

The Ministry of Environment & Climate Change Strategy (MOE) has issued a Notice of Intent to grant an Operational Certificate (OC #107689) to Upland Excavating Ltd. of Campbell River for operation of a landfill which can accept up to 45,000 tonnes of contaminated soil [including polycyclic aromatic hydrocarbons (PAH's), bagged asbestos, etc.] per year.* The site is a gravel pit located beside Rico Lake and directly across the highway from Mclvor Lake, which is part of the drinking watershed for the 38,500 citizens of Campbell River. The pit sits above a fresh water aquifer.

To date, 12 scientific reports (GHD, GW Solutions, Patrick Consulting Inc., Waterline Resources Inc. and UBC) have been commissioned to study this application. The Campbell River Environmental Committee (CREC) and others are very concerned about the potential threat to our water supply. The reports collectively raise the following unresolved issues:

1. Lack of sufficient data to support the application;
2. Drainage from Rico Lake to Mclvor Lake, our drinking water supply;
3. Insufficient knowledge of the fractured bedrock hydraulic connection between Rico Lake and the pit;
4. Groundwater flow between Rico Lake and the pit;
5. Current water-ponding in the pit and groundwater levels beneath the pit;
6. Unexplained source of high levels of metals (aluminum, barium, calcium, iron, magnesium, sulphur, zinc) currently found in Rico Lake sediment;
7. Drainage from the site east to Lost Lake, Cold Creek and the Quinsam River Hatchery unresolved;
8. No baseline groundwater sampling to the east and northeast;
9. Definition of the Campbell River Watershed Boundary; and
10. Proposed final elevation of landfill above Rico and Mclvor Lakes.

Please see additional information regarding each of the above-cited issues, along with references to their related technical hydrogeological report(s), on the attached addendum.

CREC believes that access to safe drinking water is a basic necessity of life. The government of British Columbia and employees in the Environmental Protection Division of MOE should not permit contaminated soils to be stored so close to Campbell River's only source of drinking water - our water is too precious. Our government has a social responsibility to protect the public from exposure to harm when scientific investigation has found a potential risk. In light of the existing uncertainties raised by these reports, CREC opposes this application.

As a citizen of Campbell River, you are considered a "person who may be adversely affected" by the granting of this Operational Certificate. **You have the right to send your written comments to the government until April 29, 2019 to the:**

Director: Authorizations.South@gov.bc.ca **OR:**

Director
Ministry of Environment
2080A Labieux Road
Nanaimo, BC V9T 6J9

Please send a copy of your letter to: <https://crecwebcom.files.wordpress.com/2016/05/cc-letters-to.pdf>

Attachment: Supporting evidence for unresolved issues 1-10 above.

<https://crecwebcom.files.wordpress.com/2016/05/supporting-scientific-report-information-re-upland-landfill-application-2.pdf>

* The characteristics of the waste discharge to the New Landfill must be demolition waste, construction waste, land clearing waste, contaminated soil that is not hazardous waste, sludge from the leachate management works or from the stormwater management works.

The Campbell River Environmental Committee, dated March 29, 2019