



April 24, 2009

Dr. Albert van Roodselaar
Division Manager
Utility Analysis and Environmental Management Division
Policy and Planning Department
Metro Vancouver
4330 Kingsway
Burnaby, BC
V5H 4G8

Dear Dr. van Roodselaar,

Re: Environment Canada's Comments on Metro Vancouver's Liquid Waste Management Plan Five-Year Review

This letter provides Environment Canada's comments on Metro Vancouver's March 2009 draft Liquid Waste Management Plan (LWMP), a component of the 5-year LWMP review.

We note that while earlier drafts indicated that upgrades of the two primary wastewater treatment plants, Iona and Lions Gate, were planned for 2020 and 2030 respectively, the March 2009 draft LWMP outlines two additional options, including a reversal of the previously planned dates and the option of both upgrades taking place by 2020. We wish to bring to your attention the CCME strategy that was signed in February 2009 and remind you that Environment Canada (EC) intends to develop a federal wastewater effluent regulation under the *Fisheries Act* to implement the strategy. Since the regulation is still under development and the details for implementing the strategy have not been finalized, EC cannot comment on the timelines being proposed for the treatment plant upgrades. We would therefore encourage Metro Vancouver to participate in the consultations that will take place on the proposed regulations once they have been prepared. However, in the interest of protecting the environment, we strongly encourage Metro Vancouver to upgrade its wastewater treatment plants without delay.

In addition to upgrading the two primary wastewater treatment plants, EC would like to take this opportunity to note the need for continued action to eliminate overflows from combined sewers and reduce the impacts of stormwater.

We also wish to indicate that these comments are in the context of EC's responsibilities relative to wastewater management pursuant to the *Fisheries Act* (FA) and the *Canadian Environmental Protection Act, 1999* (CEPA). This information does not constitute legal advice and following this guidance will not

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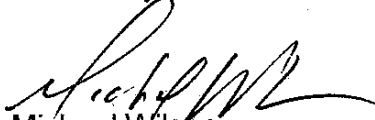
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necessarily ensure compliance with federal or any other regulatory requirement. Currently, all effluents from wastewater treatment systems and overflows from combined sewers in Canada must comply with all applicable federal legislation including the *FA* and the *CEPA*.

We appreciate the opportunity to comment on your 5-year review process. Should you have any questions regarding this letter or would like to discuss further, please do not hesitate to contact me at 819-953-1101.

Yours truly,



Michael Wilson
A/Pacific and Yukon Director
Environmental Protection Operations

cc.: Rebecca Reid, Regional Director, Oceans, Habitat and Enhancement Branch,
Fisheries and Oceans Canada
Brian Clark, BC MoE, Chair BIEAP/FREMP Management Committee
Annemarie De Andrade, Program Manager, BIEAP/FREMP
Ed von Euw / Robert Hicks, Policy and Planning Department, Metro Vancouver
Jonn Braman, Regional Manager, BC MoE, Environmental Protection Regional
Operations, Lower Mainland Region