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From: Harbicht, Stephen [Yel] [mailto:Stephen.Harbicht@EC.GC.CA]

Sent: Friday, September 16, 2005 8:44 AM

To: Heidi Wiebe

Subject: RE: Will call later

Thanks for getting back to me . Its a busy day today so I'm out for most of the day.

I'm still working my way through the Draft LUP but one comment I would like to provide to you now is noted below.

Draft Deh Cho Land Use Plan

Item A.#15 recommends that waters adjacent to or upstream of municipal water intakes are managed in accordance with CCME guidelines for the protection of freshwater aquatic life. It may be more relevant to recommend that the guidelines for drinking water be used for this purpose. Also, the geographical extent could be more practically defined to focus efforts to ensure water quality at municipal intakes is acceptable.

Item A #16 recommends that developers demonstrate that all wastewater will meet or exceed CCME Freshwater Aquatic Guidelines, and regulatory authorities will manage water quality to within 10% of baseline levels as determined by monitoring.

Application of CCME guidelines to end-of-pipe may not be the best approach, for several reasons. Firstly, the national Guidelines for the Protection of Aquatic Life may have varying applicability depending on type of receiving environment, background or baseline water quality conditions, native aquatic species, and other site specific conditions which may affect sensitivity to change. In some cases, site specific guidelines may be more appropriate.

For information on applying the CCME aquatic guidelines and on site specific guidelines, please see the following publication:

Canadian Council of Ministers of the Environment. 2003. Guidance on the Site-Specific Application of Water Quality Guidelines in Canada: Procedures for Deriving Numerical Water Quality Objectives.

Also, treatment limitations (including cost) may mean that effluent quality will not meet CCME guideline values. This should be considered on a case-by-case basis to assess potential effects and receiving environment conditions.

If you have any question regarding these comments please let me know. I'm hoping to get through the the whole plan this week end so if I have any further comments I'll pass them on to you then

Stephen

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