



August 7, 2013

CRD Core Area Liquid Waste Management Committee  
625 Fisgard Street  
Victoria, BC V8W 1R7  
Att: Chair Blackwell and Directors

Dear Chair Blackwell and Directors:

**Re: Item 8.2 - Notice of Motion – Director Derman – Core Area Liquid Waste Sewage Treatment Project**

We write on behalf of the Georgia Strait Alliance and T. Buck Suzuki Environmental Foundation, in consultation with counsel at Ecojustice Canada, in opposition to the presented motion above.

For many decades, our organizations have advocated for improved sewage treatment across British Columbia and Canada, as a viable and effective means to improve the health of local environments and communities. This stance has been based on the best available science and on the globally accepted conclusion that sewage treatment is fundamentally necessary to healthy communities. Since 2006, when the province of British Columbia ordered the Capital Regional District of Victoria to plan for treatment, our groups have participated in the extensive consultations and discussions that have resulted in the plan that the region is currently attempting to implement. This plan is the result of community will and discussion, and any efforts to delay its implementation are not a benefit to the community and place the region at risk of violating national regulations which mandate the completion of this new system by 2020.

In the last year, it has been deeply troubling to watch as some leaders in the community have taken great effort to re-write the history of the creation of this sewage treatment plan and seem focused on undermining the plan rather than strengthening it. It seems truly that the extensive consultations and agreements that were made by communities within the CRD have been forgotten and that the effort today is focused on division rather than the myriad of opportunities that sewage treatment brings to this region.

Speaking directly to the motion before the board, we make the following comments:

1. *WHEREAS the currently proposed Core Area Liquid Waste sewage treatment project may provide only limited environmental gains and, in particular, appears to be a considerably less than optimal response to climate change mitigation challenges that are rapidly becoming the imperative of our time:*

The statement that the CRD's sewage treatment plan has limited environmental gains is simply put, false. We have seen this statement being put forth by opponents of sewage treatment and it now seems to have become part of a local urban myth that is being accepted as fact. With no current treatment the *independent expert science panel* from SETAC put Victoria in the high risk low cost realm. Secondary treatment is a major step forward as proposed within the CRD plan. It removes a long list of chemicals and toxins from the effluent stream, in addition to the organic matter within, and ensures that it no longer contaminates the local waters of the CRD (<http://www.georgiastrait.org/?q=node/322>) and stops being a contributor to greater contamination of the waters of the Salish Sea. The yuck factor in poop, pathogens carrying infectious diseases, that we are so happy to pipe out of our homes and communities, currently go untreated here contaminating a vast area of Victoria Bight, a fact highlighted by the closure of 60 square kilometers to shellfish harvest. This closure may protect human health from the worst of pathogen contamination; it does nothing to protect the multitude of marine organisms, from orcas to salmon smolts, which frequent the area. Once removed, these toxins can be safely managed with the right processes that can prevent them from freely contaminating the environment.

Infrastructure projects such as this do use energy and mitigating their contribution to climate change is an important issue to address. However, using this challenge as a reason to undermine the current plan is not responsible. What is most troubling is that throughout the last 7 years, there have been many innovative ideas that have been put forth to address climate change to the greatest degree, and most have been fought by opponents of sewage treatment. To now use climate change as a reason to scrap the plan and start over is disingenuous. We believe that within the plan are efforts to mitigate climate change impacts and that further improvements can be made without rewriting of the plan.

2. *WHEREAS the City of Colwood and the Township of Esquimalt have brought forward approaches to the sewage project that hold the promise of greater environmental benefits and a better financial outcome, and given that other such opportunities likely exist within the core area:*

We greatly appreciate that in complex plans such as this, there will always be another idea to consider; each community in this country has had to face this challenge in particular in a time of speedy technology changes. However, new technologies cannot ignore the built environment that this plan must serve. There are pipes in the ground, toilets in our homes and businesses, and leachate running from our landfill; this represents billions of dollars of investment and frames the problem to be managed. Some would have us ignore existing architecture, even this was briefly considered. Moving the community to composting toilets is just not feasible, think first of hotels and high-rises. The idea that Dockside Green type developments can take care of the existing 130 million litres a day is ridiculous; for starters no reasonable timeline can be provided for such an approach. Within the extensive consultation that occurred directly after the provincial order to treat (the CRD's own SETAC report sealed this order), a myriad of technologies and approaches were reviewed for financial, environmental and social benefit. The approach within the plan was created in the CRD, this was not forced from above. The research on resource recovery and a decentralized approach was impressive, the opportunities equally impressive. However the communities showed no stomach to implement up to 32 treatment plants throughout the region. Even the four plant option was vigorously fought. If someone has

a workable comprehensive plan better than the current plan, let them bring it forward as we haven't seen it. We understand that the CRD communities are interested in ideas that will make this plan better, we support this. Ideas to scrap the plan with no viable alternative are counterproductive and we do not support them.

3. *WHEREAS the CRD approach to these initiatives and potentially others, has appeared to be inconsistent with a spirit of cooperation, a major CRD goal, and has, instead, likely fostered division:*

It is our observation that the proponents of this motion have attended their CRD duties with no spirit of cooperation, and the result has fostered division. As stated above, the CRD has been engaging with the public and community leaders for more than 7 years now, in a spirit of cooperation, to build this plan. Because some may not be happy with the outcome, in particular those whose sole goal is to never see the region treat its liquid waste, is not a reason to criticize the work of Directors and staff who have been working diligently to make this plan better and bring it to reality.

4. *WHEREAS in general, but especially in recent times, the conduct of the core area sewage treatment project has likely served to lessen public confidence in the capability and viability of regional government:*

There is no doubt that the implementation of this plan is testing the capability and viability of regional government. The responsibility for the decline in public trust around this plan is not the fault of the plan or of the staff or the Core Area Committee as a whole, but must be placed at the feet of those who have been undermining the plan from the moment of its creation. There is a vocal minority within the community who will never support sewage treatment. They have succeeded in fanning the flames of community division by providing misleading and at time blatantly false information in order to support their agenda. That some leaders in the CRD are now using these misleading messages as a basis for scrapping the plan is a credit to their ability to deceive. Many communities have successfully faced down opposition to sewage treatment. The acceptance of sewage treatment as a necessary and important aspect of community and ecosystem health is recognized internationally; it is no longer argued. This allows communities energy to focus on innovation and engagement rather than an endless circle of rhetoric that will not benefit the community. Again we see the re-writing of history in this statement and a lack of willingness to take responsibility for the challenges the region is facing.

*BE IT RESOLVED that the Capital Regional District Board request the Core Area Liquid Waste Committee to:*

1. *Initiate an extensive, independent review of the current project with the intention of insuring that the approach taken to sewage treatment:*
2. *Initiate, in parallel, a new Request for Expressions of Interest that would allow any group to bring forward progressive approaches such as those suggested by the Township of Esquimalt.*

*BE IT FURTHER RESOLVED that the Capital Regional District Board commit to working with the Core Area Liquid Waste Committee to approach provincial and federal officials both at the staff and political level in order to insure that time for such a review and expression of interest process is available without putting provincial and federal financial contributions in jeopardy.*

This again shows that the proponents of the motion have NO VIABLE ALTERNATIVE to propose. They are asking you to scrap seven plus years of planning work and two thirds senior government funding for an REI process that has no guarantee of providing any viable alternative that the region can live with. In the last seven years, the region has spent many millions of dollars and countless hours of staff, directors, consultant and community time to create this plan. There have been a multitude of options considered, including an unsuccessful REI process. The plan was built using expert advice to meet the stated goals of local communities within the CRD. To put it clearly - these resolves asks that the Board put aside all this effort and put the communities future in another REI process.

More than enough time has been spent to create this plan and we can see no reason for any level of government to offer the region an extension to keep polluting our waters for any waiver beyond 2020, in violation of national law. It is very difficult to understand how the region would be willing to throw away taxpayers' money that has been spent since 2006 because, in the minds of some, sewage treatment isn't needed in this region. Delay has been the mantra of sewage treatment opponents for decades and it will remain a tactic until sewage treatment comes to this region. This is the time to move forward with the current plan.

### **Conclusion**

In the strongest possible terms, our organizations ask the Directors to oppose this motion and to focus their energy on improving and implementing the current Liquid Waste Management Plan. Any further wasting of community energy on delay is not only causing further pollution of our local waters but also puts the region at risk of violating national law. We attach for your information a letter written by Ecojustice last fall that lays out clearly why delay is not an option for the region.

We thank you for your time and your consideration.

Sincerely,



Christianne Wilhelmson  
Executive Director  
Georgia Strait Alliance



Jim McIsaac  
Director of Sustainability  
T. Buck Suzuki Environmental Foundation

cc Lara Tessaro, Staff Lawyer, Ecojustice