

Subject: [Fwd: Senanus Point Waterline Proposal]

From: Lori Waters <lori@watersbiomedical.com>

Date: Fri, 13 Jun 2008 18:25:21 -0700

To: Central Saanich Council <council@csaanich.ca>

CC: Gary Nason <GNason@csaanich.ca>

BCC: Allison Habkirk <ahabkirk@shaw.ca>, Michael M'Gonigle <mgonigle@uvic.ca>, Don and/or Eli Chambers <elichamb@islandnet.com>

Dear Mr. Mayor and Council,

I have mentioned archaeological monitoring requirements previously in my meeting with Mr. Nason. The Provincial Government Archaeology Branch has confirmed via the email below, that there is a high likelihood of archaeological findings during any installation process related to a Senanus waterline project. As I have previously requested, archaeological monitoring requirements must therefore form part of the overall environmental assessment, which must be completed as part of due diligence before proceeding with a project of this nature. Due diligence environmental assessment must therefore include the following:

- 1) Short term impacts - how the environment would be affected as a direct result of an installation process (digging, trenching, blasting)
- 2) Special considerations during installation - installation in a Garry Oak ecosystem, and contact with riparian areas and watercourses serving riparian areas.
- 3) Archaeological impacts as noted by the Provincial Government Archaeological Branch (see below)
- 4) Long term impacts:
 - Volume calculations for properties served based on actual water usage. It should be noted by the province that the District has allowed some of these properties to build additional dwellings not specifically allowed under District zoning, such as the property at 554-568 Senanus, advertised currently as having in excess of 25,000 square feet of building enclosures not including boathouses and ancilliary buildings, etc., and five dwelling units on a lot zoned for one dwelling unit. Impacts must take into account the additional requirements for actual dwellings and septic requirements outside of zoning allowances. Impact assessments must also take into account volumes that existing septic systems could handle. The effect of CRD treated water on existing septic systems must also be examined, as this has been shown to destroy biotic systems in septic fields, necessitating installation of septic sewerage systems.
 - All available options should be examined as part of the long-term impact/sustainability study, including:
 - alternative supply, using Municipal springs at corner of Mount Newton Crossroad and Senanus.
 - Use of grey water to recharge the aquifer
 - Use of grey water for agricultural purposes
 - Reduction of percentage of impermeable surfaces on Senanus Point
 - Ensuring rainwater catchment is re-directed to the aquifer rather than into the sea
 - Construction of dry-wells for re-directing surface water run-off into the aquifer using drywell as primary filtration
 - creation of an overall water management plan for the area, including water usage guidelines and restrictions (eg: water not to be used for driveway spraying)

Thank you for your attention to these requirements.

Should the District not perform its due diligence and carefully examine long-term environmental impacts of this decision, and as all available options have not been thoroughly examined per the District's rescinded GMEF grant application in 2000, the District may be putting itself into a position of liability should this decision have impacts on taxpayers such as: increased costs and cost overages, increased requirements for installation of sanitary sewerage systems and decommissioning of septic fields per provincial guidelines.

Long term environmental impacts must be carefully considered, particularly as the District is not in a financial position to cover any cost overages it may have been negligent in not accounting for, nor would it presumably be in the position

to cover class action lawsuits from taxpayers who must decommission their septic fields as a result of CRD water treatment causing septic fields to no longer function. My assessment of the District's financial situation is interpreted from the 2008 Financing Options Report which states that if the District continues on its current path that it may be required to seek interim financing to cover day-to-day operations.

Lastly, Councillors might like to read some planning literature. The link between infrastructure and development has been well established and proven for many years. Councillors who consider this part of the argument to be a red herring or a non-issue are kidding themselves. Unfortunately, I'm afraid this also demonstrates incredibly short-sighted thinking and small-mindedness, and a lack of consideration of what future residents of this Municipality will have to address. It takes very little reading of the planning literature to clearly understand the link between these. After they've done their due diligence on this aspect of the project, Central Saanich Councillors might like to speak with Councillors from North Saanich if they still encounter difficulty in understanding the link.

It should also be noted that infrastructure impacts are measured as a longer-term impacts. Planning literature notes that provision of infrastructure now might facilitate sprawl in twenty years. Are we not now in the process of including areas into the urban infrastructure zones of our OCP, based on sprawl creep that has already been allowed to happen? Councillors of the belief that only short term implications should be considered might attempt to stretch their thinking into the longer term. As such, they may find that the Regional Growth Strategy that the Municipality ratified with all other member municipalities of the CRD, is actually designed to check this short-term thinking, and short-sighted view of decisions that affect the entire region over the longer term. Going against the RGS is, in fact, illegal.

Regards,
Lori

----- Original Message -----

Subject: Senanus Point Waterline Proposal

Date: Fri, 13 Jun 2008 16:46:43 -0700

From: Mackie, Al TSA:EX <Al.Mackie@gov.bc.ca>

To: <lori@watersbiomedical.com>

References: <4851B8D0.7040809@watersbiomedical.com>

Dear Lori Waters:

I have reviewed the captioned waterline proposal in terms of potential to impact archaeological resources. The project will serve at least 7 properties with known archaeological sites on them. The record for this area is old, probably incomplete and likely inaccurate. Given the nature of archaeological resources (buried) it is likely that there are more sites in the area, and that some of the known sites are larger than recorded and thus span additional properties. All of the known sites are along the water's edge and this is where we would expect the majority of sites to occur. However, sites are found (in well studied areas) in a variety of inland locations and there is no reason to think they will not do so in the vicinity of this waterline project and ancillary connections, etc.

Sites are protected under provisions of the *Heritage Conservation Act (HCA)*, whether they are recorded or not. Because there is a fairly high likelihood that this project could conflict with archaeological sites it is recommended that an archaeological overview assessment (AOA) be conducted to ascertain which areas may warrant an archaeological impact assessment (AIA). Such a study should be conducted by a suitably qualified archaeologist and should take into consideration the waterline placement, hookups and any revisions to or new waterlines to service the properties in question. It should also consider the nature of the road construction and the potential for survival of older land surfaces or archaeological materials beneath the roads. Archaeological potential should be identified by accepted methods based on palaeoenvironmental and cultural considerations.

It may be that the AOA will recommend no further work (this office should confirm that such a conclusion is acceptable) is warranted, or may indicate that an AIA is warranted in parts of the area. An AIA would require an HCA permit, issued to a suitably qualified archaeologist.

Sincerely

Al Mackie

Al Mackie | Archaeologist | Archaeology Branch

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