

Arrowsmith Watersheds Coalition Society

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Parksville, B.C.
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17 February 2011

Water Act Modernization Submission
Ministry of Environment
Water Stewardship Division
PO Box 9632, Station Prov Govt
Victoria, BC V8W 9M2

RE: Water Sustainability Act Review

Dear sir or madam:

The Directors of the Arrowsmith Watersheds Coalition Society welcome the opportunity to provide input and comments on one of the most important pieces of legislation to be considered by the provincial government. Two of our directors were able to participate in the very informative workshop held by the ministry in Nanaimo, 5 March 2010; however, the other directors are also active in various groups and activities that focus on the protection of our water sources.

The following over-arching principles must be acknowledged as fundamental to the effectiveness of the proposed legislation:

- Any new act intended to protect and regulate the use of water must take precedence over the Land Act and the Oil and Gas Act, if it is to protect the one resource upon which our lives depend;
- Ground water and surface water must be officially recognized as a single resource, which are inextricably linked;
- Water needs for flora, fauna and aquatic beings (ecological flows) must be legally established as the highest priority within Provincial Water Objectives [PWOs], because without them the long-term sustainability of ecosystems cannot be assured;
- Where over-licensing has taken place, such as the Englishman River, French Creek and many other water courses on the East side of Vancouver Island, the necessary ecological flows must be re-established, These flows must not be reduced just to accommodate increased human needs/wants due to population growth; and
- Even smaller extractions of groundwater need to be measured, reported, compiled, evaluated and regulated due to the cumulative impact on the aquifers which they access.

Adherence to the aforementioned principles should be considered as 'due diligence' by the government when considering the new Water Sustainability Act. Even in times of water scarcity, the ecological flows and drinking water must take precedence over all other uses.

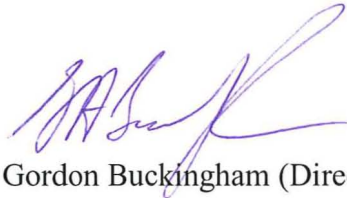
The responsibility and authority for the protection of our local watersheds needs to be clarified through a clear set of rules and regulations that delegate appropriate powers to the Regional Districts, while retaining overall accountability at the provincial level. How this can be achieved is unclear, but there are probably useful examples elsewhere in North America [eg – Ontario or Alberta].

Finally, the sale of water licenses in any market would be contrary to the concept of water being a necessity and 'a right to life'.

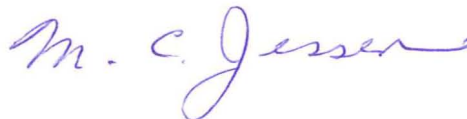
Be assured that the primary concern of the Arrowsmith Watersheds Coalition Society remains the continued safety and security of our water supplies, whether ground or surface water.

Yours truly,

Arrowsmith Watersheds Coalition Society



Gordon Buckingham (Director)



Michael Jessen (Director)