



December 20, 2013

Engineering & Development Services
City of Revelstoke
216 MacKenzie Avenue
Box 170, Revelstoke, BC V0E 2S0

Dear Chris Selvig

**Re: City of Revelstoke
Big Eddy Subdivision Referral: SD 2013-05 for 970 & 1000 Begbie Road**

I have been asked to provide comment on Big Eddy Waterworks current ability to expand services to accommodate further development through subdivision. The following comments reflect my review through a public health lens including consideration of the *Drinking Water Protection Act & Regulation* (DWPA&R), pertinent provincial and federal guidelines, and best management practices for a multi-barrier approach for safe tap water:

There are concerns with the long term sustainability of Big Eddy Waterworks. There is insufficient information on the current infrastructure assets and capacity in regards to peak daily demands and maximum production. The infrastructure is aging and the two production wells are over 33 years old with no long term plan for replacing this vital infrastructure. In addition, Big Eddy Waterworks has conducted unapproved upgrades and repairs of the distribution system in the past. This has forced Interior Health to take an enforcement stance and seek records-purpose-only information for all works conducted without permits.

The current governance structure for the Improvement District is challenged to provide adequate financial capacity and long term sustainability. Based on available information the utility appears to be in a poor financial position to fund upgrades, replacements, or to respond to emergency breakdowns. The current water rates do not align with those charged by similar sized water utilities elsewhere in Canada. Further, the Utility does not have a Renewal Reserve Fund, a critical tool for systems to undertake and implement long term planning and remain compliant with the DWPA&R.

The source wells for the Utility may be at risk with the aquifer directly influenced by surface water during freshet. If this is the case the system will need to provide additional primary treatment to meet provincial treatment objectives. As discussed above, it is not clear that the Utility has the financial capacity to undertake such improvements.

Based on the above I cannot support further development within the Big Eddy subdivision at this time. Additional information from Big Eddy Waterworks regarding the state and capacity of their infrastructure and finances is required to ensure the water system is equipped to provide clean, safe, reliable tap water over the long term.

If you have any questions please call me directly at 250-851-7410.

Sincerely,

Rob Fleming, CPHI(C)
Specialist Environmental Health Officer

cc: - Healthy Built Environment Program – Health Protection, Interior Health
- Alexa Newton, Financial Officer – Ministry of Community, Sport & Cultural Development

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