

From: Chris Barlow [cbarlow@castlegar.ca]
Sent: April-29-10 11:57 AM
To: Living Water Smart ENV:EX
Cc: Louise Scott
Subject: Submission for Modernization of the Water Act
Attachments: Water Act Letter Submission.pdf

Please accept the attached letter as a submission by the City of Castlegar, for consideration during the Modernization of the Water Act.

A hard copy will also be sent by mail.

Please call me if you have any questions.

Thank you,

Chris Barlow, A.Sc.T.
Director of Transportation & Civic Works
City of Castlegar
cbarlow@castlegar.ca
ph. 250-365-5979
fax 250-365-0594



2010 04 29

File: 5600-01

Water Act Modernization Submission
Ministry of Environment, Water Stewardship Division
PO Box 9362, Stn Prov Govt
Victoria, B.C. V8W 9M2

Dear Sir/Madame:

Re: The Water Act Modernization

Please accept the following submission from the City of Castlegar in regards to the Modernization of the Water Act.

The City of Castlegar receives its source water from the Lower Arrow Lakes. A deep intake in the lake provides the City with excellent raw water. The City's concerns center around preserving that excellent raw water source.

Development Permits

The Lower Arrow Lakes stretches from Castlegar to the Mica Dam near Revelstoke. It is a massive watershed that is almost entirely undeveloped. In the last 2 years, there have been several developments that have received a permit to construct and discharge treated effluent into the Arrow Lakes upstream of the City's intake. At the time of Development Permitting, the City provided feedback to the Integrated Land Management Bureau expressing objections to the developments. The City is concerned that private developments with private sewage treatment systems may not be able to maintain the effluent quality proposed at the time of development. This poses an immediate and continual concern for the City.

Water Quality Standards

The City of Castlegar, like other municipalities, operates under a drinking water permit that is issued by the local health authority. For Castlegar, this is the Interior Health Authority (IHA). Over the last 5 years, significant changes in drinking water quality standards have occurred. The most significant for the City of Castlegar is the requirement for dual-barrier treatment. As noted earlier, the City enjoys excellent raw water quality. In fact, the City is one of the few municipalities that meet the requirements for IHA's filtration deferral. Filtering the City's water is a

significant expense (\$15-20 million for a municipality of approximately 8300 people), and the historical data has proven it unnecessary. The City is concerned that the filtration deferral is not firmly set in law. This uncertainty of future water quality requirements makes it difficult to budget accordingly.

Lake Enhancement Programs

Since approximately 2004, the Ministry of Environment has been seeding the Lower Arrow Lakes with nutrients to produce more algae growth, thus enhancing Kokanee stocks. Fish stocks have risen, but so have concerns with the algae production in the City's raw water. Prior to 2007, there were no reported instances of algae blooms in the City's raw water. In 2007, and 2009 the City encountered algae blooms in the Lower Arrow Lake that caused problems within the City's distribution system. Point of service filters clogged quickly and prompted questions from the public. The type of algae being promoted in the Arrow Lakes would cause havoc for traditional filtration systems. If the City was required to filter its water, it would also now require a Dissolved Air Flotation (DAF) or similar system to remove the algae prior to filtering.

In summary, the City would like to see further authority provided to Municipalities to protect their watersheds. Additionally, clarity and stability in Provincial water quality guidelines will help Municipalities plan and budget for future capital upgrades.

Please contact the undersigned if you have any questions.

Yours truly,



Chris Barlow, A.Sc.T.
Director of Transportation & Civic Works

/cb

pc:- John Malcolm, City Administrator
Garry Sauer, Operations Manager