

Sent: Wednesday, April 28, 2010 11:19 AM  
To: Living Water Smart ENV:EX  
Subject: Water Act Modernization Discussion Paper Feedback

Below is the result of your feedback form. It was submitted by  
( ) on 2010 04 28, at 11:19:09

-----

FirstName: Marg

LastName: Evans

Organization: Cariboo Chilcotin Conservation Society

Address: Unit 102 197 2nd Ave North

City: Williams Lake

Province: B.C.

PostalCode: V2G 1Z5

Email: ccentre@cccconserv.org

ContactMethod: Email

Principles\_Support: Disagree

Principles\_Comments: Maintain the current governance model,  
but give due diligence to the monitoring and enforcement of :

- o Water rights and stream impacts of the often numerous water rights on a stream (in our region many of the streams have over 40 water users, with no evidence of review or enforcement on infractions of overuse/misuse). In these times of climate change and low water levels, this is decimating for fish populations (many have salmonids wintering and spawning). The Government has said they will respond to concerns (see website) within a time period, which is often three years behind their scheduled date of response. What is needed is an integrated approach to watershed protection.

- o Watershed protection- from industry and resource users/extraction. Several cases: EPCOR in Williams Lake using a large percentage (over 25% of City water). The hosing of creosote logs on the EPCOR site became a huge concern, with rain and snow melt running through huge piles of creosote chips into local streams and groundwater. The Prosperity Mine proposed in the Fish Lake area of the Cariboo region (Chilcotin), plans to drain Fish lake and several other smaller water bodies. The impacts of this on that watershed, as well as First Nations social and cultural practices in the area are being well documented by the Review Panel, and if the mines proposal goes ahead will be a serious lack of consideration in these areas.

- o Funding to implement changes- if this is a sincere wish, then why is the Provincial government cutting environmental funding (through Gaming funds) to the Environment Category â groups who currently act as stewards of the many

watersheds in the province? If you wish to collaborate with community groups working on water issues, a good way to do this is to assure they are able to maintain core funding to continue to support and educate on the conservation of water and the protection of streams and groundwater. Also, the cut backs of staff/ funding to the Ministry of Environment and Ministry of Forests, especially in areas that help to protect watersheds--example the recent severe reduction in hydrologists in the province, does not seem to be in line with the Governments new goals!

- o Legislation is needed to protect our watersheds from resource extraction activities, including many proposed Independent Power Projects.

- o Water needs to be recognized as a human right, collectively owned and governed by all.

- o Traditional knowledge, collaborative history and science would be used in all decisions regarding allocation. Funding support to those partaking (if in a voluntary capacity) should be provided.

We need an on-going discussion on water and watershed protection, at all levels of government and within communities province wide. Shared problems and solutions (previously successful, planned or projected) need to be a part of a continuing conversation in order to assure we all have adequate, clean water for the future.

Goal1\_Support: Support

EnviroFlow: Standards

WaterAllocationPlan: Required

DecisionMaker: Must Follow

DumpingProhibition: Amend

DumpingProhibition\_Comments: Include in this monitoring and enforcement of this act. If we do not do this, the change makes no difference.

Goal2\_Support: Disagree

Goal2\_Comments: If governance is flexible regarding 'future needs and values' but does not consider the long-term impacts on watersheds in this process (as in some current mining proposals in BC), this could have potentially very negative long term watershed impacts.

If management is coordinated with neighbouring jurisdictions- across all levels- does this mean provincial - international? And does 'those with a major interest in the watershed' include the industries that need large amounts of water to operate?

Goal2\_Options: Delegated

Accountability: Assuring provincial hydrologists and ecosystems related staff are hired in adequate numbers to assess the situations, use proven science and be in important positions regarding the decision making process.

BenefitsOfSharedRoles: Obviously those who live closest to the water source (within the watershed) will gain the most from well managed watersheds, and tend to be the best stewards. Those with little financial gain, but working for the health of the watershed would be the important players in stewardship.

Goal3\_Support: Neutral

Goal3\_Comments: Yes it is vital that water users conserve water during drought or when stream health is threatened. However, what if when conflicts happen regarding industries who use water 'as a natural resource' in their production stages, and cannot function without it in certain volumes. Are the new objectives going to allow industry to continue their current volume of intake during drought, or when stream health is threatened (as in Williams Lake, with the Energy Plant burning chipped creosote rail ties, left in huge piles along the WL River Valley to leech into the ground and even larger piles of ash, deposited again above the WL River? We did not find management/government able to respond to any of these concerns of contamination, everyone stating it wasn't their area of responsibility.

WaterUseEfficiency\_1: Government determines actual needs

AdminEfficiencyOptions\_PermittedUse: Permitted use consistent

AdministrativeEfficiency\_Comments: Again, this will work only if the province hires staff to manage and enforce the permitted uses.

PermittedUseConsiderations: The water should be protected, with a focus on maintaining sustainable supplies- why would we protect 'permitted use status' over this?

AdminEfficiencyOptions\_WaterUse: Report well levels

Flexibility\_Support: Strongly Disagree

Flexibility\_Comments: I strongly disagree to -'use water for a higher economic purpose', since water is life, what economic purpose could outway that? We need education on how to irrigate with systems that waste less water in the process. Whenever there is a shared system and individuals are sharing with a larger 'business', the balance is rarely in favour of the individuals. The majority of adverse impacts on aquifers or groundwater in our area is coming from industrial use.

WaterAllocationSystem\_Comments: The other option is to find out how those First users are using the water, gauge if there are too many users on a stream/aquifer, and monitor use (again, you need MOE MOF MOAg staff monitoring skills and knowledge here.

WaterScarcityTemporary\_Options: Sharing

WaterScarcityTemporary\_Comments: Again, how is this going to be enforced?

WaterScarcityPermanent\_Options: Through a mandatory Water Management Planning process

WaterScarcityPermanent\_Comments: Will there be funding provided for those involved in this process?

Goal4\_Support: Support

PriorityAreas\_Options: Combine priority areas

AtRiskWatershedCriteria: Any watershed where the health of the many species (plant and animal) are threatened.

AffectOnCommunity: Our community is affected by heavy industrial use of a dwindling aquifer, management and enforcement is urgently needed. Groundwater concerns have been neglected within our community for a long time.

Improve\_InterestsTakenIntoAccount: Consult with local environmental organizations, as well as Ministry staff in the region for an honest view of where our watershed is in crisis.

KindsOfCollaborativeProcesses: Again, consult with local environmental organizations, as well as Ministry staff in the region for an honest view of where our watershed is in crisis.

AdequatelyEquipFutureGenerations: Only if government is able to say no to industrial development that will harm our watersheds.