

Nov 14, 2013

Water Sustainability Act
Ministry of Environment
Water Protection and Sustainability Branch
PO Box 9362, Stn Prov Govt.
Victoria BC V8W 9M2

Dear Minister Polak and Ministry Staff,

I appreciate the minister of environment's letter requesting input into the water sustainability proposal. The water act needs updating and this document is a bold initiative towards protecting the environment from impacts of excessive water extraction and lack of water preservation. The following outlines some of my suggestions for consideration to enhance the current WSA proposal.

One of the three key components of the WSA proposal is to keep BC's water and aquatic ecosystems healthy. The item that seems to be missing in the WSA proposal is the mention of the serious consequences of groundwater contamination as well as referring to penalties for large contaminators of groundwater. Penalties for the contamination of water, both ground and surface, should be mentioned directly in the Water Sustainability Act as opposed to the Environmental Management Act if the government is serious in the acts ability to maintain healthy ecosystems. We are all aware that oil, gas and mining corporations are deriving billions in profits for resource extraction so penalties for groundwater contamination must be set at a fee that is much more than just a cost of doing business. We should all be concerned that fracking has the potential to pollute groundwater and responsible government procedure should provide proper overview and adjacent aquifer testing to ensure proper practices are followed and to minimize damage where contamination occurs.

Another issue I have with the proposal is the reference to the exemption of saline water extraction from usage fees. The suggested exemption does not take into account the dangers of large extraction of groundwater, and may be viewed as an initiative to assist large business in avoiding paying government fees. Science has documented that large volume producing wells, whether fresh or saline, can cause saline infiltration of freshwater. The incentive for corporations to avoid water fees by deep drilling of saline water may actually contaminate more subsurface freshwater than the volume of saline water used. Under that train of thought, saline water use could very well do more damage than contaminating freshwater mixed with chemicals for the purpose of oil and gas extraction. It defies logic to supply large corporations with a fee exemption for using saline water when there is a significant chance that the extraction may very well be contaminating groundwater. Contaminating freshwater for mining/oil& gas, or the use of subsurface saline water should garner the most expensive fees under the WSA as water can't be reintroduced back into the ecosystem and is essentially terminated at that point.

The WSA proposal establishes public meetings where large applications for water licences occur. Regional districts seem to be one of the players in organizing the public meetings. The problem is that there is no funding source for this process. Hopefully the provincial government is considering

contributing a portion of the extra funds garnered from the water fees to local government to offset the extra costs incurred.

I thank you for the opportunity to supply input to assist ministry staff and committees crafting this very important act and wish you all the best in your efforts.

Sincerely,

Personal Identifiers Removed

Rivers and the Peaks
TNRD

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 cc
CLIFF#

Cowichan Watershed
+ Renfrew Estuary
V9L1R3

13th Nov. 2013

No. 0803 P. 2

To those responsible
for governing British Columbia.

Concerning a New Water Sustainability
for B.C.

As a Voter who has lived on
Vancouver Island since 1968, and as a
steward and conserver all these years
I urge you to implement the following:-

1. Local watershed management, and
ensure river and stream restoration
by logging and mining corporations
2. Respect First Nations Rights and Title
to their lands and the teachings of
the elders.
3. Enforcement and protection needs
to be carried out.

Yours,
another grandmother,

Personal Identifiers Removed

Personal Identifiers Removed

cc to all concerned and involved

Nov. 13. 2013 11:49AM

Nov. 13, 2013

Minister Mary Polack, Environment

Re. B.C.'s new water sustainability act

It must - respect our First Nations Rights and title

- Fund local watershed management by making corporations who do bulk with draws pay suitable amounts
- Detail the ability of local bodies like our Cowichan Watershed Board to have real decision making authority
- Mandate clear, enforceable standards of protection of minimum stream flows as well as protection from pollution
- Don't let oil & gas industry off the hook.

Thank you

CC. MLA Bill Routley

CC Premier Christi Clark

CC MLA Spencer Chandra-Perbert

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Duncan

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 MINISTRY OF ENVIRONMENT

NOV 13 2013

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No. 0803 P. 1

Nov. 13. 2013 11:48AM



October 29, 2013

Personal Identifiers Removed

The Honourable Mary Polak
Minister of Environment British Columbia
Legislative Buildings
P.O.Box 9362 Stn Prov Govt
Victoria, B.C. V8W 9M2

Subject: Legislative Proposal - Water Sustainability Act

Dear Ms Polak:

The following are my comments and input with respect to the proposed changes to the Water Act as the proposed Water Sustainability Act.

1. The current proposal entails a massive overhaul of the existing Water Act and changes are necessary in an always changing world.

Times and what used to happen in our waterways are a thing of the past when one remembers when the pulp and paper industry could discharge their effluent directly into the river or ocean until the alarm bells about the carcinogen dioxins put that to an end.

2. The use of groundwater is an important source for domestic, agriculture and industry. Some areas have prolific aquifers depending on the underlying strata. In other areas groundwater can be found in limited supply even in bedrock.

3. Water on this planet covers three quarters of the surface in oceans and fresh water represents a small fraction. Nevertheless, nature in varying degrees distributes water to all parts of our province in the form of rain or snow. The cycle of course is called **evapotranspiration**. There will be periods of drought even in normally high precipitation regions. The unpredictability of nature is a normal process.

4. Climate change may be influenced by mankind in our present times but one thing is certain. Our planet has always experienced climate change whether we believe we are now the cause. Climate change is a very complex phenomenon.

5. The single largest demand on our water resources is massive urban development. We all depend on water 24/7 , 365 days a year. Proper planning which entails mitigating water supply resources before development begins is the real issue. Not wholesale overhaul of the water act. Groundwater and implementation of water licences for same as it implies to urban development makes sense. Including existing users of groundwater to remedy the obvious is really a tax grab.

6. **No caveats!** When existing wells are exempt should mean exactly that - EXEMPT. The clause under "Transitioning existing groundwater users" which states: (page 37)

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Subject: Legislative Proposal - Water Sustainability Act(continued)

Where an area-based regulation or a Water-Sustainability Plan requires all groundwater users to obtain a licence (ie, users are no longer exempt from licensing) it is expected that regulations would also describe the transition period and process for obtaining licences.

I can only add this is under-handed politics I would only expect from the NDP.

7. When are we going to quit this apartheid act dealing with our native Indians. Are they really going to licence their wells and monitor them according to what the WSA proposes for groundwater. Really?

I've lived in this province all my life and have native Indian friends but todays generation know they are in charge thanks to our 1982 Constitution and the Delgamuukw decision. Half the reservations in Canada are right here in B.C.

8. FITFIR should remain as it always has.

9. **I believe the Water Act should have amendments added to it**, not a whole new WSA which at the end of the day will add more layers of bureaucracy and bureaucracy which we need like the proverbial hole in the head.

Personal Identifiers Removed

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 2:31 PM

Hello,

It is timely to be reviewing The Water Sustainability Act. As we move into this new era of global warming with the current populations of the world, water is increasingly important to be protecting.

We are privileged to live in a country which has access to many fine potable water sources. We need legislation with teeth to protect this resource and we need the research capabilities to determine the changing needs of safeguarding our water sources in conjunction with the changing needs of industry, wilderness, agriculture, fish habitat, cities, municipalities and rural community requirements. Every living body should have the right to clean potable water. New and old water licenses need to be reviewed to determine the current effects the licenses are having or will have on the ecosystems and environments of people, plants and animals.

We need more than guidelines for our resource industries. We need to ensure security in our water systems in order to plan communities, farmland, spawning streams along with the needs of industry.

I am living in a community whose watershed has recently been affected with heavy metals. Since 2007 there has been concern among the health officers that monitor the situation. We are and have been an industrial island subject to mining and logging for over a century. Industry has supplied good employment for the people and the ability to build infrastructure to support the community. The contamination is within the watershed that supplies our school. Children are not small adults. They process the chemistry in their environment many times more quickly than the adult body. This is an important and difficult issue for our community.

The source of contamination may be old or current mining. The mining company will not allow the District to enter their land to test and find the source of contamination. Recent mining activities have clear cut large swaths in the landscape and put in new settling ponds. Both of these activities may be contributing to the problem. Recent logging within the watershed allowed on crown land by our Forestry Industry guidelines may also have affected the ability of the watershed to detoxify itself. Or the problem may be from old activities one or two of the many gold mining operations that were active here. The point is, there has not been the collaboration between industry, government health officials and the community water board that could have resolved this problem and no legislation in place to help them do so. It is now 6 years later...

It would be nice to have in place in the New Water Sustainability Act a way of addressing and resolving problems such as this. The people need some way of protecting this resource so

crucial to our health and well being and to life itself.

Please give this new legislation some teeth and some way of addressing older outstanding licenses. We need industry for jobs and economic health, environment for physical health, and good governance to get us there.

Thank you for your time and attention.

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Texada Island BC

Personal Identifiers Removed

Subject: Draft New Water Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 11:48 PM

Dear Sirs/Madams:

I enclose my comments on the current version of the Water Act. My two general themes are 1) you have not dealt adequately with the reality of First Nations, and that much of the water in NE B.C. is in their un-ceded treaty areas; hence they have every right to claim to at least equal partnership with the province to manage and plan for the waters in their area; 2) you have not dealt adequately with how you intend to handle environmental impact assessments for the big water removals owing to industrial development. A case in point is the shale gas fracking that has already gone on, with huge volumes of water taken from surface and groundwaters, and undoubtedly (to be studied and documented) some leakage of chemically polluted fracking water into surface water or into close-to-surface aquifers.

Below you will find my comments:

Comments on the new Water Act

“The most respected scientists in Canada believe that as a result of overuse, poor management and increasing climate changes, we are in, or are nearing, a massive water crisis.”(Phare 2009, p.23)

Recent cautions by the Canada West Foundation regarding shale gas and LNG should be accompanied by additional serious concerns about the environmental and cultural impacts that will be wreaked on as yet unsullied habitats in northern B.C. It is not at all clear if there will be an environmental impact assessment of the shale gas/ fracking operations in northern B.C. Fracking is a technique in which the wellbore is directed downward and then turned horizontally to follow a gas-bearing stratum, shale in the case of northern B.C. Often, small explosives are moved into the horizontal section, and set off to create cracks in the rock. Water mixed with sand and a variety of chemicals, many toxic to life, is injected at high pressure, and fluids such as simple hydrocarbons (including methane), petroleum, uranium-bearing solution, and brine water may then migrate to the well and surface.

There are numerous potential impacts of fracking – depletion of freshwater; contamination of groundwater; escape of greenhouse and other gases; noise; migration of gases and fracturing chemicals to the surface; surface contamination from spills and flow-back; and health effects on humans and ecosystems. Huge volumes of freshwater are used in fracking, about 1 million to 10 million litres of water(or more) for each drilling well. There is particular concern by First Nations about lowering water tables, and reducing fish and animal populations. Because gas extraction

entails a dense network of wells, roads, burrow pits, transmission lines, and pipelines, the landscape is greatly modified, giving concerns about limitations to land after-uses. Already several hundred oil well pads have been established in the Fort Nelson First Nations territory.

The Fort Nelson First Nation has been frustrated dealing with the government and the gas industry in the Horn River Basin over the last 5 years. The band will not grant any more water permits, especially the long-term, 40-year ones, until five conditions are met: 1) multi-year development plans filed in advance to identify proposed water sources, gas-well sites, roads and camps; 2) environmental plans that cap water withdrawals at ecologically acceptable levels; 3) mutually agreed to cumulative effects; 4) protection of culturally significant land and water resources, 5) an agreement that monitoring and enforcement will be done by an independent body. First Nations and all citizens should be concerned about the high number of LNG plants that are being proposed, which would translate into rapid gas extraction with huge increases of freshwater use and impacts on the land, wildlife, ecosystems, and indigenous and non-indigenous populations.

For the above reasons, and because the new thrust of the shale gas/LNG industry will establish an infrastructure and long-term program of gas extraction, there should be at the outset some reasonable caps on rates of production, and strict regulations and guidelines to minimize water use, water pollution and greenhouse gas liberation, and to protect the, ecosystems, wildlife and potential for continuing sustainable land-uses after the gas companies are finished.

The most important group of people to be consulted in the development of the gas fracking in northern B.C. must be the First Nations. A summary of the complex legal and ethical questions around water rights in Canada the US has been given in Denying the source: the crisis of First Nations water rights (Phare 2009). "A common viewpoint provided by all provinces that are subject to land cession treaties with Indigenous Peoples is that water rights were given up when treaties addressing land were negotiated. Yet, the treaties say nothing about this."(p.49). Given s. 35 of the Constitution Act, 1982 and Aboriginal rights legal decisions, all Canadian water law is limited by the pre-existence of Indigenous Peoples' water rights. A water rights discussion is needed to decide how to balance sets of rights against one another. "This will become an increasingly critical dialogue in times of water scarcity, when governments (federal, provincial, Indigenous) will have greater challenges making water choices that even come close to achieving a regional, economic, environmental, social and cultural balance.

"Our history has shown that when it comes to Indigenous Canadians, our governments consistently avoid fulfilling not only basic protections that all Canadians deserve, such as access to safe drinking water, but also those special obligations that the law has placed up them through the Constitution and court decisions, such as fiduciary duty and consultation responsibilities. Despite this, we must insist that this not occur again, and that Indigenous

Peoples' water needs and water rights will be ensured.”(p.62-63) The federal (and provincial) governments have avoided making contacts with First Nations, apparently not anxious or willing to come to meaningful and respectful dialogue. This lack of rapprochement is frustrating First Nations, and putting them more and more into an adversarial position to the one-sided energy thrusts of the governments.

The Indigenous Peoples have fundamental beliefs that are quite holistic and ecological in nature, and their legal and governance system are built on a spiritual foundation. All things on earth have spirit, and almost everything is seen as animate and thus possessing soul. All things have standing on their own, rocks, earth, living creatures, and water. Water is the life blood that runs through the stream-veins of Mother Earth. “The animus and interconnectedness of all things on earth are fundamental principles that require humans to engage in respectful relationships with all beings.”(p.72) “By contrast, European legal and governance traditions separate spirituality from law, people from the earth and its other inhabitants, and animate from inanimate.”(p.73) As an ecologist, considering the earth as a living system (Gaia Principle, Lovelace) I would prefer to place more confidence and hope for the proper and respectful treatment of the earth in the ethical and spiritual approach of Indigenous Peoples than in the non-ecological approaches of European-origin, peoples.

The Royal Commission on Aboriginal Peoples (RCAP) has already provided direction to us over a decade ago (1996). In 1987, the federal government created a federal water policy (one that recognized “native” interests in water and committed to negotiations) but it lies dormant, mostly forgotten or ignored by those responsible for its implementation. Indigenous Peoples' involvement in the development and articulation of this national vision is critical to achieving the mutuality suggested by the RCAP.”(Phare 2009, p.80) “Ralph Pentland, through the Polis Project on Ecological Governance, writes about the “public trust doctrine,” and its desirability as a doctrine to unite us to safeguard water. This idea has great merit being based upon the idea of governments have a fiduciary duty to all Canadians to ensure that they sustain the essence of our water resources for all human and non-human life. This doctrine could be a legally, culturally and spiritually unifying concept for all Canadians.”(Phare 2009, pp.80-81)

Is the B.C. Liberal government being accountable, trustworthy, and honorable regarding the First Nations? All indications are that they will push ahead with shale gas fracking without agreement from the First Nations. The FN have respectfully requested discussions with the federal government. The only action has been a proposed program of FN education created by Harper's government, which unfortunately did not consult FN and competes with the education program put forth by First Nations. First Nations have been taken advantage of in the natural gas development, and some, for instance those in the Fort Nelson area, are already regretting the agreements with an industry that is not living up to promises not to damage the

productivity of the land and not to impact adversely on the traditional hunting and fishing areas. A basic complaint is the taking of water and lowering of water levels in natural water bodies. The Band has put forward a statement of requirements for action that have not been followed as promised. What will happen with other Bands in the pathway of the development? The lands in the NE B.C. are Treaty 8 un-ceded reserves, and yet the government often gives license for the companies to operate without carefully formulated rules and guidelines, and well thought out environmental safeguards for the Bands, and mechanisms for compensation for damages to the land and water.

Conclusions

The government must conduct environmental impact assessments to address: 1) removal of natural waters from dugouts, lakes, streams, and aquifers; 2) leakage of the chemically-charged fracking waters, and leakage of methane gas; 3) land impacts -- drill pads and wells, burrow pits (over 2000 so far), roads on wildlife, and potential future agriculture/ranching; 4) respectful and open negotiations with First Nations, and fair agreements; 5) the impacts of pipelines; 6) the need for additional electricity to power the drilling operations, pumps, and LNG plants; 7) impacts of LNG tankers on fisheries, tourism, and potential accidents; 8) summarize the evidence the earthquakes are linked to fracking; and 9) impacts on greenhouse gases and global warming.

More hydroelectric dams or gas-powered power plants will be needed to increase the production of electricity for all these energy needs. It appears that the industry will push for the Site C dam, and other sources of energy such as gas power plants. What will the impacts be on carbon emissions, and how would these new power sources impact on the cost of electricity for existing homes and industries?

Literature Cited

Constitution Act, 1982, being Sched. B to Canada Act 1982, (U.K.), 1982, c. 11

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Govt of Canada. 1996. The report of the Royal Commission on Aboriginal Peoples (RCAP). Library of Parl., Ottawa.

Pentland, Ralph. 2009. Public trust doctrine – potential in Canadian water and environmental management. Polis Discussion Paper 09—03, Victoria, B.C., Univ. Victoria Polis Project on Ecological Governance.

Phare, Merrell-Ann S. 2009. Denying the source: the crisis of First Nations water rights. Rocky Mountain Books, Surrey, B.C., and Custer, WA

Personal Identifiers Removed, Ph.D., Professor Emeritus

Personal Identifiers Removed

Victoria, B.C

Personal Identifiers Removed

Subject: Water Sustainability Act, Ministry of Environment

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 11:22 PM

Water Act Proposal Remains Inadequate

The Act fails to define our watersheds and groundwater 'recharge' or catchment areas and protect them. For example in White Rock we draw from an Aquifer without knowing where the source is and we fail to consider any protection of the Aquifer. The proposal remains largely supportive of business as usual for industrial use, limits the ability for effective stewardship and is lacking in consideration for Indigenous Title and Rights as well as the public interest.

New Oil & Gas Use

A great deal of pressure will be placed on watersheds due to the dramatic increase oil and gas development in the region. While this industry needs far more regulation of their water use it is questionable to even consider Oil & Gas development as a beneficial use of water. There must be serious consideration given to whether licenses should be issued, particularly for shale gas fracking which has seen moratoriums imposed in many jurisdictions.

Saline Water Not Included in Groundwater Regulation

While groundwater regulation is included in the proposal, in addition to the FITFIR priority system proposed, there is concern about the exclusion of saline water. The proposal clearly acknowledges that there is an "assumed disconnection" of saline groundwater, shallower groundwater and surface water. Saline water use should not have a licensing exemption based on an assumption.

Does the Ministry of Environment have scientific evidence to prove this disconnection? Will they assess projects for these connections? It is unclear what the impacts of withdrawing saline groundwater from deep formations and although dependant on hydrogeology, a salt water intrusion of a freshwater aquifer and groundwater drawdown are key concerns.

This exemption appears to be an attempt to support the fracking industry that is very water intensive. By using the precautionary principle, even the possibility of impacts to potable water sources or other environmental impacts should be avoided.

We cannot meaningfully talk about water sustainability or Act to protect it as long as there is a failure to acknowledge that corporate rights have undermined human rights and that

investment protection mechanisms and free trade agreements have undermined rights of communities to say no to water destruction and polluting projects.

Maude Barlow in the Blue Future has stated four principles that should be guiding our Water Sustainability Act.

Water is a Human Right, Water is our Common Heritage, Water has rights(human laws and those of nature must be compatible) and Water can teach us how to live together; these are foundation principles that the water act should be written to uphold.

Personal Identifiers Removed

White Rock BC

Subject: Rewrite B.C.'s new water legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 11:20 PM

1. B.C. communities have to be protected from industrial users claiming they have the license to use the water of the watersheds as they feel fit to do so.
2. Prioritization for ecological needs has to be in the forefront. Prioritizing so called senior licenses have to be deleted in the new act.
3. Industries, whatever they claim in order to receive licenses will never feel as stewards of our watersheds and groundwater. These rights must be given to the Indigenous People and to the people in communities who are dependent on watersheds and groundwater.
4. Water is a human right. It means that every person has a right to clean and adequate water for drinking, sanitation and household use. Again communities have to have the stewardship over these rights. Industries have proven to use our water in excessive amounts to fulfill their needs for profit, regardless whether or not it would cause harm to the environment. To this day our B.C. government has paid very little or no attention to this fact. The B.C. government allows the enormous increase in oil and gas development without spending little thought on the permanent destruction of these watersheds. These industries can never be looked upon as being beneficial users of water. The B.C. government should very seriously consider whether a license should be granted to them in the first place. After the completed exploitation of one area the industries are allowed to move to the next location knowing full well that a clean up of the devastated area is not demanded by the B.C. government. The legislation of an all encompassing, strong Water Protection Act is urgently needed.

Personal Identifiers Removed

B.C.Vancouver

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 11:14 PM

Hi there:

As a property owner with a creek running through my property, I am very interested in the new act and how it can help to protect the creek and the wildlife and fish that use it, especially since there are many commercial farming operations in my area that may be polluting the creek already. Our property consists mainly of old growth cedar and plays host to fish, herons, coyotes, owls, raccoons, eagles, bears, deer and many other wildlife species. Surrounded by farmland our property and others along this creek form a small and unique ecosystem in our area that I am interested in preserving as a wildlife corridor.

Your documents mention advisory groups. I would be interested to know if those advisory groups would consist only of professionals, or if average concerned citizens such as myself would have the opportunity to serve on these advisory panels. How are these groups chosen and how can one apply?

Looking forward to hearing more.

Regards,

Personal Identifiers Removed

Personal Identifiers Removed, Spallumcheen

Subject: water act comment

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 11:12 PM

Thanks for opportunity to respond. For such a major Act, a little more time for groups and individuals to respond would have been appreciated!

Water must be protected for nature first. No exceptions for industry!

Provision for local groups and local governments to caretake and govern watersheds.

Public right to water must supercede that of private interests.

Water use licenses and fees need to be reviewed regularly. This process needs to be public.

Those are the top issues, ***Personal Identifiers Removed*** of Coombs, BC (French Creek watershed)

Subject: New Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:59 PM

Thank you for putting B.C.'s water supply in the hands of the public, where it belongs. I am writing because of my concern that the new water legislation does not address commercial users who profit from our water supply. Water is a public resource and all commercial and industrial users should pay a fee in order to withdraw groundwater for resale. My greatest concern is that there is no limit on water use. What happens in times of scarcity? The interest of the citizens of B.C. must be put before the interests of private corporations. Thank you.

Personal Identifiers Removed

Vancouver, B.C.

Subject: sustainability concern.....

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:18 PM

Move forward towards provincial water objectives and step it up for protection from oil and gas abuses. Forest "timber grabs" in peoples watersheds and the removal of Old Growth. Stop this imbalance, enough already! Water is one of the most important resources of all. Keep from ruining that which supports all life. It is time to nourish it, respect it, and alter the influences that are depleting it. The abuse is all around us! Take notice to use some care and attention to the lack of regard and sensibility that is being directed towards this irreclaimable resource.

Water is the connector.....What happens in one location is transported to other places by water. Water connects every part of the earth.

Time to assume the responsibilities that have been ignored. ***Personal Identifiers Removed***

Subject: protect our waters
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 9:59 PM

I have reviewed the proposal and wish to provide my comment regarding priorities.

The Legislative Proposal offers some good elements to BC's new Water Sustainability Act, however there are some serious omissions.

Environmental services must be recognized as a priority in the Water Act. Environmental flows are critical to healthy functioning watersheds and must be clearly prioritized over other non-essential human uses.

1: Inclusion of the Public Trust Doctrine:

The new act must contain a clause which imbeds the Public Trust Doctrine into the new legislation.
(PTD)

The PTD is required to protect ecological values, ensure water for future needs, engage the public and protect public interests. These features are an essential part of the effort to modernize the BC Water Act.

The PTD is essential to safeguard water and associated ecological resources from sale or impairment by government or through interferences by others that would shift control to private interests for primarily private purposes.

The PTD is a fundamental tool in achieving the goal of Living Water Smart in BC.

2: Improvement of the Water Allocation System

A new allocation system is required which will provide more specific information about the volume and impact of the use of the water.

The new Water Act must require cost recovery to provide monitoring, management, and enforcement, so that those who impact water quality or quantity contribute to the costs of protection to a degree appropriate to their impact or benefit.

3: Protection of Streams, Aquifers, and Aquatic Environments must be the top priority of any new Water Act

It is no longer acceptable to treat environmental flows as secondary priorities.

The government must also recognize and respect First Nations rights and title in all aspects of drafting and implementation of the new Water Sustainability Act

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Roberts Creek, BC

Personal Identifiers Removed

Subject: Water

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 9:16 PM

Dear Minister,

I am no specialist in water or natural resources management. I appreciate all the work towards clarifying facts gaining true information and updating legislation. However, I would like to add my two cents to this conversation pointing out something simple and well known but frequently ignored.

All the legislation in the world will mean nothing if us, individuals living e evolving on this beautiful planet, cannot commit to the small (and big, naturally) actions on an everyday basis. It is not enough to have legislation and a committed government. Everyone of us has to be aware, alert, present in the many ways we use water.

Water is precious and it is not enough to think Canada has lots of it. This is ONE planet and it is more than proven now that whatever happens locally will have an effect somewhere else.

Let's develop new habits and express in action our care.

Thank you,

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Salt Spring Island, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 8:58 PM

As many others have commented, I have to bring up the pricing of water. For commercial highly profit-driven enterprises such as mines and fracking operations, groundwater and surface water pricing needs to reflect the high profit margins they achieve. The proposed prices are much too low for a precious resource that is used in such high volumes. Additionally, pricing should incorporate the risk to the environment (terrestrial and aquatic), with riskier operations being charged more. Also specifically for the water-bottling industry, the prices should be more substantial than currently proposed, and reflect the high markup on the product and low amount of value-added.

My second comment refers to the key improvement area # 1 (protecting stream health). Small streams play an important role in overall watershed health. A seemingly small headwater stream becomes integrated into larger flows of the mainstem, and it provides important habitat for various life stages of animals. It is therefore important to consider environmental flows even in small streams. For the improvement: "Make sure Environmental Flow Needs are considered in new decisions on water allocation, except in very low-risk situations"--- How is "low-risk" going to be defined? Does it refer to the risk of habitat loss, loss of waste removal services... etc?

I am hopeful that this Act becomes implemented, monitored, and reported on. I will be following progress.

Regards,

Personal Identifiers Removed

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 8:23 PM

The news in 2009 that the BC Water Act would be reviewed with intent to modernize was positive. However, after an initial flurry of activity there was a deafening silence. Not totally surprising with a change of Premiers and then a Provincial election.

October 2013 saw the release of the large and pretty document introducing the proposed Water Sustainability Act. Aside from the now grossly overused term 'sustainability', especially by government the cover looked promising. What a disappointment! Seven years and all the citizens of BC are provided with are high level concepts and a bunch of new authoritative terms that have no substance or science behind them. To make matters worse government is now on a fast track to put all this into legislation. This is all very concerning, especially when juxtaposed against the current Premier's stampede to exploit ever fossil fuel and mineral resources as fast possible.

Seven years was more than enough time to have completed a review, create concepts, vet them and then draft sound and effective legislation and regulation. But too much time was filled with non productive activity. That potentially leaves us the citizens and the true owners of the Provincial water resources at risk of having new legislation imposed upon us that we do not support or agree with.

Water is too important a resource to be playing politics. The government needs to get serious and honest with the citizens. Issue a proper white paper that honestly shows what government is planning. Make sure it includes enough substance to allow meaningful review and input.

A few suggestions:

1. Commit to conducting a proper inventory on all surface and groundwater sources prior to their being exploited;
2. Commit to providing and funding qualified staff to inventory and oversee the use and management of the Province's water resources and give them the enforcement capability to protect the resource for the current and future generations;
3. Price the consumptive use of water properly. How is that an electric utility pays many times more for the privilege to use the energy of water to create electricity than a water seller? There is no consumption of water by the electric utility. But the water seller consumes water and in many circumstances exports the water to foreign countries making great profits (quite alright) while paying nothing to the Province. The currently proposed water levy is not only a joke Otis an affront to every British Columbian;

4. Define the concepts like Environmental Flow Needs, Critical Environmental Flows and others. Describe how they will be calculated. Define the thresholds so everyone understands. Define when constraints on use will be implemented including setting priority of use that generally looks like - domestic consumption for drinking and other human and environmental life sustaining requirements, food production, critical commercial and industrial use, commercial consumptive use, home use (e.g., gardens, lawns, etc.), golf courses, play fields, etc.

Commit to completing the meaningful engagement process with the citizens. Even if this means having to delay bringing forward the legislation until the autumn of 2014 or spring of 2015. Do it right the first time.

Personal Identifiers Removed

Maple Ridge, BC

Subject: Re: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 8:24 PM

Dear Ministry of Environment:

I can only write a small note due to health problems. But I think that standing up and saying that protection of our water is one of the most important things I can do in my life. Please do not let big multibillion dollar corporations take the precious life sustaining clean water we have here in BC away from us. I want the salmon to be protected and their "habitat". Recent Federal laws have taken that protection away, let us not follow in their footsteps.

I am writing this letter as a very concerned citizen of our city, province and country, I do not want to see the laws regarding water protection to change so damage can be done to our rivers, lakes and oceans.

Thank you for your attention to my letter and thoughts.

Sincerely,

Personal Identifiers Removed

Surrey BC

Personal Identifiers Removed

Subject: Improve the water governance act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 8:19 PM

I believe these points must to be included in the new legislation:

The new act must protect the public trust. Water is owned by the public and must be managed on the public's behalf. Private rights, including rights of corporations, must be subordinate to overall public interest, including future generations.

Give the public a voice. There must be a requirement of public notice and public participation in the decisions to grant water licenses.

Increase industrial water user fees. Be certain that these fees support environmental remediation rather than being absorbed into the province's general revenues.

Personal Identifiers Removed

Kimberley, BC

Personal Identifiers Removed

Subject: save our watersheds.

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent Wednesday, November 13, 2013 7:58 PM

We live in a beautiful pristine Province. Please protect our water. Nothing requiring air can live without clean water, it's a no brainer, we can't eat and drink money. Corporate greed will die when we have no clean water and all the money on the planet will not be able to provide clean water once we have contaminated our water. Please protect our water!

Personal Identifiers Removed

Subject: Water Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 7:53 PM

Honourable Mary Polak,
Minister of Environment

With the BC Government updating our 104 year old Water Act and seeking public feedback, I feel I also should share some of my thoughts.

BC has an abundance of freshwater, and since rain a common occurrence on the West Coast, we generally consider our water to be renewable. However, our water is renewable only if we take care to use our water responsibly.

Firstly, I feel every person in BC has a right to use our fresh water in a responsible fashion. In this regard, while water should be legislated at a provincial level, I believe those close to the water should be given stewardship of it. What I mean by this is that large provincial agencies, such as the Fraser Health Authority, with a limited focus agenda, should not be deciding how we use and/or treat our water. I feel municipalities and communities that have a vested interest in providing safe fresh water should be given more authority to protect this precious resource. I also think it is a travesty that our tap water and the bottled water we purchase is treated one way or another. If something is pure leave it pure, and don't demand expensive treatments based on some barely quantifiable risk. We take reasonable risks every day of lives, and these risks make us more cautious.

Secondly, water usage amounts and fees need to make sense. The amount of water a person or organization is allowed to draw from a given source should be no more than what can naturally be replaced. Water fees also need to be more balanced. It is laughable that an average Lower Mainland household spends more on water than large volume users, such as water bottling companies. \$.85/1000 cubic meters is ridiculously cheap. I'm currently researching the viability of producing bottled water. I've found the water fees so low that I ignore them from my financial calculations. I cannot think of another product that has a cost so near to zero. So while it may cost more to bottle water if the fees go up, I think it is a necessary step to create reasonable fee increases. The preservation of our water is more important than a quick buck. The BC government can set these fees to be revenue neutral, and use the funds for the administration and protection of our water.

Finally, the new water act should include better safeguards. Water licenses should be reviewed more frequently. As mentioned earlier, water use must be sustainable and renewable. Testing should be required to ensure that water use is in fact renewable. Existing licenses should not be given exemptions from new rules. I don't think the granting of new water licenses should be stopped; just implement safeguards requiring that water use be sustainable and renewable.

Updating the old Water Act is extremely important and must be done well. Thank you for giving me the opportunity to be part of this legislative process.

Sincerely, ***Personal Identifiers Removed***

Subject: WSA Response

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 6:06 PM

We must protect our ground water with legislation to all large users...a large user must be relative to the source and he must pay a reasonable fee for what he uses which will include a monitoring fee. Environmental Flows must be protected and have priority over industrial use. Public Education is needed to change the perception that water is abundant.

Land improvement must be described a stewardship not drainage as it now is. Water is a public trust - it does not belong to corporations and should not be treated as a resource to be sold/shipped/trucked away as it now is. Ground water levels are declining (eg. Langley/ Surrey and the Okanagan in dry years) and there are many problems in BC with water quality..arsenic in Langley well water and some northern wells have methane gas in the water. This is not healthy or normal. The WSA must protect our water or it will not be sustainable.

Personal Identifiers Removed

Penticton, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 6:20 PM

Thank you for soliciting input on the new legislation. I am pleased that the government is taking action but I believe that the legislation as proposed is inadequate. I urge that the government charge industrial water users the same rate that household consumers pay for water. No industries should be exempt from this--profit-making enterprises should not be subsidized by the province.

Furthermore, water should explicitly be made a public good, and rights given should be subject to revocation and to modification depending on the impact on the environment and the public.

The public should be allowed to comment on significant water governance questions and requests for new withdrawals.

Sincerely,

Personal Identifiers Removed

Vancouver ***Personal Identifiers Removed***

Subject: water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 6:13 PM

I feel that the price of water needs to increase. Especially for large industries that are exploiting large amounts and profiting over it. They contaminate and abuse our fresh water systems and It's not right. There needs to be consequences, and there needs to be a high price for doing so. You don't see local people abusing our water sources, so why should industries be allowed under the radar? we'll be soon facing increases in drought, lack of water for the environment and people. This is the time for change, and changing the water act is one step forward for making a sustainable future, but not if the people abusing out water sources are still allowed to do so for mere pennies when they're profiting millions. This needs to be addressed now and not later. Don't drag this out , fix the problem now. Think about the future generations, local people, the environment. Not industries. Think about the people in your life for once, and get it done now instead of having meetings l!

ater on debating issues and making a plan. Just get it done right, the first time.

Personal Identifiers Removed

Victoria, BC

Subject: new water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 5:23 PM

Water being a necessity of life, it's protection must be of paramount importance to anyone given the responsibility to write legislation on it's use. History will judge harshly those who can make a difference at this time because they have been entrusted with the responsibility of literally saving our world's gift of water to humanity. Although economic activity is important, government must take into account the fact that water is by nature part of the commons. Any use by industry must be strictly limited to serve the common good with a clear mission statement that water must benefit all people rather than private profits.

Personal Identifiers Removed

vancouver, BC

Subject: Water Sustainability Act -- comment

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 4:45 PM

Greetings,

I would like to provide comments on the proposed legislation to protect water in British Columbia.

I strongly support modernization of the Water Act. Priorities should include:

1. Mandatory provisions rather than discretionary; legislation rather than guidelines.
2. Enshrining the primacy of the public ownership of the resource over private rights to the resource.
3. Enshrining the principles of environmental protection as a priority.
4. Water permits or licenses should be granted by government and not tradable by licensees.
5. Water should not be allowed to be exported in bulk or as a commodity.
6. Water use required for environmental protection or public and domestic use should take priority over commercial or industrial use.
7. Licenses should be time-limited and revokable.

Regards,

Personal Identifiers Removed

Victoria, BC

Personal Identifiers Removed

p.s. I appreciate being given this opportunity for input on this important topic; however, it was rather difficult to discover how to give input. I was not able to find how to make a blog posting on the website, despite being invited to make such a posting.

Subject: WSA Comment
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 4:24 PM

Please consider these comments, which I offer as a concerned citizen. In general, I am disappointed with the proposed legislation. While it engages and touches upon critical issues, it fails to identify clear and reasonable standards and processes for achieving water sustainability. Here is what I want to see much more of in the next draft of the law:

1. Clear indication of the paramount importance of water and of the province's public trust duty to manage water resources for the benefit of all of the people of BC.
2. Clear definition of water sustainability coupled with clear processes for achieving water sustainability, clear mandates for protecting lakes and streams, and clear standards and guidelines for assessing progress (or not) in this regard.
3. Extension of FITFIR to the obvious, logical, and broadly beneficial conclusion that native ecosystems and native Nations were here way before water licensing was imposed on the basis of foreign and ultimately harmful ways of thinking and acting. The WSA cannot be called sustainable unless and until ecosystems and First Nations are guaranteed rights sufficient for their maintenance and vitality.
4. Immunity from politics. I want to see legislative commitments to providing the staff and regulatory authorities that are the hallmarks of proper and reasonable governance and decision making. BC her people need and deserve to have clear and specifically legislated processes for creating, monitoring and enforcing Water Sustainability Plans directly embedded in legislation. Do NOT leave this up to individual ministers!

Thank you for the opportunity to comment.

Personal Identifiers Removed

Van ***Personal Identifiers Removed***

Subject: Our Water our right

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 4:15 PM

This shocks me to no end. No corporation has the right to Canada's water EVER!!!
It's one element of our country that should never be sold..... it's the
countries, the peoples and the natures.... not corporations.

Personal Identifiers Removed

B.C

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 4:13 PM

Good Afternoon:

The following comments are my personal comments and do not reflect those of the City Council of which I am part.

The issue of First in Time (FITFIR) is abhorrent to good governance. The lack of intestinal fortitude for government to make a decision about the best use of water regardless of timing of request is just incredible in my opinion.

Water is needed for life to continue. [Groundwater](#) is particularly beneficial for it is virtually pure, i.e. free from contamination requiring little, if any, treatment.

We know the cost/value of potable water delivered to the municipal boundary lines in Vancouver from the [surface water](#) Seymour-Capilano Reservoirs and Treatment Plant. The cost/value is \$.23 per cubic metre.

Letting [groundwater](#) or [surface water](#) be used for industrial purposes should only occur when the industrial user is required to

- a) pay full value for the water used,
- b) treat the water effluent from the industrial process, and,
- c) recycle the treated effluent water for use in their ongoing industrial processes.

An example of this is the chemical industry in Germany.

The commercialization of [groundwater](#), as in the case of Nestle Corporation, where pure water is being given away by the province at \$.85 for 1000 cubic meters (i.e. \$.85 per 1,000,000 litres) is ridiculous.

Going with the example of Vancouver, the value of 1000 cubic meters is \$230.00, and that does not take into account the ambient value of [pure spring/artesian/aquifer groundwater](#) which will be more value again.

The proposed act does not refer to aquifers as to ownership, access, royalties, flowthrough, containment, use/usage, etc. Aquifers are becoming an extremely important issue, and the creation of artificial aquifers (such as through the use of left-over gravel pits as in Ontario or in the United States) must be included in the Act.

I would like to have seen the draft Act on which to comment with sufficient time in which to do so.

Thank you.

Personal Identifiers Removed

Councillor

City of Parksville

Personal Identifiers Removed

Subject: Don't give away our property

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 3:38 PM

Corporate freeloaders like Nestle should not be able to get our water for free and then sell it back to us. They create spectacular unnecessary waste and strain on one of our most precious resources.

Clean drinking water is the backbone of our civilization and should be available to every citizen without charge (but with reasonable limits) so citizens can continue to focus on advancing our economic, cultural and intellectual prosperity instead of worrying about whether or not they can afford basic human rights.

Clean, unpolluted water and protected habitats are critical to our wildlife, our forests and the integrity of our economy because of the many cities and communities that rely on it.

We've invested our tax dollars for decades to pay for drinking water. Why should corporations should never have the right to take that away and sell it back to us. Would you give away your house you'd worked decades to pay for only to have to buy it back from a corporation? Why should our water be any different?

Personal Identifiers Removed

Vancouver, BC

Subject: Rewrite BC's Water Legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 3:38 PM

The Human body is made up of 80% water . The current water legislation in this province states that water will be protected unless it interferes with logging , something that has been in place since 1909 . It appears that the fact that certain death results from no water was somehow rescinded in importance ,even though we all know that no one dies when logging stops . Let's fix this please .

Personal Identifiers Removed

Sechelt,BC

Subject: A Water Sustainability Act for Future Generations in BC

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 9:11 AM

Dear Premier Clark, Minister Polak and the Living Water Smart Team,

I am so grateful that the old Water Act is being reviewed and updated to meet our current situation in BC.

My hopes for the new draft are the following:

- See our water as something we need to treasure, protect, and keep safe for future generations.
- We need to see the government work actively in protecting our waters from being polluted, from being sold to private companies or foreign countries, or from being overused by industry. This could include major fines, enforcements, and follow up.
- It needs to be clear that water is what sustains life on earth and is what all of our organisms depend on. We have a responsibility to ensure that clean and enough water is accessible to everyone for drinking and cooking in BC. For example: This will not be the case if 'fracking', run-of-river projects, or piping crude oil are allowed in BC.
- We need to look at water from a watershed perspective. This would allow for a more effective management of our water. It is important to involve local watershed groups to be included in decision making and in the management of their watersheds.
- It is important to have our water be a public asset and not something for sale. A very interesting book that is written as a fictional eco-thriller is so close to our reality here in Canada. It is called Water, Inc., and describes how a powerful California company pipes water from Canada down to their area to provide water to their urban areas where they have lack of access to water. There will be more pressure coming from the USA to get their hands on Canadian water supplies with long-lasting and devastating effects if Canada would agree to pipe water down to the States. I am certainly concerned about this because when people (i.e. business and government) talk money, deals get made that should never be made. I highly recommend reading this book by Varda Bustyn.
https://www.goodreads.com/book/show/233998.Water_Inc_
- Water licensing should be revisited using public input and participation so that it is a fair and logical system that does not favour industry or business but keeps the general public in mind as well.
- Considering we are dealing with climate change and water will be a huge issue in terms of flooding, access to drinking water, dry wells, glaciers melting, and episodic weather patterns, we need to take water issues very seriously and make sure that the public interest goes above industry needs.

Public input on where their water comes from, how it is being treated, how to protect their local drinking water, and how not to have water for sale (this includes bottling plants/companies) is of upmost priority in my mind.

- Water should stay in public hands and away from private interests.

Let's make British Columbia a province to be proud of and that other provinces and territories in Canada will look toward for role model examples of how we manage our water appropriately, for the people and for our natural environment.

Thank you for considering my input into the revised legislation.

Sincerely,

Personal Identifiers Removed

Golden Bc

Personal Identifiers Removed

Subject: Protecting BC's fresh water supplies

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 3:28 PM

Dear Premier Clark and Minister Polak,

Like so many of the precious resources of this earth, water is a finite resource. In particular confined groundwater resources are, by definition, non-renewable. Unconfined groundwater resources are easily polluted and by definition can contribute to pollution in the rivers and streams with which they are connected. Any "policy" which fails to recognize these truths WILL FAIL to protect this resource. If it is your intention to truly preserve this resource, rather than to just appear to do so, you will not only rewrite the draft legislation, but you will also establish systems which make it possible to measure and monitor and report on how effective the legislation, once enacted is.

In particular, I urge you to attend to the following.

Can treating water as a public trust resolve current limitations of the Act?

Water allocation must be based upon water as a human right, water as a commons and water as a public trust. Water as a human right means that every person has a right to clean and adequate water for drinking, sanitation and basic household use. Water as a commons would mean our watersheds are to be shared, protected, carefully managed and enjoyed by all who live around them. Water as a public trust means that water, including groundwater, belongs to communities and cannot be privately owned or controlled.

The new proposal suggests that because the public trust doctrine is relatively untested in Canada and because it would influence other areas of law, it cannot be considered at this moment. However, a great deal of traditional, legal and academic expertise exists with regards to how the doctrine can be applied and its implications for other areas of law. Furthermore, there are unavoidable and unresolved legal and policy concerns that can be addressed by adopting the public trust doctrine.

The proposal clearly states that Indigenous communities contest crown ownership of water. Furthermore, there was a great deal of concern regarding any commodification of water. Public trust doctrine could be used to designate the provincial government as trustees (stewards) of water as opposed to owners. As a trustee, the government cannot sell or commodify water but can promote a stewardship role to avoid direct conflict with proven and inherent title and rights of Indigenous people.

The Union of BC Indian Chiefs had made clear in their submission that "the Province does not have the ownership and jurisdiction over water where Aboriginal Title exists, and the proposed Water Act amendments continue with the province's history of denial which is damaging both to Indigenous Peoples and cultures, and also to the waters and all life that depends upon the water." By declaring water as a public trust, rather than owned exclusively by the crown, a collaborative stewardship model can be promoted through this Act.

The Act introduces environmental offsets for remediation

Offsets have been promoted as environmentally responsible solutions to damage caused by everything from logging to CO2 emissions. However offsets do not provide incentive for the protection of ecosystems. In the proposal, environmental offsets are proposed as an option for remediation from dumping and debris. This allows users to essentially declare the areas they've damaged as sacrifice zones, knowing they can remediate another area. There is then no incentive to limit the damage they may cause in one area, knowing they may not be responsible for remediation in that location.

Offsets are primarily an economic solution to environmental problems in order to allow for continued economic growth. In order to assure the protection of water, users that do damage to a watershed or water system must be held responsible for remediation of that system.

Not having limits on water uses per licence is a concern

While the proposed transfer of water licences through trading from one use to another has been removed from the current proposal, there is concern that there may be no limit to the uses of a licence. In section 2.3.1 of the proposal it states that "the limit of three water use purposes per licence would also be removed." This again, similar to market-based transfers, raises concerns that a licence originally issued for agricultural purposes, for example, can then be used for oil and gas or mining operations. More clarity is needed on what this statement is implying and licences should be issued for specific uses with some related uses being allowed. Having no limit to uses would suggest water licences would be carried with property rights with no regulation on use for those in possession of the licence.

How does the new Act prioritize water licences?

The new proposal has retained the First in Time, First in Right (FITFIR) model of prioritizing water licences. While the proposal justifies retaining the model as something that is convenient, the model severely limits the ability for local planning and stewardship of watersheds. How can a community develop and prioritize water use on a watershed if an industrial user holds a licence with the highest priority?

While the proposal is providing some tools for periods of water scarcity - where household use and environmental needs can be prioritized - it does not allow for community planning in order to proactively avoid periods of water scarcity.

Furthermore, the FITFIR model does not allow for the prioritization of ecological needs and ignores Indigenous use of water, which in all fairness should be considered "First in Time." The Union of BC Indian Chiefs identifies the injustices imposed by the FITFIR model and the inability to reprioritize senior licences. "B.C. has controlled access to surface water through water licences issued on a 'first come, first served' basis. Historically, B.C. refused to record water allocations made to reserve lands, and in many cases, reserve lands have a lower priority than settler interests."

The privileges and biases of practices, licensing and laws established over 100 years ago remain with FITFIR rather than modernizing the allocation system to promote community planning and equity. Retaining FITFIR is a fundamental shortcoming of the current proposal as it prevents any means to prioritize water stewardship, Indigenous use and the public interest over the economic interest of providing certainty to licence holders.

Alarmingly, FITFIR is proposed as the model for groundwater licences, which will be introduced in the new Act. A new area of water regulation will not only inherit the flaws of the old model but will also create a gold rush-style licence grab by industrial users to get the highest priority licences. In modernizing the act, it is unfortunate that the early 1900s model of FITFIR is being retained and likely to promote the resource grab frenzy of those times.

There is no logic in assuming that the most senior licensees would be using water in a beneficial and sustainable manner or in the best interest of the communities that are dependent on the watershed or groundwater. There is also no benefit to sustainability plans or to communities when the more senior licensees have the most secure rights. This really only benefits those licence holders.

Localized governance models established with Indigenous communities should be empowered to establish and adjust the priorities of water use. The proposal document acknowledges that there is interest in a priority of use approach to replace FITFIR.

The justification for keeping FITFIR really seems to be a matter of maintaining the status quo, convenience and pleasing senior licence holders. These should not be the priorities of modernizing the Water Act. Need for strict environmental flows requirements

Environmental flows are proposed to be considered during licensing. Without mandatory requirements for maintaining specific environmental flows, watersheds remain vulnerable to the decisions of government appointees. Rather than leaving the room for possibility of politically influenced decisions, the environmental flows should be regulated based on strict requirements established by scientific data. This should be required of all new licences and again the FITFIR model should be eliminated in order to make senior licences accountable to flow requirements.

Allowing for discretion in low risk situations requires clarification of the definition of low risk situations. A more precautionary and proactive stewardship model is preferable. All licences should be reviewed periodically for consistency with environmental flow requirements. Reviews after 30 years may not be adequate for all licences or in all regions.

More information on environmental flows is available from West Coast Environmental Law.

Who makes decisions on applications for water licences?

While the new proposal provides flexibility for different forms of governance, the issuing of licences remains with the Comptroller of Water Rights and the Regional Water Manager, which are political appointees of the Minister. The licensing process needs to involve more public engagement.

Decisions on the issuing of licences must involve the most impacted people that are dependent upon the watershed/groundwater sources and Indigenous communities. All applications should be publicly posted so that communities are informed of proposals and can meaningfully engage in decision-making. The Act must assure adequate funding is provided for local and Indigenous communities to fully participate in planning and regulation process.

Regulators and officers must make decisions with local communities, not just in consultation with them. Indigenous Nations must not simply be included as stakeholders. In both the drafting of this Act as well as in proposed governance models, the province must recognize that it cannot claim exclusive title to the land and must recognize Indigenous title.

Full and appropriate participation of Indigenous communities and the public at large must be embedded in the new Water Act as well as in the process of developing it.

AND LAST BUT BY NO MEANS LEAST:

New oil & gas use has been introduced

A great deal of pressure will be placed on watersheds due to the dramatic increase oil and gas development in the region. While this industry needs far more regulation of its water use, it is questionable to even consider oil & gas development as a beneficial use of water. There must be serious consideration given to whether licences should be issued, particularly for shale gas fracking, which has seen moratoriums imposed in many jurisdictions.

Sincerely,

Personal Identifiers Removed

langley, BC

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 3:23 PM

I just learned today that I have only two days (to November 15) for "public commentary" about a Water Sustainable Act for the province. We were given barely a month for our comments. This is not enough time for public input for such an important piece of legislation regarding our British Columbia water. I request you publicize the proposal of this act more actively and give much more time for the citizens of BC to consider this important matter.

Sincerely,

Personal Identifiers Removed

Slat Spring Island, BC

Subject: Water Sustainability Act consultation
From: *****Personal Identifiers Removed*****
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 3:11 PM

I have a few comments:

- would like clear enforcement mechanisms, and more importantly, hard language that is enforceable
- language ensuring that public interest in water is not harmed by private interests
- more frequent reviews of water licenses, especially as our climate undergoes change
- more emphasis on clear meaning of 'environmental flows' and adequate protection of water for use in the environment by the environment

Thanks,

*****Personal Identifiers Removed*****

Vancouver, BC

Subject: Water Sustainability Act - Comment
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 2:35 PM

Dear Sir or Madame,

I would like to take this opportunity to comment on the new Water Sustainability Act.

My foremost concern is that water must always be considered part of the public commons. The use and disposition of water must always be looked at from the point of view of the "highest good", which, in my mind, means that the preservation of the natural balance of the planet, in the widest sense of the word, must come before any private, personal gain that may be gotten from the use of water. Maintenance of the natural ecosystem, must come before all else if we humans are to survive in the long run.

With Global Climate Change modifying our expectations around water, the wider vision of the impact on present and future generations must always be kept at the forefront of any decision making process concerning water use. "Beneficial Use" must include environmental flows as well as essential household needs first before any industrial use. The granting of any private rights over water can only be acceptable within this context. The public must always have a say in any dispute around the use or disposition of water because it affects all of us.

Private Rights over water must be administered as a public resource to be stewarded with care as opposed to being a property right. Any attempt to create licenses for water that can be traded is depriving the larger public of access in the long run, particularly since we are on a downhill track to scarcity, given Global Climate Change, as opposed to our previous state of guaranteed plenty. (For example, in 2012, DFO did not anticipate the shortage of rainfall during the fall, which resulted in the inability of spawning salmon to get into the Cowichan River system, due to insufficient water levels caused by radically changing rainfall patterns.) Once rights are granted to private interests, if usual patterns are radically modified, as appears to be happening, we are cutting our own throats since private interests who are granted these rights will not be so willing to give them up in case of public emergency. Private Rights over water must always be secondary to the public need, which must also include the environment.

In times of scarcity, there must be overriding regulation which prioritizes water use to go to protect critical environmental flows over industrial uses. Industrial uses of water during times of scarcity should be considered threats to water use. Keeping natural life alive (including humans) must be a higher priority than industrial profit. Clear Water Sustainability Plans should be developed to address times of water scarcity among multiple stakeholders.

Binding standards to maintain Water Quality must be a priority with respect to any industrial application which impacts water.

We must never be put in the position where we have to buy access to water from a private organization to whom we have "given" or sold the right to that water.

Management of Water Resources must always put the public first. Drinking water, food production, and ecosystem health must be the overriding priorities in any decision making process concerning water.

Thank you for considering my comments.

Sincerely yours,

Personal Identifiers Removed

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 2:08 PM

Please consider the following in the new act.

1. Pricing water to reflect its true value and encourage conservation. Large corporations should not be able to withdraw huge amounts of groundwater for a few hundred dollars.

2. Retain the right of government to protect the public interest in water. Private interests should not be able to take precedent over the public interest in water. The latter should reflect needs for clean drinking water, sustainability of groundwater resources and environmental protection.

Thank you,

Personal Identifiers Removed

Subject: Water Sustainability Act comments

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 2:08 PM

November 13, 2013

To Whom it May Concern:

Thank you for the opportunity to comment on the new Water Sustainability Act (WSA).

I am a rural British Columbian who has lived on my farm for the past 43 years.

My area has a number of important natural water features, including lakes, creeks, and wetlands. All are important to both human and non-human species, as well as to agricultural use. Water quantity, quality and flow rates are of critical significance now and in the future.

My concerns regarding the WSA are as follows:

1. Discretionary decision-making: I worry that decisions over flow of water may be too discretionary and have negative impacts on fish species and other natural values. Coupled with this is a worry that the criteria for flows will be insufficiently science-based and that their enforcement will not be mandatory.
2. Water use fees: I recommend that all water licence fees be sufficient to offset a regime of robust government oversight and management of water resources. Consideration should be given to setting up a contingency fund to support government responsibility in this function. This kind of fund could also be used to support independent oversight of water and watershed management to bolster and complement the government's role.
3. Public consultation: More opportunities should be provided for the public to participate in the process of granting water licenses and water management decision-making.
4. Provincial water objectives: Water objectives need to place priority on "environmental flows" to protect natural values. Such objectives must be more than "guidelines," but rather be enforceable and tolerate no exceptions for any industry.
5. Licence reviews: Given the unpredictability caused by climate change, shorter duration between license reviews should be contemplated in the proposed legislation. Frequent monitoring should ascertain whether licenced withdrawals are sustainable, with sustainability as a condition for the approval and renewal of such licences.
6. First Nations: I am concerned that First Nations are not adequately included or their opinions acknowledged in all aspects of water stewardship.
7. Non-governmental expertise: A much greater role must be given to non-governmental conservation groups who have first-hand knowledge and expertise on water and water management issues. Their contribution should be encouraged, legitimized, and supported.

Thank you for your attention to my input.

*****Personal Identifiers Removed*****

Comox Valley, BC

Subject: comments on new Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 12:59 PM

I believe that an important component of a sustainable water plan should be planned reuse of water and feeding of the aquifers. Runoff and drainage should be filtered, then, either reused or reintroduced to recharge the aquifer. This would prevent large amounts of fresh water from being discharged into streams and rivers. Systems currently in use serve such dual purposes: reuse of reclaimed wastewater to preserve native groundwater, and restoration of groundwater by artificial recharge of reclaimed wastewater.

Personal Identifiers Removed

Langley BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 12:37 PM

While I support the updating of the Water Act (which is long overdue), I think it needs to reflect the needs of the populace first rather than putting corporate needs ahead of people. Yes, we must share the resource with corporations, but industrial use should not have carte blanche or be prioritized ahead of water's use by people. Water is a necessity for the life of all beings and this should be the first and foremost concern for legislators before allowing water to be used as a tool for profits. Profit is life-enhancing, not life-sustaining, like water. Please put people, and the creatures with which we share this earth, first!

Personal Identifiers Removed
Vancouver, BC

Subject: Fresh water usage for fracking

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 12:22 PM

Although I do not live in the affected watersheds, I am concerned as a citizen that oil and gas companies can have unlimited access to fresh water which then has to be contained because it is contaminated, almost like the tailing ponds of mines. Meanwhile entire ecosystems and the people who need fresh water are being compromised for the profit of these companies. That is bad for our children and grandchildren that will inherit the waste of our folly.

Personal Identifiers Removed

Comox

Subject: water

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 12:11 PM

This act as written is complete rubbish, it is industry that needs to be reined in on their expectations of water and that this is a precious commodity. Also a time frame of one month for response is as usual with this Govt. a complete disregard for public input into any matter. WE STRONGLY OPPOSE THIS WATER SUSTAINABILITY ACT!!!

Personal Identifiers Removed Deep Bay BC.

<mailto:livingwatersmart@gov.bc.ca?subject=Water> Sustainability Act

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 11:24 AM

Dear Sir.

As I and forty three of my neighbors rely on ground water from our community well we demand that we have a say in the control of our ground water.

There is no way that a decision can be made that would deplete or destroy our water without our users, the lawful owners, having first right to it's use and input to future plans in the area that would have an effect on our ongoing supply of fresh clean water from our well.

Our input must have priority.

Personal Identifiers Removed

User - Last Chance Water Works Inc.

Subject: Water Legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:31 AM

It is about time the Government starts listening to the People and not "Big Business"!

In particular this Water Legislation.

The Water of Canada belongs to the PEOPLE, not the Corporations!

It is time to PROTECT our resources, not GIVE THEM AWAY!

Personal Identifiers Removed

Victoria, British Columbia

Subject: B.C.'s new water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:25 AM

Water belongs to everybody, but only as much as we NEED & it has to be protected against contamination e.g. "Fracking" and from exploitation e.g. Nestle.

Personal Identifiers Removed

Surrey, B.C.

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 10:10 AM

To whom it may concern,

We could not find in the proposed act any actual figures for ground water fees for commercial use. We have heard on the news that many respectable groups and persons feel the proposed fees for commercial/industrial ground water use will be too low. We would certainly support hefty fees for such ground water use, reasoning that if the commercial enterprise is profiting from the province's, hence the citizen's, groundwater then let them pay well for it and pass the costs onto the consumers thereby establishing a fundamentally democratic user pay model.

We would also like to point out that private domestic wells should never have fees or licensing. The reasoning here is, like ourselves, most homes that depend on a well for water also depend on a septic field for waste water disposal and since both the well and the septic field are legally obliged to be on the same property the overall ground water use is neutral. All the ground water withdrawn on our property is returned to the ground water on our property and filtered through our septic field leaving our property as clean as it entered. Therefore our overall ground water use is neutral. If there were to be a fee for domestic ground water withdrawal then there should be an equivalent fee for domestic ground water input, again a neutral cost.

Sincerely, ***Personal Identifiers Removed***

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:08 AM

The pricing for water extraction under the new Act are ridiculously low. Pricing should be more in line with what the Province of Quebec currently charges water users. During times of scarcity the interests of First Nations and the public should not fall behind industrial users. The issuing of Water Licenses should come under one ministry not multiple ones as we see now. Water is the most valuable natural resource we have in this province. It should not be traded away callously for short term economic growth.

Kind regards,

Personal Identifiers Removed,

New Westminster

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 10:05 AM

Kudos to the BC government for proposing a *Water Sustainability Act*. Water is arguably the most valuable resource on the planet and will become increasingly more so. British Columbia is fortunate to be rich in this resource, but it needs protection from environmental pollution and from corporations (e.g. Nestle) that feel that have the right to extract it without limit and without adequate compensation to British Columbians. This government has the opportunity to be hailed by posterity for their wisdom, courage and foresight.

Personal Identifiers Removed

Subject: Comment on Water Sustainability legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 9:37 AM

I am writing to submit my comments on the proposed changes to BC's Water regulation. I commend the province for updating its outdated legislation and encourage the strongest possible regulation of BC's most important resource.

BC needs detailed tracking of water consumption by large-scale users, and a fair fee system. We must track not only consumption but pollution of water and where/how it is stored. More specifically, the new legislation should provide for:

- one governmental body that collects data on water use, independently audited
- require all industrial consumers to report to the province about the source and volume of water drawn; independent monitoring of this reporting
- track all volume, source, and destination of water that becomes contaminated beyond safe future consumption or discharge back into the ecosystem; track impacts of water pollution
- consistent and fair fee system for all large-scale water consumers; increase fees and use portion of revenues to pay for BC-wide monitoring and data collection

Please ensure that the new Water Sustainability Act protects water for the future, for all users, and for a healthy ecosystem on which BC's economy depends.

Personal Identifiers Removed

Richmond, BC

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 9:23 AM

It is imperative in the interest of the public that industry pay considerable levies for water they use in BC, ground and surface. Currently, water is not managed sustainably because agriculture and industry are given priority over the public and the environment which sustains life. The cost burden must be borne by the interests who benefit the most from its use.

Thanks for your consideration.

Personal Identifiers Removed

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 9:23 AM

These are my comments on the WSA:

1. The term "environmental flows" as used in the WSA needs to be scientifically defined and it must be mandatory for all new and existing licences to meet regulations.
2. The WSA needs to explicitly state that private rights to use water cannot harm the public's interest and the WSA must reject attempts to create licences that could be traded in markets.
3. In terms of the proposed provincial 'water objectives', protecting "environmental flows" must be enforceable and apply to all sectors of industry - with no exemptions for forestry or oil and gas, as is being presently contemplated in the proposal.
4. License reviews need to occur more frequently than the present 30 year time frame. Clarify and state that the new groundwater licences being granted to existing users, who are primarily large industrial users, will be subject to a future review until such time as it can be determined the withdrawals are at sustainable levels and also to allow for constructive government consultations with First Nations.
5. Increased public participation in the setting and monitoring of environmental flows and granting water licenses - and independent oversight of water and watershed management including the resources and expertise to do this properly and comprehensively. Specifically, fees for ground and surface water must cover government's costs for responsible water management and ensure resources are available for local watershed planning and management enabled under the new Act. Watershed groups need to have a clear mandate and the resources to engage responsibly.

Personal Identifiers Removed

Victoria, BC

Subject: Protection of precious water resources

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 9:21 AM

Dear Premier Clark, Minister Polak and the Living Water Smart Team,

I appreciate the opportunity to comment on the draft proposal for the Water Sustainability Act (WSA) and hope that my comments are well received.

I believe that fresh water is the most precious resource on the planet and I sincerely hope that the WSA will serve to protect water for fish, wildlife and stream health.

I also support the idea that increased public participation in the granting of water licenses is critical to monitoring the impact on environmental flows. Please revise the process to enable increased public participation.

Lastly, please include a clear statement ensuring that private rights to use water do not harm the public's interest and access to waterways, which I believe is essential. Our waterways have been used for travel and recreation since before the first Europeans arrived and I feel strongly about preserving our rights to access waterways.

Thank you.

Sincerely,

Personal Identifiers Removed

Langley BC

Personal Identifiers Removed

Subject: A Water Sustainability Act for Future Generations in BC
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 9:11 AM

Dear Premier Clark, Minister Polak and the Living Water Smart Team,

I am so grateful that the old Water Act is being reviewed and updated to meet our current situation in BC.

My hopes for the new draft are the following:

- See our water as something we need to treasure, protect, and keep safe for future generations.
- We need to see the government work actively in protecting our waters from being polluted, from being sold to private companies or foreign countries, or from being overused by industry. This could include major fines, enforcements, and follow up.
- It needs to be clear that water is what sustains life on earth and is what all of our organisms depend on. We have a responsibility to ensure that clean and enough water is accessible to everyone for drinking and cooking in BC. For example: This will not be the case if 'fracking', run-of-river projects, or piping crude oil are allowed in BC.
- We need to look at water from a watershed perspective. This would allow for a more effective management of our water. It is important to involve local watershed groups to be included in decision making and in the management of their watersheds.
- It is important to have our water be a public asset and not something for sale. A very interesting book that is written as a fictional eco-thriller is so close to our reality here in Canada. It is called Water, Inc., and describes how a powerful California company pipes water from Canada down to their area to provide water to their urban areas where they have lack of access to water. There will be more pressure coming from the USA to get their hands on Canadian water supplies with long-lasting and devastating effects if Canada would agree to pipe water down to the States. I am certainly concerned about this because when people (i.e. business and government) talk money, deals get made that should never be made. I highly recommend reading this book by Varda Bustyn.
https://www.goodreads.com/book/show/233998.Water_Inc_
- Water licensing should be revisited using public input and participation so that it is a fair and logical system that does not favour industry or business but keeps the general public in mind as well.
- Considering we are dealing with climate change and water will be a huge issue in terms of flooding, access to drinking water, dry wells, glaciers melting, and episodic weather patterns, we need to take water issues very seriously and make sure that the public interest goes above industry needs.

Public input on where their water comes from, how it is being treated, how to protect their local drinking water, and how not to have water for sale (this includes bottling plants/companies) is of utmost priority in my mind.

- Water should stay in public hands and away from private interests.

Let's make British Columbia a province to be proud of and that other provinces and territories in Canada will look toward for role model examples of how we manage our water appropriately, for the people and for our natural environment.

Thank you for considering my input into the revised legislation.

Sincerely,

Personal Identifiers Removed

Golden Bc

Personal Identifiers Removed

Subject: water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 8:14 AM

Hello,

My first comment is that it is hard to figure out how to leave a comment on your blog, which no doubt discourages people.

I would like to see enforceable laws to protect our water in B.C. for the best interests of all British Columbians, and not to protect private interests. There should be no exemptions for certain industries, like gas, or forestry. These are probably the industries that do the most damage to our water resources. Our water is our water, and we need it! There should be fees that cover the actual cost to society and the government for the use of large amounts of water.

Thank you, ***Personal Identifiers Removed***

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 8:02 AM

Personal Identifiers Removed

Vernon BC ***Personal Identifiers Removed***

November 13, 2013

Re: Water Sustainability Act

I am please that a new Water Act is in the works, however I have a number of concerns that I wish dealt with in a new act as follows:

1. Anyone on a well (especially in an area where all others are on meters) must also pay for their water as they are ultimately taking it from groundwater which means less water getting into lakes/ streams. And, they tend to use such water flagrantly. Actually, any fresh water users must pay and pay well.
2. NO company or person can access any water in BC for "free" for bottling and sale. Even if they paid the going rate for water, they'd be making millions which is not right. This would include those wishing to use our water to frack.
3. Fees for water use are far too low, so users still use much more than is really necessary.
4. If water volume is low, first priority must be given to wildlife/fish/environment, then food producers (using efficient methods of water distribution), then the rest of us. The act must make it clear that watering non-essentials, such as lawns is not acceptable in summer. We are supposed to be citizen stewards, not blatant consumers.
5. The public, including First Nations, must be included in all decision making. Water is a right for all of us, not a right of government to make decisions on.
6. No watershed must allow any use that decreases the purity of that water. If cattle are in the area, they must be moved.
7. The old method of "first in time, first in right" is no longer acceptable and needs to be reviewed and changed. We have a responsibility to protect all water for future generations and ensure it is always there for all of us, not just those who were pioneers in the area.
8. If there are other ways of dealing with human waste that reduce use of potable water, they must be used, instead of the conventional, engineer-driven, models used at present - especially for sprawled developments and tiny municipalities.

Personal Identifiers Removed

Subject: New Water laws

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 8:01 AM

Dear Living Water Smart,

I am providing feedback on the proposed new water law. I love the Cowichan Valley natural areas like family. We have 2 rivers, the Cowichan and the Koksilah which both used to provide habitat for salmon and trout - I find it very sad that we have lost most of these indicator species, as losing so many of them shows how we have lost so much more within the ecosystem as well. I used to work for the Cowichan Land Trust, but I am now a gardener because I find thinking about all the loss so depressing.

ANYWAYS...

I think the new water law should not be a sneaky way for oil and gas industry to make it easier for them to make money - water laws to me should speak for the watershed, speak to protect the waters - not change the laws to make it easier for oil and gas industry!!

First Nations need their Rights and Title to be respected and please don't allow any more destruction of their traditional sacred places, water is life!!!

Have strict measures on minimum stream flows, not vague ideas!

Local control of our watersheds is important and groups such as the Cowichan Watershed Board need more authority.

Thanks for listening,

Personal Identifiers Removed

Subject: new water law

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 7:53 AM

To whom it may concern,

I am passionate about our water here in BC. I strongly wish our watershed management to remain locally managed.

Respect First Nations Rights and Title in both the creation of a new law and in its implementation.

Fund local watershed management (so that it doesn't become simple downloading) through revenue sources such as charging large companies that draw surface and groundwater more than the ridiculously low fees currently proposed

Mandate clear, enforceable standards for protecting minimum stream flows, instead of the vague and ineffective 'guidelines' now on offer

Don't let the oil and gas industry off the hook, as is currently proposed.

Don't let our water be used for fracking.

Sincerely,

Personal Identifiers Removed

Duncan

Subject: Rewrite the water sustainability act; protect what's ours!

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 13, 2013 7:48 AM

To the government of BC, and to whomever else it may concern, We are in an era of extreme environmental degradation and climate denial. BC's coast is already at risk from oil, pine beetles are attacking our trees....the list goes on. While we have the chance to do so, we should be protecting one of our most valuable resources and necessities; water. The "fight" for water will only become more acute as the world consumes its resources, we need to protect ours, and conserve our beautiful, pristine, supernatural province. Large companies are already taking advantage of our lax laws-- let's kick them out. No more Nestlé exploiting our land, water, and people. I would stand firmly with the government of BC if they brought in stricter water regulation. I hope you take these comments into consideration, and thank you for taking the time to read this.

Personal Identifiers Removed

North Vancouver, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 7:33 AM

Dear Living Water Smart,

I am writing to urge you to include more protections.

I understand water licenses are reviewed every 30 years; we need to reduce that to 10 years.

We need to increase the fee schedules for groundwater and surface water for any kind of business, the more water the higher the yearly fee, example would be Nielsen near Hope, this fee should be about \$5,000 per year.

Thank you for listening and protect our water please!

Personal Identifiers Removed

Cranbrook BC

Subject: The proposed new water law
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, November 13, 2013 3:27 AM

To Whom It May Concern.

My thoughts and feelings: Local bodies representing local interests must be able to take over the real decision making regarding our watersheds.

There must be funding for local watershed management through such sources as charging large companies that draw surface and groundwater equitable fees that reflect their extraordinary usage - the low fees presently proposed will have disastrous affect.

There must be clear, enforceable standards for protecting minimum stream flows rather than the vague and ineffective guidelines being put forth.

The oil and gas industry is culpable and must be made to take responsibility.

Personal Identifiers Removed

Personal Identifiers Removed Duncan

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 10:39 PM

The Legislative Proposal was released on October 18 and the public has been given less than a month to study its contents and provide responsive input. What's with the November 15 deadline? How about some reasonable duration for genuine democratic discussion? I understand certain consulting bodies are calling for an extension of the deadline to March 15, 2014. By this writing I support this campaign.

Personal Identifiers Removed

Personal Identifiers Removed

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Tuesday, November 12, 2013 10:27 PM

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

We must treat our water as if it is essential to life, which it is. It belongs to all of us, who have entrusted the government to provide and enforce stewardship so that our living ecology will be protected and every person ensured rightful access to fresh clean water from local natural sources. It cannot be treated as a commodity and to that end must not be made available to wholesale ventures that would compromise its quality, volume and supply. Bottling our water to sell it back to us is a draconian industry on many counts, including the commercialization and compromise of our vital water supply. This industry would jeopardize the well-being of many for the benefit of a few. It would not improve the quality of life for British Columbians, regardless of how 'improvement' might be quantified.

'Fracking' is another corporate venture that thirsts for our water, only to spew it back tainted with toxins or to make it disappear altogether when water tables are accidentally rearranged as a by-product of the venture. Although the government thirsts for the revenue it anticipates extracting from this venture, it must recognize that sullyng water to extract resources goes counter to the inherent right of every citizen and is in violation of the Provincial Health Act which states, under Section 15 of Division 3: "A person must not willingly cause a health hazard, or act in a manner that the person knows, or ought to know, will cause a health hazard." The government has no right to do this either, or to allow it to be done. Contaminated water is a serious human health hazard and to frack is to wilfully contaminate and jeopardize our water supply. More and more people are beginning to comprehend the great folly of contaminating our own habitat for short-term gain, and it behooves the government to start doing the same.

To conclude, we need an Act that ensures total uncompromised protection of our waterways and aquifers. Our water sources and systems inherently belong to all of us, whether we have deep pockets or no pockets, and are not to be commercialized or tainted or damaged in any way.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

Personal Identifiers Removed

Victoria, BC ***Personal Identifiers Removed***

Personal Identifiers Removed

Subject: B.C. Water legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 9:46 PM

I hope you will ensure that any Water Sustainability Act will put public interest ahead of corporate profits. I am concerned that any legislation will give corporations such as Nestle the right to make enormous profits and the publics expense. It is important to me that it will not be business as usual with industrial use of B.C. water.

Thank you,

Personal Identifiers Removed

Personal Identifiers Removed

Vancouver, B.C.

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 9:53 PM

We must treat our water as if it is essential to life, which it is. It belongs to all of us, who have entrusted the government to provide and enforce stewardship so that our living ecology will be protected and every person ensured rightful access to fresh clean water from local natural sources. It cannot be treated as a commodity and to that end must not be made available to any ventures that would compromise its quality, volume and supply. Bottling our water to sell it back to us is a draconian industry on many counts, including the commercialization and compromise of our vital water supply. This industry would jeopardize the well-being of many for the benefit of a few. It would not improve the quality of life for British Columbians, regardless of how 'improvement' might be quantified.

'Fracking' is another corporate venture that thirsts for our water, only to spew it back tainted with toxins or to make it disappear altogether when water tables are accidentally rearranged as a by-product of the venture. Although the government thirsts for the revenue it anticipates extracting from this venture, it must recognize that sullyng water to extract resources goes counter to the inherent right of every citizen and is in violation of the Provincial Health Act which states, under Section 15 of Division 3: "A person must not willingly cause a health hazard, or act in a manner that the person knows, or ought to know, will cause a health hazard." The government has no right to do this either, or to allow it to be done. Contaminated water is a serious human health hazard and to frack is to willfully contaminate and jeopardize our water supply. More and more people are beginning to comprehend the great folly of contaminating our own habitat for short-term gain, and it behooves the government to start doing the same.

To conclude, we need an Act that ensures total uncompromised protection of our waterways and aquifers. Our water sources and systems inherently belong to all of us, whether we have deep pockets or no pockets, and are not to be commercialized or tainted or damaged in any way.

Personal Identifiers Removed

Victoria, British Columbia

Personal Identifiers Removed

Read my latest column 'Finding Balance' at <http://focusonline.ca/?q=taxonomy/term/14>

Subject: Protect B.C.'s water

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 9:36 PM

Regarding a new Water Sustainability Act for BC:

The people of B.C. want our Government to prioritize water for fish, wildlife and essential human uses, and protect our water from exploitation by all commercial industry, especially from fracking, oil and gas, or logging. Water protection and preservation MUST be the priority for the next century!

Personal Identifiers Removed

W Vancouver B.C.

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:22 PM

Please make sure that local environmental and public water needs take priority over other water consumption claims, such as those of the corporate sector.

Personal Identifiers Removed

Errington, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:56 PM

My concern is that we protect all water sources in our province:

for fish, which we need as food
for wildlife sustainability
for the health of streams themselves
for our future generational needs

First Nations are impacted by threats of increased logging, and we are all likely to be impacted by oil or gas pipelines. And we do not yet know how fracking is going to affect our land and resources. These are huge, and largely unknown impacts on our precious land.

The utmost caution is needed, and we will need binding standards to protect our resources.

Thank you

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:42 PM

I am a rancher in the interior of B.C. Will our wells which are for agricultural use be grandfathered? The investment costs for my irrigation have been considerable, and water used in the production of food is as vital and important as water itself. It is also important for the next generation, too.

Sent from my iPad

Subject: The use of water.

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:42 PM

To whom may have some power re. our water situation,

Water is a 'common' right to us all. We elect people who put other people to regulate its use. These people must consult with their constituents.

This issue is fundamental for every single person in this world.

Personal Identifiers Removed

Brentwood Bay, B.C. ***Personal Identifiers Removed***

Subject: WATER SUSTAINABILITY

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:27 PM

I think it is time the Regional Districts had a say in what happens in the local watershed.

I live in Shawnigan Lake, BC and am absolutely appalled that the government has granted a permit to dump 5 million tons of toxic waste upstream from the Shawnigan Lake Watershed. I looked at a cloth model of this site in relation to the Sooke Lake Basin and Shawnigan Lake and the facts are Sooke Lake Basin is lower than Shawnigan Lake so chances are WHEN the liner breaches because they all do, the Capital Regional Watershed for the City of Victoria will be contaminated. Everyone in the community from the Municipal level, Regional level, even the city of Victoria and all four provincial candidates were against this concept but somehow SRA still got a permit.

Let the Regional Districts decide whats best for their community with some provincial oversight.

The government needs to listen to the people not think strictly about what the impact to the coffers are going to be.

Facts are if we don't treat the watershed with respect in the end the financial gains will be all for not.

The legacy of maintaining a toxic waste dump is FOREVER not to mention the loss in residential and commercial development.

Also, it's time to stop Nestle from drawing millions of gallons of water for nothing, this is a resource that they are reselling and making a fortune.

NO TOXIC WASTE DUMPS above a watershed for starters would be nice.

Thank You

Personal Identifiers Removed

Subject: Water should be an inalienable right of all peoples

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:20 PM

Unhindered access to clean, clear, safe, potable water needs to be a pre-eminent, inalienable right of all peoples (where peoples are defined as living, breathing beings and not as legal fictions) everywhere; as such, water should never be bought or sold and should never be treated as a commodity or ingredient in a commodity.

Personal Identifiers Removed

Maple Ridge, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Tuesday, November 12, 2013 3:48 PM

November 15?

deadline for comment on the new Water Act?

That deadline is too short! My community cannot get together to complete our comments in time.

This issue is crucial for our community , the Upper Sunshine Coast/Okeover ratepayers

Please let us know that you have extended the date for responses.

sincerely, ***Personal Identifiers Removed***

Subject: proposed new water law
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Tuesday, November 12, 2013 7:00 PM

Thank you for seeking input from the public regarding the new water law. Clean water and air are essential for all living beings and so this new law needs to be considered in terms of sustaining the Earth and not only in terms of economics. Also Aboriginal rights must be respected. There is much scientific evidence that Fracking is destroying the water table through over-use and pollution - so part of any water law should be a law against Fracking. It is important to mandate clear, enforceable standards for protecting minimum stream flows, and water cleanliness. Oil, gas and coal should not be transported on water or through pipelines because of the immense risks of water pollution from oil spills and oil leaks.

Bottled water should be banned and clean tap water available to all people in BC.

Yours sincerely

Personal Identifiers Removed

Subject: B.C.'S new water legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 6:57 PM

Water is not a commodity it is the right of all Canadians to have clean sustainable water.

Our rights to water must not be sold out to private industries.

Personal Identifiers Removed

Personal Identifiers Removed

Sechelt B.C.

Subject: new legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 6:47 PM

I would like the government to put water under the control of local governments, with the appropriate funding required. Large companies using our water should pay higher amounts for it than are currently charged. First Nations should be included in all water planning and control.

Thank you.

Personal Identifiers Removed

Subject: Water Sustainability Act comments

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 6:33 PM

To whom it may concern:

With regards to the public consultation surrounding BC's new Water Sustainability Act, I would like it to be known that I believe that the Oil & Gas, Mineral resources, Hydro-electric, and Forestry sectors should not be held to a separate standard than the rest of the citizens and industries that enjoy the use of water in this province. Just because they are regulated under a different suite of regulations does not mean that they should not also have to meet the same objectives and standards as every other British Columbian.

I presume that the point of updating the Water legislation in this province is to modernize our regulations for current-day water use. I hope very much that the government will ensure that these industries do not get a free pass to continue down this archaic road of extracting huge amounts of water for minuscule fees, with sub-standard reporting, in order to maximize their profits. Having a stable supply of fresh water for generations to come is not just essential for human and environmental rights, but it is also good for the economy and good for business. What would British Columbia be without water?

Any new Act that allows these extractive industries to skirt the new laws, or find loopholes, or continue to be judged under an old-world mentality of seemingly infinite resources, will be a failure, purely for show, not worth the paper it is written on. These water usurpers are among the most abusive and wasteful of our fresh water resources. And with the current government's scheme to liquidate all the natural gas in our province in the next 50 years by fracking the entire northern half of our province—one of the most water intensive processes on Earth—if these industries are not held to account by the highest possible standards, then we face the very real possibility of our water supplies being depleted or contaminated for generations to come, and that could hurt us for decades or centuries, if not forever. And it will be the most vulnerable—our northern First peoples—who will suffer the effects of these outcomes the greatest, not those in cities.

So in conclusion, please do not allow massive corporate interests to write this law. This is a once in a lifetime opportunity to enact legislation that stands up for the rights of common people across this province to have clean drinking water in stable supply for as far into the future as we can imagine. With the consciousness that is now alive on this planet, we will no longer allow industries or governments to take as much as they want without considering the natural limits of our finite planet. There will be consequences for our province if we fail to consider the fallibility of our water resources. Except, they will not be felt by us, but by our children, our grandchildren and future generations. We must enact a progressive legislation that aligns with natural laws, is supported by science, and is written for the the people, by the people—not the short-term profit of a few corporations.

Thank you,

Personal Identifiers Removed

P.S. I also want to add that one month of "public consultation" is not nearly enough time for BC to fully comment on and engage with this issue to the fullest extent, especially considering its grave implications for everyone in the province if it is not done right. I can only assume that this timeline was specifically laid out to limit debate and prevent public comment from happening. I must insist that this timeline be extended to allow everyone in the province to become sufficiently informed to provide well-informed comments.

Personal Identifiers Removed

Subject: Private Hydro Projects

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 6:13 PM

As I understand current policy, when a company builds a private, for profit, hydro project, they are given total control of the water rights for the entire watershed that feeds there project for long periods of time.

I think this is excessive, surely we can provide for their project without turning total control over vast areas of the province's water supply to a private enterprise company. these projects are usually set up to provide a floor price for their power that will provide a decent return on investment. If that is done, we don't have to also give them water rights that in the long run could be worth more that the power. Let's think ahead.

Personal Identifiers Removed

Personal Identifiers Removed

Prince George, B.C.

Subject: Water sustainability
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Tuesday, November 12, 2013 5:21 PM

To the BC Government responsible for the Water Sustainability Act

It was more than a year ago that you requested our input in order to put together this proposal...now we need more time to respond to your current proposal...I, in particular, have a few issues with it, but I need more time than this week to pull together pertinent information to provide you with my strong suggestions for a rewrite...so please extend the deadline for at least a couple of months...I think that would be fair to the taxpayers....

Thank you for your consideration.

Personal Identifiers Removed

Nanoose Bay, BC

Subject: Water Sustainability Act
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Tuesday, November 12, 2013 5:15 PM

To: BC Ministry of Environment

Re: Water Sustainability Act

Thank you for the opportunity to comment on this proposed legislation.

I live in the Cowichan region and over recent decades have grown keenly aware of how influential water is to all aspects of our cultural, social, economic, and environmental existence. The significance of water is further heightened by the spectre of oncoming climate change. The Cowichan basin has already witnessed a dramatic shift in the distribution of available precipitation and runoff over the last 30 years. The 100+-year history of extractive industries and settlement has left the hydrology of this watershed quite transformed and struggling to heal.

It is commendable that the government recognizes the need to "modernize" BC's Water Act.

I believe that the new Water Sustainability Act should specifically embrace some fundamental principles and concepts, including:

- 1 The "Public Trust Doctrine" (PTD) as described by legal contributor Oliver Brandes (POLIS). The public interest must always trump narrow private interests. This doctrine needs to have an over-arching presence and be explicitly embedded in the new Act.
- 2 The new Act should recognize that the coming 100 years will be the century of watershed restoration. As a sustainable society, we ignore watershed repair and rehabilitation at our peril.
- 3 With respect to water, there are many pieces of provincial legislation that presently touch on its management and lead to jurisdictional confusion with consequent mismanagement or non-management at the local level. The new Water Act should recognize all overlapping provincial legislation and be accorded a position of primacy so that there is clarity in understanding water rules and certainty in decision-making and enforcement. The enabling architecture should also provide for a preparedness and responsiveness to extreme and rapid events. The Act's clarity should engender resilience on the ground.
- 4 I am encouraged by the grand language of the legislative proposal but urge that water protection and management be couched in terms of ecosystems, watersheds, or basins and not just streams or surface bodies. The interconnectedness of the hydrologic cycle and the intimacy between ground and surface waters in fact need to be holistically recognized by the Act so that there is no mistake about the systemic linkages and interdependencies.

5 Rather than "water objectives," "water standards" should be set for each basin that recognize the lowest anticipated seasonal base flow values and preferentially apportion first water rights to ecosystem services before any licence allocations. Water quality standards should also be established basin by basin.

6 The "first in time, first in right" practice of the last century should be scrapped in favour of prioritizing allocations that recognize the ecosystem first and then optimize the public interest. In times of drought, hierarchal restrictions should be imposed. Above all, this arrangement should provide some protective certainty to the underlying ecosystems upon which our collective sustainability depends.

7 Land use and management decisions are critical to watershed health. When planning, water-centric thinking should always come first. Extractive industries, forest land conversion, waste disposal management, urban development, and more, are all guided by a variety of legislation. (e.g., Private Managed Forest Land Act, Forest and Range Protection Act, etc.) Water basin management under the Water Act should be accorded a supervisory role so that landscape-scale decisions and potential cumulative impacts on the hydrology can be addressed. The exercise of "self-regulation" and "professional reliance" so often depended upon is insufficient to protect the public interest.

8 Regulating groundwater is vital to understanding not just aquifer consumption and recharge, but the entire integrated hydrological picture. All water abstraction - surface and ground, should be monitored and measured. Both low and high-volume usage should be tracked. ("We can't manage what we don't measure.") Ideally, data should be tracked down to the individual household consumption level just as we do with gas and electricity. We should be reminded of and made mindful of water consumption at every stage.

9 This Act should enable the necessary survey tools for the collection and collation of scientific data, watershed by watershed, quality and quantity. Only with the detailed knowledge of comprehensive inventories can individual watersheds be understood and managed sustainably.

10 The notion of 'collaborative governance' is a fundamental breakthrough and a way of democratizing this new Water Act. The idea of defined duties and responsibilities under the Act being delegated to a local authority is a progressive development. (e.g., "Water Sustainability Plans" and "Area-Based Regulations") Decisions and advice about water should be informed by local people who live in the watersheds and drink the water. Local watershed boards should be established where there is consensual agreement amongst a broad spectrum of local representatives. This inclusivity means partnering with First Nations and respecting traditional ecological knowledge. Consulting with federal authorities is also implicit, especially in the realm of fish and saltwater estuaries. Delegated governance should be legislatively supported by a clear model of funding adequate to finance local capacity. Duties and responsibilities should not just be downloaded on local communities without providing means.

11 Water consumption incentives and disincentives should be based on water pricing. The Act should have meaningful enforcement mechanisms and powers of punishment to ensure compliance - especially with respect to watershed damage or the abuse of water.

With this new legislation, I look forward to BC leading the way and setting an example in water sustainability and water consciousness.

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\*\*\*Personal Identifiers Removed\*\*\*

Duncan

British Columbia

CANADA

\*\*\*Personal Identifiers Removed\*\*\*

Subject: Water Sustainability Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 5:08 PM

legislative assembly: please give more time, till march 15th, 2014, for study of changes in our clean water act. in the mean time please ban all corporate free use of our water. thanks, \*\*\*Personal Identifiers Removed\*\*\*

Subject: BC's Water Legislation

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 3:01 PM

Since it is acceptable in this province for Nestle to systematically take our water for free, why should individual citizens be taxed annually for their water usage? Why are other naturally derived resources taxed and taxed heavily? Fish swim freely in our waterways. Why should there be any laws restricting their extraction? Why shouldn't there be a free-for-all in our fish, forest and mining industries? Why is our most precious resource being given away? It defies every level of human logic, finances aside. And while we are on the subject of finances, is it our job as British Columbians to subsidize private companies, or for that matter, help increase their profit margin? Wow! Cannot fathom what is at the heart of this over generous policy. The BC Liberals must be reeling in some new found big bucks to forego this obvious source of what could be a sizable income. How come the taxpayers of this province haven't heard about the windfall that we must have received and how co!

me we aren't sharing in this newly found influx of dollars? Maybe the managers of our provincial accounts are planning to refund our water taxes?

\*\*\*Personal Identifiers Removed\*\*\*

Delta, BC

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 3:37 PM

Thank you for your efforts in creating the Water Sustainability Act.

I agree... that the proposed new Water Sustainability Act should require large-volume users, such as industrial operations, to measure, record and report their water use and related information.

Details, including a definition of "large volume," would be set out in regulations under the new legislation.

I do not agree... that smaller-volume licence holders should be required to measure, record and report water use, but only in specific circumstances, such as under "Area-Based Regulations.

Small volume licence holders, those that use water for their own domestic use, should not have to do any reporting requirements. This is too much government, too much paperwork, too much bureaucracy, and too much inconvenience for the license holder and anyone else involved. Everyone should naturally be able to have the water they need for their home without any government involvement.

There should be no licenses needed for access to groundwater when it involves home use, domestic use...without exception.

Thanks for your consideration

\*\*\*Personal Identifiers Removed\*\*\*  
Penticton, BC

Subject: water

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 3:21 PM

yes, you don't need more water laws and bylaws, you need more enforcement.

In the north end of Nanaimo, the rich people area, they water everyday and no one enforces every 2 day watering.

Its not fair to the rest of Nanaimo who follow watering restrictions.

My partner works at night delivering papers and sees this watering going on and i have gone and seen it myself

\*\*\*Personal Identifiers Removed\*\*\*

Subject: New Water Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 2:56 PM

This new water act does not go far enough. This province and its people need an act with some teeth in it. The fact that the act does not protect our precious water from industry is an atrocity. Let's put the health of our water ways and the people of this province before corporations for once.

\*\*\*Personal Identifiers Removed\*\*\*

Vancouver

Subject: New Water Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 2:35 PM

Dear Mme/Sir,

I realize that the issues associated with new legislation to regulate all water in B.C. are plentiful and very complex,

I am of the opinion that:

- Water is one of the natural commons of the environment. This principle needs to be firmly maintained in legislation. The underlying thought is that all members of society must be able to assist in managing this commons. All opinions must be included in the new legislation. No opinions must be ignored or dismissed.
- Individuals and every level of public management ( from organized local citizen forums to senior Government authorities) must be able to participate in the decision making process at any time they feel that their interest is affected, until a consensus regarding management of this commons has been established.
- At all times water must be able to meet all needs for it. That includes in descending order of priority;
  - ecological needs and services, and
  - actual human needs .

These principles must be established and secured in any new legislation.

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

\*\*\*Personal Identifiers Removed\*\*\*

Subject: proposed new BC provincial water law

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Cc: kstephens@watersustainabilitybc.ca

Sent: Tuesday, November 12, 2013 2:16 PM

BC Provincial Government - To Whom it May Concern,

**Please, please, please** - in your planning & implementation of any new provincial or jurisdiction law regarding water in any capacity, take into consideration the many important factors including, but not limited to, the following:

- First Nations Rights (we need to respect and honour treaty Rights and Title)
- Local control (we need to insure local control, use & protection of our water resources – drinking water & otherwise.
- Conservation - be acutely careful of water outlay for industry use of surface & ground water. Do not let industry harm or destroy our drinking water and coastline.
- Sustainability – encourage (with effective guidelines or even legislation) and enforce protection of our water – most particularly minimum stream flows and waters & areas at risk.
- Provide adequate + fair funding for local watershed management.

Thank you for your kind attention....may nature & wisdom be your guide!

\*\*\*Personal Identifiers Removed\*\*\*

Subject: Fwd: opinions re new water act final version  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 2:10 PM

I should have mentioned that the Nicola process failed for the same reason as Langley. The users got heavily involved in the process and bogged it down to the point where nothing effective was getting done and the volunteers felt that they were wasting their time. My brother has opted not to be involved in the new Nicola process started in the last year or so after his experiences with the last process.

I have to say that I am skeptical about the new process just repeating the same mistakes as before. I hear from the volunteer members that the manure issue is being minimized (talk about not blaming anyone when extensive water testing done by my brothers and others 10 years ago showed that manure coming into the lake from the streams on the ranches was a big issue). I gather that the farms have built berms around the feedlots and perhaps moved the lots back from the streams. So testing now may show a temporary decrease in nitrate and phosphate levels until the soil gets saturated and the levels in the streams build again. There isn't a lot of rain there but eventually it will carry the nitrates and phosphates into the streams. Nitrates and phosphates don't break down very much at all unless treated or unless they are collected and spread on actively growing crops that can absorb the nutrients.

Thus the problem with downloading control and decision making capability over issues to local groups.

\*\*\*Personal Identifiers Removed\*\*\*

B. A. SC. MD

\*\*\*Personal Identifiers Removed\*\*\*

Langley BC \*\*\*Personal Identifiers Removed\*\*\*

Background.

The Salmon River Enhancement Society in Langley has been very actively involved in water issues participating in working groups, holding public forums several times on the issue, successfully involving local papers in publicizing water issues and lobbying government to finally bring forward effective protection for the resource (including a Water Act, more enforcement personnel, more resolve to enforce the issues etc.).

I have been the main person involved in water issues for the Salmon River Enhancement Society in Langley. As you know the Hopington aquifer is at the top of the list of threatened aquifers in the province with the water table dropping a foot a year for over 30 years and with the provincial important Salmon River coho run being threatened as parts of the river are going dry in the summer months.

Unfortunately the pilot projects in regard to this issue including the Salmon River Watershed Management Partnership, The Water Resources Strategy and the Water Management Plan are essentially dead in the water. These groups too often were dominated by the users and were deflected from meaningful measures to deal with water quantity and water quality. A similar effort in the Nicola watershed a number of years ago (my brother was involved) also failed despite also spending a lot of money and occupying a lot of time for the volunteers involved. Little or nothing came out of these efforts.

Thus any attempt to download control and decision making to local groups would be repeating what has not worked. Encouraging local involvement and taking advantage of that involvement to tailor regulations to local conditions makes sense. But that involvement has to be given firm direction to prevent local groups from becoming dominated by user groups and/or using up large amounts of funding while becoming bureaucratic and ineffective.

#### My Main Points

- 1) The Act needs to be much stronger to protect base flows of streams (i.e. guarantee that sufficient water will be available for fish survival even in dry summer months) especially in areas like the Hopington aquifer where excessive withdrawals have caused the water table to drop a foot a year for over 30 years resulting in danger to the provincially important Salmon River. Withdrawals must be curtailed where they are causing problems.
- 2) Will regulations follow in a reasonable time frame---the artesian well sections of Phase 2 of the existing act still have no regs over 5 years later?
- 3) More money will have to be raised from the users (higher rate for water) either initially or soon (I can see the rationale for a lower introductory rate with escalation over a reasonable period to time to allow users to adjust their operations) in order to pay for enforcement and rehab efforts. Eventually it would make sense for the cost for large users to approach the cost of municipal water less the costs of treatment.
- 4) Will there be the will to enforce the act and the personnel in the field. We cannot afford a repeat of the fiasco going on at DFO where they prefer to spend their money on layers of bureaucracy and public relations while abandoning work in the field to protect the resource. If this is accompanied by a reluctance to prosecute the Water Act, like the Fisheries Act, will be a toothless tiger.
- 5) Will the act have any traction vis a vis the Right to Farm Act since farming including manure and irrigation are a big part of the quality and quantity problems
- 6) Will the government reassure us that they are not going to download responsibility for planning and action to local stakeholder groups?

\*\*\*Personal Identifiers Removed\*\*\*

Subject: CANDAIN WATER RIGHTS  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 1:24 PM

Please do not sell our water

\*\*\*Personal Identifiers Removed\*\*\*  
surrey

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 1:12 PM

New Water Act

Dear Sir/Madam

The elephant in the room in terms of water management is....climate change. Unavoidably, we will have altered precipitation patters due to global warming and storm events etc will inevitably get worse as long as we ignore the root problem – the burning of fossil fuels.

So the best thing you can do to help maintain a sustainable water supply is to phase out the burning of fossil fuels. Your government has mandated carbon emission reductions within municipalities through the Climate Action Charter. But ironically, and hypocritically, the BC government wants to increase the export of fossil fuels; thereby negating any reductions we make at a local level. This duplicitous policy is a form of insanity perpetuated by the fossil fuel lobby because that fuel will be burned overseas and the carbon dioxide returned to our own area – we share only one common atmosphere.

So it is entirely appropriate that a lead aspect of any water policy should be a reduction in the use or export of fossil fuels.

Sincerely, \*\*\*Personal Identifiers Removed\*\*\*

Cowichan Carbon Buster

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 12:55 PM

Re: BC's New *Water Sustainability Act*

Until you have lived on the ground in a water sensitive area...

Until you have lived outside of a city where engineers and bylaws protect your water...

Until you have had to worry about your well or about the purity of the lake from which you draw water.....

You cannot fully understand the importance of protecting a water source or a watershed.

Provincial civil servants are the wrong people to expect to fully protect, or understand, that life-giving resource or to know what is really going on in communities where they do not live.

Only the people on the ground have the immediacy and location to smell, feel and taste what is happening to their water.

Only the people in the area can hear the machines destroying the watershed as it is happening.

That is why some local control of watersheds must be built into the new BC Water Act.

\*\*\*Personal Identifiers Removed\*\*\* Shawnigan Lake BC

\*\*\*Personal Identifiers Removed\*\*\*

Subject: water act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 12:54 PM

everybody including Corporations should pay for water consumption and the rate should be the same for everybody including Corporations.

\*\*\*Personal Identifiers Removed\*\*\*

Castlegar B.C.

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 12:48 PM

As a resident of British Columbia, I am pleased to see this subject addressed. It is long overdue.

Our water is so important to our future. My feelings on the commercial users of our water is they should be charged and the charges should be enough that they will treasure the water as we do. DO NOT GIVE OUR WATER AWAY. Why let them off the hook and give the bottled water companies, oil companies, gas companies and any other commercial users a price break. Charge them and charge them a lot with price adjustments upwards as inflation or scarcity demands.

On the other hand the bottled water companies could maybe get a price break if they want to bottle.....say White Rock water, which is high in arsenic and other substances. ALL WATER IS NOT CREATED EQUAL. Also no tricky maneuvers such as "slant" drilling or buying property and drilling. Lets protect all our water for future generations.

This philosophy cant extend out into rivers and the ocean. Let's take care of ourselves first and foremost.

Good luck to all of us.

\*\*\*Personal Identifiers Removed\*\*\*

White Rock, British Columbia, Canada

Subject: New Water Law  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 12:35 PM

Hello,

Regarding the new Water Law changes, I have the following comments.

We live in the Cowichan Watershed area, specifically on the Koksilah River, from which we draw our drinking water, under licence, so this directly affects our household.

1. We would like to see our local Cowichan Watershed Board be able to take over the real decision making in managing our water. They are the in the area, have done the research and have a hands-on group of people who do the monitoring. Having this work managed by somebody in Victoria is just not a feasible solution and has led to problems in the past.

2. First Nations Rights and Title need to be respected in all aspects of the new water law and they should be consulted at all decision making levels.

3. The watershed management needs to be adequately funded through revenue sources by charging companies that use surface and groundwater in large quantities. The current fee system is so low, that we might just as well give it away, as I heard again on the news today. We don't just want this to be yet another download of costs on to the backs of local government.

4. The oil and gas industry must be accountable for any interference with surface or groundwater. The current proposal seems very weak to me and leaves the door open to abuse.

5. We live in an area where there are a lot of dairy farms so we need clear, enforceable standards to protect stream flows and to control the pollution from farm runoffs. The current guidelines appear to be rather vague and unenforceable.

Water is our most precious commodity, without it we have an uninhabitable planet. I trust and hope that the people involved in formulating this badly needed New Water Law will make the next generations proud of their fore bearers and not aghast at their selfish and short sighted decisions.

Thank-you for taking the time to read our comments.

Yours sincerely,

\*\*\*Personal Identifiers Removed\*\*\*  
\*\*\*Personal Identifiers Removed\*\*\*,  
Cowichan Station, B.C.,  
\*\*\*Personal Identifiers Removed\*\*\*

Subject: Water Sustainability Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 12:20 PM

Our water should not be taken lightly. It is so precious and will remain so. There should be huge charges for "for profit" users. That would include the oil companies, gas companies, bottled water users and any as yet unidentified users. (That sweeps in any future water use) On the other hand if bottled water companies want to bottle the White Rock water which is high in arsenic and other substances, we might give them a price break....maybe. Not all water is equal!

So Government of British Columbia, please stand up for the people in this Province and protect our water resources. Make the commercial users pay and pay and pay.

FOR THE LIVEABLE FUTURE OF BRITISH COLUMBIA.

Good luck to all of us.

\*\*\*Personal Identifiers Removed\*\*\*, White Rock, British Columbia

Subject: Water Legislation

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 12:14 PM

Dear Sir:

Let's protect our water - no letting free-loaders take our precious resource and no fracking.

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

Burnaby, BC

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 12:09 PM

Hello,

I'm writing to provide feedback on the proposed Water Sustainability Act. I consider the bulk rate charges that are proposed for groundwater extraction to be ridiculously low. To be charging Nestle \$285 for millions of liters of extraction annually amounts to a give-away of precious BC resources. I think the pricing structure needs to be seriously re-considered...with British Columbia's future in mind and not a corporation's profit margin.

I am also concerned at the notion of decision-making being delegated to agencies other than the BC Government. Advisory panels of various stakeholders make sense but final decisions should rest within the elected officials and/or civil servants tasked with provincial management.

I think definitions of "adequate flow" and "basic needs of British Columbians" need to be clearly articulated and the Temporary Halt clause that exists for the Minister to enact in times of drought needs to be clearly delineated – how long can a halt last without penalty from the lease holder?

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

Subject: BC Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 12:01 PM

To the Government of British Columbia,

Water legislation is required in British Columbia. It is more than a century overdue. Principles that I need to see upheld by a Water Sustainability Act include:

- recognition of access to potable water as a basic human right
- recognition of water as a common property, not a private property
- specific elimination of reference to public water as a commodity
- higher fees than are being charged to residential users applied to corporate and commercial users of water. If corporations or other businesses are selling water for profit, their usage rates should be higher than the rates charges to citizens using water for their livelihood.
- inventory of groundwater aquifers in British Columbia
- protection of all drinking watersheds by legislation - the elimination of potential polluting activities in all watersheds

All of these issues need to be adequately addressed in a new Water Sustainability Act.

\*\*\*Personal Identifiers Removed\*\*\* Merville

\*\*\*Personal Identifiers Removed\*\*\* Merville, British Columbia

Subject: Water Law

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 11:57 AM

To the BC Government

I would suggest going back to the drawing board on the proposed Water Law. The law as currently proposed seems to me to be less than what is needed to make for a sustainable future. I would suggest you do your job by-

Making sure big companies pay much higher fees for its use,

Considering and respect First Nations rights

Giving local bodies the right to real decisions over our watersheds Protecting minimum stream flows with clear standards Keeping the oil and gas industry on the agenda and keeping them answerable to the stakeholders, which includes us, the public.

Listening to the stakeholders who feel much more needs to be done to make this law fair to all

We cannot afford to get these things wrong, we are running out of time.

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

Subject: water act comment - private forest logging  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 11:44 AM

Where I live on south-eastern Vancouver Island, a big impact on our water quality comes from private land logging, so I would like to see the Water Act step in to protect our water where the Private Managed Forest Land Act fails.

Many people argue that private land owners can do whatever they want on their property but anyone who owns land knows that is un-true. Land ownership bestows a restricted bundle of rights on the owner, and not freedom from responsibility. The recent tightening of laws regarding septic system installations is just one demonstration of how a government can limit private rights for the good of the whole. Backyard burning regulations are another. I would like to see the proposed Water Act fix the ineffective system of self-regulated water "objectives" in the Private Managed Forest Land Act by setting measureable and enforceable standards for logging operations, whether on private or public land.

For recent articles on the issues with the current PMFLA system, please see:

<http://www.silviculturemagazine.com/articles/summer-2013/whoa-neighbour-how-privately-managed-forest-land-owners-broke-social-contract>

\*\*\*Personal Identifiers Removed\*\*\*

Cowichan Valley

Subject: water legislation

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 11:20 AM

public interests MUST outweigh corporate profit

\*\*\*Personal Identifiers Removed\*\*\*

Nelson, BC

Subject: BC Water Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 11:17 AM

Thank you for your invitation to comment on this important legislation. I am pleased that you wish to protect our many forms of water (rivers and streams, ground water, coast lines, etc.). I am deeply concerned that fracking gas, shipping coal, and piping/shipping oil from our ports can somehow be done without damaging our pristine waters. In the near future, the world population will be more desperate for clean water than for dirty energy sources. The energy industry is pushing carbon emitting products faster than our climate can accommodate them with devastating results. Ask the insurance industry.

If you are truly concerned about BC water quality, I hope you will push for clean, renewable forms of energy that will not endanger our air and climate as well as our water.

Please plan for 7 generations. Pass legislation that will ensure our waters will be safe and clean for our children's great grandchildren.

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

Victoria BC

\*\*\*Personal Identifiers Removed\*\*\*

Subject: water - the number one resource we have to protect

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 11:12 AM

The biggest threat to our security is not war or terrorism - it is lack of water.

The earths aquifers are drying up and many are from non renewable sources.  
No life on earth can exist without water, not human, not animal and not  
vegetation.

Without water we cannot grow food and with rising temperatures crops are at  
increased risk of failure to produce.

Even the richest people in the world need water to survive.

Climate change is causing dramatic increases in temperatures

\*\*\*Personal Identifiers Removed\*\*\*

North Vancouver

Subject: Water Sustainability Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 10:14 AM

As a well water user for domestic supply I would suggest that commercial takers and sellers of water be billed properly for their consumption. Further to marketplace prices for commercial water there should be regulation concerning drought periods where commercial taking should be curtailed. Thank you for your time and consideration.

\*\*\*Personal Identifiers Removed\*\*\*

Metchosin, B. C.

Subject: Re: New Water Act and the Cowichan Watershed  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 10:13 AM

Dear Minister Polak,

I believe this is one of the few opportunities available to respect First Nations Rights and Title in both the creation of a new law and in its implementation. The Cowichan Tribes had most of their land appropriated without consent through the E&N grant. Ensuring there is an adequate water supply for drinking and salmon spawning is one step toward recognizing the constitutionally protected rights of Cowichan Tribes.

In recognizing and respecting Aboriginal rights and title, this also provides an opportunity to clearly detail the ability of local bodies like our Cowichan Watershed Board to be able to take over real decision making authority over our watersheds. This means that proper funding is required so the provincial government does not simply devolve all of its responsibilities to direct the management of our water resources.

Mandate clear, enforceable standards for protecting minimum stream flows, instead of the vague and ineffective 'guidelines' now on offer. If necessary, purchase to expropriate the properties that will be most effected when the appropriately delegated authority (hopefully the CWB) acts to raise the weir to allow more water storage to resist against late summer droughts.

This opinion and request is based on common sense. We all need an adequate clean water supply in the Cowichan Valley for ourselves and our future generations. Please take this opportunity to act now, while it is still possible.

Respectfully,

\*\*\*Personal Identifiers Removed\*\*\*, B.A., M.A.

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 9:43 AM

Our water is our most precious resource. We must put its protection above all other common goods. So even though we need industry, we need clean water even more. Please make the new Water Sustainability Act reflect this priority.

\*\*\*Personal Identifiers Removed\*\*\*  
Victoria, BC

Subject: Stop Corporate Abuse  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 9:17 AM

When I first read the newspaper article about Nestles having unfettered access to our local drinking water, I was dumbfounded and appalled. The fact that this was perfectly legal under the current rules makes it all the more vital to amend them. We must put public interest ahead of corporate profits.

\*\*\*Personal Identifiers Removed\*\*\*  
Vancouver, B.C.

Subject: BC's Water Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:25 AM

To those who have power over BC's water:

B.C. needs water legislation that puts public interest ahead of corporate profits. I feel that our government should Implement a law that gives our communities and our First Nations the power to effectively steward our precious water.

B.C.'s current Water Act is over 100 years old and no longer works with modern-day demands and has also failed to provide the public fair return on a publicly-owned resource. Our health, environment and economy all depend upon access to clean water. B.C. is the only place in North America that doesn't regulate groundwater and I find this appalling.

I urge you to put BC's residents and first Nations communities ahead of big business and update your water act proposal to reflect this, while protecting groundwater at the same time.

Thank you for reading and for considering our future generation's water supply.

\*\*\*Personal Identifiers Removed\*\*\*

Salt Spring Island, BC

Subject: Water Sustainability Act

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 8:11 AM

To The B.C. Government,

Do not let Corporations bottle and sell our water back to us. Water is a necessity of life and (like air) is not a commodity to buy and sell. Write a Water Sustainability act that is sustainable and preserves precious water for now and the future. Keep corporations away from fresh water sources.

Thank you,

\*\*\*Personal Identifiers Removed\*\*\*

Vancouver

Subject: Water Sustainability Act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 7:31 AM

Water can not be treated the same as other commodities in terms of any trade agreements. Full exclusion from any international corporate tribunals, that could allow foreign control of our water MUST be part of this review. We can never let go of our water independence. Sincerely \*\*\*Personal Identifiers Removed\*\*\*

Subject: sustainable water act  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 6:52 AM

Good day,

I want to encourage you to ensure that the New legislation enshrined the rights of first nations people to a sustainable water supply for their communities. Also, that they have the right to decide on their rights as autonomous nations.

Thank you,

\*\*\*Personal Identifiers Removed\*\*\*  
kelowna, bc

Subject: Cumulative impacts

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 6:26 AM

The cumulative impacts of industry and small scale projects need to be considered and reported upon in order to limit anthropogenic impacts on our watersheds. Water is our most precious asset here in BC and needs to be treated that way and regulate by strict legislation. The improvements to BC's water act as suggested and defended by Various Environmental Law groups including WestCoast Environmental Law should be included in legislation including their recommendations to specific changes to the the language that make the legislation more effective.

\*\*\*Personal Identifiers Removed\*\*\*

victoria

Subject: B.C.'s New Water Legislation  
From: \*\*\*Personal Identifiers Removed\*\*\*  
To: Living Water Smart ENV:EX  
Sent: Tuesday, November 12, 2013 4:32 AM

Water, pure clean water, is the most valuable resource there is . All life depends on water, plants, animals, fish, birds and humans. No amount of oil, gold, diamonds, natural gas, electric power or any other treasure would be worth anything to you if you were dying of thirst and there was no water, or no water safe to drink.

Even in space exploration the one element most crucial being sought is water, because the presence of water indicates the possibility of life.

Our water in B.C. needs to be protected from exploitation, contamination and waste. The fracking for gas extraction poses a serious threat to water quality, the acquisition of our water for sale by Nestle or others is theft of something that belongs to us all, the privatization of rivers and/or streams for power for profit threatens our fish habitat and future food source as well as recreational value. The use of lakes for dumping sludge, tailings or toxic materials should be seen as a crime and prevented by strong legislation.

All these things and more need legislation that protects this most valuable resource for us. Safe, healthy, clean water should be recognized and valued above all other values.

Thank you

\*\*\*Personal Identifiers Removed\*\*\*

\*\*\*Personal Identifiers Removed\*\*\*

Salt Spring Island BC.

Subject: Water Legislation

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 3:28 AM

To whom it concerns;

A well is a need of survival use for individuals and families and they should not be required to pay beyond the cost of the well placement and water quality testing itself.

Industry must be charged for their use of water and not some negligible sum.

The use of massive amounts of water above or below ground must be reflected in the cost of infrastructure, resource management, and administrative costs.

The tax payers who own these commons must not be made to pay for the cost of providing this to industry, it is a cost that they must bear as part of their business plans and ongoing operational costs.

The dividing line should be when massive amounts of water is taken for an industrial "for profit" only use.

I would draw a line between a 20 hectare family run farm and an agri-business on many hundreds of hectares for instance.

A graduated rate could be put in place for operations that did not fit easily into one or the other and could be looked at case by case.

\*\*\*Personal Identifiers Removed\*\*\*

Surrey, BC

Subject: Water legislation

From: \*\*\*Personal Identifiers Removed\*\*\*

To: Living Water Smart ENV:EX

Sent: Tuesday, November 12, 2013 1:08 AM

I am opposed to wasting precious water resources for fracking. I am opposed to companies bottling groundwater free of charge, and feel the bottled water industry is the worst form of corporate welfare and waste of our resources.

\*\*\*Personal Identifiers Removed\*\*\*

Victoria, BC