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File:

April 8, 2016

**SENT VIA EMAIL ONLY:** [letters@timescolonist.com](mailto:letters@timescolonist.com)

The Editor  
Times Colonist  
2621 Douglas Street  
Victoria, BC

Dear Editor:

In the April 7<sup>th</sup> edition of the *Times Colonist* an article from George Le Masurier entitled “Victoria isn’t the only battleground over sewage” had a number of inaccuracies and it is important your readers have the facts.

The Comox Valley Regional District (CVRD) utilizes a pressurized sewer forcemain installed in 1984 (now 32 years old) to pump wastewater from the communities of Courtenay and Comox to a wastewater treatment plant. The pumping system involves two collector pump stations which discharge into a forcemain installed along the foreshore en route to the treatment plant. The forcemain is a pre-stressed concrete pipe with steel liner protected by sacrificial anode cathodic protection. There is no indication that the existing pipeline is failing as stated by Mr. Le Masurier.

A section of the forcemain is installed within the foreshore along Willemar Bluff, a coastal sand bluff, and is subject to wave action and changing beach conditions, especially during winter storms. Although the pipe is buried, changes to erosion and deposition patterns acted to uncover the pipe in 2002. The beach was temporarily restored by the placement of gabion baskets over the exposed pipe and the need for a longer term permanent solution identified. In 2005 the CVRD completed study work recommending a new pump station be installed in order that the forcemain could be intercepted and wastewater pumped to the treatment plant along a new inland route. In 2011, contrary to the statement made by Mr. Le Masurier, the CVRD completed a Sewer Master Plan for the entire Comox Valley. The master plan identified and analyzed six alternate forcemain routes all of which continue to require the new pump station recommended in the 2005 study.

In 2013 the CVRD undertook a site selection process for the new pump station. This process initially considered over 100 potential sites. These sites were assessed and narrowed down to 20, then further evaluated considering social, environmental and financial factors. A site selected on Beech Street, just east of the Town of Comox, received the highest score and was purchased by the CVRD. The site is large in size, in close proximity to existing infrastructure, provides excellent buffering, is properly zoned and will accommodate the required infrastructure. The initial site selection met with strong opposition from the local neighbourhood and contrary to Mr. Le Masurier’s article, the CVRD immediately formed a neighbourhood advisory committee to evaluate alternate sites.

One of the options considered by the advisory committee was to upgrade the Courtenay and Jane Place pump stations along with the forcemain to the treatment plant. This alternative would require significant

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upgrades at both existing pump stations plus the replacement of the entire forcemain from Courtenay pump station to the treatment plant. This alternative was cost intensive and was not considered further due to very high initial capital cost. In addition, the existing Courtenay and Jane Place pump stations, along with the existing sewer forcemain, have several years of remaining life left to maximize the investment out of the existing infrastructure.

Mr. Le Masurier suggests that there has been independent analysis completed to show long-term costs savings by upgrading the Courtenay and Jane Place pump stations. The CVRD did not complete this analysis and has not identified a more appropriate option. The reality is the new pump station located on Beech Street will allow future flexibility to eventually relocate the rest of the foreshore route, if required. The CVRD has right-of-way agreements in place with all jurisdictions along the forcemain route that provide access for installation, operation and maintenance of its installed infrastructure.

The advisory committee determined that an alternate site on a nearby road right-of-way would be more appropriate. After a detailed investigation into this property, the Comox Valley sewage commission recently made a decision to move forward with the property originally selected on Beech Street. The CVRD has worked hard to engage the nearby residents, respond to their concerns and continues to be committed to minimizing the impact of the new pump station on the local community.

The CVRD's pump station site selection process has been thorough and complete and is the most socially, environmentally, and financially effective way of resolving the ongoing environmental risks associate with the Willemar Bluff section of forcemain.

Sincerely,

Marc Rutten  
General Manager of Engineering Services  
Comox Valley Regional District