



Water and Waste Department • Service des eaux et des déchets

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Manitoba Sustainable Development
Climate Change and Environmental Protection Division
Environmental Approvals Branch
Suite 160 – 123 Main Street (Box 80)
Winnipeg, MB R3C 1A5

Attention: Ms. Tracey Braun, M.Sc., Director

Dear Ms. Braun:

RE: ENVIRONMENT ACT LICENCE NO. 3042 CLAUSE 8

The City is writing to clarify the intent and application of Clause 8 of Environment Act Licence No. 3042:

- 8. The Licencee shall not increase the frequency or volume of combined sewer overflows in any sewershed due to new and upgraded land development activities and shall use green technology and innovative practices in the design and operation of all new and upgraded storm and wastewater infrastructures.*

Combined sewerage is composed of two components: dry weather flows and wet weather flows:

- Dry weather flow (DWF) will vary over the course of the day but is generally consistent day to day.
- Wet weather flow (WWF), will vary drastically depending on rainfall or spring melt occurring.

If a property in a combined sewer district increases their sanitary sewage peak flow into the system, they increase the risk that an overflow may occur. In order to counter this and meet the requirements of Clause 8, the City has restricted the combined peak sanitary sewage and peak storm water so that it cannot be increased due to redevelopment.

For example, if the redevelopment of a site increases the DWF by four litres/second (l/s), the developer must compensate by decreasing the peak WWF by four l/s. This can be accomplished by using methods like additional on-site storage. The intent is to keep the total peak the same from pre-construction to post-construction.

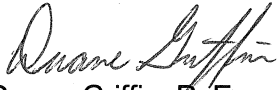
	Existing Conditions	Redevelopment Conditions
Peak DWF	2 l/s	6 l/s
Peak WWF	28 l/s	24 l/s
Total Peak Flow to Combined Sewer	30 l/s	30 l/s

The restriction that post development must be less than or equal to predevelopment flow has proven challenging for redevelopment in the combined sewer districts, particularly in the downtown area where there is limited opportunities to store additional WWF. City policy encourages densification and redevelopment to efficiently utilize existing infrastructure. Developers seeking opportunities to redevelop properties are now informed that Clause 8 of Licence 3042 is applicable to the site. This adds complexity and cost to the proposed redevelopment.

The City requests confirmation on whether this interpretation and application of Clause 8 meets Manitoba Sustainable Development's intent for the CSO Licence. If it does not, then the City requests further clarification on how this clause should be applied.

Should you have any questions on this report please contact Mr. Duane Griffin, P.Eng. at 204-986-4483 or by email at dgriffin@winnipeg.ca.

Yours truly,



Duane Griffin, P. Eng.
Branch Head Wastewater Planning and Project Delivery

AMc/jl

c: G. K. Patton, P.Eng., Water and Waste Department (email)