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**Sent:** Monday, February 21, 2011 3:48 PM  
**To:** Living Water Smart ENV:EX  
**Cc:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Subject:** City of Chilliwack Comment - Water Act Modernization

The City of Chilliwack's comments on the Water Act Modernization are as follows::

1. As a general basis the Water Act Modernization process is heading in the right direction. A process for equitable management of water resources in BC is required. There are some implementation issues that have to be addressed.
2. Water reserves for agriculture are identified with little explanation. It is true that agricultural land will be of little value without a water supply but municipalities can have their growth curtailed if they do not have access to water as well. Water allocations for both should recognise historic rights but also take the best interests of the province into account.
3. Water conservation is a critical element of the process. Whether through regulation, economic incentives, or both the efficient use of water should be a priority. This applies to agriculture as well as municipal uses. There are many water saving investments that agricultural users can employ and the allocation process should recognize and reward the users that are making the best use of their water.
4. Allocation of water allotments will require investigation of required stream flows, ecological assessment, and detailed groundwater mapping. All of these investigations will be costly. Will the last user on the chain be expected to pay for the investigation or will there be a cost sharing between users or provincial funding?
5. Evaluation of the complex issues will require significant expertise. In addition, water resource catchments typically cross municipal and even regional district boundaries. As a result, while local input into the decision making is highly desirable, regulation and enforcement will have to be a provincial responsibility.
6. Finally, data collection is a critical element of the program. Stream flows and quality can only be established after many years of records are collected. Then hydrometric network has been shrinking but for the program to have any validity the network should be expanded and properly maintained.

Sincerely,

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