From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: April-29-10 1:40 AM
To: Living Water Smart ENV:EX
Cc:
Subject: Submission for Living Water Smart
Attachments: LivingWaterSmart_letter_100424.pdf

Dear Sir or Madam,

Please see my attached letter submitted in response to your document entitled *British Columbia's* Water Act *Modernization: Discussion Paper*. Please confirm receipt. Thanks in advance.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

Attachment: LivingWaterSmart_letter_100424.pdf

PERSONAL IDENTIFIERS REMOVED

By email to: *livingwatersmart@gov.bc.ca*

April 24, 2010

Water Act Modernization Submission
Ministry of Environment
Water Stewardship Division
P.O. Box 9362
Stn Prov Gov't
Victoria, BC
V8W 9M2

Dear Sir or Madam:

I read with interest your document entitled *British Columbia's* Water Act *Modernization: Discussion Paper.*

I urge you to consider karst when formulating a new regulatory framework for protection of groundwater resources in BC. I would like to work with you with this goal in mind.

Karst is inherently sensitive and vulnerable to certain surface land-use activities. It is a three-dimensional environment with varied natural and cultural resource values including, of course, water. Karst hydrogeological systems in BC are recognized as important sources of water needed to maintain summer stream flows, which are critical for sustaining fish habitat and other aquatic life and the fauna that depend on them. The percentage of the BC population that relies on karst aquifers for drinking purposes is still very low. All the same, quality concerns linked to specific karst aquifers used for these purposes have been recorded in BC. The concerns are largely centered on the potential of karst aquifer contamination due to surface land-use activities.

The provisions for springs in the *Forest and Range Practices Act* and its regulations provide a limited measure of protection for groundwater. As your document noted, however, there is as yet no coordinated and integrated legislation to effectively protect and manage groundwater resources in BC, and licenses are not required to use groundwater.

(…/2)

Attachment: LivingWaterSmart_letter_100424.pdf

There appears to be no effective coordination between karst aquifer users, and those who have authority and jurisdiction over activities that impact on the resource. The development and extraction of natural resources in BC including timber can occur without a good understanding of karst hydrogeology, and the vulnerability of specific karst aquifers to surface impacts in source areas, even as information and authoritative documents are readily available to the planners, foresters, engineers, biologists and geoscientists.

While government has published guidance on how to identify source areas for springs, the knowledge and understanding of karst springs and associated recharge areas is limited, and there appears to be very little willingness to properly investigate or characterize the karst hydrogeological system involved with specific water supplies.

Detailed assessments should always be required for karst due to its sensitivity.

Please contact me to discuss.

Sincerely,

*****PERSONAL IDENTIFIERS REMOVED*****

cc: Mr. Scott Fraser, MLA Alberni-Qualicum