Comox Valley REGIONAL DISTRICT

Staff Report

DATE: June 8, 2021

FILE: 5330-20/CVSS LWMP

TO: Chair and Members
Sewage Commission

FROM: Russell Dyson
Chief Administrative Officer

Supported by Russell Dyson
Chief Administrative Officer

R. Dyson

RE: Sewerage Service Liquid Waste Management Plan Information Requests

Purpose
To provide an update on the information requests of Mr. Eduardo Uranga concerning the Sewage Service Liquid Waste Management Plan.

Recommendation from the Chief Administrative Officer:
THAT the Commission accept the responses and information provided to date to Mr. Uranga in regards to the Liquid Waste Management Plan and the Sewer System Conveyance Project, as outlined in the staff report dated June 8, 2021.

Executive Summary

- Local resident Eduardo Uranga has provided detailed input and requests as part of the Sewage Commission's consideration of the preferred Liquid Waste Management Plan (LWMP) and specifically the Sewer System Conveyance Project. Such engagement culminated with formal delegations to both the Sewage Commission and Comox Valley Regional District (CVRD) Board in February and April respectively in which Mr. Uranga contested the evaluation of the different alternatives, suggested an alternative approach and outlined a number of informational requests.
- Following the above-noted delegations staff provided written follow-up to Mr. Uranga with an update on the status of the LWMP and a response to the detailed issues and questions raised. Such correspondence is provided as Appendix A and B to this report.
- Following receipt of the May 13, 2021 letter in which the CVRD responded to the informational requests, Mr. Uranga advised staff of his rejection of the information provided. A further response dated June 1, 2021, provided as Appendix C, was then sent to Mr. Uranga to advise that the information provided and available to him had been deemed by staff as sufficient and conclusive. Mr. Uranga's response, dated June 2, 2021 is provided as Appendix D.
- In consideration of the apparent impasse, this report is provided for information and to seek the Commission's general endorsement of the responses and provision of information to Mr. Uranga. Alternatively, the Commission may direct staff to undertake further dialogue with and investigation of Mr. Uranga's requests and proposals.
- Endorsement of the recommendation provided in this report does not limit or restrict Mr. Uranga from seeking assistance or remedy through the Office of the Ombudsperson or from accessing information held by the Comox Valley Regional District in accordance with British Columbia's *Freedom of Information and Protection of Privacy Act.*

Prepared by:

J. Martens

Jake Martens
General Manager of Corporate Services

Government Partners and Stakeholder Distribution (Upon Agenda Publication)

N/A	

Attachments: Appendix A – Correspondence dated March 10, 2021 from R. Dyson re: "Sewer System Conveyance Project"
Appendix B – Correspondence dated May 13, 2021 from R. Dyson re: "Sewer System Conveyance Project Information Request"
Appendix C – Correspondence dated June 1, 2021 from R. Dyson re: "Sewer Conveyance and LWMP"
Appendix D – Correspondence dated June 2, 2021 from E. Uranga re: "Sewer Conveyance and LWMP"

Appendix A

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Comox Valley REGIONAL DISTRICT

File: 550-04

March 10, 2021

Sent via email only: [redacted]

Eduardo Uranga
[redacted]

Dear Mr. Uranga:

Re: Sewer System Conveyance Project

Thank you for presenting your findings and perspectives respecting the Sewer System Conveyance Project at the February 9, 2021 Sewage Commission meeting.

As you are likely aware, the February 23, 2021 Sewage Commission met and received a detailed staff report concerning the preferred Liquid Waste Management Plan conveyance options and public assent process for the Sewer System Conveyance Project. This report and the recommended conveyance option were developed through extensive technical assessment and public engagement and guided by the Technical and Public Advisory Committees. In this regard, we have full confidence that this project has been informed through a professional and transparent process that considered multiple interests from stakeholders, technical experts and the community at large.

Based on the decision, and direction of the Sewage Commission, the Comox Valley Regional District is now proceeding with the conveyance "Option 2" which includes a combination of trenching and tunneling from the Courtenay and Jane Place Pump Stations to the Comox Valley Water Pollution Control Centre. We recognize this is not the approach you have proposed or support but appreciate that you've been afforded opportunities to share your viewpoints during this process and in advance of the decision by the Sewage Commission. In this regard, please note that your subsequent written submission of your presentation was received and considered by the Sewage Commission at their March 9, 2021 meeting.

Once again, thank you for taking the time to provide your perspectives and feedback on this important matter.

Sincerely,

Russell Dyson
Chief Administrative Officer

cc: Doug Hillian, Chair, Sewage Commission
Maureen Swift, Vice Chair, Sewage Commission
Jesse Ketler, Chair, Comox Valley Regional District

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Comox Valley REGIONAL DISTRICT

File: 5330-20/CVSS LWMP

May 13, 2021

Sent via email only: [redacted]

Eduardo Uranga
[redacted]

Dear Mr. Uranga:

Re: Sewer System Conveyance Project Information Request

While you touched on many things in your presentation, we have chosen to focus our response on the key issues you've raised. Staff provide the following:

Issue 1: Competency of WSP on Wastewater Treatment
Issue 2: Wastewater Flow Volume
Issue 3: Flow Reduction
Issue 4: Use of Reclaimed Water
Issue 5: Age of the Treatment Plant
Issue 6: Cost Estimate for a New WWTP in Long List Option 5
Issue 7: Building a New Oxidation Ditch Treatment Plant to Replace the Existing WWTP
Issue 8: Carbon Footprint
Issue 9: Decision Making

Hyperlinks have been used as much as possible, either to documents at the Comox Valley Sewerage Service Liquid Waste Management Plan (LWMP) homepage, the LWMP guidelines or the Municipal Wastewater Regulation.

In summary the technical and consultative process that has been followed is robust and thorough, going above and beyond the standard set by the province in their Liquid Waste Management Planning guideline, and jurisdictions that have used this statutory process since it was implemented by the province.

The province has been consulted throughout the three year planning process and we are confident that the LWMP will be well received once it is submitted late this year.

The objective of the process was to ensure the best long-term sewage management solutions for the community were identified and implemented, and we believe we are well on our way to achieving this goal.

Rigorous public engagement and feedback is a key part of the planning process, and we acknowledge and appreciate the significant effort you've spent in helping to ensure the community's best interests are met.

Sincerely,

R. Dyson

Russell Dyson
Chief Administrative Officer

Enclosures

cc: Doug Hillian, Chair, Sewage Commission
Maureen Swift, Vice Chair, Sewage Commission
Jesse Ketler, Chair, Comox Valley Regional District

Issue 1: Competency of WSP on Wastewater Treatment

Objection: They are pipeline specialists with little to no experience in wastewater treatment.

Response
The use of properly qualified and experienced consultants for designing wastewater treatment plants and pumping stations is required by the BC Municipal Wastewater Regulation (the Regulation). The Regulation defines qualified professionals as follows:

> **"qualified professional"** means an applied scientist or technologist specializing in a particular applied science or technology, including agrology, biology, chemistry, engineering, geology or hydrogeology,
>
> (a) who is registered in British Columbia with the professional organization responsible for his or her area of expertise, acting under that professional association's code of ethics and subject to disciplinary action by that association, and
>
> (b) who, through suitable education, experience, accreditation and knowledge, may be reasonably relied on to provide advice within his or her area of expertise as it relates to this regulation;

By extension, the development of the technical content of Liquid Waste Management Plans (LWMP) must also be done by qualified professionals, as the LWMP is advising how to meet the short- and long-term requirements on the Regulation. These plans are reviewed by the BC Ministry of Environment & Climate Change Strategy (the Ministry) at each stage of their development. The LWMP process requires public input so any person may bring forward comments, ideas and potential solutions, but in matters of meeting the regulatory requirements, only the qualified professional can recommend a solution for adoption. For non-regulated aspects, such as treatment above the required standards, resource recovery or facility locations, the qualified professional prepares the technical content and cost estimates, but decisions on whether to proceed or not are community decisions.

WSP (formerly Opus 2011-2018, and before 2010 as Dayton& Knight) has extensive experience in wastewater planning, specifically including wastewater treatment, and have acted as the qualified professional many times. Even though they may not highlight all the projects on their corporate website, WSP (and their corporate predecessors) have carried out many wastewater planning and treatment plant projects in BC. This was presented at TACPAC meeting #1 on Nov 13, 2018 as part of WSP's introduction.

Their experience includes 20 LWMPs in BC, with most recent ones, prior to the Comox Valley Regional District (CVRD), being Tofino and Powell River. Each of these LWMPs were approved by the Ministry, which recognises WSP (and its corporate predecessors) as the qualified professional.

When it comes to construction projects, WSP is an engineering consulting company that designs and manages projects. The actual construction—be it pipelines or treatment plants—is always done by specialised contractors. So it is incorrect to claim that WSP is "selling the pipeline they will build," as WSP does not do the building; they do the design.

Recent treatment plant design projects (as WSP, OPUS or Dayton & Knight) include:

- Ladysmith – conceptual and detailed design for construction
- Tofino – conceptual design for LWMP and detailed design for construction
- Powell River – conceptual design for Stage 3 LWMP
- Campbell River – detailed design for treatment upgrades to the existing plant

WSP were hired by the CVRD in 2018 after a Request for Proposals for suitably qualified professionals to be the technical consultants for developing this LWMP. The RFP required that the consultants have experience in all the areas of conveyance, treatment, marine disposal and resource recovery. WSP's team for the CVRD are the same staff who have been involved in these four projects. The CVRD is more than satisfied with WSP's qualifications and experience, and how they have applied these to this critical project.

Issue 2: Wastewater Flow Volume

Objection: Ministry of Environment & Climate Change Strategy is unlikely to raise the current permit limit of 18,500m3/day.

Response
The LWMP guidelines (section 5.4) require that "the capacity of the community water and sewage systems should also be determined, including population served and unit flows in developing future projections."

The issue of flow volumes was first addressed by WSP in their presentation on "Inflow and Infiltration" presented at TACPAC meeting #4 on January 24, 2019, which showed that the average dry weather flow for 2013 to 2017 ranged from 11,669 to 12,366 m3/day, and the maximum day flow (MDF – wet weather conditions) was 39,998m3/day in 2016.

The MDF is well in excess of the current permit maximum flow of 18.500m3/day. The main purpose of the LWMP process is to determine what the future flows will be, how to convey, treat and dispose of them, and to obtain Ministry authorization for those flows. The authorization is in the form of an operational certificate that states the maximum allowable flows and effluent quality, and will replace the existing permit.

WSP completed their analysis of flows and loads, and future predictions, and these were presented in their technical memo as part of the agenda for TACPAC meeting #9 on 20 March, 2020. The following is excerpted from "Table 3: Flow Projections, 2020-2060" of that memo.

Year	**2020**	**2030**	**2040**	**2050**	**2060**
Population Projection	45,259	53,018	60,448	68,940	78,645
ADWF (m3/day)	12,885	15,094	17,210	19,627	22,390
MDF (m3/day)	37,547	43,984	50,148	57,193	65,244
Maximum Instantaneous Flow (m3/day	49,734	58,260	66,425	75,757	86,421
Maximum Instantaneous Flow (L/s)	576	674	769	877	1,000

These numbers were based on a review of a 2016 capacity assessment report prepared by ISL Engineering.

The modelling shows a peaking factor of 2.9 for the maximum day flow and 3.3. for the maximum instantaneous flow. The conveyance system—pump stations and pipelines—must be designed for these maximum instantaneous flows at the future design horizon; in this case it is 2060. The treatment plant and outfall are required to be designed for the maximum day flow, and the design horizon is typically 20 years for treatment upgrades, which means the year 2040, and all the conceptual designs and cost estimates for treatment upgrades are based on the projected flows in 2040.

The existing Courtenay Pump Station reaches its full three pump capacity (480L/s) during peak wet weather flows, so a capacity expansion is required to handle these future flows.

In the sizing of pipes for conveyance, an additional consideration is the dynamic head (head loss) from friction in the pipe. Enlarging the pipe sizing to reduce friction losses reduces the pumping pressure, horsepower requirements and annual energy consumption. These are all factors considered by WSP in their sizing of system components in the indicative design to inform the Class C cost estimate required by the province for LWMP options analysis.

WSP is confident that with the analysis performed to date, and the environmental impact study that will be completed in advance of submittal of the Stage 3 LWMP, the province will support a realistic maximum flow for 20 years that will be in the draft operational certificate submitted with the stage 3 plan.

Issue 3: Flow Reduction

Objection: Flow volumes can be substantially reduced by toilet replacements.

Response
The MWR and LWMP guidelines require that continuing efforts be made on water conservation and reducing wet weather inflow and infiltration, and the City of Courtenay and Town of Comox are working on this.

But the CVRD's wastewater treatment system must handle whatever flows arrive, and the flow projections are based on the current conditions. The operational certificate issued by the Ministry will state the maximum day flow, and requires that the treatment system is able to handle this.

Toilet water use is a part of the wastewater flow, and the use of high efficiency toilets to replace old high flush toilets is a well proven means of water conservation, and efforts to encourage their replacement will continue. However, the observed wet weather peaking factor of 3.3:1 is entirely due to inflow and infiltration of rain and groundwater, not toilet water that is part of the base flow. Replacing any remaining old toilets will only have a minimal impact on the maximum day or instantaneous flows.

This does not mean that water conservation efforts shouldn't be continued, it just means that since the design requirements for conveyance pumps and pipes, the treatment plant and the effluent outfall are based on peak wet weather flows, they cannot be substantially reduced by an accelerated toilet replacement program.

While a substantial reduction in wet weather flows could reduce the design requirements and Courtenay and Comox are continuing efforts to reduce inflow and infiltration, the easiest and least expensive opportunities for inflow and infiltration reduction have been implemented. City and Town staff are committed to ongoing incremental improvements; however, those improvements will take time and today's current conditions are what must be used for design purposes.

Issue 4: Use of Reclaimed Water

Objection: The effluent can be used as reclaimed water for agriculture, and would negate the need for a new pipeline.

Response
Reclaimed water, and other options for resource recovery, have been considered as part of this LWMP process. It is not mandatory to implement resource recovery, but it is mandatory to study it and to identify implementation possibilities, and this is referenced in the LWMP guidelines (section 5.7) as follows: "Sewage that is appropriately treated for a direct designated use can, in some cases, beneficially used as reclaimed water. Potential uses for reclaimed water should be identified in a LWMP."

The use of reclaimed water for agriculture was discussed by WSP as part of their presentation at TACPAC meeting #4 om January 24, 2019.

A brainstorming session for reclaimed water ideas—agriculture and otherwise—was conducted at TACPAC meeting #5 on February 8, 2019, and the results for reclaimed water (and all resource recovery options) were brought back to TACPAC meeting #9 on March 4, 2020

The consultant's recommendation is that, at this time, reclaimed water only be pursued for in-plant uses, and this recommendation was accepted by the TACPAC.

The use of reclaimed water for agriculture does not negate the need for an effluent pipeline. Section 114 of the Municipal Wastewater Regulation states:

Alternate disposal or storage

> **114** (1) A person must not provide or use reclaimed water unless all of the following requirements are met:
>
> (a) there is an alternate method of disposing of the reclaimed water that meets the requirements of this regulation or is authorized by a director;

The intention of this section is that there is still a means of disposing of water even if there is no demand from the reclaimed water users. In the case of agriculture, there is no demand in winter, and reduced demand in wet summers. But the effluent is still being generated every day and must be disposed of. It is of particular importance to note that the maximum day flows, which determine the hydraulic capacity for treatment and outfalls, occurs during winter when there is little or no reclaimed water demand.

It is possible to store winter effluent for summertime irrigation use, and the largest example of this is the reclaimed water system for the City if Vernon. However, Vernon is still required to have an appropriately sized alternate disposal means, which is an outfall to Okanagan Lake. In recent years the demand for reclaimed water has been low, and the (180 hectare) reservoir is now full; in February 2021 Vernon began discharging effluent to Okanagan Lake (as reported by the Vernon Morning Star, Feb 11, 2021).

The Vernon discharge shows why the alternate disposal method is needed regardless of the reclaimed water use. Thus, the use of reclaimed water does not negate the need for an effluent pipeline to connect to the ocean outfall, and both the pipeline and outfall must be sized to handle future maximum day flows.

Agricultural use of reclaimed water remains a future possibility, but it is up to the agricultural community to pursue this option.

The use of reclaimed water for stream augmentation is also a possibility, and this is being considered as part of the ongoing Tsolum River Watershed study. The effluent quality requirements for stream augmentation are very high, to prevent nutrient overload on the receiving waters in summer low flow conditions. A thorough environmental impact study is required for consideration of stream augmentation. As with reclaimed water for agriculture, stream augmentation does not relieve the requirement for a full capacity

outfall, and imposes additional treatment requirements that are not needed for ocean disposal. Stream augmentation remains a future possibility, but as with agricultural use, it is not the mandate of the Comox Valley Sewerage Service (CVSS) to pursue this option.

Issue 5: Age of the Treatment Plant

Objection: It is 39 years old and it would be better to build a new one than expand this one.

Response
The existing plant was built in 1982. The plant has been well maintained and is generally in good condition. Some mechanical components are at capacity and/or need of refit, and some have already been refitted, such as the headworks. Overall, the plant is operable and maintainable and is not nearing the end of its life.

It is usually, but not always, more cost effective to expand and upgrade existing plants than to build new ones. There are numerous examples of similarly sized and age treatment plants in BC that have or are being upgraded and expanded.

Location	Service Population (2020)	Year Built	Year Expanded
Kelowna	100,000	1982	2011
Nanaimo	100,000	1972	2017-2020
Campbell River	35,000	1996	2021

To date, none of the consultants involved with wastewater planning for the CVSS over the last twenty years have recommended decommissioning/replacing or relocating the existing treatment plant.

Issue 6: Cost Estimate for a New WWTP in Long List Option 5

Objection: The cost estimate was not justified.

Response
An essential part of the LWMP process is the development of cost estimates for the various options.

WSP gave a presentation about cost estimates and explained the categories and methodologies at the TACPAC meeting #5 on February 8, 2019.

The LMWP guidelines discuss this in section 5.15 and Appendix 1. From section 5.15:

> Normally in Stage 1, Class D estimates will be appropriate to evaluate the long list of options. In Stage 2, the accuracy of cost estimates for short listed options should advance to Class C level, and preferably to Class B when a pre-design level of study has been carried out in support of an option.

When the long list of options was presented for evaluation at TACPAC meeting #6 on March 22, 2019, it was stated that cost estimates were to the Class D level.

At the long list stage, the intention of cost estimating is not so much to know specifically how much an option will cost, but how the options compare to each other. To achieve this, all cost estimates are prepared using the same methodology and base assumptions, and this was clearly laid out by WSP in their Stage 1 Conveyance Long List Study memo, attached to the agenda for TACPAC meeting #6. It was specifically noted in WSP memo (Section 10.2.6) that "These costs are only for the purpose of options comparison and discussion and are not suitable for budgeting."

The methodology identified the various physical components (pipelines, new or upgraded pump stations, etc.) for the various options. Option 5 was decentralized treatment and was centred on building a second treatment plant to handle the flow from the Courtenay Pump Station, which is more than half of the total wastewater flow. The option analysis included the conveyance requirements for getting water to and from both the existing and the new plant, assuming all effluent goes to the existing ocean outfall.

WSP prepared the capital and operating cost estimates for the new treatment plant based on their experience and references to other projects. No detailed breakdown of this estimate was requested nor deemed necessary. Given that all these long list option costs were prepared by the same team, and with the same methodology and assumptions, they are deemed suitable for their intended purpose of option comparison and evaluation. Budgeting for a possible construction cost begins in the short list stage where Class C estimates are prepared.

Given that WSP are experienced consultants and are currently involved in numerous designs of treatment plants and conveyance projects, there is no reason to question their cost estimate for a second treatment plant, or the various conveyance components.

The next section also offers addition information related to costs estimate for treatment plants.

Issue 7: Building a New Oxidation Ditch Treatment Plant to Replace the Existing WWTP

Objection: A new plant with an oxidation ditch process would be cheaper than the nominal $105M cost used by WSP for Long List Option 5.

Response
The oxidation ditch is a well proven and commonly used treatment process. It is the core treatment process at the Campbell River treatment plant, where WSP are designing the expansion and upgrade project. WSP also completed the Tofino LWMP, in 2017, which requires a new treatment plant, conveyance and ocean outfall. In 2018, WSP selected the oxidation ditch process as the preferred treatment process and commenced detailed design. The treatment plant is designed for a population equivalent of 15,000 people and an MDF of 9,000m3/day

The Class B cost estimate developed by WSP in 2018 is $38.7M for the treatment plant portion and $54.9 for the entire project. The project was put out to tender in 2020 and the bids came back in the order of $80M, for a much smaller community.

Another current example of treatment plant costs is the Powell River Wastewater Treatment Plant (WWTP) project. This is a new WWTP with a design capacity for 18,000 people, and the City of Powell River has just awarded a tender for $61M

These current real world examples show that building even a modest sized new treatment plant is expensive.

Issue 8: Carbon Footprint

Objection: The carbon footprint of construction is not being quantified and/or evaluated.

Response
"Minimising Climate Change Impacts" was one of the environmental goals set by the TACPAC for all three LWMP components. Specifically, this was about reducing greenhouse gas (GHG) emissions, which includes carbon dioxide, but also includes methane. In developing the evaluation scoring, this goal was assigned 5 per cent of the total for all three categories, as reported in the agenda for TACPAC meeting #3 on Dec 11, 2018.

A greenhouse gas assessment is also a requirement for all federal infrastructure funding programs, and so this TACPAC goal is consistent with the Government of Canada goals.

In evaluating the long list, a carbon footprint calculation was done for all the long list options. This was presented to the TACPAC at meeting #6, March 2019 (on page 7 of the WSP presentation). This calculation used an industry standard tool for estimating pipeline construction GHGs and followed the provincial government methodology for calculating the carbon footprint of purchased BC hydroelectricity.

The calculation did not include GHGs associated with pump station construction, as these were assumed to be relatively similar for all options. Neither did it include the footprint for with a new treatment plant (Option 5) as none of the other options included a footprint for expanding the existing plant.

The GHG calculations were used to calculate the score for the "mitigate climate change impacts" evaluation category.

Issue 9: Decision Making

Objection: The decision making seems to be based on cost alone.

Response
The TACPAC developed a comprehensive, goal-based evaluation system in TACPAC meetings 2, 3 and 4. The system used weighted scoring of goals as developed and ranked by the TACPAC. The goals were grouped in to technical, affordability and then economic, environmental and social benefit categories, with capital and operating costs being in the economic group. The goals were compared to the relevant goals from the major planning documents, such as the Comox Valley Sustainability Strategy and the Regional Growth Strategy. The final form of the evaluation system was presented in the March 21, 2019 staff report to the CVSC.

The summary of the scoring is reproduced below.

Category	Conveyance	Treatment	Resource Recovery
Technical	45%	30%	25%
Affordability	18%	30%	50%
Economic Benefit	2%	0%	5%
Environmental Benefit	18%	25%	15%
Social Benefit	17%	15%	5%
Total	**100%**	**100%**	**100%**

The conveyance options had an intentionally low rating for affordability/cost and high weighting for technical factors. This reflected the desire of the TACPAC for a technically robust solution, with cost being a secondary factor. For treatment, affordability and technical are equally weighted and for resource recovery affordability is half the score, reflecting that resources recovery should only be implemented where it is worthwhile.

In all evaluations of long and short list options, for conveyance, treatment and resource recovery, this evaluation system was used rigorously. In each case the numerical results were then discussed by the TACPAC, and sometimes re-considered, before making a decision and recommendation to the CVSC.

The most comprehensive discussion of the evaluation of the long list of conveyance options is contained in the March 5, 2020 staff report to the CVSC.

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Comox Valley REGIONAL DISTRICT

File: 0550-04

June 1, 2021

Sent via email only: [redacted]

Mr. Eduardo Uranga
[redacted]

Dear Mr. Uranga;

Re: Sewer Conveyance and LWMP

I am in receipt of your May 17, 2021 email which rejects the package of information provided to you in response to your detailed request of April 15, 2021. This package of information was provided to you in addition to multiple phone calls, email exchanges and meetings between you and our engineering staff over the past two years. We have endeavoured to respond with care and attention to your feedback and requests throughout our Liquid Waste Management Planning process.

Our public engagement on the Liquid Waste Management Plan has been comprehensive, transparent and accountable. We have held four open houses and our staff have engaged with you at these events. The preferred treatment option was identified using a rigorous evaluation system developed, and put to use by our technical and public advisory committees. Results of our extensive public consultation was a key input to the evaluation of options and selection of the preferred conveyance and treatment solutions.

Mr. Uranga, you have made it very clear that you do not agree with the decision on the long term plan for treatment of wastewater. This decision was made by the Sewage Commission based on the Liquid Waste Management Plan process, which included recommendations from our CVRD and municipal staff, professional advisors, and advisory committees. Given your disagreement with these matters, our staff recommended that you apply as a delegation to the Sewage Commission. You were granted this audience on February 9, 2021, where you presented your opposition and rationale. You then requested, and were granted, the opportunity to present to the CVRD Board of Directors on April 13, 2021. Your delegation was heard by the CVRD's elected officials and your questions and comments were responded to in my correspondence of May 13, 2021.

In consideration of the above, you have been provided multiple opportunities to engage with and provide your input to for consideration by staff and the elected officials charged with administering the Comox Valley Sewerage System and Liquid Waste Management Plan. Further, I feel the information that is available to you, based on the extensive process the CVRD has undertaken, is sufficient and I do not believe there is anything more that we can provide which will help you on this matter. I understand this response may not be satisfactory to you. If this is the case, you may wish to follow up with the Ombudsperson of British Columbia for further assistance.

Sincerely,

R. Dyson

Russell Dyson
Chief Administrative Officer

cc:
Jesse Ketler, Chair, Comox Valley Regional District
Doug Hillian, Chair, Comox Valley Sewage Commission

Russell Dyson
Chief Administrative Officer
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From:
Sent: June 2, 2021 2:40 PM
To: Russell Dyson <rdyson@comoxvalleyrd.ca>
Cc: 'Info-OMBD' <Info@bcombudsperson.ca>; 'Jesse Ketler' <councillor.ketler@cumberland.ca>; Doug Hillian <dhillian@courtenay.ca>
Subject: FW: Sewer Conveyance and LWMP

Mr. Dyson:

Judging for the tone of your letter, you seem to think that you are not responsible and/or accountable for the construction of the conveyance pipeline for which, you have failed to provide the evidence that is needed, as I have pointed out in my correspondence with you and your staff. The existence of a Sewage Commission

For the record, I have not met with any of the members of your staff privately, only the casual encounter with Kris La Rose at one of the open houses, in which he insisted that the conveyance pipe was necessary, the design flow was 500 liters/s and that the price for a new wastewater treatment plant would be three times the cost of the conveyance pipeline; go ahead, ask Kris La Rose. The only thing that Marc Rutten has done is to direct me to the information on the CVRD website; which obviously, has not done much. I am sure you are aware that he called me to reprimand me for having contacted WSP directly; something I found strange and utterly offensive; I can call and talk to whoever I decide; no matter what it is.

Quote: I feel the information that is available to you, based on the extensive process the CVRD

has undertaken, is sufficient and I do not believe there is anything more that we can provide which will help you on this matter.

At this point and to make things simple; why don't you provide a copy of the quote that you must have obtained from a supplier to make such a bold statement; in which the cost of a new plant for the city of Courtenay would be what Kris La Rose and Marc Rutten seem to be convinced of; and obviously, you are also a firm believer that it is true. This amount can not be obtained by extrapolation from other cities, like Victoria or Cumberland. Moreover, the cost of the conveyance pipeline has increased to 73 million, according to the official statement from the CVRD, from 54 million when the project was evaluated.

I also challenge Doug Hillian as a chair of the Sewage Commission, to publicly declare that he has seen such document and he is willing to backup the decision made by the commission. Has this decision been put through the council of the City of Courtenay?

It is obvious that I am not going away on this matter; you have not provided what the freedom of information act gives me the right to have; I did not ask for your opinion or arguments; I asked for a copy of the documents and direct answers to my questions, no evasive arguments to backup whatever decision you made.

I am sure you realize that as the CFO of the Comox Valley Regional District, you are responsible and accountable for everything that happens on your watch.

I wish you enough.

Eduardo Uranga

From: Administration <administration@comoxvalleyrd.ca>
Sent: June 1, 2021 3:06 PM
To: Eduardo Uranga
Cc: 'Jesse Ketler' <councillor.ketler@cumberland.ca>; 'Director Hillian' <dhillian@courtenay.ca>; Russell Dyson <rdyson@comoxvalleyrd.ca>
Subject: Sewer Conveyance and LWMP

Good afternoon Mr. Uranga,

Please find attached incoming correspondence from our Chief Administrative Officer, Russell Dyson.

Respectfully,
Andrea Sutherland, *CIAPP/P for Teresa Warnes, Executive assistant*
Manager of Administration
Corporate Services Branch, Comox Valley Regional District
770 Harmston Avenue, Courtenay, BC V9N 0G8
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