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**Sent:** Wednesday, March 2, 2011 8:22 AM  
**To:** Living Water Smart ENV:EX  
**Cc:** PRRD\_Internal; Shannon Anderson  
**Subject:** PRRD\_comments\_Feb2011.pdf

Please find attached comments from the Peace River Regional District in response to the Policy Proposal for a new Water Sustainability Act.

Thank you,

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## PEACE RIVER REGIONAL DISTRICT

March 1, 2011

Water Act Modernization  
Ministry of Environment  
Water Protection and Sustainability Branch  
PO Box 9362 Stn Prov Govt  
Victoria, BC V8W 9M2

**Re: Policy Proposal on British Columbia's New Water Sustainability Act**

Upon review of the above noted policy proposal the following comments are provided:

**Process:**

The open and multi-faceted review process is to be commended. The use of internet and social media technologies have encouraged discussion and enabled greater information dissemination and public participation than ever before. However, the next steps of legislation development are unclear regarding further opportunity for input. Being able to comment on proposed details of legislation further strengthens public support for guiding principles and policy.

- ***In the continuing spirit of this open and accountable process of legislation development the government is strongly encouraged to continue with publication of draft legislation for review and comment.***

**Policy Directions (General):**

The approach across the Province based on levels of action appropriate to broad conditions of risk and sensitivity to water quality and quantity is considered reasonable and appropriate to focus resources where they are needed.

- ***To further enhance this policy it is strongly encouraged to proceed immediately with water resource assessments and watershed sustainability planning in known problem areas to ensure that they don't become chronic problem areas. As the economic engine of the province with booming petroleum and mining sectors, a growing population, an unprecedented demand for water resources, and as an identified problem area, the Peace Region should be a priority area for water resource assessments and watershed sustainability planning.***
- ***It is further recommended that the diversion of water courses be restricted to ensure the protection of ecosystems and water resources.***
- ***Consideration should also be given to the protection of drainage headwaters.***
- ***The mapping and quantification of underground aquifers should be a priority to support the principle of measuring the resource in order to manage it.***
- ***That permitting for water access and use be consolidated under a single agency. The current practice of multiple agencies issuing permits and licenses causes a horribly fragmented system that defeats any attempt at comprehensive measurement and management.***

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**PLEASE REPLY TO:**

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**Policy Direction #5 – Improve Security, Water Use Efficiency, and Conservation:**

The PRRD is generally supportive of measures that support this policy.

- 5.1 Economic Instruments:

*However, the policy description provides insufficient information to assess how the policy would affect community use and access to water. More information is required concerning how such a policy would be implemented, with particular regard to community use and access.*

- 5.4 Agricultural Water Reserves:

The idea of such reserves is supported, *however, implementation is unclear and the potential for delegation to an unrelated agency (i.e. Oil & Gas Commission) is of grave concern.*

**Policy Direction #6 – Measure and Report**

It is agreed that there is a need to measure and record both the inventory and use of our water use.

- *It is implied that there may be no requirement for measuring and recording for domestic licensees and small private domestic well owners, except in problem areas. Two questions arise:*
  1. *Will domestic licensees and small private domestic well owners be required to be licensed?*
  2. *What will trigger the requirement for measuring and recording for domestic licensees and small private domestic well owners, in problem areas?*

**Policy #7 – Enable a Range of Governance Approaches:**

Greater flexibility, responsiveness and collaboration in decision processes is supported

- *The PRRD does have concerns regarding how and to whom delegations of responsibility are established. Delegations must not be made to agencies purely for expediency (i.e. Oil & Gas Commission), but rather, must be to agencies that consider protection and conservation of the water resource as a primary mandate. Delegation to agencies with multiple and competing mandates will not support the principles of water sustainability.*
- *Prior to any delegation, there must be water resource assessments, watershed sustainability planning, and water allocation plans in place.*
- *Any delegation must also include local/regional accountability with stakeholder participation, advice and oversight.*

On behalf of the Peace River Regional District Board, Water Act Modernization Review Committee, we would thank you for the opportunity to be included in this process and provide our input. We look forward to your positive response in addressing the comments raised.

Yours truly,



Bruce Simard  
General Manager of Development Services

cc. Peace River Regional District Board