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Sent: May-01-10 12:09 PM
To: Living Water Smart ENV:EX
Cc: Pobran, Ted ENV:EX
Subject: Ducks Unlimited Canada - WAM Submission
Attachments: wamsheet-Mar10.pdf; DUC WAM submission_April.pdf

Good morning,

Please find attached Ducks Unlimited Canada's submission to the WAM consultation process. Also attached is a BC wetland fact sheet. Thank you for the opportunity to provide comments. Ducks Unlimited Canada looks forward to further discussion about wetland and water issues in BC in the coming months.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Andrea

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Ducks Unlimited Canada Submission to Water Act Modernization

April 30, 2010

Everyone needs to understand the far-reaching consequences of unencumbered wetland destruction. Society needs to recognize that we all play a role in this story, and we should take comfort in the fact that we can shape its plot. As taxpayers, we need to engage politicians, at all levels, to help find solutions. Governments must also play their role, by listening to their constituents and by taking this issue seriously. The solution to this problem can be found in the right mix of policies and regulations, and DUC will continue to push for this so we can end the troubling story of wetland loss.

("The drain game," Conservator, 31-1)

Wetland loss needs to be stopped immediately to prevent further deterioration of Canada's water resources. Additionally, wetland restoration must begin if we hope to improve and maintain the quality of our water supplies for future generations.

(DUC Broughton's Creek fact sheet).

Ducks Unlimited Canada (DUC) envisions Canada as a nation that can sustain use by people and wildlife without endangering the amount or functions of natural lands. DUC leads wetland conservation for waterfowl, other wildlife and people in North America and aims to conserve, restore and manage wetlands and associated habitats for North America's waterfowl. These habitats also benefit other wildlife and people. DUC is a member of the British Columbia **Wetland Stewardship Partnership**.



DUC is grateful for the opportunity to provide comments on the WAM process and looks forward to continued participation in the discussion about wetlands and water related issues in British Columbia.

General Comments:

1. Wetlands play a vital role in ensuring water quality and quantity in British Columbia.
2. Conserving wetlands is fundamental to *Integrated Watershed Management*.
3. Wetland protection and restoration must be a priority for British Columbians and the BC government.
4. **DUC advocates formal protection for wetlands in the provincial *Water Act*.**
5. DUC advocates the development of a no-net loss/ net gain policy for wetlands in BC that is supported by an effective and enforceable mitigation/ compensation framework.
6. Mitigation/ compensation must put an emphasis on impact avoidance and minimization and not simply compensation.
7. DUC wants to continue working collaboratively with the province and other partners to develop strategies that protect water resources, wetlands and water related ecosystems in BC through the **Wetlands Stewardship Partnership**.
8. DUC advocates transparency in the WAM process and would like to maintain communication with the Ministry of Environment while legislation is developed in the coming months.

Specific Comments

Goal 1: Protect Stream Health and Aquatic Environments

- ❖ Wetland health is integral to stream and watershed health
- ❖ Protecting all wetland types (swamps, marsh, fen, bog) whether permanent/temporary provides an important source protection for water quality and quantity.
- ❖ Language in the *Act* must recognize all wetlands classifications in BC. Definition of wetland must be expanded beyond swamp/ stream and account for all wetland classifications, including ephemeral wetlands.
- ❖ Allocation decisions should take place only after assurance is made that there is adequate water for species and ecosystems
- ❖ Riparian area protection is critical for water quality and supply
- ❖ Over and above wetland protection, restoration is important for water quality and quantity

Goal 2: Improve Water Governance

- ❖ Regardless of the governance model chosen, DUC wants assurance that there will be rigorous standards that will apply provincially and that cumulative effects will be carefully monitored.

- ❖ DUC, through the Wetland Stewardship Partnership has relevant information and tools that can help build capacity at a local government level to improve governance. (Green Bylaws Toolkit, Wetland Ways)

Goal 3: Introduce more flexibility and efficiency in the water allocation system

- ❖ Wetlands play a critical role in ensuring water supply.
- ❖ DUC supports a science-based approach to water allocation in BC that ensures adequate flow for species and ecosystems before allocation decisions are made.
- ❖ DUC supports flexibility of allocation and the use of the precautionary principle, particularly because of uncertainty about climate change and how this will affect our water systems in the future.
- ❖ Wetland restoration in key areas supports water quality and quantity. Opportunities for wetlands restoration should be considered provincially, and particularly in areas where there are supply and quality issues.

Goal 4: Regulate groundwater extraction and use.

- ❖ Wetlands are critical for groundwater recharge
- ❖ DUC strongly supports legislation that regulates of groundwater in BC
- ❖ DUC supports science that increases knowledge of groundwater process, impacts and availability in BC.

Thanks you for the opportunity to comment. Please do not hesitate to contact Ducks Unlimited Canada if you have any questions or comments.

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Stop the vanishing act.

Up to 85 per cent of freshwater and 80 per cent of tidal wetlands have disappeared in settled areas of British Columbia.

Wetlands are one of the Earth's most productive ecosystems. They are also one of the most threatened.

British Columbia needs abundant healthy wetlands to ensure the social, ecological and economic well-being of our province for the future. Wetlands and nearby habitats are essential parts of healthy watersheds linking streams, lakes and other water bodies.

Wetland loss and water quality should be of concern to all British Columbians and we all need to take an active role. Wetland loss impacts our quality of life and our economic well-being. Wetland loss continues because it is unregulated. As long as no enforceable legislation exists, this loss will continue. If we do not recognize and protect wetlands through policy, allocation and regulation as part of an integrated strategy, this loss will continue.

Wetland loss is a major environmental issue. We cannot afford to keep losing wetlands. Join DUC in protecting B.C.'s wetlands.



B.C. needs a wetland policy to ensure ecosystem protection

Protecting wetlands is a vital part of protecting B.C.'s water resources. British Columbians cannot rely solely on voluntary protection measures if we want to protect our wetlands; we need effective and enforceable legislation and regulation to help curb the loss.

Ducks Unlimited Canada believes that effective planning for wetlands and water resources requires co-operation and effort from all levels of government and their supporting agencies. B.C. needs a "no net loss" comprehensive and integrated wetland policy, ensuring that all ecological functions of wetlands are maintained.





Stop the vanishing act.

Healthy wetlands support the health of B.C.

- Wetlands help moderate effects of droughts, flooding and erosion by storing large amounts of water.
- Wetlands improve water quality by removing nutrients like phosphorus and nitrogen that flow into lakes streams, rivers and groundwater.
- Wetlands recharge our groundwater. If wetlands are destroyed (drained or converted to another land use), groundwater levels will be reduced.
- Wetlands have the potential to remove and store greenhouse gases from the atmosphere.
- Wetlands provide the lifecycle needs for over 600 species of wildlife.
- Wetlands offer tremendous learning and recreational opportunities for all ages.

Send your comments and submissions to:

Water Act Modernization Comments

Ministry of Environment,
Water Stewardship Division
PO Box 9362, Stn Prov Govt
Victoria, British Columbia V8W 9M2

Email: livingwatersmart@gov.bc.ca

Blog: blog.gov.bc.ca/livingwatersmart

We want ecosystem protection for wetlands in the Water Act modernization

In the existing *Water Act*, there is no mention of wetlands – only swamps. All wetland classes need to be explicitly identified and protected in the new legislation. The provincial government has set four goals for the *Water Act* modernization:

- Stream health and aquatic environments are protected
- Improved water governance framework
- An efficient and flexible allocation system
- The quality and use of ground water is protected

The only way to achieve all of these is through integrated watershed management. An integrated watershed management strategy puts wetland ecosystem protection at the forefront.

In *Living Water Smart*, the British Columbia government committed to:

- Legislation recognizing water flow requirements for ecosystems and species
- Wetland and waterway function will be protected and rehabilitated

Government should enable a no net loss wetland policy to follow through on its commitments. When it comes to wetland loss, avoiding and minimizing impacts should be highest priority and compensation only a last resort. If you are charged with taking care of our future water supply and make no mention of ecosystem protection, of which wetlands are an integral component, you won't succeed.

Your support is critical to help solve this problem.

We need to help governments make good decisions. Become conservation leaders in your community, and encourage members of your community to follow your lead.

- Write or email the Ministry of Environment and your MLA with a cc: to Ducks Unlimited Canada to call for the protection of British Columbia's wetlands
- Participate in the online discussion on the *Living Water Smart* blog, a forum open to all interested in commenting on the modernization of the *Water Act*
- Write letters to your local paper to elevate the status of wetlands in your community



Ducks Unlimited Canada
Conserving Canada's Wetlands

Active by nature.

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