

September 10, 2007

Dwayne Kalynchuk, PEng General Manager, CRD Environmental Services PO Box 1000, 625 Fisgard Street Victoria, BC V8W 2S6

Re: Comments on the Site Selection Review Process

Dear Dwayne:

Here are our comments concerning the site selection review process.

An environmental and social review for treatment plant site selection is premature since the CRD's current plan only contemplates resource recovery at the treatment plant level. This narrow system boundary approach cannot optimize environmental and social benefits or economic value for the community.

A fully integrated plan for resource recovery will not only address liquid waste management, but also solid organic waste management, potable water management, community energy requirements, community transportation requirements, and greenhouse gas reduction objectives.

In a fully integrated plan for resource recovery, community demand for heat energy from treated sewage will affect the location of treatment plants, in order to optimize energy recovery. Similarly, if community requirements for reclaimed water are considered, distributed treatment plants may be favoured over a more centralized approach.

Land consultation should recommence after your integrated resource recovery study is complete, and an integrated resource recovery plan for the region is in place.

Sincerely,

Christianne Wilhelmson, MSc Georgia Strait Alliance

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Stephen Salter, PEng

Jim McIsaac, BSc T. Buck Suzuki Environmental Foundation

cc: TCAC Members