

Notice of meeting of the  
**LIQUID WASTE MANAGEMENT PLAN**  
**JOINT TECHNICAL AND PUBLIC ADVISORY COMMITTEES (TACPAC)**

Monday, December 2, 2024

CVRD Civic Room, 770 Harmston Avenue, Courtenay and Zoom  
9:00am – 1:00pm

<b>Item, Time</b>	<b>Description</b>	<b>Owner</b>
1.1 9:00	Call to Order	Allison Habkirk
1.2 9:00- 9:15	Introductions	Allison Habkirk
1.3 9:15-9:45	Review of Comox Valley Sewerage Service	Kris La Rose, CVRD
1.4 9:45-10:30	Summary of LWMP Process and Decisions Made to Date	Mike Desilets, WSP
Break		
1.5 10:45-11:00	How the South Addendum LWMP Fits	Darry Monteith, CVRD
1.6 11:00-12:00	Work Underway – Stage 3 LWMP Scope	Kris La Rose, CVRD Mike Desilets, WSP Piero Galvagno, Carollo
1.7 12:00-12:30	Next Steps and TACPAC Engagement	Kris La Rose, CVRD Darry Monteith, CVRD
Lunch		
1.8 1:00	Adjournment	Allison Habkirk

**Attachments**

1. Stage 1 and 2 LWMP Provincial Review and Proposed Path Forward for Stage 3 Staff Report, dated July 4, 2023.

More information on the [Stage 1 & 2 LWMP](#) and the [South LWMP Addendum](#) can be found on the CVRD's website.

**DATE:** July 4, 2023**FILE:** 5330-20/CVSS LWMP**TO:** Chair and Members  
Sewage Commission**FROM:** Jake Martens  
Acting Chief Administrative OfficerSupported by Jake Martens  
Acting Chief Administrative Officer*J. Martens***RE: Stage 1 and 2 Liquid Waste Management Plan Provincial Review and  
Proposed Path Forward for Stage 3 Report**

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**Purpose**

To present feedback provided by the Ministry of Environment and Climate Change Strategy (Ministry) on the Comox Valley Regional District's (CVRD) Core Regional Liquid Waste Management Plan (LWMP) Combined Stage 1 and 2 report and proposed path forward for completion of the Stage 3 LWMP Report.

**Recommendation from the Acting Chief Administrative Officer:**

THAT the Comox Valley Sewage Commission approve the proposed path forward as described within the staff report dated July 4, 2023, to complete the necessary study work required to submit the Stage 3 Liquid Waste Management Plan.

**Executive Summary**

The Comox Valley Sewerage Service (CVSS) initiated a LWMP in 2018 to determine the preferred conveyance solution for replacement of the existing large diameter forcemain from Courtenay, K'ómoks First Nation and Comox to the Comox Valley Water Pollution Control Centre (Plant), establish the desired level of treatment at the Plant, and explore further opportunities for resource recovery. Given the urgency to resolve the environmental risk along Willemar Bluffs, the Sewer System Conveyance Project was subsequently separated from the LWMP and borrowing was authorized by an Alternative Approval Process rather than waiting for the authorization provided by the approved LWMP.

In fall 2022 the Sewage Commission approved and the CVRD submitted the Stage 1 and 2 LWMP report to Ministry. The Stage 1 and 2 report summarized in detail the various options that were reviewed and considered, the consultation process and the evaluation completed to select preferred solutions, these being:

- Secondary treatment with disinfection of all wastewater flows at the Plant, incorporating into the design the ability for future implementation of filtration if and when required.
- No further opportunities for resource recovery, with the exception of increased reclaimed water use at the Plant, which will be further studied through a subsequent master planning process.

The Ministry has reviewed the Stage 1 and 2 LWMP report and provided a list of recommendations and considerations for preparation of the Stage 3 LWMP Report in the letter attached as Appendix A. In review of the letter, CVRD staff have determined that there are four separate pieces of work required to successfully submit the Stage 3 Report and meet the recommendations as detailed by the Ministry. The proposed path forward is summarized below, with additional details provided in the background section and schedule provided as Appendix B.

1. **The Plant Process Optimization:** Working with a process expert to optimize the current process and lower the sludge volume index (SVI) at the Plant with the ultimate goal of increasing capacity of existing tankage to delay future capital upgrades
2. **Finalization of the Plant Site Master Plan and Detailed Design of Phase 4 Upgrades:** A requirement of the Ministry is a detailed upgrade plan for all upgrades at the Plant and a Class ‘B’ cost estimate for any projects occurring before the first review of the LWMP. Confirmation on an achievable SVI at the plant is required to complete the site master plan and progression of the first phase of upgrades to a 60 per cent design is needed to develop a Class ‘B’ cost estimate.
3. **South Sewer LWMP Addendum Approval:** The south region LWMP Stage 2 addendum report is intended to be completed and submitted to the province in winter 2024. Once approved, the Sewer Extension South project and related service area will be included in the CVSS Stage 3 report.
4. **Stage 3 LWMP:** Additional work and consultation is required in drafting of the Stage 3 report. In addition, outputs of each of the three tasks listed above need to be completed to be able to address all of the Ministry’s recommendations listed in the letter and to submit the final report. This work includes application for and completion of the operational certificate for the Plant, which will require an updated Environmental Impact Study (EIS) be completed.

The LWMP process included establishment of a technical and public advisory committee (TACPAC) to help guide the planning process, along with consultations with the K’ómoks First Nation and public consultation meetings. The TACPAC will meet at key points to review the Stage 3 LWMP report, and following submittal of the Stage 3 report a plan-monitoring committee will be created to monitor the implementation commitments of the LWMP.

Prepared by:

**Z. Berkey**

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Zoe Berkey, P.Eng.  
Senior Engineering Analyst

Concurrence:

**K. La Rose**

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Kris La Rose, P.Eng.  
Acting General Manager of  
Engineering Services

**Government and Community Interests Distribution (Upon Agenda Publication)**

K’ómoks First Nation	✓
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**Background/Current Situation**

As part of the LWMP process, development of a conveyance solution, review of the level of treatment at the Plant and options for resource recovery were completed. Following extensive technical assessment and public engagement, guided by the TACPAC formed to help guide the LWMP process, a preferred level of wastewater treatment was selected that included secondary treatment with disinfection of all wastewater flows, and consideration being made to incorporate resource recovery and advanced treatment options in the future. Given the urgency to resolve the

environmental risk along Willemar Bluffs, the Sewer System Conveyance Project was subsequently separated from the LWMP and borrowing was authorized by an Alternative Approval Process rather than waiting for the authorization provided by the approved LWMP.

A number of decisions have been made since selection of the preferred level of treatment and resource recovery options that are key inputs to the proposed path forward and schedule as outlined within this report.

- **June 2022:** Sewage Commission approval of Sewer Extension South project addendum being included within the CVSS LWMP
- **September 2022:**
  - Sewage Commission approval of Stage 1 and 2 LWMP report; subsequent submission to the Ministry
  - Sewage Commission approval for proceeding with Conventional Activated Sludge technology and completing a value management exercise for the Plant Site Master Plan
- **May 2023:**
  - Value management exercise for Plant Site Master Plan
  - Receipt of Stage 1 and 2 letter from the Ministry

To address all of the different components that are key inputs to the Stage 3 LWMP report, CVRD staff have identified four tasks that must be completed as summarized in further detail in the sections below and outlined in the schedule attached as Appendix B.

#### *Process Optimization*

Over the last year, the CVRD has been working with AECOM on the development of a site master plan for the Plant. The site master plan is a key input to the Stage 3 report by outlining the estimated costs and proposed timing of upgrades. Upon approval of the Stage 3 report, the CVRD will receive the necessary approvals for borrowing for these projects without having to complete electoral assent processes.

As part of the site master planning work, a value management review was completed. The value management process involves a group of subject matter experts analysing the Plant site master plan and trying to find “value alternatives.” The focus of this workshop was to review the site master plan and look for options to defer and spread out capital upgrades, optimize the existing process and complete a comprehensive review of the solids management strategy for the Plant. The following list highlights the key takeaways from the exercise.

1. It is critically important that the Plant’s electrical systems be upgraded. There are significant health and safety concerns with the current configuration and system.
2. There are a number of benefits and general agreement on building a new headworks now due to the condition of the influent channel concrete and existing grit system equipment.
3. There is the possibility of significantly increasing the capacity of the existing secondary treatment by limiting peaks in the system to two times the average dry weather flow and improving the SVI.
4. The primary clarifiers have current capacity to 2033; if the SVI can be improved and secondary tankage delayed we can continue to use the current primary clarifiers and not build new tankage. Furthermore, there are options to expand the capacity of the existing tanks by utilizing the grit system area once the grit system equipment is installed in the new headworks.

- Options to improve current solids management by installing variable frequency drives on existing pumps can help to delay the timing of construction of a new gravity thickener.

The majority of the value management recommendations and key highlights focus on the CVRD improving the SVI at the plant and limiting the flow through the secondary treatment process to two times the average dry weather flow. Limiting the flow requires improving peaks into the plant primarily associated with inflow and infiltration and utilizing the existing equalization basin continually to peak shave during wet weather. Improving the SVI will require changes to current operations and trialing of some chemical addition in the process. SVI is a measure of sludge settleability; sludge with an improved SVI settles quicker and is more dense, meaning that the sludge takes up less space per gram and creates a uniform and compact sludge blanket.

To help the CVRD try to achieve a lower SVI, CVRD staff have identified that a third party process expert is required. This expert will work with CVRD's operations staff to digest the results of the value management process and develop an implementation plan aimed at optimizing the CVRD's current process to lower the SVI and increase capacity in the existing tankage. This work will be a critical input into finalizing the site master plan; if the SVI cannot effectively be lowered, delaying capital upgrades related to additional tankage is not possible. CVRD staff intend to procure and begin this work immediately.

#### *Comox Valley Water Pollution Control Centre Site Master Plan and Phase 4 Upgrades*

Regardless of the process optimization, a new headworks and screening area, replacement of the existing grit technology and a new electrical building are required as soon as possible due to poor condition and health and safety risks. In addition, a commitment and recommendation through the LWMP was installation of UV disinfection, to be completed as part of the first phase of upgrades at the facility.

To finalize the scope of the first phase of upgrades and the site master plan, further work at the Plant is required to confirm an achievable SVI as detailed above. Finalization of the site master plan is proposed to be the first phase of the scope for the detailed design engineer of the phase four upgrades at the facility. Based on the current schedule, procurement of the engineer would occur in fall 2023 with design work beginning in winter 2024. This will allow the process engineer approximately eight months to be working on optimizing the process before the design engineer is on board. This also allows the process engineer to provide third party feedback and an expert opinion on the draft scope for the engineering consultant work, the final site master plan and the detailed design of the phase 4 upgrades at the facility.

The final site master plan and Class 'B' cost estimate developed by the design engineer will be a key input to the Stage 3 LWMP report as noted in the Ministry letter. Following completion of the detailed design, tendering and construction of the phase 4 upgrades cannot occur until after approval of the Stage 3 report, resulting in construction occurring in 2026/2027. Completing the detailed design sooner allows for the CVRD to be shovel-ready to complete the critically required first phase of upgrades as early as possible.

#### *South Region LWMP Addendum*

The south region LWMP Stage 2 addendum report is intended to be completed and submitted to the province in winter 2024. Once approved, the Sewer Extension South addendum will be included in the CVSS Stage 3 report.

*Drafting and Completion of the Stage 3 LWMP Report*

As outlined within the letter from the Ministry there are a number of items that must be incorporated within the final report that aren't included in the above noted scopes. The Stage 3 LWMP scope will include:

- Application and completion of the operational certificate for the Plant, including environmental impact studies and recommendation on timing of the outfall replacement
- Further work and discussion on source control and reducing inflow and infiltration, working in collaboration with our member municipalities
- Finalization of recommendations on resource recovery building off the business case completed by AECOM for reclaimed water use at the Plant
- Cost impacts for users of the CVSS and total costs of all commitments building off the finalized site master plan.

Engagement with K'ómoks First Nations will continue through development of the Stage 3 report, and engagement with other nations as listed within the Ministry letter is planned prior to submittal of the Stage 3 report. Additional public consultation on the Stage 3 report and meetings with the TACPAC to review the draft report will occur. Submission of the Stage 3 report is anticipated in winter/spring 2025.

**Options**

1. Proceed with completion of the Stage 3 LWMP Report per the proposed path forward as outlined within the staff report.
2. Provide alternate direction to staff.

The LWMP process is identified as a strategic priority for the CVRD. Through the value management process it was highlighted that there are significant possibilities to delay substantial capital costs by optimizing and improving the current process. The proposed path forward has been developed with careful consideration in regard to process changes, impacts on capital costs and impacts on overall timing of completion of the Stage 3 LWMP report; as such only Option 1 above is recommended.

**Financial Factors**

- Process Expert: \$40,000 was carried forward from 2022 for AECOM's scope for the site master plan and only \$15,000 will be spent. As such, CVRD staff are proposing that the remaining \$25,000 be used from engineering fees to fund the new process expert scope for 2023. The 2024-2028 financial plan will include the necessary dollar value for further work to complete this scope.
- Finalization of Site Master Plan and Phase 4 Detailed Design: Procurement of this consultant is not planned until late 2023, with contract award anticipated in February/March 2024; staff will include the costs associated with this role within the 2024-2028 financial plan.
- South Region LWMP Addendum: Is not funded by the CVSS. The LWMP addendum work is funded by the electoral areas through the Liquid Waste Management Planning service, function 340, and the Electoral Area A feasibility studies service, function 151.
- Stage 3 LWMP Report: Included within the 2023-2027 financial plan is a \$100,000 for LWMP consulting services for the Stage 3 report in 2023 and \$100,000 in 2024.

**Strategic Considerations: Strategic Drivers and Regional Growth Strategy**

CVRD Board Strategic Drivers:							
Fiscal Responsibility	✓	Climate Crisis and Environmental Stewardship and Protection	✓	Community Partnerships	✓	Indigenous Relations	✓

- **Fiscal Responsibility:** The intent of the process expert is to look at any and all ways to optimize and therefore maximize the capacity of our existing treatment plant tankage in order to defer significant capital costs associated with building new tankage.
- **Climate Crisis and Environmental Stewardship and Protection:** Reducing peak flows at the plant and improving our process will help to ensure that the Plant remains within regulatory thresholds for effluent quality. Through the Stage 3 LWMP report process, the CVRD will also be completing an application for an operational certificate for the facility that will replace the existing discharge permit.
- **Community Partnerships:** Close collaboration with CVSS partners is essential to look for options to reduce inflow and infiltration, in addition to providing input and feedback on the Stage 3 report and site master plan. Further engagement with the TACPAC and the public is also key to the success of completion of the Stage 3 plan.
- **Indigenous Relations:** Throughout the development of the Stage 3 report, staff will continue to engage with K’ómoks First Nation and will further engage with other nations with overlapping interests in the region.

CVRD Regional Growth Strategy Goals:							
Housing		Ecosystems, Natural Areas and Parks	✓	Local economic development		Transportation	
Infrastructure	✓	Food Systems	✓	Public Health & Safety	✓	Climate Change	✓

- **Ecosystems, natural areas and parks:** Upgrades at the Plant will look to ensure effluent quality continues to meet regulations as flows and loads to the facility increase over time.
- **Infrastructure:** Looking for ways to optimize our existing system to maximize use of existing infrastructure to provide an affordable, effective and efficient long-term plan for the Plant.
- **Public health and safety:** The intent of the site master plan is to plan for growth in the area to ensure the Plant has the necessary capacity to continue to provide secondary treatment of all wastewater flows. The first phase of upgrades will also include installation of UV disinfection to further improve effluent quality.
- **Climate change:** Per the CVRD’s strategic priorities and the Ministry letter, the CVRD will also consider and review options as part of the Stage 3 LWMP report to minimize greenhouse gas emissions.

**Intergovernmental Factors**

The LWMP process has been guided by the TACPAC; representation has included interest groups, members of the public, municipal engineering staff and government agencies. A final plan monitoring committee will be required once the plan has received approval from the Ministry.

Staff will continue to update the TACPAC, Sewage Management Advisory Committee and Sewage Commission as required throughout the process.



**Citizen/Public Relations**

Further public consultation will be required on the Stage 3 LWMP report per the Ministry letter and guidelines. Staff will review the timing and develop a proposed engagement plan to accompany development of the Stage 3 report.

Attachments: Appendix A – May 10, 2023 letter from Ministry of Environment and Climate Change Strategy regarding CVRD Core Regional Liquid Waste Management Plan Combined Stage 1 and 2 Report  
Appendix B – Stage 3 LWMP Schedule



May 10, 2023

Comox Valley Regional District – Core Regional  
LWMP Stage 1 & 2 Report

Comox Valley Regional District  
770 Harmston Avenue  
Courtenay, BC V9N 0G8

VIA EMAIL: [engineeringervices@comoxvalleyrd.ca](mailto:engineeringervices@comoxvalleyrd.ca)

Dear Mr. Dyson:

**Re: Comox Valley Regional District Core Regional Liquid Waste Management Plan Combined Stage 1 & 2 Report**

Thank you for submitting the Comox Valley Regional District (CVRD) Core Regional Liquid Waste Management Plan (LWMP) Combined Stage 1&2 Report dated November 18, 2022.

The two stated objectives for a Liquid Waste Management Plan (LWMP) are to protect public health and the environment and to properly consult the public. In addition, local governments are encouraged to show leadership and innovation in water conservation, watershed security, resource recovery, energy conservation, climate change adaptation and mitigation, and asset management.

The Province has a duty to consult Indigenous Nations whenever a decision could impact Aboriginal Rights and Title. Although the duty to consult rests with the Province, local governments are expected to engage Indigenous Nations throughout the planning process to build relationships, understand potential impacts on Indigenous interests and modify plans to avoid or mitigate those impacts, if needed. The LWMP process is an opportunity to advance reconciliation with Indigenous Nations grounded in the framework established by the United Nations Declaration on the Rights of Indigenous Peoples.

Staff reviewed the LWMP Stage 1 & 2 Report (the Report) with respect to the “*Interim Guidelines for the Preparation of Liquid Waste Management Plans*” (July 2011) and the standards outlined in the Municipal Wastewater Regulation, and have the following comments for consideration when preparing the Stage 3 Report:

1. The Report identifies a preferred level of treatment for the expansion of the Comox Valley Water Pollution Control Centre (CVWPCC) which includes maintaining secondary treatment standard for all flows and adding ultraviolet disinfection. In addition, we support the Report recommendation that all proposed upgrades to the CVWPCC be configured to allow future addition of tertiary and/or alternative secondary biological treatment without requiring significant modification to the plant. We understand that these provisions are being included in the Site Master Plan process for the CVWPCC and that this work will inform the Stage 3 LWMP Report.

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2. Further studies are required to determine the timeline for outfall replacement. Given the potential costs, this should be determined prior to completing the Stage 3 Report to inform the public of the timing and cost.
  3. The Report does not address source control, which is an important component of a LWMP. Please ensure the Stage 3 Report includes commitments to develop a source control program for the plan area based on a survey of industrial and commercial inputs into the system, known problematic inputs from residential connections and the concentration of contaminants of concern in the effluent.
  4. The Municipal Wastewater Regulation requires local governments to make commitments to reduce inflow and infiltration to below two times average dry weather flow. Although the CVRD will be seeking an Operational Certificate to authorize the discharge from the CVWPCC, the MWR guides the conditions considered. The Report reviews the significant work done to address I&I in the plan area by the Town of Comox and the City of Courtenay but falls short of making commitments to reducing I&I to below two times average dry weather flow in the future. Please work with the Town of Comox and the City of Courtenay as part of the Stage 3 Report to set commitments to reduce inflow and infiltration.
  5. The Report provided a general overview of resource recovery options and recommends further analysis be undertaken. Generally, we expect a more detailed analysis to form part of the Stage 2 Report including costs of various resource recovery options. We understand that this level of analysis is informing the Site Master Plan process and will be incorporated in the Stage 3 Report. Please ensure the Stage 3 Report includes a detailed cost-benefit analysis of resource recovery options to inform specific commitments to resource recovery.
  6. There are important linkages between the LMWP process and meeting the CVRD's commitments to address climate change. For example, implementing anaerobic digestion at the CVWPCC and using the biogas to heat the facility will reduce emissions and energy consumption, I&I reduction strategies will help adapt to larger storm events, and use of reclaimed water will reduce dependence on potable water during draught conditions. Please ensure the Stage 3 Report links commitments in the LWMP to the broader work being done towards climate change mitigation and adaptation in the CVRD and includes the emissions attributed to wastewater from the 2023 Greenhouse Gas Emissions Inventory to track reductions.
  7. The Report proposes incremental changes to the wastewater treatment facility and outfall over the 2040 design horizon of the plan as flows increase and assets need replacement. Please include a detailed implementation schedule for upgrading the wastewater treatment facility, replacing the outfall and extending sewerage service to the south region as part of the Stage 3 Report. Further conversations on how the Operational Certificate can consider upgrades overtime can take place as part of the Operational Certificate application process.
  8. The Stage 3 Report must provide Class B estimates for implementing the commitments in the LWMP that will be enacted prior to the first review of the plan. Any commitments that will be completed after the first review can be Class C estimates.

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9. K'ómoks First Nation has been adequately engaged as part of the Stage 2 Report. However, we are unable to assess whether adequate engagement has occurred with the other Indigenous Nations with interests that overlap with the Liquid Waste Management Plan area. Please engage with the following Indigenous Nations during the Stage 3 Report in addition to ongoing engagement with the K'ómoks First Nation:
- Hul'qumi'num Nations Marine Territory: Lake Cowichan First Nation, Halalt First Nation, Penelakut Tribe, Stz'uminus First Nation, Cowichan Tribes, Lyackson First Nation.
  - Snuneymuxw First Nation
  - Snaw'Naw'As Nation
  - Nanwakolas: We Wai Kai Nation, Wei Wai Kum First Nation
  - Xwemalhkwa (Homalco) First Nation
  - Qualicum First Nation
  - Tla'amin Nation.

Please note that the Snuneymuxw First Nation was missed in the list of Indigenous Nations to be consulted in the "2022-07-21 First Nations Consultation Framework".

10. Continue to consult the public on the proposed commitments in the LWMP Report including the costs with and without grants and the cost per user and total costs of all commitments. Results of public consultation for all three stages of the LWMP should be consolidated into a final report submitted with the Stage 3 Report;
11. The Stage 3 Report must include the creation of a Plan Monitoring Committee to monitor the implementation commitments in the LWMP. The CVRD may use an existing committee for these purposes.
12. The Stage 3 Report must commit to a review of the LWMP within 10 years and regular status update on commitments.
13. The scope of the Stage 3 Report should be provided to Provincial staff for comment prior to commencing the work.
14. An application for an Operational Certificate should be submitted as soon as the Stage 3 Report process is initiated. The Operational Certificate application process will provide further guidance on the requirements for the environmental impact study which must be completed prior to finalizing the Stage 3 Report.

If you have any questions regarding this letter, please contact Melanie Mamoser at 250-739-8328 or [melanie.mamoser@gov.bc.ca](mailto:melanie.mamoser@gov.bc.ca)

Yours truly,



Digitally signed by Liz  
Archibald  
Date: 2023.05.10 12:08:55  
-06'00'

Liz Archibald, P.Ag  
Section Head - Communities, IPM, & Agrifood| Environmental Protection Division  
BC Ministry of Environment and Climate Change Strategy

### Path Forward for Stage 3 LWMP Report Completion

	2023							2024							2025							2026																				
	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov
<b>Site Master Planning and Process Optimization</b>																																										
Complete AECOM Site Master Plan																																										
Process Engineer Optimizing Process																																										
<b>CVWPCC Phase 4 Upgrades</b>																																										
Procurement of Consultant																																										
Preliminary Design/ Finalizing Master Plan																																										
Engineering/ Design																																										
Class B Cost Estimate																																										
Tender for Phase 4																																										
Construction in 2026/27																																										
<b>Stage 3 LWMP Report</b>																																										
Procurement of LWMP Consultant for STG 3 Plan																																										
Draft Stage 3 LWMP																																										
Submit Application for O.C and STG 3 Scope to Ministry																																										
Outfall Inspection																																										
EIS (sub to LWMP Consultant)																																										
TAC/PAC and First Nation Review of Draft Stage 3 Plan																																										
Stage 3 Plan Submitted																																										
Provincial Review of Stage 3																																										
Approval of Stage 3 Plan & Operational Certificate																																										
<b>South Region LWMP Addendum</b>																																										
Drafting of Addendum and TAC/PAC Process																																										
Addendum Submitted																																										
Provincial Review																																										
Addendum Approved																																										

