. The Construction Manager is fulfilling the role of Safety Manager until the position is filled.

The following safety management activities are planned to be initiated in the next quarter:

- Review of Harbour Resource Partner's ("HRP") Project Safety Plan, including field verification of the Plan, and a review of HRP's Blasting Plan. HRP has been awarded the contract to build the McLoughlin Point Wastewater Treatment Plant. Their Project Safety Plan is scheduled to be submitted on April 10, 2017;
- Perform Project site inspections in conjunction with HRP;
- Set up of the format and process for safety statistics data collection;
- Set up of the format for the safety statistics monthly report;
- Victoria (James Bay) traffic management plan review;
- CRD Project Office Inspection; and
- Provide Safety Orientations to CRD staff.

4. Environment and Regulatory Management

4.1 Environment

¹ * A TRIF of no more than 1 means that there is 1 or fewer recordable incidents (being a work-related injury or illness that requires medical treatment beyond first aid or causes death, days away from work, restricted work or transfer to another job, or loss of consciousness) for every 200,000 person-hours of work.

As part of the development of the Project Charter, an environmental KPI of *'Protect the environment by meeting all legislated environmental requirements and optimizing opportunities for resource recovery and greenhouse gas reduction'* was defined. Performance against this KPI will be monitored, tracked, and reported throughout the Project's execution phase.

The key environmental management activities that have been completed during this reporting period are as follows:

- The archaeological study for the Clover Point Forcemain and Clover Point Pump station has been completed
- The draft Archeological Overview Assessments have been completed for the Clover and Macaulay Forcemains and the ECI Trent Twinning components.
- The draft Environmental Overviews have been completed for the Clover and Macaulay Forcemains.
- The Environmental Effects Determination Report for the Project's activities on the Department of National Defence lands at Work Point has been completed.

The following environmental management activities were initiated during the reporting period and are scheduled to be completed in the next quarter:

- A permit tracking system is under development for each of the three Project components, identifying all of the permits required and who is intended to be responsible for obtaining the permit (the CRD or the relevant contractor); and
- The archaeological study for the Macaulay Point Pump Station and Forcemain.

The following environmental management activities are planned to be initiated in the next quarter:

- The environmental studies for Clover Point and Macaulay Point Forcemain; and
- HRP will continue the permitting process for the McLoughlin Point Wastewater Treatment Plant.

4.2 Regulatory Management

The Project has received the following approvals during the reporting period:

- Re-zoning of the McLoughlin Point site (which was initiated by the Township of Esquimalt).
- Development permit for the WWTP.
- Re-zoning of the Clover Point Pump Station.
- Permits from Transport Canada and NavCan, and a letter of advice from Department of Fisheries and Oceans (obtained by HRP) to enable the geotechnical works associated with the cross-harbour forcemain.

The Project has entered into the following agreements over the reporting period:

- Two agreements with Greater Victoria Harbour Authority ("GVHA") associated with the Project's activities on GVHA's lands.
- An agreement with the Department of National Defence to authorize works associated with the Project's activities on the Department of National Defence lands at Work Point (the WWTP, portions of the Conveyance System).

- A licence from Transport Canada to authorize the geotechnical works associated with the cross-harbour force-main.
- A lease with Matullia Holdings to use the Rock Bay site as a laydown area for the four years of the Project.
- Three agreements relating to the amenities to be provided to the Township of Esquimalt in connection with the McLoughlin Point Wastewater Treatment Plant.
- An agreement with the City of Victoria to authorize the works associated with the Clover Point Pump Station.
- An agreement with the City of Victoria to authorize the works associated with the Clover Point conveyance works.
- A support agreement with the Esquimalt Nation in recognition of the Crown's obligation to consult with the Esquimalt and the contribution of the Esquimalt Nation, including to the planning of the wastewater system.
- A support agreement with the Songhees Nation in recognition of the Crown's obligation to consult with the Songhees and the contribution of the Esquimalt Nation, including to the planning of the wastewater system.

In the next quarter, the Project will:

- In collaboration with the CRD, and, where applicable, HRP, will progress the required permits to undertake the Project's scheduled activities.
- Continue engaging with regulators and provide timely information to facilitate the Project's permitting schedule.
- Track and meet its commitments, including reporting and financial commitments, under the various agreements.

5. Schedule

As part of the development of the Project Charter, a schedule KPI of '*Deliver the Project by December 31, 2020*' was defined. Performance against this KPI will be monitored, tracked, and reported throughout the Project's execution phase.

The Project Work Breakdown Structure ("WBS") has been finalized and the baseline schedule is being developed in alignment with the WBS.

Figure 2 outlines the preliminary high level Project schedule. The process to develop a baseline schedule that fully integrates all the Project components is ongoing. As the design of each of the Project components is further developed, the schedule will be subject to optimization.

Wastewater Treatment Project Schedule

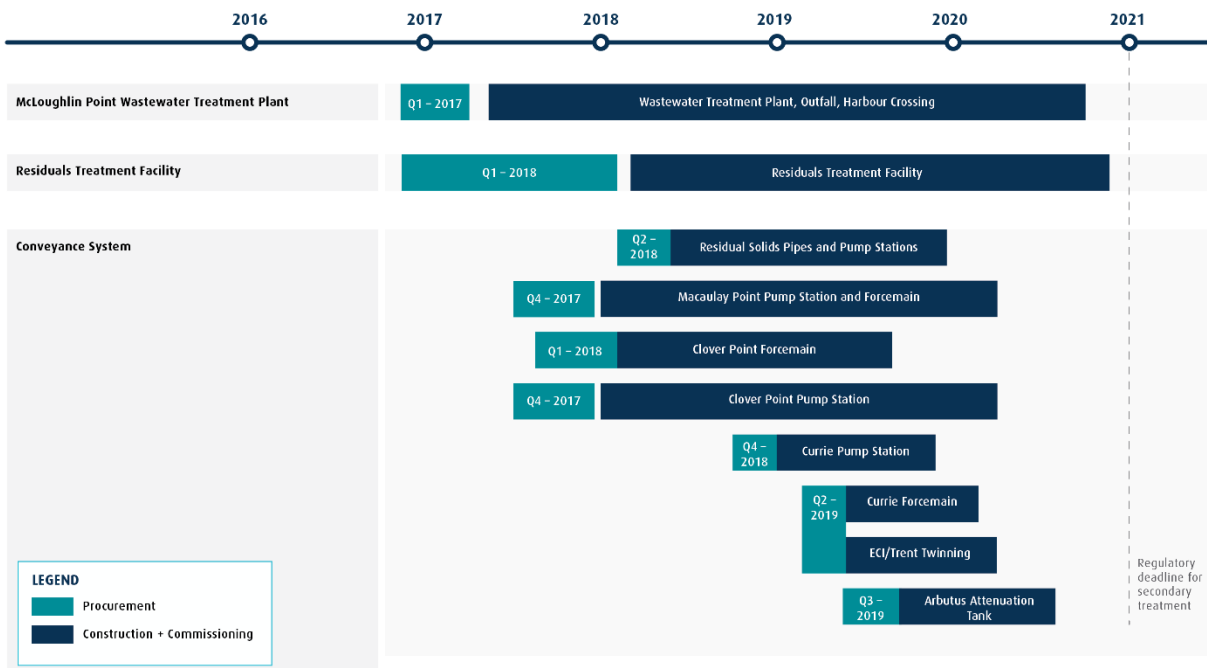


Figure 1- High Level Project Schedule

6. Cost and Forecast

As part of the development of the Project Charter, a cost KPI of ‘*Deliver the Project within the Control Budget (\$765 million)*’ was defined. Performance against this KPI will be monitored, tracked, and reported throughout the Project’s execution phase.

The Business Case established the Control Budget of \$765 million. The sources of funding for the Control Budget are: Infrastructure Canada (Building Canada Fund for \$120 million and Green Initiative Fund for \$50 million), PPP Canada for \$41 million, and the Province of British Columbia for \$248 million, and the CRD for \$306 million. During the reporting period, agreements with Infrastructure Canada, PPP Canada, and the Province of British Columbia were executed.

Table 2 shows the allocation of the Control Budget into the three major Project components as presented in the Business Case and compares it against the WTP actual cost summary based on the financial information to 28 February, 2017. For further information see attached appendices 2, 3 and 4. At the time of writing this report, the financial results for the month of March were still under development.

A top-down estimating approach was used to establish the Control Budget. The Project Leadership Team is currently in the process of reallocating the Control Budget between the three major Project components, based on a bottom-up estimating approach and a series of risk workshops.

Table 2- WTP Project Summary Report

Project Summary Report Summary of Project Expenses to February 28, 2017 (in \$ millions)		
	Budget	Cost to Date
Wastewater Treatment Plant	384.8	16.3
Conveyance System	188.5	20.5
Residuals Treatment Facility	191.6	8.1
Total	764.9	44.9

7. Progress

7.1 WTP Progress

As the Project progresses into its execution phase, good overall progress is being made with procurement and the initial construction phase activities.

The allocation of the Control Budget into the Project WBS structure is in progress. Once the Project schedule has been baselined and the Control Budget allocated to the WBS, overall Project progress, including Earned Value analysis, will be reported on.

7.2 Projects Progress

7.2.1 McLoughlin Point Wastewater Treatment Plan

The first construction contract has been awarded for the Project: HRP has been awarded a \$272 million contract to build the wastewater treatment plant at McLoughlin Point, which includes the construction of three main components:

- A 108 MI/d tertiary wastewater treatment plant located at McLoughlin Point;
- A cross-harbour undersea forcemain between Ogden Point and McLoughlin Point; and
- A marine outfall for treated wastewater at McLoughlin Point.

HRP were selected by the CRD through a competitive selection process and is a consortium of experienced firms including AECOM Canada, Graham Infrastructure, CEI, SENA, Gracorp and Michels Canada. Construction will begin in [April] on the treatment plant and the undersea forcemain. On March 14, 2017, the Project successfully reached financial close and entered into a Project Agreement with HRP. The Project Team continue to work closely with HRP to ensure they can commence construction during April.

7.2.2 Residuals Treatment Facility

A competitive selection process is underway to select a preferred proponent to enter into a contract (Project Agreement) for the design, build, partial-finance, maintenance and operation of a Residuals Treatment Facility. The Project Board approved, on December 2, 2016, the initiation of the competitive selection process, with the issue of a Request for Qualifications ("RFQ"). The RFQ closed on February 9, 2017, and seven submissions were received.

The Project Team is currently finalizing its evaluation of those submissions, with the objective of selecting a shortlist of three qualified respondents (“Proponents”) who would be invited to participate in the next stage of the competitive selection process: the Request for Proposals (“RFP”) stage. There may be an update to this section of the quarterly report prior to its submission to the CALWMC.

The evaluation has been conducted in accordance with the RFQ. The Project Director appointed an evaluation committee to evaluate the submissions, and the evaluation committee appointed evaluation teams with expertise in the relevant area to review the various submission sections. The evaluation committee and teams included employees from the Capital Regional District (CRD), Partnerships BC, Stantec Consulting Inc., and Deloitte LLP, with design, construction and operations experience and expertise in residual solids treatment, public private partnership arrangements, and financial capacity and capability.

The evaluation was monitored by a fairness advisor who will act as an independent observer to ensure that the competitive selection process, up to the selection of a Preferred Proponent is conducted in a fair, open and transparent manner. A due diligence panel to provide an independent review of the evaluation process to determine whether, in their opinion, the evaluation has followed the pre-established evaluation process, including diligent, consistent and unbiased application of the pre-established evaluation criteria. The due diligence panel reports directly to the Project Board. A conflict of interest adjudicator was available to provide decisions on conflicts of interest or unfair advantage issues, including whether any person is a Restricted Party. In addition, a relationship review committee to review relationship disclosure information provided by all parties involved in the evaluation process and those of the Respondents to determine if any participants involved in the evaluation process are in a conflict of interest (COI) situation.

The Project Team has developed the RFP, including the Initial Draft Project Agreement. Both the RFP and Project Agreement are based on provincial standards, and so will be familiar to the market. The RFP will require technical proposals to be submitted in early fall 2017 and the contract is expected to be executed in early 2018. The Residual Treatment Facility’s scope, budget, and risk profile are consistent with the Core Area Wastewater Treatment Project’s Business Case.

The Project team has also held preliminary discussions with and provide Project updates to the District of Saanich.

7.2.3 Conveyance System

The following progress has been made with regards to the Conveyance System:

- The draft Archeological Overview Assessments have been completed for the Clover and Macaulay Forcemains and the ECI Trent Twinning components.
- Draft Environmental Overviews have been completed for the Clover and Macaulay Forcemains.
- Draft Geotechnical drilling programs have been developed for the Clover Forcemain and Macaulay Point Pump Station and Forcemain Projects.

- Progress is being made with the Topographic surveys for the Clover and Macaulay Forcemains and the ECI Trent Twinning components.
- Updates to the Clover Point Pump Station Tender Documents and the Macaulay Point Pump Station and Forcemain Request for Qualifications document are underway.
- Meetings with those authorities in which the conveyance pipelines will be located are being planned.

8. Risk and Key Issues

The Project Team has completed risk workshops for the Project and the WWTP, RTF, and Conveyance System Project components. The result of these workshops is a comprehensive Risk Registry that outlines all WTP related risks, their qualification, assessment, owners, and mitigation strategies. The Project risks will be monitored and managed on a continuous basis within the Project Risk Registers.

The table below shows a summary of the current Risk Register risk events being managed by the Project as of March 24, 2017. The associated risk ranking is the product of the likelihood of the risk event and the potential cost, schedule or scope impact to the Project.

Risk ranking serves as a priority scale used by Project Management to proportionally align Project resources to the development of risk control strategies. Risk status details risk control actions as of March 24, 2017.

Table 3- Project Risks

Risk Event	Risk Ranking			Risk Status
	Low	Medium	High	
Pre-procurement scope growth/creep		●		Planned Hartland site geotechnical and archaeological surveys to align budgeted versus representative conditions.
Delays during procurement phase	●			RTF RFP is under development.
Archaeological findings			●	Archaeological Overview Assessments for the Clover and Macaulay Forcemains and the ECI Trent Twinning components is under way.
Unexpected geotechnical conditions during site investigation conveyance excavation (DBB)		●		Geotechnical surveys for the Clover Forcemain and Macaulay Point Pump Station and Forcemain Projects is in progress.
Unexpected contaminated soil		●		Environmental Overviews studies for the Clover and Macaulay Forcemains ongoing.

conditions during investigation				
Start-up of PMO office is delayed and impacts the management of the project		●		Hiring of Project Team leadership roles continues.
Stakeholder Engagement		●		Community information sessions are planned for April.

9. Contingency

As part of the risk analysis and quantification, WTP contingency budgets and initial contingency drawdown curves have been developed for each of the Project components and will be presented for approval within the next reporting period. The Project Team will communicate the status of contingency to the Project Board through updated contingency drawdown curves from the next reporting period onwards.

10. First Nations

Support Agreements with both the Songhees and Esquimalt Nations were finalized in Q1 2017, the agreements provide the CRD with Letters of Support for all aspects of the Project. As part of the agreement, two First Nations Liaison positions will be created to facilitate communications between and among the CRD and the Chiefs and Councils throughout the 4 year Project duration. The liaisons will also assist with cultural and archaeological protocols.

Communications and Engagement with other neighbouring First Nations, who are not directly impacted by the WTP but who may have an interest in receiving updates on the Project, will be undertaken with support and guidance from the CRD’s First Nations Relations division.

11. Stakeholder Engagement

The Project will maintain an ongoing two-way Communications and Engagement Program with stakeholders, communities and the public to provide Project information and respond to public inquiries. A variety of materials and methods will support the Communications and Engagement program, including a public inquiry program, Project website, social media, construction notifications, community and stakeholder meetings, and door-to-door notifications.

11.1 Activities in the Reporting Period

The following activities have been completed in the reporting period:

- Communications and Engagement Plan developed;
- Comprehensive stakeholder lists developed;
- News release developed and distributed
 - March 16 - Construction Starting on Capital Regional District’s Wastewater Treatment Project;

- Pre-Construction Notices developed and distributed:
 - Jan. 6 - Geotechnical Drilling
 - March 7 - Site Clearing Activities
 - March 16- Geotechnical Work for the Cross Harbour Forcemain and McLoughlin Point Outfall;

- Attended and provided Project information at six community / stakeholder meetings:
 - Jan. 11 - James Bay Neighbourhood Association
 - Jan. 11 - Fairfield Gonzales Community Association
 - Jan. 12 - Esquimalt Public Open House #1
 - Jan. 14 - Esquimalt Public Open House #2
 - Jan. 18 - Department of National Defence Open House
 - March 8 - James Bay Neighborhood Association;

- Responded to public inquiries;

- Communication protocols outlining roles and responsibilities for construction contractors for the construction communications program have been developed;

- The Terms of Reference for the Local Government Technical Engagement Program have been developed;

- Materials developed and notification completed for April 5 and April 12 Community Information Meetings; and

- The website (wastewaterproject.ca) has been updated for the construction period of the Project.

11.2 Planned Activities

The following stakeholder Communication and Engagement activities will be carried out over the coming months:





- Project information phone line to be set up;

- Information to be developed regarding construction activities at Ogden Point and McLoughlin Point for website and public meetings; and

- Community Information Meetings to be held in Victoria on April 5, 2017 and Esquimalt on April 12, 2017.

12. Appendices

Appendix 1- High Level Status Key

Status	Description
	KPI unlikely to be met
	KPI at risk unless correction action is taken
	KPI at risk but corrective action has been identified/is being implemented
	Good progress against KPI

Key Performance Indicators	
Cost	Deliver the Project within the Control Budget (\$765 million).
Schedule	Deliver the Project by December 31, 2020.
Safety	Deliver the Project safely with zero fatalities and a total recordable incident frequency (TRIF) of no more than 1*.
Regulatory Requirements	Deliver the Project such that the Core Area complies with provincial and federal wastewater regulations.
Environment	Protect the environment by meeting all legislated environmental requirements and optimizing opportunities for resource recovery and greenhouse gas reduction.
Stakeholders	Continue to build and maintain positive relationships with First Nations, local governments, communities, and other stakeholders.

* A TRIF of no more than 1 means that there is 1 or less recordable incidents (being a work-related injury or illness that requires medical treatment beyond first aid or causes death, days away from work, restricted work or transfer to another job, or loss of consciousness) for every 200,000 person-hours of work.

Appendix 2 – Core Area Liquid Waste Management Summary Report

CORE AREA LIQUID WASTE MANAGEMENT SUMMARY REPORT
MONTH ENDING FEBRUARY 28, 2017
(in \$ millions)

3.798C - Core Area Wastewater Treatment Program	to 2013	2014	2015	2016*	2017	Total*
Program Expenses						
Wastewater Treatment - McLoughlin	9.71	0.43	0.48	(0.15)	-	10.5
Conveyancing	6.90	7.53	3.01	0.02	0.00	17.5
Biosolids/Energy Centre	2.99	1.66	0.01	0.82	-	5.5
Common Costs*	4.96	3.16	0.24	(1.70)	0.04	6.7
Interim Financing	0.04	0.03	0.19	0.23	0.04	0.5
LWMP - Project Board	-	-	-	2.61	1.66	4.3
Total program expenditures	24.60	12.80	3.93	1.83	1.74	44.9

*Fiscal Year 2016 has not been audited.

Appendix 3 – Summary of Project Expenses to February 28, 2017

PROGRAM SUMMARY REPORT
SUMMARY OF PROJECT EXPENSES TO FEBRUARY 28, 2017
(in \$ millions)

	to 2013	2014	2015	2016*	2017	Total *
WASTEWATER TREATMENT PLANT						
Marine Outfall - McLoughlin Pnt - CAWTP	210,592	4,843	-	-	-	215,435
Project Management & Commission	983	-	-	-	-	983
Victoria Harbour Crossing - CAWTP	467,794	5,377	102	-	-	473,273
Wastewater Treatment - McLoughlin Pnt	9,035,692	417,911	476,269	(151,019)	-	9,778,854
Subtotal Wastewater Treatment Plant	9,715,061	428,131	476,371	(151,019)	-	10,468,545
CONVEYANCING - PUMP STATIONS & PIPES						
Arbutus Rd Attenuation Tank	3,740,034	552,160	135,860	-	-	4,428,054
Clover Ogden FM	13,840	15,930	-	-	-	29,771
Clover Pt PS	318,411	86,020	142,857	-	-	547,288
Craigflower PS	2,616,936	6,805,124	2,684,505	15,976	350	12,122,890
Currie FM	4,245	588	-	-	-	4,832
Currie PS	4,245	-	-	-	-	4,245
Macaulay - McLoughlin FM	20,993	588	-	-	-	21,581
Macaulay Pt PS	141,761	50,790	50,000	-	-	242,551
Trent/ECI Twinning	35,487	14,506	-	-	-	49,993
Subtotal Conveyancing - Pump Stations & Pipes	6,895,951	7,525,706	3,013,222	15,976	350	17,451,205
RESOURCE RECOVERY CENTRE						
Project Management & Commission	596	-	-	-	-	596
Resource Recovery Ctr	2,930,973	1,530,025	13,223	816,975	-	5,291,196
Sludge & Concentrate Conveyance	63,463	127,131	-	-	-	190,593
Subtotal Resource Recovery Centre	2,995,032	1,657,155	13,223	816,975	-	5,482,386
COMMON COSTS						
Commission Direct	374,120	144,694	89,199	31,821	-	639,834
Project Management	4,583,480	3,013,700	148,393	(1,726,466)	41,079	6,060,186
Subtotal Common Costs	4,957,600	3,158,394	237,592	(1,694,645)	41,079	6,700,019
INTERIM FINANCING	36,600	29,916	192,834	226,776	40,088	526,214
PROGRAM CONTINGENCY	-	-	-	-	-	-
LWMP - PROJECT BOARD						
Project Oversight (Project Board)	-	-	-	554,661	114,679	669,339
Communications	-	-	-	38,616	124,919	163,535
Feasibility and Costing Analysis	-	-	-	649,203	-	649,203
Business Case review	-	-	-	75,630	-	75,630
Partnerships BC	-	-	-	373,042	649,131	1,022,173
Project Management (Staff and Wages)	-	-	-	193,600	184,036	377,636
Miscellaneous and Legal	-	-	-	725,862	582,957	1,308,819
Subtotal LWMP - Project Board	-	-	-	2,610,613	1,655,723	4,266,336
TOTAL	24,600,244	12,799,303	3,933,242	1,824,676	1,737,240	44,894,705

* Fiscal Year 2016 has not been audited.

*2016 values increased by 285K from Draft version distributed February 8, 2017. Change relates to invoices received after reporting date that relate to services rendered in 2016 and were accrued.

Appendix 4 – Program Summary Report Month End February 28, 2017

**PROGRAM SUMMARY REPORT
MONTH ENDING FEBRUARY 28, 2017
(in \$ millions)**

	Budget	Cost to Date	Commitments Unpaid	Total CTD + CU	Forecast to Complete	Forecast to Completion	Variance	Variance from Last report
WASTEWATER TREATMENT PLANT	384.8	10.5	-	10.5	374.3	384.8	-	-
CONVEYANCING -PUMP STATIONS & PIPES	188.5	17.5	-	17.5	171.1	188.5	-	-
RESOURCE RECOVERY CENTRE	191.6	5.5	-	5.5	186.2	191.6	-	-
COMMON COSTS**	-	6.7	0.1	6.8	(6.8)	-	-	-
INTERIM FINANCING*	-	0.5	-	0.5	(0.5)	-	-	-
PROGRAM CONTINGENCY*	-	-	-	-	-	-	-	-
LWMP - PROJECT BOARD*	-	4.3	1.6	5.9	(5.9)	-	-	-
TOTAL	765.0	44.9	1.7	46.6	718.3	765.0	-	-

* The budget for common costs, interim financing, program contingency and Project Board are allocated directly to the project components.

** Common costs include salaries & benefits, consultants, building rental, supplies.