

From: [Veins of Life Watershed Society](#)
To: [Council](#)
Cc: [Parks General Inquiries](#); [Engineering General Delivery](#); [Corporate Services](#); gateway_office@islandhealth.ca
Subject: Re: Formal objection and demand for disclosure — Gorge/Chan Creek contamination and commercial sauna proposal
Date: July-18-26 8:09:00 PM

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Municipal parking-lot runoff into Gorge Creek

When the Gorge Park Pavilion was constructed between 2020 and 2022, the Township had an obvious opportunity—and an environmental obligation—to upgrade the adjacent parking-lot drainage.

Esquimalt’s own 2020 Gorge Park Master Plan specifically identified a “**Green Infrastructure Parking Lot.**” Yet the Township has not publicly demonstrated that this work was completed or that the existing parking-lot catchment was fitted with adequate runoff treatment.

It is our understanding that catch basins serving the parking lot continue to discharge through the stormwater system directly into Gorge/Chan Creek. If the Township disputes this, it must immediately release the drainage plans, as-built drawings and flow-path mapping showing:

1. Every parking-lot catch basin and its identification number.
2. The underground pipe routes.
3. The ultimate discharge point and receiving water.
4. Every Stormceptor, oil/grit separator, filter, bioswale or other treatment device.
5. The date, capacity and design standard of each device.
6. Inspection, cleaning and sediment-removal records.
7. Laboratory results for any sediment or water collected from the system.
8. The location and method used to dispose of contaminated catch-basin sediment.

The CRD itself acknowledges that runoff from parking lots can collect **oil, gasoline, antifreeze, metals, sediment, litter and other vehicle-related contaminants** before entering creeks and marine shorelines. A conventional catch basin provides limited settling; it is not proof that runoff has received adequate environmental treatment. [CRD stormwater information](#)

This is especially serious because the Township’s own Gorge Creek monitoring history includes hydrocarbons, elevated bacteria, sewer odours, metals and repeated unidentified or incompletely corrected sources. Adding a commercial sauna—and the resulting increase in vehicles, parking-lot use, shower water, foot-washing water and cleaning activities—would increase the cumulative loading on a drainage system whose condition and receiving-water impacts have not been publicly disclosed.

The Township cannot promote shoreline restoration at the mouth of Gorge Creek while permitting untreated or inadequately treated municipal parking-lot runoff to enter the creek

upstream. **Restoring the shoreline while ignoring the drainage catchment is cosmetic environmentalism, not source control.**

Before any sauna licence, permit or site agreement is issued, we demand:

1. A complete drainage and runoff audit of the Pavilion, parking lot, proposed sauna site and Gorge/Chan Creek catchment.
2. Confirmation of whether the master plan's proposed **Green Infrastructure Parking Lot** was ever constructed. If it was abandoned, Council must disclose who made that decision, when it was made and why.
3. Wet-weather and first-flush sampling of the parking-lot discharge for hydrocarbons, suspended solids, copper, zinc, lead, bacteria and other vehicle-related contaminants.
4. Installation or upgrading of proper oil/grit separation, filtration and green stormwater infrastructure before additional commercial activity is authorized.
5. Written confirmation that no sauna shower, bucket, foot-washing, cleaning or disinfectant wastewater can enter this parking-lot drainage system, Gorge Creek or the Gorge Waterway.
6. Review by Island Health Environmental Public Health and referral to Esquimalt's Environment, Parks and Recreation Advisory Committee.

Esquimalt should not be allowed to monetize the appearance of a clean waterfront while refusing to disclose what its own parking lot and stormwater infrastructure are discharging into the creek.

The supporting Township document is the [2020 Esquimalt Gorge Park Master Plan](#).

Regards

John Roe

Former appointed member Esquimalt Parks board and awards recipernet

Founding director

Veins of life Watershed Society

On Sat, Jul 18, 2026 at 7:35 PM Veins of Life Watershed Society [REDACTED] wrote:

Mayor Desjardins, Council, Township staff and Island Health Environmental Public Health:

This correspondence is a formal public-interest objection and demand for disclosure concerning the proposed Gatherwell commercial sauna at Esquimalt Gorge Park/Kinsmen Park.

Please place this letter in the public Council record and refer it, without abridgement, to the Environment, Parks and Recreation Advisory Committee, Parks and Recreation, Engineering and Public Works, and the responsible Island Health Environmental Health Officer and Medical Health Officer.

Council is proposing to authorize and profit from a commercial “wellness” operation beside water that is presently under an official warning for unsafe swimming and other water-contact activities.

That is unacceptable without full public disclosure of the wastewater arrangements, health review, drainage servicing, contamination history and conditions governing the operator’s promotion of cold-water immersion.

The Gorge may look attractive, but beautification is not remediation.

A new pavilion, flowers, paths and commercial wellness branding do not erase approximately 150 years of industrial wastes, raw sewage, filled lands, buried creeks, petroleum spills, cross-connections and contaminated stormwater entering this waterway.

The CRD’s own history states that sawmills, shipbuilding, paint manufacturing and fish processing operated around the Gorge and Victoria Harbour following the establishment of Fort Victoria in 1843. Residential neighbourhoods discharged sewage directly into the water until approximately 1955 in Esquimalt at this location directly into the Gorge in 1996. By the late 1930s, the Gorge was no longer considered safe for swimming.

This is not a pristine recreational waterfront. It is a legacy industrial and municipal waste-receiving environment that must be managed accordingly.

THE CHAN CREEK/GORGE CREEK AND ESQUIMALT HIGH SCHOOL HISTORY

Our organization has worked on what we have long referred to as the Chan Creek/Gorge Creek drainage system for decades.

The historic Chan Creek pond, buried drainage, upper Gorge Creek catchment and lands around Esquimalt High School, Colville Road and Ellery Street cannot be separated from the modern storm-sewer system simply because portions of the historic watercourse were filled, culverted, renamed, rerouted or removed from public view.

We have repeatedly raised evidence and historical accounts concerning:

1. A former pond and filled waste area associated with the Esquimalt High School/Colville–Ellery portion of the catchment.
2. The nature and origin of the material used to fill that pond or low-lying area.
3. Groundwater and buried-drainage movement through the filled area.
4. Historic and present connections between this upper catchment, Gorge/Chan Creek and the municipal storm system.
5. Earlier investigations involving CRD staff and possible mercury or other metal sources.
6. The apparent absence of public reports explaining the investigation, results, source-tracing conclusions or remaining risks.

If the Township disputes any part of this history, it should not respond with a denial unsupported by records. It should release the historical maps, fill records, environmental site assessments, soil and groundwater results, mercury and metals data, drainage plans, correspondence with School District 61, and all CRD and consultant reports.

Until those records are disclosed, Council has no reasonable basis for treating the downstream park and beach as though the only relevant hazard is a single seasonal bacteria sample.

MOVING THE DISCHARGE DID NOT REMOVE THE CONTAMINATION

The Township states that Gorge Creek was “restored” in 2005. Our organization’s direct involvement and understanding is that the discharge was rerouted or moved into the daylighted/restored creek in the context of efforts to establish a treatment and restoration system.

The intended approach was not merely decorative creek construction. It involved a treatment train consisting of upstream source identification and control, oil-and-grit interception using Stormceptor-type equipment, sediment and contaminant capture, and vegetated creek or wetland bioremediation before water reached the Gorge.

The comprehensive drainage-wide source-control and treatment program was never implemented.

Esquimalt’s own open-data system now maps Stormceptor assets, including devices in the Gorge Park/Gorge Creek area. Yet important public fields concerning installation dates, accumulated sediment, present condition and inspection or maintenance history are largely blank.

Accordingly, the Township must disclose:

1. Why the Gorge/Chan Creek discharge was relocated or rerouted.
2. The original engineering and environmental objectives of the 2005 project.
3. Whether the restored creek was intended to provide any treatment or bioremediation function.
4. The design capacity and actual performance of every Stormceptor or other treatment structure in the catchment.
5. Inspection, sediment-depth, cleaning, disposal and maintenance records for each device.
6. Whether captured sediments were chemically analyzed and, if so, where they were disposed.
7. Why the proposed drainage-wide source-control, Stormceptor pre-treatment and bioremediation program did not proceed.
8. Who made the decision not to proceed and whether that decision was made by staff, Council, the mayor’s office, budget direction or another authority.

Our firsthand understanding is that the comprehensive program was stopped or cancelled under the leadership of Mayor Desjardins.

If the mayor or Council disputes that account, then release every relevant Council resolution, staff report, budget decision, grant application, memorandum of understanding, email, briefing note and correspondence showing what was proposed, approved, rejected, withdrawn, defunded or terminated—and by whom.

Silence in published minutes is not proof that no decision occurred. It may instead demonstrate that the decision was made administratively, informally or without adequate public documentation.

THE DOCUMENTED DISCHARGE RECORD

This is not an argument about one isolated incident. The record shows repeated and continuing discharges.

1. In November 2015, a kerosene-like substance entered Gorge Creek. Esquimalt's January 2016 update reported that contamination remained visible weeks later between the creek mouth and the footbridge and that containment booms remained necessary. A separate spill was reported near McNaughton Avenue, and its source was not found.
2. In July 2017, septic sewage and a disinfecting chemical were deliberately discharged into a storm drain south of Gorge Park. Laboratory results confirmed fecal coliform and E. coli. The disinfectant apparently killed algae in the creek.
3. The 2017 problem did not end with that dumping incident. Later sampling showed fecal counts increasing again, together with high turbidity and "milky" water. The Township continued sampling, inspecting and cleaning upstream storm sewers.
4. In October 2017, the Township acknowledged that a significant continuing source was a wastewater-to-stormwater cross-connection at the upper end of the collection system.
5. The SNC-Lavalin consultant investigation in our evidence file examined 33 locations between August and December 2017. Its reported dataset included:
 - 137 exceedances among 149 fecal-coliform samples.
 - 130 exceedances among 146 E. coli samples.
 - 140 exceedances among 149 enterococci samples.
 - Chemical oxygen demand reported as high as approximately 23,000 mg/L at a downstream location, compared with the 1,000 mg/L benchmark used in the report.
 - Ethanol and other evidence associated with wastewater in the brewery/Devonshire Road portion of the catchment.
 - A substantial decrease after repair of a cross-connection around September 28, 2017.

The drop following one repair demonstrated that the cross-connection was significant. It did not establish that the entire catchment was clean.

6. In January 2020, petroleum from a leaking residential oil tank entered surrounding ground and pipes before appearing in Gorge Creek, the estuary and the Gorge Waterway. Cleanup costs exceeded \$50,000 while other possible sources remained under investigation.

7. In 2020 and 2021, CRD monitoring continued to classify discharge 744B at Gosper Crescent as a high public-health concern. The CRD reported that 13 of 21 monitored Gorge and Portage Inlet discharges exceeded the copper guideline, with some also showing excessive cadmium, iron or zinc.
8. In 2022, the CRD again classified 744B as a high public-health concern. It reported sewer and stormwater relining, repair of a sewer-to-stormwater misconnection and installation of cleanout ports. The CRD expressly stated that bacterial counts had decreased but remained elevated in some areas.
9. The CRD's 2023 inflow-and-infiltration report states that Esquimalt removed another Gosper Crescent cross-connection that was contaminating the Gorge. It also identifies the Colville catchment as Esquimalt's highest I&I priority and reports limited pipe and lateral repairs.

These were necessary repairs. They were not a comprehensive, drainage-wide source-control program.

10. The CRD's 2024 stormwater report again classified 744B as high concern and stated plainly that, although Esquimalt had repaired one source and replaced or relined pipe, another source still existed.
11. The 2024 dry-weather results are particularly damning:
 - SW0744B measured 110,000 E. coli per 100 mL on February 7, accompanied by sewer odour and murky flow despite no recent rain.
 - It measured 65,000 on April 18, again with sewer odour, murky water and no recent rain.
 - It measured 59,000 on August 12, with strong laundry odour, grey water and no rain.
 - It remained at 5,500 on November 14.
 - The main Gorge Creek flow, SW0744, measured 1,400 on March 27 and 600 on August 12.
 - SW0744A measured 16,000 on May 8 with sewer odour and murky flow.

These findings are incompatible with any suggestion that the problem is merely historical or caused only by rainfall.

12. The CRD's concentration table reported average E. coli values of approximately:
 - 744 at 844 CFU/100 mL.
 - 744A at 2,095.
 - 744B at 209,474.
 - 749 at 1,349.
 - 751 at 1,817.

The same table reported average copper at 744B of 29.07 µg/L, compared with the listed marine guideline values of 3 µg/L maximum and 2 µg/L mean. Manganese averaged 200 µg/L against a listed 100 µg/L guideline.

These are stormwater-discharge measurements, not beach-water measurements. That distinction makes them more—not less—important for source control because they identify concentrated pollution entering the receiving environment.

REACTIVE REPAIRS ARE NOT SOURCE CONTROL

Esquimalt may point to cross-connection repairs, pipe relining, smoke testing, dye testing, spill booms and periodic sampling.

Those actions are useful, but they are reactive.

A drainage-wide source-control program requires systematic mapping, business and residential inspections, private-property connection testing, repeated dry- and wet-weather sampling, sediment chemistry, pollutant fingerprinting, catch-basin cleaning, Stormceptor maintenance, enforcement, public reporting and verification that each identified source remains eliminated.

Fixing one cross-connection is not source control.

Moving a discharge into an attractive restored channel is not treatment.

Installing a Stormceptor without inspection, maintenance, sediment testing and upstream enforcement is not a complete pollution-control program.

Testing a beach for one bacteriological indicator is not chemical clearance.

Putting up landscaping and calling the area restored does not remediate historic fill or contaminated sediment.

THE COMMERCIAL SAUNA MAKES THIS A PUBLIC-HEALTH DECISION

The municipal sauna report says the site was chosen partly for “direct water access,” that it would serve the cold-water swimming community and that it could complement the proposed dock.

Gatherwell’s established business model promotes hot-and-cold exposure and ocean dipping.

Council cannot credibly claim that water entry is unforeseeable.

The Township is currently warning the public that Gorge Park is unsafe for swimming and other water-contact activities. It is simultaneously considering a revenue-sharing business positioned to attract people seeking cold-water immersion.

Council expects 15 percent of gross revenue from this operation. It cannot monetize the appearance of clean water while withholding the full contamination, drainage and public-health record.

NO WASTEWATER DISCLOSURE

The public sauna documents still do not disclose:

1. Whether a shower, footwash, cold-water bucket or plunge will be provided.
2. Where wash-water, cleaning water, disinfectants, sweat, body oils and other wastewater will go.
3. Whether the sauna will have a permitted sanitary-sewer connection.
4. Whether anything will discharge to pavement, soil, landscaping, a catch basin, the restored creek, the storm system or the Gorge.
5. Whether wastewater will be held in a sealed tank and removed.
6. Whether Island Health and CRD Source Control have reviewed the complete operating plan.

The existence of public washrooms or a nearby sanitary sewer is not proof that the commercial operation will be properly connected.

OUR REQUIREMENTS

Before any licence is executed or construction begins, we require:

1. Immediate suspension of final approval pending full disclosure.
2. Public release of the complete sauna site-servicing, plumbing and drainage plan.
3. Identification of the destination of every operational wastewater stream.
4. Written confirmation that nothing will discharge to soil, pavement, storm drains, Gorge/Chan Creek or the Gorge Waterway.
5. Copies of every Island Health, CRD, plumbing, building, drainage and environmental review or permit.
6. The complete SNC-Lavalin Gorge Creek investigation, laboratory appendices and chain-of-custody records.
7. All historical reports concerning the Chan Creek pond, former fill or dump lands, Esquimalt High School, Colville–Ellery drainage, mercury investigations and groundwater or buried-creek pathways.
8. Engineering records for the 2005 creek restoration and relocation or rerouting of the discharge.
9. All Stormceptor design, inspection, maintenance, sediment-analysis and waste-disposal records.
10. The complete decision record explaining why the proposed bioremediation and comprehensive source-control program was not implemented.
11. A current environmental health and safety survey addressing biological, chemical, sediment and physical hazards—not bacteria alone.
12. An enforceable licence condition prohibiting Gatherwell from advertising, recommending, depicting or facilitating water entry while any advisory exists.
13. Clear warnings on the booking page, waiver and site stating that the Gorge is not an approved cold plunge and that sauna use does not establish the water is safe.

14. Written Island Health confirmation that its review considered foreseeable inducement of swimming, the current beach advisory, unresolved stormwater sources and the chemical and sediment record.
15. Referral of this letter and the complete evidence package to the Environment, Parks and Recreation Advisory Committee before—not after—the commercial agreement is finalized.

Pretty landscaping is not remediation. A waiver is not public-health protection. Revenue sharing is not environmental due diligence.

If the Township and Island Health again respond with generic reassurance, incomplete disclosure or after-the-fact permitting, we will refer this evidence to the CRD Environmental Protection and Regional Source Control programs, the responsible Medical Health Officer, BC Ministry of Environment and Parks Compliance and Enforcement, federal Fisheries Act authorities, and information-access oversight bodies as applicable.

Please confirm receipt, identify the responsible staff and health officials, and advise when this correspondence will appear before Council and the Environment, Parks and Recreation Advisory Committee.

We request a substantive written response within 14 calendar days.

Sincerely,

[Name]

[Organization]

[Contact information]

Principal supporting records:

[CRD: Gorge Waterway history and continuing threats](#)

[CRD: 2020–2021 Gorge Waterway Initiative review](#)

[CRD: 2022 Gorge Waterway Initiative review](#)

[CRD: 2023 Core Area Inflow and Infiltration Report](#)

[CRD: 2024 Core Area Stormwater Quality Report](#)

[Esquimalt: public Stormceptor inventory](#)

[Esquimalt: 2015 kerosene-like Gorge Creek spill](#)

[Esquimalt: 2017 septic sewage and disinfectant dumping](#)

[Esquimalt: increasing contamination during 2017 investigation](#)

[Esquimalt: 2017 wastewater-to-stormwater cross-connection](#)

[Esquimalt: 2020 oil entering Gorge Creek and estuary](#)

[Esquimalt: current Gorge Park advisory](#)

[Island Health: Kinsmen Beach sampling history](#)

[Health Canada: preventive recreational-water risk management](#)

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John R Roe

- [REDACTED]
- [The Dead Boats Disposal Society](#)
- [The Veins of Life Watershed Society](#)
- "Over 30 years of cleanup and restoration have taught me one truth—if you don't stop the pollution at its source, you're just sweeping sand in a windstorm. Source control, source control, source control. Then, and only then, do you restore."
— JR Roe. Amen
- oshaku shushaku—mistake upon mistake compounds to become the sum total of one's knowledge.
- "Lucid waters and lush mountains are invaluable assets" — i.e., nature (healthy ecosystems) is real wealth, not a trade-off against wealth.

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Canada stays strong by standing united—defending democracy, rejecting division, and leading with truth, justice, and integrity. We fight tyranny with resilience, compassion, and an unwavering commitment to a better future.

Public Recreation in Contaminated Waters: A Practical Question from Heavy Industry Experience

I have spent much of my working life in heavy industry. I have worked as a welder, commercial diver, mechanic, supervisor, factory worker, and tradesperson in settings where materials, chemicals, contaminated surfaces, waste streams, and exposure pathways were treated seriously.

In those workplaces, we were trained to read and understand MSDS/SDS sheets. Before handling materials or working in a potentially contaminated environment, we were expected to understand what we were dealing with, what the exposure risks were, what protective equipment was required, how materials could move through air, water, soil, or sediment, and how cleanup and disposal had to be handled. If we worked on land or in the water, the same basic principle applied: identify the hazard, control the exposure, protect the worker, and prevent the contamination from spreading.

That is why I am struggling with how public use of contaminated rivers, lakes, estuaries, beaches, and tidal waters is currently treated.

In public recreation, the discussion often seems to stop at fecal-indicator testing. Agencies talk about *E. coli*, enterococci, fecal coliform, beach advisories, and whether bacterial numbers are above or below guideline values. That information matters, but it is not the whole picture.

Fecal indicators are warning lights. They do not identify everything in the water or sediment. They do not tell the public whether there are viruses, pharmaceuticals, endocrine-disrupting compounds, metals, PAHs, PCBs, dioxins/furans, hydrocarbons, contaminated sediments, stormwater contaminants, or legacy industrial pollutants. They also do not answer what happens when sediment is disturbed by construction, cable placement, dredging, prop wash, anchoring, or public activity.

In heavy industry, a known contaminated area would not be treated as safe simply because one narrow indicator passed on one day. A proper hazard review would ask what contaminants are present, how they can be disturbed, how people may be exposed, what protective measures are required, and whether the area should remain open during or after disturbance.

The public system often appears to apply a much narrower standard. A waterbody with historical industrial use, stormwater outfalls, known sediment contamination, sewer cross-connection risk, and active construction may still be treated as suitable for public recreation unless fecal-indicator testing triggers an advisory. That creates a serious gap between industrial exposure-control practice and public recreational-water management.

The concern is not that every beach requires full chemical testing at all times. The concern is that in known contaminated urban waterways, fecal testing should not be treated as a complete public-health assessment. Where there are contaminated sediments, outfalls, legacy industrial activity, and disturbance, a broader human-health and environmental risk review should be completed before public swimming or other direct-contact recreation is encouraged.

The practical question is simple:

Has the area been assessed for all reasonable recreational exposure pathways, including contaminated sediment, stormwater contaminants, fecal contamination, chemical contaminants, and disturbance-related resuspension, or has the decision been based mainly on fecal-indicator testing?

From my experience, society has not fully connected industrial contamination practice with public recreational exposure. Workers are protected through hazard identification, SDS review, PPE, exposure controls, decontamination, and disposal procedures. The public, including children, swimmers, paddlers, shoreline users, and people entering urban tidal waters, should not receive a weaker standard of care in areas already known to be contaminated.

Fecal-indicator compliance is not the same thing as a contaminated-site recreational exposure assessment.

[Guidelines for Canadian Recreational Water Quality: Understanding and Managing Risks in Recreational Waters](#)