

**DATE:** November 26, 2020

**FILE:** 5360-01

**TO:** Chair and Directors  
Comox Strathcona Waste Management Board

Supported by Russell Dyson  
Chief Administrative Officer

**FROM:** Russell Dyson  
Chief Administrative Officer

*R. Dyson*

**RE: Waste Management Centres Statutory Holiday Closures Update**

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### **Purpose**

To update the Comox Strathcona Waste Management (CSWM) Board (Board) on impending statutory holiday closures for the Comox Valley and Campbell River Waste Management Centres, effective January 1, 2021, given recent correspondence from the Town of Comox.

### **Recommendation from the Chief Administrative Officer:**

THAT the Comox Strathcona Waste Management Board affirm their original direction from the November 6, 2019 Board meeting to close the Comox Valley and Campbell River Waste Management Centres on statutory holidays effective January 1, 2021.

### **Executive Summary**

At their November 2019 meeting the CSWM Board passed a recommendation that the Comox Valley and Campbell River Waste Management Centres close on all statutory holidays, effective July 1, 2020. This same staff report and recommendation was also supported by municipal staff at their October 31, 2019 CSWM Advisory Committee meeting.

At their June 2020 meeting staff informed the Board that the statutory holiday closures would be deferred until January 1, 2021 at the request of member municipalities in order to provide their hauling contractor additional adjustment time to accommodate their collection schedule. In support of this direction significant communication and planning has been completed to accommodate the updated schedule:

- Communications with Emterra informing them of the change
- Two separate letters (June 2020, October 2020) informing and reminding over 1,100 account holders of the change
- Development of a new collection calendar for the Royston Garbage Service as well as the development of materials for printing
- Development and implementation of an add-a-day calendar by the City of Courtenay to specifically deal with this change and with community growth.

The following Appendix A - Statutory holiday communications, further details these efforts.

On November 12, 2020 the Town of Comox provided a letter to the CSWM Board requesting the repeal of the Board's decision to close the Comox Valley and Campbell River Waste Management Centres on statutory holidays (letter attached as Appendix B). The letter summarizes that statutory

holiday closures will have significant impact to residents and businesses in Comox and suggests that the Board delay the decision to close on statutory holidays, or provide the Town's contractor with some other means of access on those days.

- Statutory holiday closures at the Comox Valley and Campbell River Waste Management Centres were directed by the Board in November 2019, allowing 13 months for transition.
- Extensive communications have been completed by the CSWM service to over 1,100 account holders informing them that the Comox Valley and Campbell River Waste Management Centres will be closed on statutory holiday's effective 2021. Undoubtedly many of these stakeholder have made new arrangements.
- The Comox Valley Regional District (CVRD) has developed an updated Royston garbage service collection calendar and prepared materials for printing and mailing to residents. The uncertainty initiated by the Town of Comox's letter is delaying the timely distribution of these materials.
- In direct response to the planned closures, the City of Courtenay has expended considerable resources and funds to transition towards an add-a-day calendar. Courtenay has communicated, through the advisory committee, that it is not in favour of delay unless it can be compensated for its efforts and for the operation of the landfill on statutory holidays.
- At the November 19, 2020 CSWM Advisory Committee meeting, staff from the Village of Cumberland and City of Campbell River also raised concerns with the impending statutory holiday closures. These municipalities support the Town of Comox letter and also request to either stay open or allow access on statutory holidays.

Statutory holiday closures will save the service approximately \$60,000 per year. The rationale for closing on statutory holidays is not solely based on the monetary saving to the service. The closures allow staff at both regional facilities to enjoy time off with friends and family on these important days, as well as reduce staff burn out. The closures also help provide staff resources during annual vacation time. Closing during statutory holidays allows the municipality's contract haulers time off as well. As noted in the 2019 staff report, even with the new statutory holiday closures the CSWM regional landfills provide the most hours of operation of all landfills on Vancouver Island.

At the November 19, 2020 CSWM Advisory Committee meeting it was suggested by municipal staff that providing a key to the Comox Valley and Campbell River Waste Management Centres, or having limited staff available so that select commercial/municipal vehicles could be allowed to dispose of their waste also be considered. This suggestion raises the following concerns:

- Liability issues if there were an accident on site with no staff present
- Garbage must compacted and covered daily – regulatory operational requirement
- Staffing for a partial statutory holiday is inefficient, complicated would be extremely difficult to implement
- Traffic control is required to prevent residents from accessing the landfill
- Pressure on staff and the service to accommodate other interests and the public

## Options

The Board has the following options for consideration:

1. Continue with the closure of the Campbell River and Comox Valley Waste Management Centres on statutory holidays beginning January 2021.
2. Repeal previous Board direction and continue to operate the Campbell River and Comox Valley Waste Management Centres on statutory holidays.

At this time staff do not recommend any additional options be considered. There are only a few short weeks to communicate next year’s operating calendar to over 1,100 stakeholders plus the general public. There is no time for analysis of additional options.

The Board first directed this change in November 2019 providing 13 months for an orderly transition to an updated collection schedule. The CVRD and the City of Courtenay have prepared updated calendars and materials for their residents. The updated schedule has been communicated to over 1,100 account holders.

The Town of Comox, City of Campbell River and Village of Cumberland have not been able to identify an appropriate solution for their municipalities and are expecting significant service disruption if facilities are closed on statutory holidays in 2021.

Based on the above, and with respect to the challenges identified, staff continue to recommend Option 1 above.

**Citizen/Public Relations**

Communication to account holders is complete. Residents will require a moderate communications plan to ensure reasonable notice is provided to limit any confusion related to the closing on statutory holidays. Staff will distribute a media release to the CSWM service area, update the website and share information via social media.

Prepared by:

***J. Lee***

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Jesse Lee, B.Sc.  
 Manager of CSWM  
 Operations

Concurrence:

***M. Rutten***

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Marc Rutten, P.Eng.  
 General Manager Engineering  
 Services

**Stakeholder Distribution (Upon Agenda Publication)**

Eterra Environmental	✓
Member Municipalities	✓

Attachments: Appendix A – "Statutory holiday communications"  
 Appendix B – "Town of Comox requesting the repeal of the CSWM decision to close on statutory holidays"

## Appendix A – Statutory Holiday Closure – Campbell River and Comox Valley Waste Management Centers - communications

The following communications and considerations have taken place:

October 2019

- Draft staff report presented at the advisory meeting

November 2019

- Staff report at the Board meeting. The recommendation to close stats was carried and there were no Board members opposed. The closures were to come into effect July 1, 2020

March 2020

- CSWM staff hosted a meeting with representatives from the Town of Comox and City of Courtney. Staff from Village of Cumberland or the City of Campbell River did not attend
- Courtenay requested an extension until 2021 to allow more time to make adjustments to their collection schedule. Comox did not express concerns but did not yet know how they were going to approach making adjustments to their collection schedule. Comox supported the extension. Cumberland (via email) expressed they were not in favour of the closures and wanted the landfill to remain open. Campbell River did not comment and were still deciding how they were going to approach the changes.
- Following up on this meeting with the municipalities it was decided to postpone the statutory closures until January 1, 2021 to provide the municipalities more time to adjust schedules.
- An email was sent out to the municipalities.
- Letter sent to Emterra (waste hauler for all four municipalities) informing the closures would be implemented January 1, 2021.

June 2020

- A staff report was presented to the Board advising of the postponement until January 1, 2021. There were no objections to the pending closures from the Board.
- Letter provided to over 1,100 account holder including municipalities informing that the closures would now be effective January 1, 2021 rather than July 2020.

October 2020

- An email provided to the municipalities reminding them of the pending stat closures, including information that facilities would remain open on Easter Monday and Boxing Day as they are not recognized by the province. No response from municipalities received.
- Letter provided to over 1,100 account holder including municipalities informing that facilities would remain open Easter Monday and Boxing Day.

November 2020

- The Town of Comox provides a letter to the CSWM board advising that statutory holiday closures will have significant impact to residents and businesses in the Town and suggests that the board delay the decision to close on statutory holidays, or provide the Towns contractor with some other means of access on those days.
- Staff discuss the letter at the advisory meeting. Campbell River and Cumberland support the Town's position but the City of Courtenay does not.

Marc Rutten



# TOWN OF COMOX

File No: 5360-02 / 20-03

November 12, 2020

Comox Strathcona Waste Management  
770 Harmston Avenue  
Courtenay, BC V9N 2X6

Dear Comox Strathcona Waste Management Board:

At the Town of Comox Regular Council Meeting (November 4, 2020) Council voted to request the repeal of the Comox Strathcona Waste Management Board's (CSWMB) decision (209/19) regarding the closure of the Comox Valley and Campbell River Waste Management Centres on statutory holidays, effective January 1, 2021.

The Town is aware this change constitutes an annual savings to the Comox Strathcona Waste Management Service of \$30,000, and notes the CSWM Staff Report (November 6, 2019, File: 5360-20/CV CR) states "These changes will not have a significant impact on the public". The implications of the decision will have continuing costs for the municipalities of the service to bear, as well as require further changes once a regular organics program comes online.

This change will be especially difficult for businesses that will be forced to reschedule their collection days numerous times throughout the year, in the midst of facing far greater challenges as a result of COVID-19.

Additionally, participating member municipalities will have to outlay significant funds, staff time and resources to produce communications and marketing materials to alert, and attempt to educate residents and commercial businesses of a new, unfamiliar schedule. These collective hard costs will surpass the money being saved by the CSWM from the closures, and those new expenses will be borne by our tax payers, who will receive a reduced quality of service.

Given the above issues, we request that Emterra continue to be able to deliver Town of Comox waste to the Comox Valley Waste Management Centre on statutory holidays. This could be achieved by delaying the decision to close on statutory holidays until such time as an organics program is developed, or by providing some other means, such as allowing Emterra continued access the Waste Management Centre on days that it is closed to the public.

Thank you,

Russ Arnott  
Mayor

cc: Bob Wells, Mayor, City of Courtenay  
Leslie Baird, Mayor, Village of Cumberland  
Andy Adams, Mayor, City of Campbell River  
Comox Valley Regional District Board