Response to SIA Public Consultation Report by Active Earth Bruce Fraser, Area Director, Shawnigan Lake

"...a high degree of indifference to the proposal by the local population" Active Earth Summary of Public Consultations

Active Earth has produced their summary of the public response to the application by SIA to establish a contaminated soil dump at their Stebbings Road Quarry. Members of the public who were directly engaged in the consultations conducted by SIA and by the CVRD are calling into question the completeness of the public response report, citing a substantial misreading of public concern and dismissive treatment of the real issues raised about watershed integrity by those who responded. Downplaying the public concern for threats to the Shawnigan watershed appears to be an attempt to dismiss a public outcry that was abundantly evident during the consultations. The public consultation report illustrates very well why public consultation should be conducted and interpreted by an independent and objective agency rather than by agents for the proponent. A good case in point is their suggestion that I supported their proposal at its first presentation, willfully transforming a polite reception to a conceptual draft into endorsement. The CVRD is on record as willing to work with the Ministry of Environment in searching for a needed but also suitable facility location that does not compromise a domestic watershed. This is definitely not the same as endorsing the SIA proposal.

The validity of the engineering proposal has also been called into question by the Provincial Groundwater Protection Officer and by an independent review conducted by Lowen Hydrogeology Consulting under contract to the Shawnigan Residents Association. Presentation of the SIA proposal at the CVRD sponsored public meeting served to further reduce public confidence in the proposal. Questions of seismic safety, liner integrity over time, management of surface water, sustainability of the proposed leachate treatment system, lack of prior evidence of successful engineering in similar sites, accuracy of the groundwater aquifer descriptions and long term integrity of the site remain. These are not the trivial concerns of an "indifferent population".

The Ministry of Environment is faced with serious questions both of engineering and public concern, reflected in very clear statements from qualified professionals, public interest groups, individual citizens and by the CVRD Board of Directors. I do not believe it is in the public interest to deliberately subject a major drinking water supply to contamination risks and no government should be approving such a risk over the valid objections of affected citizens. Approval of the SIA application under these circumstances would be unjustifiable and a grievous mistake by government.