

Critique in red by Gerald Graham, Ph. D., Nov. 3, 2007

The undersigned citizens of Greater Victoria support the efforts of our local, provincial, and federal governments to explore alternative methods of handling liquid waste disposal in our community. *This is disingenuous: many of the signatories, including a number of professors from UVic, are in fact ardent supporters of the current practice of dumping raw, untreated sewage into the Strait of Juan de Fuca. Moreover, they are adamantly opposed to building a sewage treatment plant, whatever the cost, because they think it is a complete waste of time, replacing a service they claim nature does essentially for free.* The region is growing and changing, and future needs must be considered. We are however concerned that objective information is needed, and soon, balancing the costs and benefits of all currently available options. *Including the costs and benefits of dumping raw sewage into Victoria Bight; has your group looked at that? I see a potentially significant cost to the environment and economy (e.g. tourism, whalewatching, windsurfing, fishing, etc.) and very little benefit. Thus, dumping raw sewage into the Strait may be a case of "penny wise, pound foolish".*

We have been impressed by the detailed assessment by well-informed people - environmentalists, marine scientists, engineers, economists and health care professionals - that has been assembled on the web site www.rstv.ca . *Surely this is self-serving, amounting as it does to a pat on one's own back.*

The evidence indicates that the worst problem with the existing liquid waste disposal system is the continued failure to address storm drain overflows. Last January, for example, heavy rains resulted in raw unscreened sewage being discharged from storm drain outfalls along the coastline over 40 times. *This is one problem, but whether it is "the worst problem" is open to debate, to say the least. There are many other problems with dumping raw, untreated sewage into the Strait, such as the fact that no one really knows what happens to it, where it goes, and what impact it has on the environment. My position is that the onus should be on those who claim that the sewage has no appreciable impact on the environment to prove that, and yet such proof does not really exist. On the contrary, a serious argument can be made that the waters of the Strait are too cold to break down the sewage the way the proponents of dumping claim that it does, and to destroy pathogens. Moreover, oceanographic evidence presented to the MMAC suggests that a significant percentage of the sewage and contaminants it contains is not flushed out to sea but instead ends up in Haro Strait, prime habitat to the endangered southern resident killer whales. While no one is suggesting that raw sewage is the principal, let alone only reason for the orcas' decline, it could be the straw that breaks the camel's back, since the immune systems of the whales in question are already stressed to the limit.*

The Ministry of Environment has mandated sewage treatment, at an estimated cost of \$1.1 billion dollars. Yet the currently recommended plan submitted to the Minister would not fix the storm drain problem. Nor would it enhance the already exemplary source

control program (which stops many toxic chemicals from ever going down the drain). ***The source control program is ambitious, but suffers from two main problems: it does not cover raw sewage, and it does not cover what householders dump down their drains and toilets- a potential toxic cocktail of discarded prescription drugs, grease, used paints, oil, household cleaners and chemicals, etc.*** The proposed treatment expenditure is huge: \$1.1 billion is equivalent to \$500-700 per year, per average household, in the core area for the next 50 years. The cost is similar to the annual cost per Victoria household of the entire City of Victoria Police Department.

Evidence-based policy requires evidence. ***Evidence works both ways: provincial studies have produced evidence that contaminants from Victoria sewage, including mercury, are ending up in the sediment of Juan de Fuca Strait.*** Open government requires that citizens be informed. With these requirements in mind, we assert that the Ministry of Environment has a duty to commission and publish an independent, objective, cost-benefit study of the proposed land-based treatment option. ***Why not just come out and say what most of you apparently think, i.e. that there is no evidence that the current practice of dumping raw sewage does any harm, and that there is also no evidence that mandating secondary treatment will do any good.***

Consistent with provincial and federal guidelines for cost-benefit analysis, such a study must examine all relevant alternatives, including a) the existing system “as is” (the status quo) ***i.e. the system many of your signatories, including especially a group of UVic oceanographers, believe works so well*** ; b) the existing system with low-cost and probably highly-cost-effective enhancements, related to storm drain discharges and source control and c) the currently proposed plan. ***d) another plan or plans; I mean, why stop there?***

Before proceeding with a \$1.1 billion expenditure, citizens of the Capital Regional District, and interested observers elsewhere, should be provided with evidence of the environmental or other benefits to be expected from the treatment plan proposed, and the harms that may result (for instance from the disposal of large volumes of sludge that will be trucked through residential neighbourhoods). ***Let us not be too selective here: this same sludge, absent treatment, currently ends up in the Strait. What harm is that practice doing?; is this not a valid question as well?***

At present, only hypothetical benefits have been identified for proposed land-based treatment. ***Likewise, only hypothetical benefits of the existing practice have been identified.*** The costs are substantial. This is hardly good evidence for acceptable, rational public policy.

Before the CRD spends more of our local tax dollars on planning for land-based treatment, it is essential that the evidence be assembled on the costs and benefits of all viable alternatives. We call on the Ministry of Environment to fund, commission, and publish such a study, with no further delay.

To be fair and balanced, any study should look at the costs and benefits of doing nothing versus the costs and benefits of various alternatives.

Signed: Gerald Graham, Ph. D., Nov. 3, 2007