

File: 5340-09

September 23, 2024

**Sent via email only**

Mayor and Council  
Town of Comox  
1809 Beaufort Ave  
Comox, BC V9M 1R9

Dear Mayor and Council:

**Re: Hudson Trunk Capacity Constraints**

The Hudson Trunk sewer begins at the City of Courtenay boundary near Idiens Way and extends eastward along Dryden Road to Hudson Road and then northward to the regional sewer line on Knight Road that conveys wastewater to the Comox Valley Water Pollution Control Centre for treatment prior to discharging effluent in the Strait of Georgia.

The Hudson Trunk was constructed by the Comox Valley Regional District (CVRD) in 2017 and completed in 2018. Recently, several developments have been proposed that far exceed the original density projections used for sizing the Hudson Trunk. As a result of this significantly higher than anticipated density there are capacity constraints within the Hudson Trunk, especially along Aspen Road where proposed developments within the Town are proposing to connect.

For the developments proposed on Hector and Aspen Roads, system modelling has confirmed the Aspen Road line of the Hudson Trunk is not sufficiently sized to accommodate the full increase in flows as predicted with the current proposed density of these developments. Recently completed modelling of the Hudson Trunk and branch lines along Aspen and Parry Road suggests that:

- The Aspen Road branch can support approximately 18.5L/s of flow before exceeding its capacity.
- The Parry Place leg could easily accommodate the 3.5L/s increase expected from the Lannan development.
- The Parry Place to Anderton Road section of the Hudson Trunk can accommodate the combined maximum flow from Aspen and the anticipated flow from the Lannan development down Parry Place.

The CVRD does not have a direct approval role in respect to applications for connection to a municipal sewage collection line, even if the municipal collection line ties into a regional trunk sewer. Since the collection line is a municipal service, regulating connection to and use of the service is a municipal responsibility. As such how the additional capacity within the Aspen Road leg of the Hudson Trunk is allocated to development is the responsibility of the Town of Comox.

The CVRD does have a consultative role in relation to the municipality's consideration of certain development applications that could impact the capacity of the regional sewer system, and the CVRD and its member municipalities need to work closely together to review and consider capacity when the municipality is considering an OCP or zoning bylaw amendment for increased density of development. Such collaboration is required for implementation of effective funding strategies, and to ensure the CVRD has adequate lead time to add infrastructure in time to avoid constraining municipal development should capacity issues exist because of higher density development in the area.

The CVRD recognizes the importance of municipal development and the capacity of regional infrastructure to support such development and is initiating a servicing study of the Greenwood and Hudson Trunk sewers to consider the scope, timing and projected costs of infrastructure upgrades required to service higher density developments in these catchment areas. This study work will inform updates to financial instruments such as development cost charges. The CVRD staff will work closely with municipal staff on timing and details and will share the results with the member municipalities once available in late 2024.

The CVRD would be willing to participate in municipality-led meetings with developers to be able to assist in providing clear and consistent information to the development community on the Hudson Trunk capacity.

I write this letter as Chair of the Sewage Commission, which has delegated responsibilities for the sewerage conveyance and treatment activities under the CVRD. I look forward to finding resolution to the Hudson Trunk capacity constraints.

Sincerely,

***D. Hillian***

Doug Hillian  
Chair  
Comox Valley Sewage Commission

cc: Jordan Wall, Chief Administrative Officer

*Comox Valley Regional District*