

From: Fawn Ross <rossf@ae.ca>

Date: March 2, 2018 at 3:56:35 PM PST

To: Jason Smith <Jason.Smith@anmore.com>, Juli Halliwell <Juli.Halliwell@anmore.com>

Cc: Ewen Stewart <estewart@azuramanagement.com>

Subject: RE: 2018-02-01 Action Plan Approval

Hi Jason and Juli,

This email is to update you on the recent communications with MOE, and to request a meeting with you. Please note that my role the project is to address the fecal contamination, and work with MOE to meet their requirements. It does not include anything to do with the proposed subdivision to bare land strata, or any other type of development on the property.

The recent direction from MOE is to delay the March 1 deadline until such time that meetings and/or presentations with the Village of Anmore can occur. This is because collaboration with Anmore is seen as the most viable option for reaching a solution. If an amicable solution cannot be reached, the next step is to request the direct involvement of the Minister of Environment, who can order a municipality to prepare a Liquid Waste Management Plan under the Environmental Management Act, Section 24, subsection (3). These are municipality wide plans based on public consultation and protection of health and environment. From my discussions with MOE, my understanding is that if ordered, all exiting MOE septic permits within the municipality are cancelled, then re-issued as operation certificates once the plan is approved by the Minister. The fencing and signage will remain in place until such time that there is no more risk of exposure.

The Anmore Green Estates objective is to address their immediate situation and risk, and not to weigh into politics of that scale, therefore, they much prefer reaching an amicable solution with Anmore. There are other options than ministerial involvement, but those options require collaboration between Anmore Greens Estates and Anmore. I also understand from media releases that Amore still has some questions regarding the source of the fecal contamination. We have scientific options for investigating the system further, but would much prefer to proceed in conjunction with Anmore as a means of alleviating some of the political tension this issue has caused.

With this in mind I would like to meet with you to discuss any technical questions or concerns you may have, and possible options for moving forward. I will also submit a Delegation to Council Request Form as a means of addressing any questions and concerns council has.

Please call either Ewen or myself to discuss this further.

Cheers,

Fawn Ross, B.Sc., R.P.Bio.
Environmental Scientist

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From: Jason Smith [<mailto:Jason.Smith@anmore.com>]
Sent: Friday, March 2, 2018 4:07 PM
To: Bings, Dan P ENV:EX
Cc: Juli Halliwell
Subject: Fwd: 2018-02-01 Action Plan Approval

Hi Dan,

We would like to arrange a meeting with you as soon as possible to discuss this matter. The threats implied in this email would have major political and financial ramifications for our community.

We would like to have a clear understanding of the Ministry's position on this matter.

Perhaps sometime early next week. Please advise on when you are available.

Regard, Jason

From: Bings, Dan P ENV:EX [<mailto:Dan.Bings@gov.bc.ca>]
Sent: March-06-18 10:28 AM
To: Jason Smith <Jason.Smith@anmore.com>
Subject: RE: 2018-03-06 Extension to Requirement 5 Order Deadline

Jason, apologies for the delay in responding to your email and phone messages, but I was out of town late last week.

I have granted a one month extension to the deadline for submitting the report required by requirement number 5 of order 109192. This report for final disposal options is now due April 1, 2018. The reason for the extension was to provide a reasonable amount of time for AGE to attempt to engage the organizations involved in this matter in pursuit of the most viable long term solution.

As to the reference to the waste management plan, this is something that AGE could lobby the Minister of Environment to require and is an authority that could theoretically be employed as it was with the Capital Regional District, but as of this writing, the Minister has not been briefed nor approached regarding this matter by line staff and the ministry does not have a position as such on this evolving issue other than the desire to see it resolved in accordance with the current order and in the most environmentally protective manner.

Please feel free to contact me at your convenience if you wish to discuss. I'll be in the office all week.

Regards,
Dan Bings
A/Compliance Operations Manager
Compliance Section

Ministry of Environment and Climate Change Strategy
Environmental Protection Division
Regional Operations Branch
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From: Jason Smith [<mailto:Jason.Smith@anmore.com>]
Sent: Tuesday, March 6, 2018 10:49 AM

To: Bings, Dan P ENV:EX

Subject: RE: 2018-03-06 Extension to Reuirement 5 Order Deadline

Hi Dan,

Thank you for the update and I will use this information to update Council.

Could I request that in the future you let us know directly about Ministry decisions regarding Anmore Green Estates, such as granting them an extension. That would be helpful to us so that we can inform our politicians with the most accurate and up to date information.

I would also appreciate your perspective on the Keystone report, furnished by the School District, that brought in to question, in my mind, the basis for pursuing this abatement order.

Regards,

Jason

From: Bings, Dan P ENV:EX
Sent: Tuesday, March 6, 2018 11:14 AM
To: 'Jason Smith'
Subject: RE: 2018-03-06 AGE Sewage Concerns

Will do Jason, attached is a copy of the email granting the extension.

I've yet to read the Keystone report in detail, but the idea that they could come up with low or no results doesn't surprise me given previous QP work indicating that the issue is likely to be seasonal and sporadic. Furthermore, I am informed by AGE that they have not been discharging to the western field which could have been the cause of the high results obtained by AE. Instead, they have been directing the discharge solely to the eastern field; however, this raises the new concern of off-site migration of sewage resultant from the French drain installed behind the retaining wall South of the eastern field and the diversion of sewage through the storm sewer into the small watercourse South of the ball field.

This is a matter I have yet to take up with AGE, but will be shortly. If confirmed it would only underscore the limitations for resolving this issue via onsite treatment and disposal, since while disinfection as a mid-term option may kill the bugs and abate the public health risk to some degree, it would not address eutrophication of surface waters from nutrient loading. There is also the matter that waste discharge permit 4606 requires that the two fields be alternated on a monthly basis, but given what occurs when the western field is utilized, I am disinclined to make an issue of this in the short term. I am at present more interested in identifying what impacts if any are resulting from the exclusive utilization of the eastern field.

Regards,
Dan Bings
A/Compliance Operations Manager
Compliance Section

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From: Bings, Dan P ENV:EX <Dan.Bings@gov.bc.ca>
Sent: Tuesday, March 06, 2018 11:21 AM
To: Fawn Ross <rossf@ae.ca>
Subject: FW: 2018-03-06 Eastern Field Use

Fawn,

For your information, recent correspondence with Anmore. With regard to the identified concern regarding the exclusive use of the eastern field potentially impacting surface water quality, would AGE be prepared to attempt to quantify or verify that concern voluntarily or should I look to amending the order to formalize the requirement. I really don't see that as necessary if the information can be obtained voluntarily.

Regards,
Dan Bings
A/Compliance Operations Manager
Compliance Section

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