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*Encompassing the Coastal Communities of Ocean Falls, Bella Bella, Denny Island, Oweekeno and the Bella Coola Valley*

May 6, 2014

Natalia Kukleva P.Eng., Environmental Management Officer  
Ministry of Environment – Environmental Standards Branch  
PO Box 9341 Stn Prov Govt  
Victoria, B. C.  
V8W 9M1

Dear Ms. Kukleva:

**Re: Comments on the "Landfill Criteria for Municipal Solid Waste", Draft Interim Second Edition**

The Central Coast Regional District (CCRD) would like to express in the strongest of terms our objection to a number of the proposed changes to *Landfill Criteria for Municipal Solid Waste* as outlined in the *Draft Interim Second Edition*. To help understand the context of our concerns, it is helpful to give a brief outline of Solid Waste Management in our Regional District.

The CCRD encompasses a large remote portion of the province. Our boundaries reach south across the Hecate lowlands to Cape Caution, then north up the inside passage towards Haida Gwaii, and finally east through deep coastal fjords and fertile forested valleys to the eastern flank of the Coast Mountain Range and the heart of Tweedsmuir Provincial Park. Approximately 4000 residents live throughout the region, with the majority residing in the Bella Coola Valley. Bella Coola is accessed by a challenging 450 km stretch of highway from Williams Lake, the nearest major center.

For the past two decades, Bella Coola has relied on a small Modified Sanitary Landfill to dispose of refuse. Finances are a constant challenge, and we have always relied on grants of one kind or another to undertake planning or site development. The local tax base is so small, that every additional \$6000.00 we spend, results in approximately a 1% increase in the entire CCRD tax levy to Valley property owners. A good example of our budget sensitivity is the recent request from the Ministry of Environment that the CCRD undertake a Development, Operation and Closure Plan (DOCP) for our Landfill. This translates into a 10% tax levy increase for any given year. We do not dispute the value and importance of a DOCP, but we have to reconcile the financial position of our Regional District with the ever increasing list of plans and reports required by provincial regulatory agencies.

The CCRD recognizes and appreciates the progressive efforts of the Ministry of Environment to update our province's landfill criteria. There are many positive aspects to the new draft criteria, however we wish to communicate the following concerns:



1. It is the view of the CCRD that **the single most important and potentially devastating change** in the Draft Criteria is the removal of *Section 3 Landfill Classifications* and the lumping of all landfills into one category, subject to the same planning, siting, design, and operating criteria. Under existing landfill criteria we are classified as a Modified Sanitary Landfill (MSL) due to the fact we serve a population of less than 5000 residents and that we have a very small permitted discharge of 1300 tonnes per year. The last paragraph of Section 3 states that, "The intent of these criteria is to set Sanitary Landfills as the goal for all MSW landfills while recognizing that, for some types of waste and in **some areas of the province, there is a need for Modified Sanitary and Selected Waste Landfills.**". Our classification as a Modified Sanitary Landfill is what gave MoE personnel and managers the latitude necessary to develop an Operating Certificate that had realistic operational criteria and was achievable within the financial means of our Regional District.

Environmental engineers involved with the original assessment of the landfill site had the flexibility to think outside the box and identify that the high dilution levels and a relatively small site were significant enough factors to allow groundwater to meet receiving water criteria at property edge and that, "Based on the chemistry data available to date, and the small volume of waste generated by 2,000 to 2,500 people, it is considered highly unlikely that leachate collection and treatment would be required for this site."

**Under the new draft criteria, any lateral expansion of the landfill will be subject to the same design requirements as a major regional landfill.** Only vertical expansion of existing landfills would be possible, and would require a plethora of technical reports and assessments to justify the proposed exemptions. These new criteria, if adopted in current form, will impose a "one size fits all" set of criteria on municipalities and regional districts throughout the province. Natural Control Landfills and variations thereof will become a thing of the past, and if you don't have 4 million dollars to construct an engineered landfill, you will be forced to truck or barge your waste to a regional landfill at huge environmental and monetary cost. The energy consumption, greenhouse gas emissions and pollution associated with trucking our waste to the nearest regional engineered landfill (500 km away) seems ludicrous when compared with the operation of a small local landfill with minimal environmental impact.

2. A second concern raised during review of the draft criteria is the extraordinary number of reports, analysis, assessments and plans that are required as outlined in Section 10. Depending on the type of landfill, the owner will be faced with a minimum of 11 and probably closer to 25 different types of plans and reports. To produce these plans, reports and assessments, the services of environmental engineering firms will be required. Knowing that these draft criteria were prepared, reviewed and edited by landfill engineering firms raises the question of conflict of interest. The CCRD takes the position that Ministry of Environment personnel experienced with the operation and regulatory management of landfills should decide what plans, reports and assessments are of real value on an individual basis and in consultation with each Certificate holder.

3. A third concern is the high degree of prescription and level of detail in the various design and operation criteria (Sections 5,6 and 7). There is the risk that MoE personnel will start writing these detailed criteria into Operational Certificates without discussing and evaluating the merits of the criteria, available alternatives or implications.

An example is Section 5.10 which addresses site security and fencing. The draft criteria call for 1.2 m post and wire fencing around the entire perimeter of the landfill site boundary. Most of our landfill site boundary is through densely wooded area and a fence line would be difficult to install and pointless. Another portion of the landfill boundary is through the face of a gravel pit and it would be almost impossible to fence. We have electric bear fence around the active operating area, but at this point do not see any need for chainlink fencing around the entire site.

Another example is Section 5.11 which specifies specific design grades for traffic and equipment. This should be left to the judgment of a Qualified Professional. There are many instances in our region where roads for public and commercial traffic far exceed the 8 percent grade specified in the draft criteria. Construction tote roads, equipment trails and spur roads are routinely built in excess of 25% on the coast. Placing restrictive criteria in this document only serves to limit the reliance on professionals and move back in time to the era of cookbook prescriptions.

There will always be a temptation within regulatory agencies to use a cookbook or one size fits all approach to help process applications faster and homogenize the compliance and enforcement component of their work. Unfortunately this does not lead to better environmental stewardship and it most certainly costs society more in the end.

This letter is by no means intended to capture and articulate all the shortcomings of these draft criteria. The purpose of this response is to highlight our main concerns and to emphasize that if these Criteria are put into effect with no exemptions, it will mean closing our only landfill, and massive tax increases to pay for transport of MSW almost half way across the province.

Lastly, we would like to invite you and your colleagues, at your convenience, to tour our landfill operations and enjoy the beautiful Bella Coola Valley located in the heart of the Great Bear Rainforest. Thank you for your consideration.

Yours truly,

CENTRAL COAST REGIONAL DISTRICT

Reginald Moody Humchitt  
Board Chair

Cc: Hon. Mary Polak, Minister of Environment  
Jennifer Rice, MLA North Coast  
Spencer Chandra Herbert, MLA Vancouver West End, NDP Environment Critic