

November 17, 2016

File: 0620-20
Core Area Liquid Waste Management Plan
Amendment No. 11

The Honourable Mary Polak
Minister of Environment
PO Box 9047 Stn Prov Govt
Room 247, Parliament Buildings
Victoria, BC V8W 9E2

Dear Minister Polak:

RE: CONDITIONAL APPROVAL OF CAPITAL REGIONAL DISTRICT ("CRD") CORE AREA LIQUID WASTE MANAGEMENT PLAN ("CALWMP") AMENDMENT NO. 11

Thank you for your letter of September 30, 2016 granting conditional approval of Amendment No. 11 of the CALWMP (the "**Conditional Approval**"). I am writing on behalf of the CRD and Core Area Wastewater Treatment Project Board to respectfully request that you clarify two aspects of the Conditional Approval. Clarifying these aspects of the Conditional Approval at the outset of the CALWMP implementation phase will reduce uncertainty and help the project proceed efficiently.

1. Wastewater Treatment Plant Flow Capacity

The Conditional Approval states: "For flows that are greater than 2 times ADWF but not more than 4 times ADWF, primary treatment will be guaranteed. Construction of the wastewater treatment plant will be completed by December 31, 2020."

We request that the reference to the plant guaranteeing primary treatment for flows of "not more than 4 times ADWF" be replaced with "not more than 3 times ADWF for the Clover Point catchment."

The CRD'S CALWMP Amendment 11 application and the submitted Business Case committed to pump only up to 3 times ADWF from Clover Point to McLoughlin Point. Section 6 of the Amendment 11 application proposed these commitments:

"2(b) A pump station at Clover Point in the City of Victoria having capacity to pump up to three times the average dry weather flow (ADWF) to McLoughlin Point in the Township of Esquimalt for at least primary treatment;



2(d) A 108 MLD ADWF wastewater treatment plant at McLoughlin Point that will provide primary treatment for wet weather flows up to four times ADWF for the Macaulay catchment and three times ADWF from the Clover catchment and tertiary treatment for flows up to two times ADWF;"

The commitment to pump up to 3 times ADWF from Clover Point to McLoughlin Point for primary treatment was originally proposed in Amendment No. 8 of the CALWMP and approved on August 25, 2010 by the Minister of Environment, the Honourable Barry Penner.

To guarantee primary treatment for flows up to 4 times ADWF for the Clover Point catchment, the CRD would have to add substantial capacity to the planned conveyance system and treatment plant at a significant cost. The CRD and the Project Board believe this additional capacity is not warranted and the commitment to capacity to 3 times ADWF outlined in the CRD's CALWMP Amendment 11 application and Business Case is reasonable and sufficient, for the reasons detailed in those documents.

2. Integrated Resource Management

The Conditional Approval states: "As a condition of my approval and in accordance with Section 24 (5) of the Environmental Management Act, I require a definitive plan for the beneficial reuse of biosolids to be submitted to the Minister on or before December 31, 2017."

We understand that the December 31, 2017 deadline requires the CRD to submit a plan outlining a solution for the beneficial reuse of biosolids. We request that the deadline to submit the plan to the Minister be extended from December 31, 2017 to June 30, 2019.

The focus of the Core Area Wastewater Treatment Project ("**CAWTP**") is to treat wastewater and residual solids. The CRD will undertake a separate public process, with the participation of municipalities and First Nations, to review its regional waste management policy and develop a definitive plan for the beneficial reuse of biosolids and integrated resource management.

The CRD commits that the definitive plan will not incorporate multi-year storage of biosolids in a biocell. Biosolids may be stored to the extent necessary to implement the definitive plan and manage short term variations in biosolids demand.

The definitive plan's implementation will not change the CAWTP's scope and schedule because the definitive plan will be a separately funded and scoped program. If it will assist you, the CRD can submit a plan by May 31, 2017 outlining the procedural steps and schedule it will implement to achieve the definitive plan by June 30, 2019.

The CRD has briefed your Ministry staff on these two aspects of the Conditional Approval. We appreciate the Ministry staff's cooperation and assistance on this project, and the offer to share the ministry's jurisdictional review of how other similar-sized and larger municipalities reuse biosolids.



If you or your ministry staff have questions about the clarifications requested, please contact me or Larisa Hutcheson, Interim Project Director, CAWTP at [250.360.3085](tel:250.360.3085) or lhutcheson@crd.bc.ca.

Yours truly,



Jane Bird
Chair, Core Area Wastewater Treatment Project Board

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cc: Honourable Peter Fassbender, Minister of Community, Sport and Cultural Development
Barbara Desjardins, Chair, CRD Board
CRD Board of Directors
Robert Lapham, Chief Administrative Officer, CRD
Larisa Hutcheson, Interim Project Director, Core Area Wastewater Treatment Project

