

From: Buttman, Ashley ENV:EX <Ashley.Buttman@gov.bc.ca> on behalf of Morel, David P ENV:EX <David.Morel@gov.bc.ca>

Sent: Thursday, November 30, 2017 11:37:20 AM

To: 'stopbowseroceansewage@outlook.com'

Cc: Downie, AJ ENV:EX

Subject: RE: Sustainable Development Treated Effluent Options for Bowser Village Centre Sewer System

Reference: 312615

November 30, 2017

Thomas Gates

Stop Bowser Ocean Sewage Campaign Director

Email: stopbowseroceansewage@outlook.com

Dear Mr. Gates:

On behalf of the Honourable George Heyman, Minister of Environment and Climate Change Strategy, thank you very much for your email of November 8, 2017, regarding the Regional District of Nanaimo's (RDN's) proposed sewage treatment system and outfall intended to serve the Bowser Village. I am pleased to have this opportunity to respond.

I appreciate the time you have taken to share your comments and questions with us. Your comments regarding alternative options to marine disposal of treated effluent as a measure to avoid local impacts and cumulative effects are valuable and have been provided to Ministry staff on the South Authorization Team in the Environmental Protection Division for consideration during adjudication of any future application for this project.

The Ministry has not yet received a formal application for a proposed system to service the Bowser Village Centre so I am unable to respond with specific comments on the RDN proposal in relation to your concerns. However, I would like to assure you that we take the protection of our air, land and water resources seriously and will ensure that the environment and human health is at the forefront of our decision-making. In the meantime, my staff have provided the following information to assist in answering your questions.

1. All discharges to a wetland must first meet all reclaimed water standards and requirements as per the provincial [Municipal Wastewater Regulation](#) (MWR). Municipal effluent quality requirements for reclaimed water are dependent on its use, as categorized in Section 104. Please note that these are *minimum* requirements and any additional municipal effluent quality requirements necessary to protect the receiving environment and public health are determined by the Environmental Impact Study (EIS) findings and conclusions. The Ministry expects the qualified professional(s) working on behalf of the discharger to adhere to the MWR and its supporting guidelines including but not limited to the [Reclaimed Water Guideline](#) in preparing an application for registration to discharge reclaimed water. Ministry staff are not directly involved in the technical design of wastewater treatment and disposal systems. Rather, the role of ministry technical staff in reviewing and assessing an application for MWR registration is to determine whether or not it has been adequately demonstrated by appropriately qualified

professional(s) that the proposal will meet MWR requirements and standards.

2. Where a discharger is proposing to provide reclaimed water, the qualified professionals retained on their behalf are to follow the recommended EIS scope outlined in Section 3.3 of the [Environmental Impact Study Guideline](#) – A Companion Document to the Municipal Sewage Regulation (now replaced by the Municipal Wastewater Regulation).
3. Your request for additional information respecting specific Ministry authorizations has been brought to the attention of Ms. Stephanie Little, our acting Authorizations Section Head who is responsible for Municipal Liquid Waste files. I have asked her to contact you to discuss what information we have on file for both Qualicum Landing Developments Ltd. and Spider Lake Springs Holdings Inc. authorizations and to make arrangements to share copies of specific documents if/as necessary. Ms. Little will also provide you with further assistance regarding what additional soil information we may be able to provide in relation to the 5 km radius around Bowser that you are interested in.

You may also perform your own search for specific soil information using iMapBC which is publicly available at <https://www2.gov.bc.ca/gov/content/data/geographic-data-services/web-based-mapping/imapbc>

Certainly soil suitability is critical to siting of a ground disposal system. However, it is important to note that the suitability of a location for disposal of effluent to ground depends on many factors. It is not possible to determine the suitability of a particular location, and its ability to meet all applicable ground discharge requirements and standards under the MWR, based solely on the soils of a specific area.

4. Prior to submitting an application for a municipal wastewater discharge, the Ministry requires meaningful consultation with members of the community and First Nations. The results of these efforts are then presented as part of the submission to the Ministry. Once received by the Ministry, an application for a municipal effluent discharge is assessed according to the requirements identified in the MWR, and in accordance with the principles in the RDN's Liquid Waste Management Plan. This includes the preparation of an environmental impact assessment. You can learn more about the regulatory requirements and authorization process on our website at <http://www2.gov.bc.ca/gov/content/environment/waste-management/sewage/municipal-wastewater-regulation>.

Planning and public consultation regarding the types and locations of proposed wastewater treatment systems, including the outfall, rest with the local government. I understand that residents in the area to be serviced by the proposed sewerage system supported the project in a recent petition, allowing the RDN to proceed to the next phase of detailed design and consultation with the broader community. I also note that the RDN website contains significant information on the proposed facility, with community engagement details, recent updates and direct contact information to the appropriate RDN staff working on this project. I encourage you to visit their website at <http://www.rdn.bc.ca/cms.asp?>

[wpID=3609](#), and participate in the ongoing consultation process.

Thank you again for taking the time to provide your comments and concerns.

Sincerely,

David Morel

Assistant Deputy Minister

cc A.J. Downie, Director, Authorizations – South. AJ.Downie@gov.bc.ca

From: stopbowseroceansewage@outlook.com [<mailto:stopbowseroceansewage@outlook.com>]

Sent: Wednesday, November 8, 2017 3:35 PM

To: jenifer.verge@gov.bc.ca; Morel, David P ENV:EX

Cc: kim_recalma-clutesi@shaw.ca; Bryan Holyk <bryanholyk@gmail.com>; Fraser.MLA, Scott LASS:EX; Minister, MAH MAH:EX; gord.johns.a2@parl.gc.ca; Minister, ENV ENV:EX

Subject: Sustainable Development Treated Effluent Options for Bowser Village Centre Sewer System

Hi Jennifer:

Thank you for taking my call this afternoon and offering to forward my questions and request for information to appropriate Ministry staff. It is unfortunate that I was not able to speak with the ADM.

As the Ministry may know the draft Bowser Village Center (BVC) Sewer Service bylaws will most likely be adopted by the Regional District of Nanaimo (RDN) next week (on Nov. 14) and the ***Stop Bowser Ocean Sewage Campaign*** of the ***Area H Rate Payers and Residents Association*** is interested in exploring alternative options to marine disposal of treated effluent as a measure to avoid injurious affection to beachside residents (per Expropriations Act), and long term cumulative adverse contamination of herring and salmon nursery areas, beaches and shellfish.

Here are the questions:

1. Can a discharge of secondary treated effluent to a private exorheic or endorheic wetland be permitted/approved? If so, would a constructed subsurface wetland be required at the top end of the wetland gradient? The current BVC design is a Single Batch Reactor (residence time 4 hours) followed by UV disinfection, with a marine discharge. A wetland could act to polish the final effluent and may serve as the necessary add on for sustainable development. It would also serve for system upset contingency. The phase 1 volume is ~250 cu m/day but will go many times higher as the RDN consolidates other local sewerage as is now supported in the official community plan. (http://www.rdn.bc.ca/dms/documents/wastewater-services/bowser-village-wastewater-study/bowser_village_wastewater_servicing_design_report.pdf, for actual design specs.)
2. If a wetland pollutant removal step can be approved, what additional information would

be required in the EIS?

3. The RDN has said in 2017 (based on Stantec 2017/ desktop review) that no ground is available in the vicinity of Bowser for ground infiltration disposal of municipal effluent. Given that most residences and residential developments currently use ground infiltration systems for effluent disposal, we are interested in further information on soils distribution compatible with ground disposal and the design specifications and as-builts for approved systems to discuss with the RDN, towards a satisfactory options analysis. Accordingly could you please provide the following information or links where that information may be accessed:

-For Qualicum Landing and Spider Lake Springs developments copies of the MOE permits, as-builts and system specifications, and number of hookups.

- information or maps on suitable soils for ground infiltration disposal of treated effluent within a 5 km circle of Bowser. Please see the attached study and links below for background on some of the acceptable areas we have already found for ground disposal (<http://www.rdn.bc.ca/application-document> ; <http://www.rdn.bc.ca/cms/wpattachments/wpID3024atID5390.pdf>)

4. We are very concerned about the lack of consultation on this proposal which will see Bowser Village as the host for the next RDN Pollution Control Center with yet another Salish Sea Municipal Effluent outfall, directly beside the largest scallop farm in Canada. Will the BC Government provide for public review, Aboriginal consultation, and comment submission for dispositioning by Ministry staff for the proposed Bowser Village Sewer Service EIS? If so could you please add ***Stop Bowser Ocean Sewage*** to the consultation and reviewers list?

Sincerely,

Thomas Gates

Stop Bowser Ocean Sewage Campaign Director

CC B. Holyk Executive Director, AHRPRA

Attachment (1)