

Dear Minister Penner

02 April 2010

The intent of this letter from the executive directors, Cadboro Bay Residents Association (CBRA) is to inform you of concerns brought forward by some of our residents in regard to the Capital Regional District's Core Area Waste Water Management project as currently proposed.

Please know the community is not opposed to most of this project's aims nor to the criteria your government has set out to guide its implementation. Some residents however have identified valid concerns the project does not meet the environmental, social or cost-effectiveness criteria mandated by your government.

From an environmental standpoint adoption of the proposed Saanich East Oak Bay plant site in Haro Woods will destroy a minimum of one and a half hectares of a second growth (mature) Coastal Douglas Fir ecosystem (CDF ecosystem classified as threatened) as well as significantly disturb a wider area of vital forest floor. The current plan is for installation of a bio-membrane technology de-watering system. Such a system option is considered both costly and highly energy consuming as pointed out by the Peer Review Committee in their May 2009 report to the Core Area Liquid Waste Management Committee. Additionally carbon neutral efficiencies and benefits are negated with siting at the expense of cutting trees.

Haro Woods ownership is divided between UVIC, Saanich and the CRD (largest portion of the woods recently purchased from the Queen Alexandra Foundation for Children). In its entirety Haro Woods is the last remaining urban forest tract in this area. For the last twenty years residents of Cadboro Bay have continually petitioned Saanich Council to preserve and zone the municipally owned section of Haro Woods as a natural woodland or municipal park. The 2002 Local Area Plan enshrined this reiterated stance. As well this position has been clearly communicated to the CRD at the public meetings and consultations attended by our residents. The CRD is also aware that Saanich has registered a covenant on its part of Haro Woods, a covenant the community expects to be honoured.

In the view of some CBRA executive directors the fact that one small area of the Saanich portion of Haro Woods is already "cleared and disturbed" should not make it an attractive site in the eyes of the CRD for a treatment plant. Restoration and reforestation should be undertaken as initially promised 15 years ago following construction of the East Coast Interceptor in this area. Other directors although equally opposed in principle to the use of Haro Woods for a sewage treatment facility site do not object to some form of "straddling" of a facility in this particular area if constrained to the smallest possible portion of the Saanich owned land.

Haro Woods is situated within a residential area and close to an elementary school, two kindergartens, and a facility for disabled children. The owners of this facility across from Haro Woods have a large undeveloped land area ideal for facility siting but cannot give this possibility consideration as they have expansion plans. Since an increasing number of CALWMC committee members and residents believe Haro Woods is not the best site for a proposed SENOB plant renewed attention should be paid to alternative sites which have too readily been dismissed or overlooked.

Of wider concern to residents is the question of burden on taxpayers currently estimated at between \$250 and \$450 per annum (if present identified costs prove accurate). Costs identified as well do not reflect total project cost. For example, any cost of additional resource recovery infrastructure does not appear to have been factored into bottom line costs nor do costs for various forms of mitigation such as compensation to nearby residents for noise abatement and odour elimination.

Some residents point out that a solid case can be made against the need for a SENOB plant. Reasons for a SENOB plant requirement have been stated as resource recovery enablement in the form of heat energy and non potable water (major recipient being the University of Victoria) and for better control flows into the Northeast Trunk waste water line to avoid raw sewerage overflows in heavy rain incidents. Such overflows result from the poor condition of separate storm water transportation mechanisms (or total lack thereof in some areas) ie infiltration and inflow water into the waste water system downstream from our area. The installation of a membrane system in Haro Woods does not address this problem but rather at great expense provides simply a more efficient means of control of flow when required than do the flume tanks that are presently sited underground in Haro Woods.

Many residents are certain a better way to address the problem of overflows would be to invest in upgrading of the downstream infrastructure, which in fairness as of amendment 7 to the Waste Water Management plan seems to have been at least partially recognized. A \$120 million estimated plant will be redundant for the purposes of flow control with downstream infrastructure upgrades are completed and which must be undertaken sooner or later. A recent study by UVIC students has shown that the real problem is not so much sewage disposal but rather the pollution caused by storm water runoff.

With respect to resource recovery, each study and the Peer Review Committee concluded that for the SENOB plant this was simply not cost-effective. Potential users (like UVic) of the low temperature heat energy that could be generated would in fact, not be able to use it because their heat source and plumbing infrastructure is for suitable only for high temperature heat. There is concern for why this fact was not established early on in the project. It also appears current regulatory requirements make the use of any non-potable water produced marginal and users would require extra expense for additional plumbing. In brief, resource recovery from the SENOB plant is both uneconomical and not practical at this point in time.

The University of Victoria is undertaking a total energy-use plan and results are not yet in. However the University's most recent student residence building is being built to LEEDS standards. The University is also looking at the possibility of converting an adjacent block to LEEDs standards. In light of this it is believed the University is seriously and commendably looking to being energy self-sufficient as at Dockside Green. Simply put, some of our residents believe there is good reason from the perspective of least cost to the taxpayer to closely examine the validity of the presently proposed plan.

The CRD position, as expressed at the March 3rd Waste Water Management Committee meeting, is that without a SENOB plant the presently planned McLaughlan Point and/or Upper Harbour site will not be able to manage the flow. Presently the separate Westshore portion of the overall

plan, where the infrastructure will see by far the largest increase in flow over the lifecycle of the project, it would appear that the proposed treatment infrastructure would be designed not to account for the full projected flows and that some of the flow would in fact be directed to the McLaughlan Point/Upper Harbour sites. The grounds for this (not validated to our knowledge) identifies that an increase of 10% capacity in the downtown plant/s and a smaller capacity Westshore plant would be economical. The question from residents is: “Would it be equally economical *without* a SENOB plant?”

In summary some residents feel there is good reason to entertain serious doubts and misgivings about the secondary sewage treatment siting project as it is now proposed, a project which has changed little from that proposed at the outset back in 2006. This is not surprising as the process is seen as having been flawed with public involvement much too late in coming and until recently tightly controlled. Very little of the advice given by the Peer Review Committee has been heeded and similarly very little to public input. Our community respects and supports the need for waste water treatment. It is the community’s wish to stay within the law, and residents also wish, as taxpayers and concerned citizens, that you ensure by means of a review, challenge and validate that in reaching the project’s goal the CRD is also meeting the criteria your government has established.

Our community looks forward to your response.

Irene Stewart on behalf of CBRA Executive Directors
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