

**From:** R-J Gilleland \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*  
**Sent:** Wednesday, January 12, 2011 1:54 PM  
**To:** Living Water Smart ENV:EX  
**Cc:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Subject:** Fwd: WSA proposal comments

Attached is a comment sheet on the wam-wsa proposal

R.J. Gilleland, P.Eng(retd)

Water Sustainability Act Proposal- Comments  
January 2011

From: R.J. Gilleland, P.Eng (retd) for Mount Belcher Improvement District

Representing a rural small system on groundwater, my comments are primarily directed at 3, regulating groundwater Use under the proposed act.

Overall, I can see the inclusion of many of the viewpoints I heard at the workshop and read in the report on engagement. The flexibility to address specific regional problems and local issues is the only practical way to go while still holding certain requirements at the Provincial level. There are also signs that some directions are being proposed based on practicalities, and cost-benefit and impact analysis. Some indication of this analysis in the proposals would help public understanding and acceptance.

I'm expecting too much of a WSA proposal but there are not enough details on how things will be done, what the act will look like and what the language will be. And of course we are not seeing the resulting regulation framework, regulations, processes and practical methods required to operate under the act. Until tested down the line with actual directives and cases this proposal is a very big leap of faith. Will there be future public involvement to comment on the Act itself?

The three levels of action in Appendix B, helps address my concerns on the Gulf Islands, but I still feel that the volume criteria for licensing large groundwater withdrawals is too high. There needs to be prominent, stated criteria and thresholds where any small areas, communities or private wells can have protection. With groundwater capacity being invisible one shouldn't have to prove there is a water shortage before action is taken.

As always, encourage and stress all measures to conserve water use.

Lastly, in a transplant from marketing lore (location, location, location) I can only say... governance, governance, governance! Without significant improvement this will all be for nothing.