



**Conservation and Climate**

Environmental Compliance and Enforcement  
1007 Century Street, Winnipeg MB R3H 0W4  
T 204-945-7100 F 204-948-2338  
[www.manitoba.ca](http://www.manitoba.ca)

File No.: 3205.10

July 8, 2021

Michelle Paetkau, P. Eng.  
Acting Branch Head  
Wastewater Planning and Project Delivery  
110-1199 Pacific Avenue  
Winnipeg MB R3E 3S8  
Email: [mpaetkau@winnipeg.ca](mailto:mpaetkau@winnipeg.ca)

Dear Michelle Paetkau:

This will acknowledge receipt of your letter dated April 19, 2021, in response to our March 18, 2021, letter requesting clarification on your December 21, 2020, submission.

Conservation and Climate has reviewed all the information provided on the estimated increase in volume of Combined Sewer Overflows caused by infill developments and the estimated decrease in volume as a result of infrastructure development on the overall Combined Sewer system, and has determined it satisfies the intent set out in Clause 8 of Environment Act Licence No. 3042. Future compliance with respect to Clause 8 will be assessed through our review of the information provided in the Combined Sewer Overflow (CSO) Annual Reports, starting with 2021 as requested in our March 18, 2021 letter.

As per your letter dated December 21, 2020, the City's strategy to meet Clause 8 provides offsets by sewer separation projects being completed under the CSO Master Plan for the following: increases in wastewater and/or land drainage contributions from new single and two family dwellings replacing older homes; renovations and small additions for residential, industrial, and commercial properties; and new homes on vacant land and lot splits with small scale development where the existing building remains. Further, you have also stated that larger scale developments in combined sewer districts will continue to comply with Clause 8 via land drainage discharges restriction in order to offset increased wastewater contributions.

In addition, Conservation and Climate wishes to confirm that the proposed strategy regarding small development compliance with Clause 8 applies to the overall combined sewer district for the purpose of interpretation of the above Environment Act Licence. It should be noted that the city and Conservation and Climate are of the same understanding regarding the interpretation of 'sewershed' as the overall combined sewer district and using the CSO Master Plan to achieve the Clause 8 requirements as per the deliberations at the recent CSO Milestone meeting held on May 10, 2021. The City should continue to review developments on a case by case basis to enforce compliance with Clause 8 at the broad sewershed level, the CSO Master Plan and other City standards (e.g. Sewer-By-Law, Basement Flood Relief, etc.) as required.

If you have any questions, please contact Yvonne Hawryliuk, Provincial Manager, Environmental Compliance and Enforcement Branch, at [Yvonne.Hawryliuk@gov.mb.ca](mailto:Yvonne.Hawryliuk@gov.mb.ca) or 204-945-5305.

Sincerely,



Kristal Harman, Director  
Environmental Compliance and  
Enforcement

c: Y. Hawryliuk/N. Suresh/J. Froese, Environmental Compliance and Enforcement Branch  
L. Pyles/S. Burland Ross/ B. Assefa, Environmental Approvals Branch  
G. Patton, P. Eng., Manager of Engineering Services Division  
M.L. Geer, CPA, CA, Water and Waste Department  
R. Grosselle, Water and Waste Department  
C. Carroll, Water and Waste Department  
P. Coote, Water and Waste Department, City of Winnipeg