

December 3, 2017

Dear Area H Residents and Rate Payers Association Members:

Our non-profit association was established to create a unified voice with which to promote the environmental, political and recreational interests of RDN Area H on Vancouver Island. We are 100% member funded and operated by local residents who volunteer their time and expertise.

AHRPRA supports the concept of a sewer system and we fully support the proposed development projects for Bowser Village. We however, are fundamentally opposed to the marine disposal of environmentally damaging secondarily treated sewage effluent in Baynes Sound. We believe that Area H and Bowser Village Center are unique and special places which should set the standard for a model green community.

Our association sponsors the SOS (Stop Ocean Sewage) Bowser Campaign. The SOS campaign began in June 2017 when concerned residents became aware of the RDN's plan to fast-track the construction of a sewer system with a marine outfall to serve 102 properties in Bowser Village Centre without a referendum or proper consultation of Area H residents. To qualify for federal grant money the project must be completed by March of 2019 so the rush is on.

On the surface this project seems straightforward. But due to politics, economics, engineering and environmental issues it is far more complex than it appears.

The proposed "Sequencing Batch Reactor" treatment plant is conventional old school technology that does a form of secondary treatment. Incoming raw sewage is filtered to remove nonorganic material and then air is bubbled thru it in a tank for four or five hours. This causes the sludge to settle which is then sent to another tank (it will be trucked to French Creek for further processing). The remaining liquid effluent is passed thru a UV light pipe and then sent out to the ocean.

This process does nothing to remove harmful and often bio-accumulative substances such as pharmaceutical drugs like hormones and antibiotics, detergents, plastic micro beads and chemicals from household cleaners and personal care products.

There will be no filtration of the effluent to remove certain viruses, bacteria and other disease causing pathogenic organisms that UV light doesn't touch. Pharmaceuticals, chemicals and heavy metals all remain in the effluent and are sent to the ocean. There are also phosphorus and nitrate fertilizers and climate changing organic carbon that will cumulatively affect marine ecology. To top it off the RDN's choice outfall location lies only 400 meters from a shellfish lease.

In keeping with the standard outdated RDN practice of building expandable big pipe marine outfalls the current plan is for the effluent outfall pipe to be 200mm in diameter - that's over 7.5 inches!

Based on the average daily water use of 100 gallons per person and average occupancy of 2.1 people per home a 7.5 inch pipe has potentially enough outfall capacity for over 1800 homes. Factors like pipe elevation, pressure, friction and structure of the diffuser array will affect the flow rate so we actually don't know with any certainty what the flow capacity will be - and neither does the RDN because no detailed engineering design for the outfall has been done yet. But one thing is for sure - the collection system will be expanded and over time more and more effluent will pour into Baynes Sound.

In addition to the "big pipe" the planned treatment plant will be expandable by the addition of another cell – another clue that the initial hookups in Bowser Village Centre are only the very beginning of turning Bowser into an RDN sewage hub. This is the thin edge of the wedge and once this outfall pipe is in the water there is no turning back.

What will the future environmental impact be on Baynes Sound? How about the impact on our beaches and our shellfish, tourism, fishery and recreation industries? What will it be like when the system is running at full capacity?

What will the reaction be when there is a large sign on the beach warning of a sewer outfall? The RDN says it won't make any difference to property values, sports anglers or to tourism. Seriously?

Over the last few months SOS has embarked on an active and continuous letter writing campaign to all levels of government including the Prime Ministers office, various MP's and MLA's, Ministries of Environment, the Green Party of BC, the Canada Food Inspection Agency and the Ministry of Municipal Affairs to name a few.

The Stantec Engineering desktop report (which the RDN has adopted as the foundation for this project) claims that marine disposal of effluent is the only viable option due to challenging soil conditions. We have acquired several engineering reports that were commissioned in the past to study the issue of land based sewage treatment in the area. The opinions in these engineering reports are that a land based disposal system is entirely possible. Subsequently the SOS team has researched modern green land based solutions for sewage treatment and disposal and presented them to the RDN.

To raise community awareness we held parallel community meetings during the RDN's open houses at the Community Centre in October. Association representatives have attended virtually all public RDN council meetings (and when allowed to, have spoken) when the sewer issue was on the agenda. We also attended the recent Official Community Plan open house at the Community Center. We have had numerous formal and informal meetings with representatives of the RDN - including our own Area H representative and RDN chairman.

By statute Municipal Governments in BC hold considerable power with what seems like minimal oversight from the Provincial Ministry of Municipal Affairs - yet the impact and consequences of decisions that local governments make are felt for decades to come. It is more important than ever for local residents to get involved and to attend the RDN meetings on December 6th and 12th and to make their views known.

The RDN is aware of the lack of community support for this project yet continues to move it ahead. The Federal/ BC Waste Water Grant is a time limited offer. The system has to be completed by March of 2019 and deadlines are approaching for the passage of bylaws to proceed with construction.

The most desirable outcome to this situation is that by working with the RDN we can find a suitable location for a modern green land based treatment solution that will put Bowser on the map as an example to other communities.

If that is not possible on behalf of our members we will have no choice but to move ahead with the appropriate legal action to protect Baynes Sound.

Please check the sosbowser.ca website regularly for updates and further information.

Yours truly,

Bryan Holyk

Executive Director AHRPRA.