



CITY OF ARMSTRONG

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OFFICE OF THE MAYOR

Hon. Murray Coell, Minister
And John Slater, Parliamentary Secretary for Water Stewardship
Ministry of Environment Office of the Minister
Parliament Buildings
Victoria, BC V8V 1X4

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MINISTER'S OFFICE - RECEIVED 2011
MINISTRY OF ENVIRONMENT

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Dear Hon. Minister and Mr. Slater,

Mayor and Council for the City of Armstrong are pleased to advise that we appreciate your efforts to allow for broad consultation regarding the proposed Water Sustainability Act. While we find that the latest policy document is much too general to comment on in any meaningful way we do provide some comments below.

Council has had concerns for a number of years about water licences issued on creeks with little to no knowledge by the Province on whether the creek can provide that water. We understand that the licence says that it is a first in time-first in right and if you are low on the creek and there is no water you don't get any, but it can become an opportunity for conflict with others licensed on that creek, especially if one of them is local government. Also, Water Licenses are maintained by water districts that do not use them, yet maintain that they have the "right" to that water amount. Our example is that we have a number of Water Districts that are provided water by the City of Armstrong water system, which does not include their water licence amount in the "water system" accounting. If they don't use the licence - i.e. they aren't taking water from Fortune Creek under that licence - why do they still have rights to it? We know it is because they pay the Province for it annually - a false economy. In short our comment is likely that we respectfully suggest that the idea of water licenses also be part of the clean-up of the Water Act in British Columbia.

We understand that there is consideration to begin the licensing or managing of groundwater systems. We believe that it is an idea whose time has come, but we would like to ensure that proposed legislation takes into account those existing municipal water systems with groundwater sources as "grandfathered" in some way, with respect to adding a whole bunch of new rules and regulations to local gov't's. who are running water systems which include all or a portion of ground water.

The City of Armstrong encourages further consultation with local government water purveyors when the draft legislation is available. Then it will be possible for local governments to provide you with comments on how what is actually proposed will affect us in our operations.

Yours very truly,

Chris Pieper, Mayor

Cc: Honourable Stephanie Cadieux, Ministry of Community, Sport and Cultural Development
Mr. Gary MacIssac, Executive Director, Union of British Columbia Municipalities

