

STAFF REPORT

File No.: 6500-20

Water Sustainability

DATE OF MEETING: October 5, 2021

TO: Salt Spring Island Local Trust Committee

FROM: Jason Youmans, Island Planner

Salt Spring Island Team

COPY: Salt Spring Island Watershed Protection Alliance (SSIWPA)

SUBJECT: Business Case – Salt Spring Island Watershed Stewardship and Protection Strategic Plan

RECOMMENDATION

1. That the Salt Spring Island Local Trust Committee amend the Watershed Stewardship and Protection Strategic Plan project charter in accordance with Appendix 1 of the staff report dated October 5, 2021.

- 2. That the Salt Spring Island Local Trust Committee endorse the First Nations engagement strategy for the Watershed Stewardship and Protection Strategic Plan attached as Appendix 2 to the staff report dated October 5, 2021.
- 3. That the Salt Spring Island Local Trust Committee endorse the business case for Salt Spring Island Watershed Stewardship and Protection Strategic Plan attached as Appendix 3 to the staff report dated October 5, 2021 and forward it to Islands Trust Financial Planning Committee for inclusion in the fiscal 2022/23 budget.

REPORT SUMMARY

The purpose of this report is to provide a business case for Salt Spring Island Local Trust Committee (SS LTC) consideration related to the development of a Salt Spring Island Watershed Stewardship and Protection Strategic Plan. It also provides a brief First Nations engagement strategy for the project.

The business case attached is primarily to record that the bulk of the spending on this project initially anticipated in fiscal 2021/22 will instead be spent in fiscal 2022/23.

Also included for the LTC's review are an updated project charter to reflect amended timelines for the development of the watershed plan as well as a brief description of how First Nations with territorial interests on Salt Spring Island will be engaged.

Staff are recommending an additional \$8,400 be allocated to First Nations engagement, spread across fiscal 21/22 and 22/23.

BACKGROUND

At its May 25, 2021 meeting the SS LTC endorsed a project charter for the development of a Salt Spring Island Watershed Stewardship and Protection Strategic Plan. Staff posted a request for proposals on September 10, 2021 to hire a consultant to undertake development of this watershed plan.

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Further background on this project is available on page 79 here and here.

\$50,000 was allocated to this project in the fiscal 2021/22 budget, with the money to be drawn from the SS LTC's accumulated unspent special property tax requisition funds from previous fiscal years.

ISSUES AND OPPORTUNITIES

Project Cost and Timing

Given the delay in posting the RFP to carry out this project, the majority of the spending associated with development of the Salt Spring Island Watershed Stewardship and Protection Strategic Plan will occur in fiscal 2022/23 instead of all within fiscal 2021/22.

Final deliverables of Phase 2 were initially planned for March 2022. However, staff acknowledge that September 2022 is a more likely target.

Staff anticipate that spending over the two fiscal years will break down as follows:

Fiscal 2021/22

- \$10,000: Phase 1 Situation Analysis and Options Identification Report
- \$5,000: Phase 2 Preliminary work on Salt Spring Island Watershed Stewardship and Protection Strategic
 Plan
- \$2,500: Initial First Nations engagement

Fiscal 2022/23

- \$35,000: Salt Spring Island Watershed Stewardship and Protection Strategic Plan (main work)
- \$5,900: First Nations Engagement

Unspent Reserve Funds

Islands Trust finance department advises that as of March 31, 2021 the SS LTC has \$93,030 in unspent special property tax requisition funds, plus a further \$14,079 in unspent provincial constituency grant funding, for a total of approximately \$107,000.

\$80,000 of the unspent special property tax requisition funds has already been allocated, as follows:

- \$30,000 Weston Lake Water Availability and Climate Change Study being pursued jointly with the CRD;
- \$50,000 Salt Spring Island Watershed Stewardship and Protection Strategic Plan

If the foregoing is correct, the SS LTC has approximately \$27,000 in unallocated unspent special property tax requisition funds.

Staff are recommending that an additional \$8,400 from these funds be allocated to First Nations engagement on freshwater.

Consultation

Agency and community consultation on this project will largely be channelled through SSIWPA and its members.

Additional general community consultation will be worked out with the successful consultant once they are hired and pending discussions about what can be reasonably achieved for the allocated budget and within the prescribed timelines.

First Nations Engagement

See Appendix 2 for proposed First Nations engagement strategy developed in consultation with Islands Trust Senior Intergovernmental Policy Advisor.

Rationale for Recommendation

- 1. That the Salt Spring Island Local Trust Committee amend the Watershed Stewardship and Protection Strategic Plan project charter in accordance with Appendix 1 of the staff report dated October 5, 2021.
 - Staff Comment: Because the RFP related to this project was delayed it is necessary to amend the original project charter to reflect the new anticipated timelines.
 - Staff are also recommending it be amended to reflect an additional \$8,400 in spending on First Nations engagement.
- 2. That the Salt Spring Island Local Trust Committee endorse the First Nations engagement strategy for the Watershed Stewardship and Protection Strategic Plan attached as Appendix 2 to the staff report dated October 5, 2021.
 - Staff Comment: This First Nations engagement plan attached as Appendix 2 was developed in consultation with Islands Trust Senior Intergovernmental Policy Advisor.
- 3. That the Salt Spring Island Local Trust Committee endorse the business case for Salt Spring Island Watershed Stewardship and Protection Strategic Plan attached as Appendix 3 to the staff report dated October 5, 2021 and forward it to Islands Trust Financial Planning Committee for inclusion in the fiscal 2022/23 budget.
 - Staff Comment: Islands Trust is currently in the fiscal 2022/23 budgeting process. All projects with anticipated budgets of over \$5,000 require a corresponding business case to be submitted to Islands Trust Financial Planning Committee. While \$50,000 was already allocated to this project for fiscal 2021/22 an updated business case is required to show that the bulk of the spending will occur in fiscal 2022/23, rather than fiscal 2021/22 as originally planned.

The business case attached as Appendix 3 recommends an additional \$8,400 for First Nations engagement related to development of the watershed plan, spread across the two fiscal years.

ALTERNATIVES

The SS LTC allocated \$50,000 to this project in fiscal 2021/22, thus staff assume that it wishes to see this work continue. Notwithstanding shifting timelines, the only real departure from the original <u>project charter</u> that this report advocates is the additional \$8,400 to fund First Nations engagement.

1. Fund First Nations engagement from within existing allocation

If the SS LTC is not comfortable with adding an additional \$8,400 to the overall project budget – for a total budget of \$58,400 – it does not have to authorize extra funding. A resolution to amend the attached documents in accordance with this direction is as follows:

That the Salt Spring Island Local Trust Committee amend the Salt Spring Island Watershed Stewardship and Protection Strategic Plan business case and proposed project charter v1.1 to remove reference to an additional \$8,400 in First Nations engagement funding, endorse the business case and project charter as amended, and request staff to forward it to Islands Trust Financial Planning Committee for consideration in the fiscal 2022/23 budget.

The implications of this resolution are that staff and the consultant undertaking the watershed strategic plan process would have to determine what type of First Nations engagement could be done within the existing budget. This may reduce the scope of that engagement.

2. Other Options

The SS LTC may identify other aspects of the proposed charter that require amendment. Staff will carry out those amendments as directed.

Next Steps

If the SS LTC accepts staff's recommendations:

- Staff will carry out the project in accordance with the updated project charter;
- Staff will carry out First Nations engagement for the project in accordance with the First Nations engagement strategy; and
- Staff will submit the business case for the Salt Spring Island Watershed Stewardship and Protection Strategic Plan to Islands Trust Financial Planning Committee.

Staff will carry out any alternative resolutions passed by the SS LTC.

Submitted By:	Jason Youmans, Island Planner	September 22, 2021
Concurrence:	Stefan Cermak, Regional Planning Manager	September 22, 2021

ATTACHMENTS

- 1. Project Charter (Draft) Salt Spring Island Watershed Stewardship and Protection Strategic Plan
- 2. First Nations Engagement Strategy (Draft) Salt Spring Island Watershed Stewardship and Protection Strategic Plan
- 3. Business Case (Draft) Salt Spring Island Watershed Stewardship and Protection Strategic Plan

SALT SPRING ISLAND LOCAL TRUST COMMITTEE

PROJECT CHARTER v1.10

Salt Spring Island Watersheds Stewardship and Protection Strategic Plan

May 25 October 5, 2021

Purpose

To develop, under the guidance of a qualified consultant, a strategic plan to guide and prioritize watershed protection work on a medium-term basis (5-to-10 years) to better support Salt Spring Island Watershed Protection Alliance member agencies in advancing effective, equitable and modernized land and water use planning.

Background

Section 24(2)(b) of the Islands Trust Act allows Local Trust Committees to regulate the development and use of land for the purposes of carrying out the object of the Trust. This means that local trust committees can use their regulatory powers to preserve, protect and guide restoration of watersheds.

In 2013, Islands Trust Council adopted Bylaw No. 154 which delegated authority to the Salt Spring Island Local Trust Committee (LTC), for the purpose of preserving and protecting the quality and quantity of water resources within the Salt Spring Island Local Trust Area, the power to:

- Coordinate and assist in the determination of regional, improvement district and government of British Columbia policies;
- Coordinate the implementation of regional, improvement district and government of British Columbia policies; and
- Coordinate the carrying out of regional, improvement district and government of British Columbia policies

To date, the LTC has used this delegated authority to fund and coordinate the Salt Spring Island Watershed Protection Alliance (SSIWPA). SSIWPA has advanced understanding, agency cooperation, and community engagement in watershed issues. SSIWPA undertakes an annual work planning exercise to identify water issues of concern to SSIWPA's membership and wider community in the hope that member agencies will undertake projects to address the issues raised. However, a longer range strategy for watershed protection on SSI has not been developed.

Objectives

This project has two objectives:

- 1) Improve the coordination of watershed stewardship and protection policy on Salt Spring Island through:
 - a) an external review of current approaches to watershed stewardship protection policy; and
 - Analysis of, and recommendations for, the types of planning processes, policy/guidance documents, or mechanisms that will improve watershed stewardship and protection.
- 2) to better support Salt Spring Island Watershed Protection Alliance member agencies in coordinating and advancing effective, equitable, and modernized land and water use planning by developing a strategic plan to guide and prioritize watershed protection work on Salt Spring Island on a medium term (5-to-10 years) time frame.

In Scope

- 1) Situation Analysis and Option Identification
 - Review current approaches to watershed stewardship and protection policy coordination on Salt Spring Island;
 - Review documented watershed protection issues facing salt Spring Island;
 - Stakeholder interviews w/in and outside of SSIWPA about SSIWPA and watershed protection issues generally;
 - Engagement will include subjectspecific stakeholder engagement on Coastal Douglas-fir and Associated Ecosystem Protection in the context of watershed protection
 - Engage First Nations in discussion about how they could be involved in water policy coordination;
 - Assess the performance SSIWPA;
 - Recommendations to improve watershed protection policy coordination based on best practices in other jurisdictions, in order to implement future watershed protection plans;
 - Recommendations to appropriately fund coordination of watershed protection policy on Salt Spring Island;
- Recommendations about appropriate planning processes, policy/guidance

Out of Scope

- Watershed Assessments
- Implementation of strategic plan
- Development of new tools

- documents, or mechanisms to improve watershed stewardship and protection; and
- Recommendations and justification for the 2022/23 special tax requisition amount.
- 2) Watershed Stewardship and Protection Strategic Plan
 - Apply POLIS Water Champion Handbook Stepping Stones;
 - Identify and engage relevant agencies, First Nations, stakeholders and broader community to:
 - Establish stakeholder roles and responsibilities as they relate to watershed protection on SSI, as well as their respective capacities and desired outcomes;
 - Identify watershed protection challenges;
 - Identify knowledge gaps;
 - Identify and prioritize potential tools (including Water Sustainability Act) and best practices to address those challenges;
 - Situate SSI watershed strategic plan in the context of other plans and initiatives (CRD/NSSWD Integrated Water Management Service Review, IT Freshwater Sustainability Strategy, IT Strategic Plan, SSI OCP, SSI Area Farm Plan, SSI CAP 2.0; Islands Trust Conservancy Regional Conservation Plan)
 - Apply a methodology that can be reproduced across the Southern Gulf Islands and/or Islands Trust Area

Work Plan Overview

Deliverable/Milestone	Date
LTC endorse project charter and direct staff to proceed with procurement	March May 25, 2021
Procurement process	TBDSeptember 2021
Situation Analysis and Option Identification Process	TBDOctober 2021 to January 2022
Situation Analysis and Option Identification report received	November 9February, 202 <u>2</u> 1
Strategic Plan development	TBDMarch 2022 to August 2022
Final Deliverables received	March 31, September 2022

Project Team		Budget			
	Jason Youmans	Project Manager	Salt Spring	g Island Water Sustainability Top Prior	ity Project
	Shannon Cowan	Project Coordination	Fiscal	Item	Cost

William Shulba	Technical Support	2 <u>1</u> 1/2 <u>2</u> 2	Consulting Services	\$ 50 15,000
Lisa Wilcox	First Nations Support	21/22	FN Engagement	<u>\$2,500</u>
Rob Pingle	Administrative Support	21/22	<u>Total</u>	<u>\$17,500</u>
Director Approval:	LTC Endorsement:	22/23	Consulting Services	\$35,000
Date: DD, MM, YYYY	Resolution #: SS-2021-98 Date: 25, 05, 2021	22/23	FN Engagement	<u>\$5,900</u>
		2 <u>2</u> 1/2 <u>3</u> 2	Total	\$ 50 40, 000 90
				<u>o</u>

September 14, 2021

Salt Spring Island Watershed Stewardship and Protection Strategic Plan

First Nations Engagement Strategy

With the assistance of Islands Trust Senior Intergovernmental Policy Advisor, staff intend to implement a First Nations engagement strategy building on the work done as part of the greater Islands Trust Freshwater Sustainability Strategy. This work will occur in two streams:

- At the community level, engage with Cultural Knowledge Holders and Elders to gain a greater understanding of the cultural significance, oral history, and Indigenous ways of knowing related to the watersheds of the Salish Sea Basin - specifically Salt Spring Island - and the stewardship of the lands and waters of the watershed; and
- At the governmental-to-government level, engaging First Nations staff or representatives of the First Nations that have treaty or territorial rights and title in and around Salt Spring Island.

Islands Trust staff have used the engagement model described above in other projects, with successful results and, depending on capacity, may hire a consultant to facilitate the watershed planning process and event management involving First Nations community engagement with Elders, Cultural Knowledge Holders, and/or youth. This draft strategy has been assembled for the purpose of fiscal 2022/23 budgeting.

Cultural Learning

- 1) Staff and/or a consultant will familiarize themselves with relevant documents related to Indigenous perspectives on watersheds and freshwater, including, but not limited to, relevant articles from the UN Declaration on the Rights of Indigenous People; Assembly of First Nations National Watershed Protection Strategy; First Nations Fishery Council Protecting Water Our Way; Indigenous Water Governance in Canada: Annotated Bibliography; Indigenous Watershed Initiatives and Co-Governance Arrangements: A British Columbia Systematic Review. As well, any consultants hired to this project will familiarize themselves with Islands Trust reconciliation work and principles.
- 2) Staff and/or a consultant will review the recordings, meetings notes, and final outcomes of the Indigenous engagement framework used in the Islands Trust Freshwater Sustainability Strategy.
- 3) Staff and/or a consultant will seek information interviews with Indigenous Cultural Knowledge Holders with specific knowledge of Salt Spring Island and ensure that plan development incorporates and is informed by the engagement. Staff will return to those knowledge holders to determine whether their perspectives have been accurately captured.

Engagement with Nations with Treaty and Territorial Interests

 Staff will advise First Nations of the LTC's plan to begin the watershed planning process and seek guidance from First Nations on Indigenous Cultural Knowledge Holders or community members they would like to put forward to assist. 2) Staff will share any draft documents with WSANEC Leadership Council and First Nations with treaty and territorial areas within Salt Spring Island for their review and feedback. Staff will incorporate feedback received via these two bodies.

Anticipated Budget

Activity	Cost
Indigenous Cultural Knowledge	\$4,000
Holder engagement	
WSANEC Leadership Council	\$1,700
engagement	
Individual First Nations	\$2,700
engagement eg: Penelakut,	
Halalt, Malahat, Cowichan,	
BOKEĆEN,	
Total	\$8,400

Funding Sources

First Nations engagement in the development of the Salt Spring Island Watershed Stewardship and Protection Strategic will be funded through unspent special property tax requisition funds accumulated over previous fiscal years. This is the same account from which development of the greater plan is being funded.

While the necessary funds are available in the unspent special property tax requisition reserve, staff will seek grant opportunities as appropriate to offset costs to the SS LTC, or expand the scope of the engagement program if feasible.



Budget Funding Request Short-Form Business Case

Completion of this form initiates a request to the management team for allocation of budget funds. The form is to be completed and submitted at the start of the decision making process. The business case forms part of the Annual Budget Process (refer to Islands Trust Council Budget Process Policy 6.3.i).

TO BE COMPLETED BY INITIATOR		
Initiated by: Jason Youmans, Island Planner (on behalf of Salt Spring Island Local Trust Committee) Business Area: Local Planning Services Name of Request: Salt Spring Island Watershed Stewardship and Protection Strategic Plan	Budget Source (select all that apply): Specific Project Funding Third Party Contractors Staff Travel Expense Staff Overtime Expense New Staff Member Computer Hardware/Software Furniture & Equipment Computer Hardware/Software New Staff Resources (see Staff Costing Tool) Permanent Temporary Temp Duration: Other – please describe: Honoraria for speakers/First Nations for ongoing meetings and participation, minute-taking, technology support, mapping, facility rental, open house meetings and materials, posting of meeting, ads, and	
Date initiated: October 5, 2021 Resolution SS-2021-0XX	Date required: April 1, 2022	
To be included once resolution is passed.		

BACKGROUND:

At its meeting of May 25, 2021, the Salt Spring Island Local Trust Committee (SS LTC) endorsed a project charter to undertake a Salt Spring Island Watershed Stewardship and Protection Strategic Plan. The anticipated project budget of \$50,000 would be funded from the SS LTC's unspent special property tax requisition funds accumulated over several fiscal years.

Work on the watershed plan project is now several months behind the initial schedule, and as such it is anticipated that the bulk of project spending will now occur in fiscal 2022/23.

Only \$15,000 of the \$50,000 requested for fiscal 2021/22 will likely be spent within the current fiscal year. That leaves \$35,000 of project spending to take place in fiscal 2022/23 instead.

The purpose of this business case is to ensure that the needed funds will be available in the 2022/23 budget.

This business case also includes an additional \$5,900 to be spent in fiscal 2022/23 on First Nations engagement related to this project that was not included in the original project charter. The SS LTC will consider an amended project charter that includes this enhanced First Nations engagement at its meeting of October 5, 2021.

Therefore, the total amount that SS LTC is seeking for inclusion in the 2022/23 budget is \$40,900.

In summary:

Current Fiscal 2021/22

- \$10,000: Phase 1 Situation Analysis and Options Identification Report
- \$5,000: Phase 2 Preliminary work on Salt Spring Island Watershed Stewardship and Protection Strategic Plan
- \$2,500: Initial First Nations engagement

Total: \$17,500

Next Fiscal 2022/23

- \$35,000: Salt Spring Island Watershed Stewardship and Protection Strategic Plan (main work)
- \$5,900: First Nations Engagement

Total: \$40,900

PROBLEM STATEMENT/OBJECTIVES:

In 2013, Islands Trust Council adopted <u>Bylaw No. 154</u>, which delegates authority to the Salt Spring Island Local Trust Committee – for the purpose of preserving and protecting the quality and quantity of water resources within the Salt Spring Island Local Trust Area – the power to:

- Coordinate and assist in the determination of regional, improvement district and government of British Columbia policies;
- Coordinate the implementation of regional, improvement district and government of British Columbia policies; and
- Coordinate the carrying out of regional, improvement district and government of British Columbia policies

To date, the SS LTC has used this delegated authority to fund and coordinate the <u>Salt Spring Island Watershed Protection Alliance</u> (SSIWPA). SSIWPA's current terms of reference and membership is available <u>here</u>. Since its inception, SSIWPA has tried to advance understanding, agency cooperation, and community engagement in watershed issues. SSIWPA steering committee undertakes an annual work planning exercise to identify water issues of concern to SSIWPA's membership and wider community in the hope that member agencies will undertake projects to address the issues raised. SSIWPA's current work plan with agency leads is available here.

Despite SSIWPA's work over the years, a longer-range multi-agency plan for watershed stewardship and protection on SSI has not been widely adopted and implemented.

The SS LTC has decided that now is an appropriate time to review SSIWPA's strengths and weaknesses as a coordinating vehicle for watershed stewardship and protection on Salt Spring Island, how it can be strengthened, or alternatives to it.

The SS LTC has also decided to fund the development of a Watershed Stewardship and Protection Strategic Plan that will serve to guide the actions of all parties with a mandate for, or interest in, freshwater sustainability on Salt Spring Island.

The project charter for this initiative identifies two project objectives:

- 1) Improve the coordination of watershed stewardship and protection policy on Salt Spring Island through:
 - a) An external review of current approaches to coordination of watershed stewardship and protection policy; and;
 - b) Analysis of, and recommendations for, the types of planning processes, policy/guidance documents, or mechanisms that will improve watershed stewardship and protection.
- 2) To better support Salt Spring Island Watershed Protection Alliance member agencies (SSIWPA) in coordinating and advancing effective, equitable, and modernized land and water use planning by developing a strategic plan to guide and prioritize watershed protection work on Salt Spring Island for the next 5 to 10 years.

PROJECTED RESULTS/DELIVERABLES:

Phase 1 (fiscal 2021/22): Situation Analysis and Options Identification Report

Phase 2 (fiscal 2022/23): Watershed Stewardship and Protection Strategic Plan

ALTERNATIVES CONSIDERED:

\$35,000 for Watershed Plan Consultant

No alternatives considered to the primary watershed planning consultant contract. The purpose of this business case is simply to document that what was originally supposed to be \$50,000 spent in fiscal 2021/22 will now be \$15,000 in 2021/22 and \$35,000 in 2022/23.

Additional \$5,900 for First Nations engagement in fiscal 2022/23

Islands Trust Senior Intergovernmental Policy Advisor says that additional funds are advised so Islands Trust can transcend the "document referral" model of First Nations engagement and work toward the active involvement of Indigenous people in relevant projects and relationship-building activities in the Islands Trust area. See First Nations engagement plan included in staff report of October 5, 2021.

Alternative approaches to undertaking First Nations engagement includes:

1) Principal project consultant undertakes First Nations engagement within existing \$50,000 contract

The consultant undertaking development of the watershed plan could lead this work, and the RFP under which their contract will be secured suggested that they could. However, in order to give this matter the weight that it is due and the budget necessary to do it meaningfully, staff recommend that this be a separate funded item within the larger project.

2) Staff undertake First Nations engagement with no extra budget

Staff can undertake conventional referral-based engagement with area First Nation governments. However, given the cultural importance of freshwater to Indigenous people of the area the Senior Intergovernmental Policy Advisor says this would be an insufficient approach. Certain organizations, such as the WSANEC Leadership Council, require capacity funding in order to review documents.

CRITICAL SUCCESS FACTORS (List):

- Agency buy-in/cooperation in the development and subsequent implementation of the watershed stewardship and protection strategic plan
- Meaningful First Nations engagement

CHANGE MANAGEMENT/COMMUNICATIONS/COLLABORATION:

The Salt Spring Island Watershed Protection Alliance (SSIWPA) – a table of agencies and organizations with an interest in freshwater on the island – will be the vehicle through which the watershed plan is developed. It is inherently collaborative.

BENEFIT/COST ANALYSIS SUMMARY:

Spending on this project was part of the fiscal 2021/22 budget as directed by the SS LTC.

The additional \$8,400 in funding recommended for First Nations engagement across fiscal 21/22 and 22/23 will help ensure that Islands Trust meets its commitments to reconciliation.

RECOMMENDED DECISION:

That Islands Trust Financial Planning Committee include \$40,900 in the Islands Trust 2022/23 budget to complete the Salt Spring Island Watershed Stewardship and Protection Strategic Plan and this money come from the Salt Spring Island Local Trust Committee's unspent special property tax requisition funds.

PURCHASING PROCEDURE:

An RFP for this consulting work was posted at BC Bid, on the <u>Islands Trust website</u>, civicinfo.bc.ca and circulated to contacts from September 10, 2021 to October 8, 2021.

Jason Youmans, Island Planner Initiator:	September 23, 2021 Date	
Director/CAO	Date	
REVIEWED BY MANAGEMENT TEAM:		
Date received:	Approved: X YES NO	
 the funding for the reques reviewed by FPC in Octobe If not approved by management: 	orwarded to FPC for review in October of each year. It will be included in Draft 1, Version 1 of the budget which is It of each year, and the business case forwarded to FPC. In orwarded to FPC for information in October of each year.	