

Appendix B:

Letters from the Liquid Waste Advisory Committee



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Letters from the Ministry of Environment

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October 28, 2010

File: 76780-30/RDN

John Finnie, General Manager
Regional and Community Utilities
Regional District of Nanaimo
6300 Hammond Bay Rd
Nanaimo BC V9T 6N2

Dear Mr. Finnie:

Re: Regional District of Nanaimo September 2010
Draft Amendment Liquid Waste Management Plan

General Comments:

Liquid Waste Management Plans (LWMPs) must be consistent with the ministry's long-term environmental management objectives. For municipal wastewater effluent, the ministry's long term goals are compliance with the requirements outlined in the Municipal Sewage Regulation (MSR). The MSR outlines the requirements that are expected to be met for new discharges and eventually met for existing discharges. It is not clear from the draft document as to how or over what timeframe the programs will comply with the MSR and other applicable regulations respecting to the management of municipal liquid waste. This includes point source discharges, inflow and infiltration and opportunities around resource recovery.

The new draft Wastewater Systems Effluent Regulations (WSER) under the *Federal Fisheries Act* have been released. The standards therein set a minimum of secondary treatment, or equivalent water quality, for municipal wastewater treatment plants across Canada that discharge to surface waters. As these regulations apply to the Regional District of Nanaimo (RDN) facilities, the amendment plan should outline how the requirements of the new federal regulations will be met.

It is not clear from this draft document how this plan links to the original LWMP and its commitments. Further, the plan should outline which of the original commitments have been met, which have not, and why, as well as which of the commitments have been revised or omitted, and why. It is not clear what the purpose or scope of this plan amendment is.

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This should be clearly identified, whether it is a review of the entire plan or only particular sections. There should also be further background as to the basis for the LWMP review (e.g. whether this was a voluntary initiative, or driven by regulatory requirements and/or as part of a commitment made in the original LWMP). Please also include a revised upgrade implementation schedule showing associated costs.

The ministry encourages the RDN to take a stronger leadership role in addressing failing private onsite systems, source control and rainwater management programs, and supports having further discussion of these topics at the Liquid Waste Advisory Committee (LWAC) level.

There is no inclusion or reference to the LWAC discussion papers or resulting recommendations. The plan indicates that each of the programs are scheduled to be reviewed in 2011. It was our understanding that these sections have been under review since the process was initiated in 2008, and most have been presented as discussion papers for discussion at the committee level at the LWAC meetings. Was this not part of a review process for each of the programs? If not, please explain what the purpose or intent of the discussion papers and these discussions was.

The plan does not cover the potential servicing of rural areas. As this was included in discussions at the committee level, and also in Discussion Paper 10, please indicate why there is no mention of this topic in this draft plan.

Section 2.1 Objective

The objective does not outline what efforts or actions will be taken to achieve the objective, nor does it define a timeframe for the plan. The chapters or subject areas of the plan should be identified here.

Section 2.2 Defining Wastewater

This section should also include reference to onsite systems.

Section 2.4.1 Guiding Principles – Responsibilities to our Environment

With regards to the statement, 'wastewater will be treated as a resource', it is not clear how or where this guiding principle is applied in the LWMP. There is no mention of resource recovery initiatives in the plan.

Section 3.0 Scope

As discussed in the general comments, the scope of the plan needs to be clearly outlined.

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Section 3.2 Geography

This should include Douglas fir only; not Hemlock.

4.0 LWMP Review Process

As noted in section 5.1, the LWMP has borrowed the format of the EMS, which is a cycle that includes review and continuous improvement. As part of the review process for this plan, the original commitments and initiatives, and their current status should be outlined (which were met, which weren't and why/why not). The review should also allow for the identification of what areas of the plan may be deficient and in need of improvement. There should also be mention of the frequency at which the plan will be formally reviewed (typically every five years).

First Nations consultation should be taking place throughout the review process and all efforts and communications need to be clearly documented in the plan.

5.0 LWMP Format

The targets should clearly identify the actions that will be taken, and the timeframe over which they will occur. The performance indicators should be quantifiable or somehow be able to be measured so that there is a means of gauging how well the programs are meeting their objectives. The objectives and targets do not reflect the MSR standards and requirements which must be met as minimum standards.

5.1 Continual Improvement

In applying this cycle, this plan should include review and discussions around the existing plan and identification of what objectives have been met and where improvements can be made. The original plan and what progress has been made since the original plan was approved must first be evaluated in order to be able to improve upon it.

7.0 Financial Planning

The plan indicates that the RDN may have to postpone expansion and upgrade projects if funding cannot be secured. However, the need to upgrade the facilities has already been defined in the original approved 1999 plan, and thus it was assumed that the RDN had already implemented a financial system to prepare for upgrades by the designated implementation dates. Depending on the availability of funding, the plan may have to be revised or other options considered, including adjustments to timeframes and/or alternative waste management strategies. Should this be necessary, further public consultation and amending of the plan would be required. Please note that if a delay in plan implementation were to occur, the ministry could elect to impose more restrictive intermediate requirements on some of the existing discharges within the plan area.

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Has consideration been given to potential application(s) for funding with the basis of meeting current CSSP objectives to protect shellfish harvesting areas in the vicinity of marine STP outfalls? Perhaps there may be potential to apply for funding on this basis, given two of the RDN facilities achieve only primary treatment and discharge to sensitive shellfish harvesting areas. The ministry encourages the RDN to consult with other municipalities such as the Town of Ladysmith that are faced with similar challenges respecting to the protection of shellfish harvesting areas near marine outfalls. Has the RDN explored potential cost-sharing opportunities around broader area-based biosolids management or reclaimed water use options with other neighbouring municipalities?

8.0 Related Initiatives and Plans

It is noted that the LWMP reflects various regulations at national, provincial and regional levels that foster sustainable wastewater management. However, there is no mention of the MSR, nor the new draft Wastewater Systems Effluent Regulation that have been released under the *Federal Fisheries Act*.

9.1 Shellfish Harvesting Areas

The reporting of spill overflows in itself will not ensure for the health of shellfish harvesting areas. These procedures result in closures which serve to protect consumer health. Rather, the health of shellfish harvesting areas would be improved through actions to upgrade the facilities and improve the quality of the effluent discharge.

Please note that the MSR gives consideration to the protection of all shellfish areas regardless of their closure status, as shellfish waters are defined as “water bodies that have or could have sufficient shellfish quantities that recreational or commercial harvesting would take place or water for which commercial shellfish leases have been issued”.

9.2 Contaminants of Concern

This may also be referred to as emerging contaminants.
See further comments under Source Control Program section.

9.3 Marine Vessel Discharge

Please provide more specific commitments and timelines around this initiative.

10.0 Public Wastewater Systems

As mentioned earlier, targets should clearly identify the actions that will be taken, and the timeframe over which they will occur. It is understood that these may require revision over time. However, in establishing future targets and timelines, and securing the necessary funding in advance, this will facilitate long term planning and allow for future objectives to be met.

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There does not appear to be any connection between the objectives set for this program and the Guiding Principles outlined in section 2.4.1. There is no evidence of committing to these principles in the plans for the systems.

The performance indicators need to be measurable in order to be able to assess whether targets are being met.

Under Action 2, there is reference to establishing a process to achieve wastewater servicing for properties with failing private systems. However, it is also indicated that this is to be done on a case by case basis. It is not clear how a process can be established for one site. It may be more effective to address these issues through a regional strategy and/or policy.

11.0 Private Onsite Systems

It may be beneficial to include as a target, working with Vancouver Island Health Authority to determine the number and age of the failing systems.

Any commitments made in the original plan regarding problem onsite systems should be referenced in this section. Further, there should be comment with regards to the progress that has been made to address these issues.

You may wish to review the Capital Regional District's (CRD) LWMP for potential methods and approaches that may be taken in addressing failing private onsite systems.

The MSR does not authorize pump and haul as an acceptable means of disposal.

12. Source Control Bylaw

Targets should include reference to both domestic and non-domestic sources.

Will the source control bylaw specifically address each contaminant and their potential sources?

The performance indicators need to be measurable in order to assess whether the targets are being met.

It is recommended that the public outreach strategy target businesses as well as residents. Will public outreach include increasing public awareness of more environmentally friendly products and proper disposal methods?

Action 1a. Testing of influent on an annual basis is insufficient.

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Action 1b. Most LWMPs now make use of a Code of Practice (COP) rather than a bylaw. The ministry encourages the RDN to take a stronger leadership role in implementing and enforcing a COD address Source Control. Please refer to the CRD COP as one example. Please also refer to the current Hazardous Waste Regulation to ensure that current standards for metals, etc will be met.

Action 1c. Performing mandatory business inspections may also prove effective.
Action 2e. Further details around the source control program should be provided.

The actions listed appear to mirror those outlined in the original plan. Please outline what progress has been made in carrying out these actions since 1999.

I note that the source control budget is only 0.31 of an FTE and \$16,731. It is questionable whether this would be sufficient allocation of time to adequately address source control issues.

13. Odour Control

A budget of \$5,397 and allocation of 0.1 FTE seems insufficient to adequately address odour issues.

14. Biosolids Program

In order to improve the quality of the biosolids, the influent quality must first be improved. This could be done through source control and should be targeted at businesses as well as residents.

Action 3. Education should include information on source control, to help improve influent quality which would in turn improve the quality of the biosolids.

There is a need to identify a back-up option in case of an emergency. There also needs to be options for disposal in cases where the biosolids do not meet Organic Matter and Recycling Regulation (OMRR) standards.

15. Rainwater Management

It may be more advantageous to address the management of rainwater through the LWMP process than through the Water Sustainability Action Plan as the LWMP allows for the development of applicable bylaws and provides a means for recovering administrative and operating costs.

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The trend for recently approved LWMPs completed by regional districts is to have a more regional strategy that establishes minimum performances standards and objectives that apply across the region. These objectives are then incorporated into each municipality's or jurisdiction's bylaws, this approach ensures a consistent and environmentally sound management strategy that is enforceable across the region.

The RDN has the challenge of dealing with multiple municipalities with varying rainwater management policies and watersheds that cross municipal boundaries. For the RDN LWMP to achieve success in the area of rainwater management, regional policies need to be considered and applied across the board. Further, these plans should be coordinated between Federal and Provincial legislation.

The program should include a baseline monitoring program to establish stormwater quality at the point of discharge.

Using the monitoring data and findings, the RDN could develop a strategy to standardize and coordinate management of the region's watershed that would apply to all municipalities.

There is no reference to the commitments made in the original plan (pg. 37 and pg.41) with regards to co-operating with neighbouring municipalities and the Ministry of Transportation regarding stormwater management.

A budget of 0.2 FTE or \$10,794 allocated to this program seems insufficient to adequately implement a rainwater management plan for the entire RDN.

16.0 Inflow and Infiltration Program

As with the Stormwater Program, it is recommended that the RDN develop an overarching regional policy to achieve consistency between municipalities.

There is a need to review section 17 of the MSR to ensure requirements pertaining to inflow and infiltration (I & I) will be met. The RDN may need to develop a plan if the I & I volume is significant.

There does not appear to be any inclusion of a water conservation program or Water Smart initiatives. There is no mention of an Action Plan for Water or that there is taxation authority within the drinking water protection and watershed service area.

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Action 1f should include the collection of data, as well as its evaluation. Collection systems should be identified where additional information is required, in order to identify flows and the extent of I & I as well as remaining system capacity.

A budget of 0.2 FTE or \$10,794 allocated to this program seems insufficient to adequately implement I & I management plan for the entire RDN.

17.0 Greater Nanaimo Pollution Control Centre

The objective should reflect the need to meet MSR standards.

Remove 'permit' and replace with 'Operational Certificate'.

Performance Indicator 4 and Action 4c mention resource recovery opportunities and reclaimed water for use onsite. Further information and timelines regarding these initiatives are required. There should also be reference to the COD for Reclaimed Water Use and the need for any reclaimed water use initiatives to meet its requirements. The RDN may wish to refer to the CRD plan for further ideas with respect to both potential initiatives and chapter format.

18.0 French Creek Pollution Control Centre

More detail is required with respect to the recovery of resources from wastewater and beneficial use of biosolids. Please include specific initiatives and their target dates to be implemented by. Were there any commitments made in the original LWMP? If so, these should be reviewed and discussed in this section.

The budget calls for 0.1 of an FTE and \$5397 for this facility's LWMP program. It is questionable whether this would be adequate to complete the action items listed.

19.0 Nanoose Bay Pollution Control Centre

The targets should include upgrading of the facility to meet MSR standards. It is not sufficient to "maintain integrity of existing infrastructure" that is already aging and failing. It is not sufficient to plan for upgrades to occur in 2040 only to meet the Canada Council of Ministers of Environment (CCME) Wastewater Strategy. The RDN must meet the requirements of all applicable regulations, including the Municipal Sewage Regulation.

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The plans to upgrade this facility by 2040 do not align with the commitment outlined in the original approved 1999 LWMP, to upgrade the facility between 2005 and 2010. Further, postponement of upgrades to this plant does not align with the Guiding Principles of the plan, nor does it reflect the RDN's Wastewater Services Environmental Policy which states that it is the WWS policy to 'comply with the letter and spirit of relevant environmental laws and regulations, prevent pollution and continually improve our performance relevant to this environmental policy'.

More detail is required with respect to the recovery of resources from wastewater. Please list specific initiatives and their target date to be implemented by. Were there any commitments made regarding resource recovery in the original LWMP? If so, these should be reviewed and discussed in this section.

Under 'Upgrade and Expansion Costs', it is not clear what upgrades are being referred to here (planned for 2015 and 2025).

20.0 Duke Point Pollution Control Centre (DPCC)

It is noted that there are no major upgrades planned for the next 10 years. However, it is not clear as to whether there will be any expansions planned in the near future. There is no mention of any follow up or review being done of the potential for connection of problem areas and future Village Centres within Electoral Area "A" that was outlined in the original LWMP Section 3.6.4.

Please include specific initiatives and target dates with respect to resource recovery. To present the exploration of options as "on-going" does not reflect any firm commitments being made.

The budget summary table shows the DPCC facility budget to be 0.01 of an FTE and \$540. It is questionable how all of the action items could be achieved on this budget.

If you have any questions or require further clarification regarding these comments, please contact the undersigned at (250)751-3233.

Yours truly,



Kirsten White
Senior Environmental Protection Officer



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FILE COPY

March 11, 2011

File: 76780-30/RDN

John Finnie, General Manager
Regional and Community Utilities
Regional District of Nanaimo
6300 Hammond Bay Road
Nanaimo BC V9T 6N2

Dear Mr. Finnie:

Re: Regional District of Nanaimo January 2011
Draft Amended Liquid Waste Management Plan

Thank you for the submission from the Regional District of Nanaimo (RDN) entitled 'Liquid Waste Management Plan January 2011 Draft'. I will refer to this draft plan dated January 2011 hereafter as "draft #2". Similarly, I will refer to the earlier draft plan dated September 2010 as "draft #1" and the RDN's originally approved Liquid Waste Management Plan as "approved LWMP". The following are my comments and suggestions upon review of draft #2. As you will find, many of my comments are repetitive in nature, and reflect those made in my October 28, 2010 letter.

General Comments

As indicated in my October 28, 2010 letter, the RDN's approved LWMP is a legal document, approved by the Minister of Environment in 1999. Upon approval, it became the responsibility of the RDN to implement the plan as outlined in accordance with Section 24 of the *Environmental Management Act* (EMA). In particular, the Ministry is concerned with draft #2 wherein it appears that the RDN is using the Canada-wide Strategy for the Management of Municipal Wastewater Effluent (CCME Strategy) as a means to delay original commitments to upgrade the Nanoose Bay Pollution Control Centre (NBPCC) to meet provincial wastewater standards of secondary treatment.

At the January 13, 2011 meeting between the RDN and the Ministry of Environment (MoE) staff, it was indicated that most goals of the original plan have been reached. However, upon review, draft #2 does not appear to include these achievements. As requested in my earlier letter, please provide a summary and/or table confirming which of the projects and tasks have been completed to date.

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John Finnie, General Manager
Regional and Community Utilities
Regional District of Nanaimo

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March 11, 2011

Similarly, for any programs and/or facility upgrades that have not been carried out, please include the rationale for deviating from the commitments of the approved LWMP. In order for the Minister to make an informed decision as to whether or not to approve the revised plan, it must be clear as to which objectives from the approved LWMP have and have not been carried out, and further explanation as to why/why not.

1.0 Liquid Waste Management Plan

There is mention that draft #2 complies with various regional initiatives. However, there is no mention of having to meet applicable provincial and federal regulatory requirements. The MoE's long term goals with respect to Liquid Waste Management Plans (LWMPs) are for existing municipal wastewater facilities to meet the MSR requirements over time. Further, the MoE has endorsed the standards set out in the CCME Strategy, which are brought into force through the Wastewater Systems Effluent Regulations (WSER). This section of the plan should identify the need for the plan to meet the requirements of both the MSR and the new WSER under the federal *Fisheries Act*.

2.3 Regional Priorities

I note that regional priorities include upgrade and expansion plans for Greater Nanaimo Pollution Control Centre (GNPCC) and French Creek Pollution Control Centre (FCPCC). The upgrade of the NBPCC from primary to secondary treatment, however, is not identified as a regional priority over the next 5-10 years, nor is there mention of this occurring within the scope of this 20 year plan. The approved LWMP specifies that the upgrade of this facility to secondary treatment was to occur by 2010. This was based in part on the expectation that the sewer service area would be expanded to encompass areas such as Madrona and Red Gap in the future; however, this expansion did not occur as identified in the plan. Both the Nanoose Bay Official Community Plan (OCP) and RDN Regional Growth Strategy (RGS) support the provision of community sewer service to land designated as urban areas and village centres within the urban containment area to accommodate future growth and development, such as trunk sewers to Madrona and Red Gap. Further, the Nanoose OCP indicates that additional properties may be included in the Community Sewer Service Bylaw area, based on health and/or environmental reasons (e.g. failing on-site systems). While the approved LWMP aligned with these goals, draft #2 does not appear to, despite the reference to the plan objectives working to meet the RGS and OCPs in Section 4.0.

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Given the funding that was originally allocated towards this project as outlined in the implementation schedule, and the associated tax increase that taxpayers faced, further explanation is required as to why this project has been delayed and where the funding was reallocated.

Further, in not including a long term plan for the NBPCC that will meet the requirements of the MSR, draft #2 does not meet the long term objectives of the MoE as they pertain to LWMPs. The plan must include an updated implementation schedule that outlines plans for the upgrades and expansion of this facility.

3.0 LWMP Review

Please include in the appendices of the plan the list of options for expansion and upgrade and the feedback provided by the Liquid Waste Advisory Committee with respect to their preferred options.

3.1 Liquid Waste Advisory Committee

Please indicate which representatives were invited to provide representation on the committee, and ensure that the list is reflective of the committee members that were in attendance.

4.1 Continual Improvement

Additional information around which of the original plan commitments have 'lost relevance or applicability over time' is required. As outlined in the approved LWMP, the District was to track the implementation of its Plan by preparing a brief annual report summarizing the tasks proposed in the plan and the progress made. Did the RDN prepare any of these annual reports, and if so, do they outline the factors for deviating from the approved LWMP commitments?

4.2 Auditing

It is acknowledged that the RDN has adopted a new format for the revised plan that is reflective of the ISO 14001 cycle and the RDN's internal annual review process. This is acceptable provided this format is also able to lend itself to long term liquid waste management planning and details the activities that are scheduled to occur over the entire

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length of the plan (20+ years), their implementation dates (or timeframe) and projected costs. It is essential that the plan include a long term implementation schedule that forecasts the activities and upgrades that are to occur for at least the next 20 years, and details the costs associated with each.

4.3 Budgeting

As mentioned earlier, the projected costs associated with each of the programs, upgrades and/or expansions over the timeframe of the plan (20+ years) must be included and made available to the public. It is not sufficient to provide only program totals for the year 2011 as this does not cover the entire length of the plan.

6.0 Guiding Principles

Draft #2 indicates that ultimately RDN residents will guide the decision making with respect to program objectives, targets and actions. However, many of the original commitments of the approved LWMP that were endorsed by the public do not appear to have been carried out. Further, draft #2 does not outline how the originally approved commitments will be met. If the RDN has been unable to meet one or more of the existing objectives as specified in the approved plan, the RDN must inform the public as to what activities have not been initiated and/or completed and the rationale for these decisions.

While public consultation and input is a key element of the planning process, the Ministry also believes that it is the role of government at all levels, to provide leadership with regards to wastewater management planning and to promote wastewater management options that will improve the quality of the environment and in turn improve the quality of life for residents in the RDN.

8.0 Related Initiatives and Plans

Please note that while the RDN will need to ensure that draft #2 aligns with the new federal WSER, the federal regulation does not supersede the MSR. In meeting the WSER, this should not preclude the RDN from having to meet the requirements of the MSR.

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9.0 Emerging Issues

It is unclear how high quality effluent is a priority for the RDN given the NBPCC currently provides only primary treatment and draft #2 is proposing to delay upgrades to this facility until 2040.

9.3 Marine Vessel Discharge

Please include specific commitments and timelines around this initiative as previously requested.

10.0 Introduction to Programs

It is noted that most of the short term objectives are scheduled for 2011 and none exceed 2015. As this is a 20+ year plan, it should include strategies and actions scheduled to occur throughout the length of the plan, which may lessen the burden of implementation and associated costs. The RDN may wish to consider deferring commitments around source control, rainwater management and other programs as necessary during the first 5 years of plan implementation, to allow for the completion of secondary treatment upgrades to the GNPCC and NBPCC facilities, and enable the RDN to take stronger actions with regards to these programs in year 6 of the plan and beyond.

13.0 Source Control Program

Please define the frequency of influent sampling at the treatment facilities (e.g. daily, weekly or monthly).

In comparing draft #2 to the approved LWMP, it appears that many of the new objectives or tasks with respect to source control are the same as those committed to in the approved LWMP. Please provide brief explanation as to why these objectives have not already been completed as per the approved LWMP implementation schedule. It is acknowledged that there may be unknown factors resulting in delays of certain program tasks. However, the reasons for these delays must be noted in the new plan to provide the public with a clear understanding of how the revised plan connects with the original plan. Please indicate what measures will be taken to ensure the new commitments with respect to source control will be carried out in accordance with the implementation schedule of the revised plan.

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15.0 Biosolids Program

Please refer to the comments in the October 28, 2010 letter.

16.0 Rainwater Management

Please refer to the comments in the October 28, 2010 letter.

Should the RDN wish to address the management of rainwater outside of its LWMP, the LWMP should include a summary of the rainwater plan (which has been included) but also a proposed long term budget and implementation schedule.

17.0 Inflow and Infiltration Program

I commend the RDN for including in draft #2 the commitment to develop a regional policy to achieve consistency between municipalities, to be carried out in 2013.

It is recommended that the RDN implement a standardized investigative program involving flow monitoring, smoke testing and video inspection to be carried out in each of the municipalities, to thoroughly assess the sources of inflow and infiltration (I & I). For larger municipalities, it is expected that the program would be implemented in a staged approach. The investigative program findings could then be used to develop a cost benefit analysis for I & I reduction options.

There is brief reference to the Water Services outreach program and action plan in the Inflow and Infiltration program, developed to conserve, protect and manage water resources in the RDN. However, the Volume Reduction Program as part of the approved LWMP has been omitted from draft #2. Please include an update on the approved LWMP commitments with respect to volume reduction, outlining which have been completed and which will be carried over as commitments in the amended plan.

As per my October 28, 2010 letter, please ensure that the requirements pertaining to I & I outlined in Section 17 of the MSR will be met. In particular, the plan should ensure that for flows up to 2 times the Annual Dry Weather Flow (ADWF), secondary treatment is provided, and all flows in excess of this amount receive at least primary treatment.

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18.0 Financing Major Capital Projects

As indicated in my October 28, 2010 letter, it was assumed that the RDN had already implemented a financial system to begin preparing for upgrades, including upgrading of the NBPCC to provide secondary treatment. As such, has the RDN already collected the funds outlined in the original plan through tax requisitions? If so, are these still in reserve for the upgrades they were originally intended for or have these been reallocated elsewhere? Please also indicate whether or not any grant applications have been made and/or accepted by the Ministry of Community, Sport and Cultural Development that would allow for upgrades at the NBPCC to occur in a timelier manner than specified in this amendment.

Next Steps

I encourage the RDN to revise draft #2 to provide additional clarification and information as requested in my October 28, 2010 letter and in the preceding paragraphs above. The plan should clearly identify the following:

- 1) The scope of the plan amendments.
- 2) Which of the approved LWMP commitments have been met, which have not, and why/why not.
- 3) The linkage between the approved LWMP and the amended plan.
- 4) Clear long term commitments (20+ years), implementation dates and the projected costs associated with each of the programs.
- 5) Facility upgrade plans that are reflective of the Ministry's long term goals respecting to the management of municipal liquid waste.

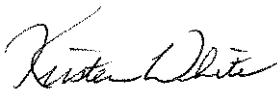
As previously indicated, the Minister must have adequate information in order to make an informed decision as to whether or not to approve the plan. The Minister must also be satisfied that adequate consultation has taken place and that the public has been adequately informed about the plan details and associated costs. This is essential as once the plan is approved there is no mechanism by which the public can appeal the decision. Please note as per Section 24(6) of EMA, the Minister may, at any time, with or without conditions, approve all or part of a waste management plan or an amendment of a waste management plan. As indicated in my October 28, 2010 letter, should there be further delays to the approved LWMP implementation schedule, the Ministry could elect to impose more restrictive intermediate requirements on some of the existing discharges within the plan area.

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These comments are presented as part of the Ministry's role in providing advice to local government on regulatory requirements, guidelines, and aspects related to achieving the Minister's approval of a LWMP. The RDN is ultimately responsible to ensure that the planning process is followed, the LWMP is prepared in accordance with the EMA, and that adequate public consultation takes place so that the LWMP can be considered for approval by the Minister.

If you have any questions regarding these comments, the Guidelines for Preparing Liquid Waste Management Plans and/or any regulatory requirements, please contact the undersigned at (250)751-3233.

Yours truly,



Kirsten White
Sr. Environmental Protection Officer
Environmental Protection Division
Ministry of Environment
West Coast Region

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January 2011 MoE comments 2011_03_11.docx



March 28, 2013

File: 76780-30/RDN

REGISTERED MAIL

Shelley Norum
Wastewater Program Coordinator
Regional and Community Utilities
Regional District of Nanaimo
6300 Hammond Bay Road
Nanaimo BC V9T 6N2



Dear Ms. Norum:

Re: Regional District of Nanaimo September 2012
Draft Amended Liquid Waste Management Plan

Thank you for the submission from the Regional District of Nanaimo (RDN) entitled 'Liquid Waste Management Plan Draft Update September 2012'. I will refer to this draft plan as "draft #3". The following are my comments and suggestions upon review of the latest draft as they relate to each of the sections.

Executive Summary

While it is advised that the Liquid Waste Management Plan (LWMP) be updated every five years, please note that the plan monitoring committee may wish to initiate the plan amendment process at more frequent intervals over the life of the plan, based on regional needs and initiatives.

Glossary

It may be useful to also include and define the Wastewater Systems Effluent Regulations (WSER).

1.0 Introduction

The new federal WSER is no longer draft and the regulations are now in effect. As such, the amended plan objectives should reflect and adhere to all WSER regulatory requirements for municipal wastewater treatment plants.

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The Ministry of Environment's (MoE) long term goals with respect to LWMPs are for existing municipal wastewater facilities to meet the Municipal Wastewater Regulation

(MWR) requirements within a reasonable time frame. Without an approved LWMP in place, the RDN would need to register each of the wastewater facilities under the MWR, and ensure that all applicable regulatory requirements be met, including the provision for secondary treatment as a minimum level of effluent treatment. The intent of an LWMP is to allow for community-specific liquid waste management solutions to be developed over a reasonable timeframe, acknowledging that some requirements of the MWR may not be met immediately. The approved 1997 plan commits to a 13 year timeframe and 2010 deadline for the expansion and upgrading of the Nanoose Pollution Control Centre (NPCC). Delaying upgrades to the NPCC for an additional 15 years beyond the originally approved deadline of 2010 to 2025 is not reasonable. Further, project implementation should not be contingent on the availability of senior level government funding. The approved plan remains a legal document that gives the RDN the responsibility to carry out its commitment to upgrade the NPCC by 2010.

Although perhaps not included in the scope of this amendment, future plans may also include further examination of non-point sources of pollution within the plan area and management thereof.

2.2.1. Public Wastewater Systems

It is noted that stormwater sewers are either owned by a municipality or the Ministry of Transportation and Infrastructure. However, the member municipalities could take a collective approach with respect to rainwater management within the scope of the LWMP, such that the same objectives and requirements and associated enforcement bylaws could be applied consistently throughout the entire plan area.

3.6 Nanoose Bay Pollution Control Centre

Given the approved plan legally commits the RDN to the expansion and upgrading of the NPCC, it is unclear why the RDN held a public referendum on the matter of whether or not to expand service in the Nanoose area after the plan was in place. Once approved by the Minister, there is no mechanism by which to appeal the plan, and this includes by public referendum.

4.0 & 4.3 Plan Update Process

Draft #3 is not consistent with the original commitments of the 1997 approved plan, the MWR, or the WSER with respect to the primary level of effluent treatment that the NPCC is proposed to be limited to until 2025. .../3

4.1 LWAC

Although each of the groups listed may have been invited to participate on the Liquid Waste Advisory Committee (LWAC), please confirm and list only those who provided representation on the committee. For the groups that did not attend or provide input, please include in the public consultation section, any/all correspondence on behalf of the RDN soliciting their participation and input during the amendment process.

4.4 Regional Priorities

Draft# 3 states that secondary upgrades for the Greater Nanaimo Pollution Control Centre (GNPCC) and the NPCC are priorities yet the deferment of implementation until 2025 for the NPCC does not reflect this priority.

5.5 Rainwater Management Program

The MoE is pleased to see that the RDN will be preparing a new regional rainwater management plan. A regional rainwater/stormwater management plan can help to reduce environmental impacts on lakes, rivers and watersheds, minimize health risks, provide a potential alternative water source, and contribute to community safety and financial risk management by reducing the risk of urban flooding and erosion.

During the collaboration process, it will be key to ensure all member municipalities are involved in the process if there is to be opportunity for developing harmonized stormwater management objectives and requirements, and associated enforcement bylaws for application throughout the RDN.

As recommended in the Guidelines for Preparing Liquid Waste Management Plans, a master drainage plan should be the first undertaking as part of managing stormwater. Please confirm whether there are any plans to develop such a plan and/or include this as part of the stormwater management plan.

Once developed, the Ministry encourages the RDN to include the rainwater management plan in the LWMP during the next iteration of amendments. It would be advantageous to include the rainwater plan within the framework of the LWMP, as this would allow for the development of applicable enforcement bylaws and provides a means for recovering administrative and operating costs.

5.9 GNPCC Program

Please include a firm completion deadline for the upgrades and expansion to the GNPCC (i.e. no later than 2016).
.../4

5.10 French Creek Pollution Control Centre Program

Since the MWR has replaced the the Municipal Sewage Regulation (MSR), the RDN may wish to review the new regulation to ensure that reclaimed water conveyed from French Creek Pollution Control Centre to Morningstar Golf Course meets the current requirements for the use of reclaimed water.

7.0 Costs, Financing and Implementation Schedule

Draft #3 presents Class D cost estimates. However, as indicated in the preliminary comments by MoE staff, Baljeet Mann, all costs at this stage of the amendment process should be Class C, if not Class B estimates.

7.3.3 Nanoose Bay Pollution Control Centre

As per the AECOM report in Appendices C, it is estimated that it will cost approximately 7.5 M to provide secondary treatment for 3000 residents and approximately 11 M to provide secondary treatment for 6000 residents. Table 15 of draft #3 however, outlines plans for a facility upgrade estimated at 6.1 M based on a population of only 2000 and does not account for any new connections external to the Fairwinds area. Thus, draft #3 conflicts with the approved LWMP, by not including any long term commitments with respect to service expansion within the NPCC catchment area. Further, Table 15 notes that any additional trunk sewers are subject to referendum. As noted earlier, LWMPs and the commitments therein are not publically appealable once approved by the minister. Thus, it is not clear how these decisions are going to referendum.

As indicated in previous correspondence, the approved LWMP commits to both expansion and upgrading of the NPCC by 2010, therefore it was assumed that the RDN would have implemented a financial system to prepare for the associated capital expenditures. Given this project is identified as being a priority, it is unclear why, and with consideration towards any funding already secured, this project remains unaccounted for in the current Ten Year Capital Plan.

I also note in Discussion Paper No. 1 under 'Milestone Dates for Scheduled Upgrades' that the upgrade and expansion for NPCC was re-scheduled for 2013. As the schedule has now been postponed significantly, please indicate if the LWAC was made aware of this change and the rationale behind the change since the LWAC review of this discussion paper in 2008.

8.1 Plan Monitoring

Please ensure the MoE is notified when each of the annual reports are made available.

.../5

Appendices C

Draft #3 indicates that several of the 1997 milestones have been met. However, for some of the commitments that remain outstanding, some important details seem to be absent from both the draft #3 document and the appendices.

With regards to stormwater management, there is mention of a draft stormwater management plan that was prepared in 2002 and I understand this plan was not implemented. It notes that some of the original stormwater plan elements from the draft plan were then incorporated into the Drinking Water and Watershed Protection Action Plan but it is not clear which were and were not. Please indicate which, if any of these former initiatives will be encompassed in the new rainwater management plan.

There is mention that upgrades to both the NPCC and GNPCC have been deferred but there is no mention of the approved commitment deadlines of 2010 and 2015 respectively. It is important that the public has a clear understanding of the plan commitments contained within the current approved plan and how proposed amendments relate to the approved plan.

The draft #3 document indicates that the NPCC will be upgraded to secondary treatment by 2025. However, in Appendix C, there is mention that facility expansion to accommodate a population of 3000 is scheduled for 2023 and facility upgrades are scheduled for 2032.

Similarly, the draft #3 document indicates that the upgrades and expansion to the GNPCC will be completed by 2016, yet Appendix C references a deadline of 2018. Please update as necessary.

Please update the summary in Appendix C for consistency and with regard to the comments made throughout this letter in respect to the timeline.

Appendices D

Refer to comments for Section 7.3.3.

Appendices E

Please update the list to have Kirsten White as the current MoE representative with Baljeet Mann, Environmental Management Government & Compliance Section Head, as an alternate contact.

.../6

Appendices F

I understand this section is to be completed following completion of a draft plan. However, as stated in previous correspondence, the MoE will expect to see records and/or summary of ongoing consultation efforts that occurred during the amendment process involving all stakeholders, general public and affected First Nations groups.

Appendices G

Thank you for including the cost summary for the upgrades.

Appendices H

Please note that the Operational Certificates will need to be revised to reflect current regulatory requirements.

As outlined in the draft Operational Certificates, it will be necessary to include a receiving environment monitoring (REM) program for each of the authorized discharges. For the NPCC and GNPCC REM programs, it is recommended that these be established by January 2014 to allow for the collection of preliminary receiving environment information, prior to the completion of the facility upgrades. This will help assist in determining if the secondary treatment upgrades will be sufficient to protect the marine receiving environment or if additional treatment works and/or disinfection measures will be necessary to meet applicable water quality guidelines. It is suggested that the RDN meet with Ministry staff from both the Environmental Quality and Environmental Management sections to further discuss the scope and details around these REM programs.

I encourage the RDN to take the comments and suggestions made throughout this letter under consideration and make adjustments to the plan as necessary. In particular, it is recommended that the timeline for expansion and upgrades to the NPCC be revisited, and there be further review of how to advance these plans such that they align more closely with all applicable provincial and federal regulatory requirements as well as the RDNs Official Community Plan and Regional Growth Strategy.

The Ministry welcomes the opportunity to meet with RDN staff to discuss these comments further and provide any additional clarification as necessary.

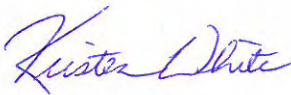
.../7

Please note as per Section 24(6) of EMA, the Minister may, at any time, with or without conditions, approve all or part of a waste management plan or an amendment of a waste management plan. Should there be further delays to the approved LWMP commitments, particularly the delay of upgrading to the NPCC, the Minister may elect to impose more restrictive intermediate requirements and/or deadlines.

These comments are presented as part of the Ministry's role in providing advice to local government on regulatory requirements, guidelines, and aspects related to achieving the Minister's approval of a LWMP. The RDN is ultimately responsible to ensure that the planning process is followed, the LWMP is prepared in accordance with the *Environmental Management Act*, and that adequate public consultation takes place so that the LWMP can be considered for approval by the minister.

If you have any questions regarding these comments, the Guidelines for Preparing Liquid Waste Management Plans and/or any regulatory requirements, please contact the undersigned at 250 751-3193.

Yours truly,



Kirsten White
Sr. Environmental Protection Officer
Environmental Protection Division
Ministry of Environment
West Coast Region



January 9, 2014

File: 76780-30 RDN

REGISTERED MAIL

Randy Alexander, Manager
Regional and Community Utilities Manager
Regional District of Nanaimo
6300 Hammond Bay Road
Nanaimo BC V9T 6N2

Dear Mr. Alexander:

Re: Regional District of Nanaimo Liquid Waste Management Plan Amendment and
Public Consultation Summary Report

Upon review of the draft December 2013 Regional District of Nanaimo (RDN) Liquid Waste Management Plan Amendment (LWMP) & Public Consultation Summary Report, I provide the following comments for your review and consideration.

RDN LWMP Amendment

The wording in certain sections of the executive summary appears to suggest that the secondary treatment upgrades scheduled for the Greater Nanaimo Pollution Control Centre (GNPCC) and the Nanoose Bay Pollution Control Centre (NBPCC) are newly proposed events. However, the RDN is proposing to amend existing approved plan commitments and timelines which have not yet been met, which is an important distinction.

As per the regional priorities section of the executive summary, the plan indicates that it will meet the needs of the environment now and in the future. This is somewhat misleading as there is no information or data results available to indicate that the existing primary effluent is not currently impacting the environment. Until an EIS for each of the GNPCC and NBPCC receiving environments have been completed, it is unknown if the provision of secondary treatment alone will be adequate to protect the marine environment and ensure public safety, or if additional treatment and/or disinfection techniques will be required. What is known at this time is that both the GNPCC and NBPCC require upgrading in order to meet the minimum ministry requirements and standards as outlined in the Municipal Wastewater Regulation (MWR).

.../2

The RDN is to be commended for its comprehensive consultation and public outreach efforts. It is equally important though to ensure that all of the comments and feedback received are given careful consideration and where possible, are reflected in the plan to assist in shaping what should ultimately be a community-driven LWMP. As discussed at our November 21, 2013 meeting, it was agreed that the consultation report would be submitted as a stand-alone document due to its large size. However, to ensure the linkage between these two documents, it was anticipated that there would be reference to the consultation report and the key findings and results of the public consultation process in the executive summary. As the upgrade dates remain undefined, and there does not appear to be any recommendations made based on public input or summarized consultation findings, it is unclear from the plan document what the public has concluded on these matters and how public input received through the consultation process, has or will be factored into the selection process of these dates.

Public Consultation Summary Report

The introduction of this report seems to suggest that Ministry laws requiring secondary treatment as a minimum standard have recently been enacted. This is somewhat misleading as these requirements have been in place for over 14 years since the implementation of the Municipal Sewage Regulation in 1999. Although this regulation proceeded the completion of the original RDN LWMP, the MSR requirements would then typically have been taken into consideration as part of the first 5 year LWMP review in 2004.

In reviewing this document and appendices, I do not see the following items included in the report:

- Ministry response letters
- Response letters received from RLWAC members (i.e. Georgia Strait, etc.)
- Record of comments gathered at public open house events
- RLWAC agendas and meeting minutes (in LWMP Amendment document only)
- RLWAC Discussion Papers
- Correspondence with First Nations thus far

All of the above noted items should be included in this report for equal consideration, just as the detailed summary of public emails and phone correspondence was included. As per the Interim Guidelines for Preparing Liquid Waste Management Plans, the proceedings and results of all activities which are part of the consultation process should be well documented and available for public scrutiny.

.../3

The section entitled Incorporation of Public Feedback of the report indicates that the LWMP was updated to accommodate feedback from the public. However, with respect to the proposed secondary treatment upgrade dates for the Pollution Control Centres Program, it is unclear how public and First Nations input and opinions have resulted in any changes to the LWMP document in regards to this program or how the public consultation results will influence the final selection of one of the upgrade timing options. At minimum, the executive summary of the plan should contain a concluding summary of the public consultation results for the RDN Board and Minister's consideration.

Other

In performing a final review of the online RDN LWMP content including the RLWAC correspondence and documents, I note that in Discussion Paper 1 for the RLWAC, timing for the NBCC preliminary designs for expansion was scheduled for 2012 and the timing for upgrades is scheduled for 2013. While it is appreciable that conditions change over time, there does not seem to be any further communication, in the minutes of subsequent RLWAC meetings or otherwise, regarding the rationale for the additional deferment in upgrade dates from 2013 (as proposed in 2008) to a range of 2020-2030 that is being proposed at this time. To ensure the linkage between the LWMP and the original discussion papers that helped to shape the plan, it should be documented within the plan when this change in upgrade dates occurred during the review process and why. Without this clarification, the relevance and purpose of the RLWAC discussion papers is not clear.

The Ministry encourages the RDN to update its Environmental Management System (EMS) and associated action items and target dates to align with the key target dates for the LWMP pollution control centre programs and all other programs upon Minister approval. I note that as part of the EMS, there is an external audit to be conducted every 4 years, which may coincide well with the external audit of the LWMP that is required.

If you have any questions regarding these comments or require further clarification, please do not hesitate to contact me at 250 751-3193.

Yours truly,



Kirsten White
Senior Environmental Protection Officer
Coast Region

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Letters from the Georgia Strait Alliance

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Georgia Strait Alliance

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#607-207 W. Hastings St, Vancouver, BC, V6B 1H7
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Regional District of Nanaimo
Sent by email: rcu@rdn.bc.ca

Sept 30, 2013

To whom it may concern:

Re: Amendment to Liquid Waste Management Plan

I am writing on behalf of the Georgia Strait Alliance (GSA) to offer our comments on the draft Amendment to the Regional District of Nanaimo's Liquid Waste Management Plan (LWMP). For over 20 years, GSA has been a successful advocate for the reduction of pollution of our waters and improvement of the health of our communities through the implementation of advanced sewage treatment and we offer our comments based on these many years of experience and expertise.

We commend the region for the many goals that have been met since the last LWMP was approved. Improvements in areas of source control and rain water management are commendable and are having significant impacts on the health of our region. We do, however, have concerns about more substantive parts of the amendment; please see our comments below.

Timelines for upgrades/funding model

It is always concerning and disheartening to see the continuation of pollution from sewage outfalls in any region. In 1997, the RDN set realistic goals for the upgrades of the Greater Nanaimo Pollution Control Centre (GNPCC) and Nanoose Bay Pollution Control Centre (NBPCC) yet within this document we see that neither timeline for upgrades will be met – what can only be called a violation of the previous LWMP - and that modest to extensive delays are being proposed. The explanations given are detailed but seem to lead to two conclusions: that the upgrades were not a priority for the region so efforts to set aside or find funds outside of tax dollars were not made in earnest and that the funding model being used by the region is seriously flawed.

- *Timelines*
 - Though delays of any kind are always disheartening, we can accept a modest delay related to the upgrade of GNPCC, but strongly urge the region to make this delay no more than a year or two. Anything further seems unnecessary.
 - As to the delay regarding upgrading NBPCC, that the upgrades are already 3 years behind the agreed upon date for completion set out in 1997 is discouraging, but that the region is seriously putting forward the suggestion that it would be acceptable to delay the upgrades a further 17 years (a total of 20

years behind schedule) is unacceptable. The new federal regulations are designed to ensure all communities upgrade their sewage treatment systems as soon as possible, however it should not be used as an excuse to ignore past commitments with the Province (under the Municipal Sewage Regulations) or give the region license to continue polluting. In the strongest possible terms we ask the region to reconsider this delay request and make the upgrade to NBPCC a priority.

- *Funding model*
 - Throughout the document, the lack of a tax base and the use of the ‘user pay’ funding model is the primary reason put forward for the above delays. Leaving aside the question as to why starting in 1999 when the LWMP was approved that the region didn’t begin to put aside funds to pay for the upgrades, it is clear that this funding model does not work for the region. When it comes to the health of our regions and regional districts, all member communities benefit when pollution is reduced in shared waters. It is not solely those who use the closest sewage treatment plant who benefit from its use, therefore, we strongly urge you to review this model and move to a shared funding model similar to that used in Metro Vancouver. In that region, the community that will be directly using a plant does pay proportionally more, but all other communities pay some share as they all benefit, if not directly then indirectly in having a healthier region.

Integrated Resource Recovery

- When we first began attending Advisory Committee meetings regarding this amendment, Integrated Resource Recovery (IRR) was not high on the agenda. We commend the RDN for opening up the conversation and allowing this issue to be discussed in a fulsome manner. That this was so deeply discussed is one of many reasons we are very disappointed at the weak commitment to finding all opportunities possible to use the resources found in sewage to the benefit of the community. Most of the actions within this part of the plan are limited to using the resources on site, and in many other areas “to consider”, “to examine” or “to discuss” other opportunities. This is at best a weak commitment and at worst a lost opportunity. It is possible that some resources may not have a market at this time making the business case for recovery less than ideal, however, if the upgrades do not put IRR as a central priority and that upgrades are not done with future use in mind, the system built today will preclude changes in markets and technology. The RDN will have a system that will reduce pollution but will also reduce the potential for funding operations through the sale of the resources found in sewage

Biosolids

- As we stated at Advisory Committee meetings, we continue to strongly oppose the land based spreading of biosolids due to the growing complexity of chemicals found within which may leach into the environment and have a wide variety of impacts our local water systems.

I&I

- We concur that the issue of I&I in pipes on private land is a very complex and difficult issue for the RDN and all regional districts around the Strait. However, that something is difficult does not mean that in essence little should be done, which is what we see in this amendment. Outreach to home owners will do little to solve the problem and we strongly encourage the RDN to take stronger leadership in this area. As is being done in Metro Vancouver, one possible path to dealing with the issue is working with the real estate sector to see if there are opportunities to fix or replace pipes on private land at the point of sale. This is simply one idea but unlike what is proposed in this document, at the very least this idea could result in needed changes that could finally have an impact on I&I.

Combined sewers (CSOs)

- Though there are no combined sewers in the RDN's public wastewater system, mention of and encouragement for the removal of CSOs in member municipalities would strengthen this plan


Source control

- We commend the region for its efforts on improving source control and we've been happy to work with the RDN whenever possible to improve public knowledge on ways they can reduce the chemicals and products that end up in the sewage effluent stream. To build on this success, we strongly urge the RDN to develop and implement enforceable Codes of Practice for businesses such as is done in the CRD, in addition to your outreach with the dental and restaurant sectors. Many other businesses – including parking lot owners and dry cleaners – could benefit from more direct engagement and enforcement, and reducing the pollution from these sectors would greatly improve the quality of the RDN's effluent

Finally we would like to offer some thoughts on the issue of leadership. As a regional district, it is your job to not only provide services to your communities but also provide leadership so that the communities within the RDN are healthy and strong. However, at the core of this document we don't see leadership but rather using the fear of raised taxes as a scare tactic so that individuals in the RDN will support the delays you propose. Unlike in the past, sewage treatment is an amenity that can give back to a community in so many ways – through the resources that offset fossil fuel use to the onsite amenities that can improve a local community. If the RDN had created a vision for what pollution prevention can be in your community – and the myriad of benefits to our local oceans and the at risk species that ply them - I have no doubt that your citizens would be inspired by that vision and would be willing to invest more in making it happen. Instead, you have underestimated them, assuming that a small tax increase would be greeted with an uproar – and because of the way you have presented this, this will likely be a self-fulfilling prophesy. We have worked with some very wonderful people at the RDN during the amendment advisory process and we know within your walls, there are leaders – sadly, their fingerprints can be little seen on this document.

We thank you for allowing our organization to be part of the Advisory Committee that offered guidance to the region during the process to create this amendment. We appreciate and value the opportunity to work with the region to improve wastewater treatment and strengthen citizen engagement during these processes. We offer the comments above in the spirit of improving our shared communities and local waters.

Regards,

A handwritten signature in black ink, appearing to read 'C. Wilhelmson', with a long horizontal flourish extending to the right.

Christianne Wilhelmson
Executive Director



Georgia Strait Alliance

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Regional District of Nanaimo
Sent by email: SNorum@rdn.bc.ca

January 14, 2014

Mr. Alexander and RDN Directors and staff:

Re: Amendment to Liquid Waste Management Plan

I am writing on behalf of the Georgia Strait Alliance (GSA) to offer our comments on the updated draft Amendment to the Regional District of Nanaimo's Liquid Waste Management Plan (LWMP).

As was made clear in the Advisory Committee meeting that I attended on November 19th, the region has accomplished and was planning to do so much more than appeared in the original document. In listening to the reports at the meeting, I could sense that the work being undertaken and the plan did not align and I greatly appreciate all the hard work that has gone into this update to better reflect the region's vision and work.

I will reiterate what I stated at the meeting – that the region should be very proud of its efforts to reach out to each and every community member in the RDN. Consultation is too often given short shrift and the comprehensive plan to ensure that everyone in the community was touched at least once with information about the LWMP and their opportunity to comment on it is rare and is truly an example for other communities.

Following up on our initial comments to the draft plan in a letter dated September 30th, we add the following thoughts:

I&I

We commend the region for expanding the details on both monitoring of the inflow and infiltration that occurs but also taking tangible steps to reduce it both on public and private land. As we stated previously, this is a very challenging problem, in particular on private land, and that the LWMP clearly commits to working with member municipalities and homeowners is a positive step forward. We look forward to hearing how this engagement helps to reduce I&I and what creative solutions are uncovered for managing I&I on private land, as we know discussion is only the first step.

Source control

We continue to commend the region for their excellent work in this regard.

Integrated Resource Recovery

We are glad to see an interest in further exploring IRR options as projects come up and we hope to see extensive examination of those opportunities during the design phase of the upgrades at GNPCC and NMPCC. We strongly encourage you to reach out to Metro Vancouver to learn from their initial design process for the Lions Gate WWTP, which will not only have some IRR built into the initial design but incorporate “future proofing” to allow for the region to take advantage of new technologies as they become economically viable. We look forward to seeing what the report being done this year around opportunities looks like.

Biosolids

We continue to have concerns about the ongoing plan to spread biosolids on land due to the complex nature of the chemicals that find their way into the by-products of wastewater treatment. We appreciate that the RDN is following provincial regulations on this, however, we would encourage the province to expand the range of chemicals it tests for when classifying biosolids and that their synergistic impacts in the natural environment be more deeply monitored. This is the only way we will understand any long-term impacts of applying the biosolids, and all the chemicals they contain. We note that in the small poll done during consultations, the RDN public also has concerns about biosolids application near groundwater.

Timelines for upgrades/funding model

We realize that the polling that was done during the consultation was small but it was encouraging that many RDN citizens saw the value in upgrading GNPCC and NBPC as soon as possible, contingent on securing funding from other levels of government. Our organization mirrors those opinions. As we stated in our previous letter, the public will get onside if they understand a project’s benefits.

We note that in the updated plan, the desire to upgrade NBPC by 2030 has been changed to a date in the 2020s and we commend the region for that change.

We reiterate our comments from our previous letter regarding GNPCC:

- Though delays of any kind are always disheartening, we can accept a modest delay related to the upgrade of GNPCC, but strongly urge the region to make this delay no more than a year or two. Anything further seems unnecessary.

We modify our comments from the previous letter regarding NBPC to state the following:

- As to the delay regarding upgrading NBPC, that the upgrades are already 3 years behind the agreed upon date for completion set out in 1997 is disappointing so we encourage the region to propose a date of completion of 2020, or soon after. Delays in the end cost communities more, both in the quality of their environment but also in the cost of construction which rises annually. Note that some work can be done in parallel with work being done on GNPCC, so the timelines are reasonable. We recognize that funding is a challenge and we encourage both the provincial and federal governments to support the regions efforts to upgrade this plant as soon as possible.

Thank you once again for the opportunity to comment on the RDN's LWMP. We are very happy to see that the comments from the community at large and our organization (representing more than 1200 individuals, many in the RDN) were heard and that changes have been made to the plan to reflect those perspectives.

Sincerely,

Christianne Wilhelmson
Executive Director