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[www.jbna.org](http://www.jbna.org)

July 8<sup>th</sup>, 2015

CRD Eastside Select Committee,  
and  
City of Victoria Mayor and Council.

**Re: Wastewater Treatment Site Selection**

JBNA has endeavored to inform, and to forward interests of, James Bay residents regarding the wastewater treatment site selection process.

On May 18 representatives from the Eastside spoke at the JBNA General Meeting. On May 30/31 and June 24 JBNA Board members and other JB residents attended the public workshops and the Open House event. The June 10 Belfry event conflicted with the JBNA general meeting (86 attendees) but board members reviewed the video of the presentation. Recently JBNA encouraged residents to complete the “Eastside Wastewater Survey” and/or provide comments directly to the Eastside Committee plus Mayor and Council.

In addition to input from JB residents at the public sessions, we have received responses from several residents stating they do not have enough information or technical expertise to give anything other than an opinion. Others have expressed disappointment in the City of Victoria for even considering putting more traffic and potentially emissions into James Bay.

**JBNA is opposed to any sewage treatment plant configuration at Ogden Point or Coast Guard property (also referred to as the Outer Harbour).** Our reasons include:

- Emissions, noise and transportation impacts are major quality of life matters for James Bay residents. James Bay, particularly the west side, has been overburdened with negative impacts from the cruise-industry. Traffic, noise and potential emissions associated with a sewage treatment plant would add insult to injury.
- Cruise-industry representatives project an increase of 30% in passenger numbers in the short-term. Hollow words about addressing residents’ concerns have been ongoing for years, with no remedies in sight.
- Elderly and frail residents and young families who live downwind from Ogden Point in James Bay have identified specific health concerns related to emissions. (see Appendix for wind information.)

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- James Bay is the most densely populated neighbourhood on Vancouver Island and one of the highest in British Columbia. James Bay's **5,718** population per km<sup>2</sup> (excluding Beacon Hill Park) compares to the rest of Victoria's population density of **3,930** population per km<sup>2</sup>. **The use of Ogden Point for any treatment facility would maximize the number of people affected.** (see Appendix)
- Ogden Point and the Coast Guard properties are adjacent to many residential buildings; only a narrow roadway separates these sites from cooperatives, condominiums, apartments, townhouses and (a few) single-family homes.

These issues were raised during the May 30/31 workshops but seemingly have not been taken into consideration by the Eastside Committee. Indeed, the opposite has occurred. In addition, based on criterion buried within the Ethelo survey, James Bay is not even worthy of being considered a "residential neighbourhood".

**The Eastside two-tiered consideration of citizen rights, based on the type of structure in which people live, has shocked many James Bay residents.** It displays a profound disrespect for all James Bay residents and any other Eastside resident who does not live in a single-family home.

The Eastside process has been problematic in other ways:

- The consideration of sites suggested by the three municipal Councils, (each using its own selection criteria), has resulted in the elimination of sites in Oak Bay and perhaps Saanich which have been suggested by experts as those which may be best-suited in the region for treatment sites.
- Of the six options put forward for public considerations in the Eastside survey, five involve James Bay (i.e. Ogden Point/Coast Guard/Outer Harbour site). It seems that an arbitrary definition of "residential neighbourhood" led to this.
- There are issues with the survey itself: it is not user-friendly; one must provide personal information to participate (this is not a democratic "vote"); only through careful reading does one learn that only single-family residences count as "neighbours"; there is no indication of how the results will be interpreted or used.

- The Ethelo web-site states “*Ethelo will gather quantitative, qualitative and hidden knowledge from your market and determine the most desired combination of features.*” We understand the error identified earlier this week by residents and Mayor Helps’ July 7 explanation that this was a “glitch”. The error raises question of what other errors may exist within the system. Any public confidence in the survey has been further diminished. The “hidden knowledge” in the survey and priority setting by the Eastside Committee regarding quality of life considerations based on type of residence is prejudicial to James Bay.

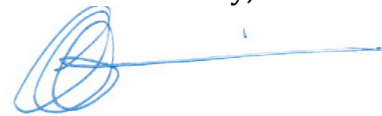
JBNA supports improved wastewater treatment and understands that getting public input is not easy. Thus far, the Eastside process has not been truly consultative, transparent or fair; rather, the Eastside Committee’s process has been biased against residents of James Bay.

During the May 31 workshop at the Conference Centre, almost half the participants chose the South Victoria site group for the first round table. They wanted their voices to be heard. The message at that table was that **James Bay is already overloaded with adverse social and environmental impacts** and it is nearby residents who would live with added impacts 24-7-52/year. This message seems to have fallen on deaf ears.

The challenge for the Eastside Committee is to identify a technically **and** socially responsible solution to the sewage treatment mandate. The challenge for JBNA is to find open ears.

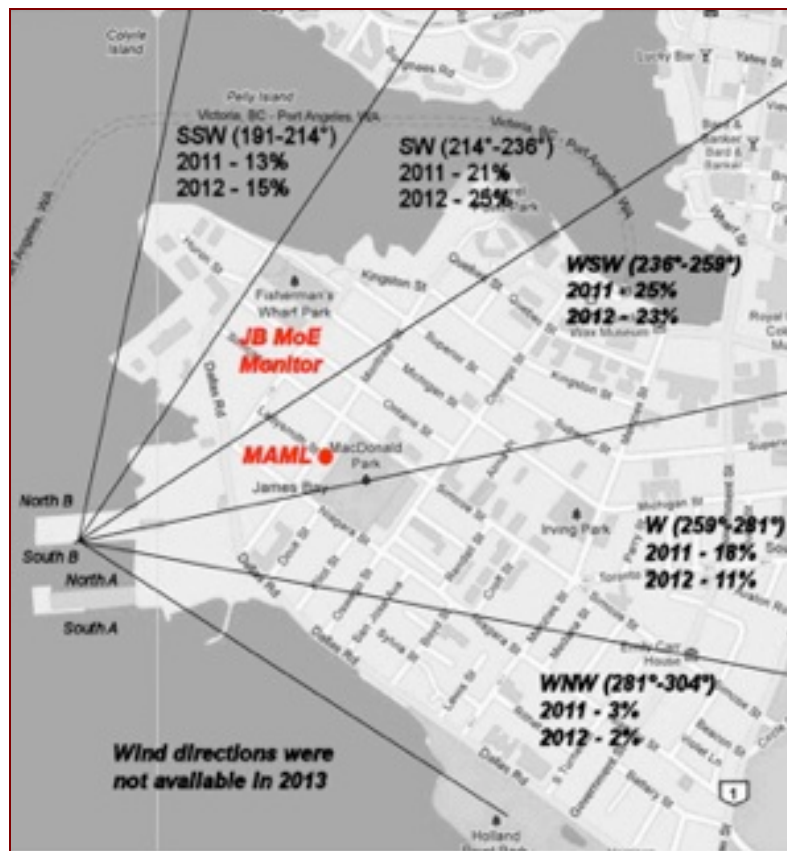
In conclusion, JBNA cannot support any of the options that propose an Outer Harbour site.

Yours sincerely,



Marg Gardiner  
President, JBNA

## Appendix: Winds and Population Density



POPULATION CENSUS DATA									
	JAMES BAY			VICTORIA			VICTORIA - excluding JB		
	Total	Male	Female	Total	Male	Female	Total	Male	Female
Population in 2011	11,207			80,017			68,810		
Population in 2006	11,260			78,057			66,797		
2006 to 2011 population change (%)	-0.47%			2.50%			2.51%		
Total private dwellings <sup>2</sup>	7,500			47,691			40,191		
Private dwellings occupied by usual residents <sup>3</sup>	6,672			42,957			36,285		
Population density per square kilometre	5,718			4,109.40			3,930		
Land area (square km)	1.96			19.47			18		