



# Anmore Green Estates

April 30, 2018

> The Honourable Mayor McEwen and Council Members

> Village of Anmore  
2697 Sunnyside Road  
Anmore, BC, V3H 5G9

Dear Honourable Mayor and Council Members,

**Re: Anmore Green Estates Pollution Abatement Order, and the Village's letter dated April 11, 2018 to Mr. Dan Bings, Director of Ministry of Environment and Climate Change Strategy**

We are writing this letter in response to your April 11, 2018, letter to the Ministry of Environment and Climate Change Strategy (as enclosed) that states your position on Anmore Greens Estates (AGE). We understand and respect the Village of Anmore's (the Village) current position of "all residents are responsible for treating their own sewage on-site and that the Village will not be joining the Metro Vancouver Sewerage and Drainage District (MVS&DD)", as Anmore is a semi-rural community.

We feel there is misunderstanding regarding the history of AGE, what our objective is, and what we are requesting of the Village. As Village staff has been unwilling to meet with AGE representatives, we provide this letter as a means of resolving the misunderstandings, sharing information, and ultimately finding resolution.

## Site History

When AGE was developed in the 1990's, the Village assumed that a municipal sewer system would eventually be provided in Anmore. There are Statutory Right of Way Agreement on Utilities documents registered on our lands that clearly demonstrate the original intent of the Village's planned connection of AGE to municipal services (both water and sewer). These documents contained covenants and indemnities that clearly state the septic field will only be used until a municipal sewerage connection is available, and that the Village intended for our septic fields to be developed in the future.

Your April 11, 2018, letter states that that the Village's current position has been "from the beginning of this process". However, this position has only been a policy since the 2014 revision of our Official Community Plan. This shift in position is important to recognize as the establishment of AGE predates this policy by more than 19 years.

We respect that the Village has full discretion to reverse positions on supporting or allowing municipal sewer services in Anmore but your 2014 change to the OCP vision of our community does not undo previous Village obligations, decisions, or negate the Village's roll in the creation of AGE with a sewer system that assumed future connection to municipal sewer services, and planned for future development.

### **Consideration of Onsite Treatment**

Your letter states that "AGE and its consultants are only willing to put forward the unrealistic solution of sewer connection as the only possible way to resolve the pollution abatement order and are unwilling to consider any other possible solution to resolve this issue." With respect this is simply not correct. We have been and continue to be open to onsite treatment if a long term solution truly exists.

The Engineering Assessment completed in January 2018 investigated options for onsite treatment that would meet the current requirements of the Municipal Wastewater Regulation. It found none existed. The Ministry of Environment has given us permission to consider design options outside of the present-day standards. We are in support of this especially if a relaxation of those requirements brings about an economically viable onsite solution that is long term and protective of human health and the environment.

Please keep in mind that the time of our septic field development, the receiving environment for the septic field was forested parkland at natural grade. If that was still the case, onsite options under relaxed regulations would likely be possible, but the downslope environment is now two schools and a recreational park. This has drastically reduced options. Thus, any onsite treatment must now account for the risk to students, public, and the environment, as well as be supported by the engineering community and the Ministry of Environment officials.

Your letter indicates that your consultants have recommendations for how onsite treatment could be done under an amendment to the existing disposal permit PE4606. If you are open to collaboration, please send us their contact information or ideas, as we will explore any recommendations or ideas they may have.

### **AGE Objective**

Recent comments from council members have been that our focus to resolve the issue through a sewer connection is driven solely by AGE homeowners and a developer to redevelop the septic field. AGE's objective is find a permanent solution to a longstanding problem and we strongly believe the sewer connection

is the best option as it is permanent, and the most protective of the health and safety of the neighbouring downstream school and park. Nevertheless it is important to note that any potential for redevelopment of the fields would be subject to present day local government bylaws, and cannot occur without Anmore's approval.

### **Our Request**

We understand and respect the Village's position to avoid joining membership of the GVS&DD given the financial burden it would create. AGE's efforts and focus is on addressing the immediate situation and risk of our wastewater system and not to weigh into politics and community direction of the Village of Anmore as a whole. We much prefer to work with the Village to find an amicable solution.

We also understand in 2014 Anmore and Port Moody Councils supported SD43's request for sewer connection because a screening assessment determined that an onsite septic field was not possible due to poor soil conditions, steep slopes, and insufficient space for an effluent dispersion field (Metrovancouver Memo Village of Anmore's Request for Sewer Service for Eagle Mountain Middle School dated May 2, 2014). That connection was requested by the Village, and granted by GVS&DD, without Anmore becoming a member municipality. AGE is facing these exact same site conditions and our downslope receiving environment is the very school who's connection you supported. We hope a similar agreement can be reached to resolve this issue.

It is clear to us that this problem was not created by one single party; nor can one single party resolve it. Any path forward requires collaboration between affected parties. Since AGE is currently a member of the Village of Anmore, we are respectfully asking that the Village collaborate with us to find resolution.

**Sincerely yours,**

**On Behalf of the Owners, Strata Property LMS 3080 – Anmore Green Estates:**



**Brandie Roberts**

**Vice-President, Anmore Green Estates Strata Council**

cc'd:

**Dan Bings, Ministry of Environment and Climate Change Strategy**

**Tim Savoie, City of Port Moody**

**Chris Nicolls, School District 43**



April 11, 2018

Dan Bings, Operations Manager ~ Compliance Section  
**Ministry of Environment and Climate Change Strategy**  
Environmental Protection Division  
Regional Operations Branch  
Ste. 400- 640 Borland Street  
Williams Lake, BC V2G 4T1

Re: Anmore Green Estates Pollution Abatement Order

Dear Mr. Bings:

The Village of Anmore (the Village) would like to clarify its position on sewage treatment and request further action from the Ministry of Environment to resolve the issues of on-site sewage treatment at Anmore Green Estates.

The Village has been clear from the beginning of this process that it will maintain the Village's long standing position that all residents are responsible for treating their own sewage on-site and that the Village will not be joining the Metro Vancouver Sewerage and Drainage District (MVS&DD). This has been communicated explicitly to the Anmore Green Estates Strata Corporation (AGE) on numerous occasions over the last few years – most recently in October 2016 and again in May/June 2017.

Despite this clear position from the Village, AGE and its consultants are only willing to put forward the unrealistic solution of sewer connection as the only possible way to resolve the pollution abatement order and are unwilling to consider any other possible solution to resolve this issue.

The Village is of the opinion, based on discussions with its consultants, that through modifications to the existing permit, AGE can comply with the Ministry of Environment's regulation and safely treat its sewage onsite. However this ultimately is a matter for the approval of the Ministry of Environment.

The Village is pleased that the Ministry of Environment is finally directing AGE to consider on-site solutions to address the pollution abatement order requirements and cease the pursuit of the sewer connection option. The Village is more than happy to offer its assistance to the Ministry of Environment and the Anmore Green Estates Strata in pursuing an on-site solution and has communicated that consistently to AGE and its consultants. The Village is not willing to invest any further effort in discussion regarding membership in the MVS&DD as our position is clear and not open to change with regards to the situation at Anmore Green Estates.

The Village is concerned as to who will choose the peer reviewer and direct their work – it is not clear from the communication we have received to date. The Village feels strongly that the peer reviewer should be chosen by the Ministry of Environment and that the only role for representatives of AGE is to respond to questions from the peer reviewer.

The Village respectfully requests that deadlines be established and enforced with regards to the peer review. This will give some confidence to the Village and its residents that the Ministry of Environment will require AGE to comply with its regulations and implement a long term solution to AGE treating its sewage onsite in a timely manner.

Sincerely,



**Juli Halliwell** SCMP, CRM  
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CC: AGE, School District 43, City of Port Moody