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February 17, 2017

Your File No.: CVRD: File No. 03-H-16RS

Rachelle Rondeau, RPP  
Planner II Development Services Division  
Cowichan Valley Regional District  
175 Ingram Street  
Duncan, BC V9L 1N2

Dear Ms. Rondeau:

**Re: Referral - Bylaw Amendment Referral Form  
Schnitzer Steel, 13271 Simpson Road**

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Thank you for referring File No. 03-H16RS regarding Schnitzer Steel Canada Ltd's., rezoning application. Regional District of Nanaimo (RDN) staff has reviewed the application to evaluate the potential land use conflicts and environmental risks.

We have provided comments on three areas of interest and these are as follows:

**1. Protection of the Cassidy Aquifer**

The RDN's concerns pertain to the Cassidy Aquifer as it is classified as an environmentally sensitive area within the RDN's Electoral Area A Official Community Plan. Schnitzer Steel's Summary of Environmental Management Plan seems to address protection of groundwater supplies and any surface water runoff is captured in an oil water separator.

To further protect the aquifer it is recommended that all business operations are conducted on impermeable surfaces such as where the storage of materials are located and where processing operations are carried out. According to the report currently 50% of the site is paved.

Paving the entire site would ensure hydrocarbons or any runoff/leachate from the operation can be contained onsite and directed into an oil water separator. It is preferable that the storage of wet vehicles be stored on an impervious surface such as asphalt, concrete or other similar impermeable surfaces.

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## **2. Aesthetics**

Aesthetics along the Trans-Canada Highway Corridor is of concern. We would encourage that screening and buffering be a requirement of the rezoning or development permit requirements. Any screening or buffering should occur on the side in public view that fronts the Trans-Canada Highway. While the site is industrially zoned there should be some requirement for buffering and screening of the operation from public view. We would recommend a landscaping plan to improve buffering.

As part of the Waste Stream Management License application process, the RDN would suggest a Qualified Professional be engaged to consider current and proposed operations and provide a statement that they are satisfied that all measures are in place to prevent any environmental impact on surface or groundwater.

## **3. Economic Development**

This site provides residents in the south part of the RDN with a convenient location to recycle metal. The continuation of this facility is important to local community economic development and job creation.

Yours sincerely,



Sharon Horsburgh, M.A. MCIP, RPP.  
Sustainability Coordinator

cc: Alec McPherson, RDN Director Electoral Area A  
Geoff Garbutt, GM of Strategic & Community Development, RDN  
Jeremy Holm, Manager of Current Planning, RDN  
Paul Thompson, Manager of Long Range Planning, RDN