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April 22, 2010

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

Re: Water Act Modernization Discussion Paper Comments

Thank you for hosting the Water Act Modernization Workshops and providing the opportunity for stakeholders to submit their comments and concerns as part of the process for modernizing the Water Act.

Please accept this letter as the SCR D's formal response, outlining the Board's collective comments and concerns on the goals and objectives presented in the Water Act Modernization Discussion Paper. The comments and concerns expressed in this letter begin with a comment on the overall approach to modernizing the Water Act followed by comments specific to certain Objectives from Goals outlined in the Discussion Paper.

COMMENTS AND CONCERNS

Holistic Approach – One Water Act

The SCR D is encouraging that a holistic approach to managing our water resources be considered in this modernization process through the development of a single Water Act. Ideally, a single Water Act will promote consistency in watershed management and recognize the various uses, sources, and impacts relating to water resource management. In addition to one Act for governing fresh water resources, the SCR D is also encouraging that the Province recognizes the one Water Act as the overriding priority in the hierarchy of Provincial Acts.



Comments and Concerns on the Objectives from the Goals outlined in the Water Modernization Discussion Paper

- Goal 1. Objective One: Environmental flows are considered in all water allocation decisions to protect stream health.
 - Environmental flows should include all of the water in the watershed and the water cycle (surface flow, sub-surface flow, atmospheric etc.).
 - Protecting stream health should be expanded to protecting watershed health, where the precautionary principle is the underlying principle in water allocation decisions and activity in watersheds.
- Goal 1. Objective Two: Watershed-based allocation plans include environmental flow needs and the water available for consumptive use.
 - Environmental flow needs should encompass more than just surface flow.
 - Source protection should be incorporated into this objective.
- Goal 2. Objectives One and Two: Governance roles and accountabilities are clarified in relation to the allocation of water and the protection of stream health; and Governance arrangements are flexible and responsive to future needs and values.
 - Local governments need control over managing the watersheds. The new governance arrangement should recognize that Local Governments, as the purveyors of drinking water to their communities, are responsible for the provision of safe drinking water yet they have no control over land use on crown land within their drinking watersheds.
- Goal 2. Options for new Governance Arrangements:
 - The SCRD strongly supports the option of a Delegated Governance arrangement. Delegating governance arrangements for watershed management and functions to a local watershed agency would enable a localized watershed management approach. This arrangement would allow local governments to develop management strategies that are unique to their areas while meeting standards and guidelines set out by the Province.
- Goal 3. Objective Four: Water users conserve water during drought or when stream health is threatened.
 - Water users should always be encouraged to conserve water. Water conservation strategies should be proactive as oppose to reactive.
- Goal 4. Objective One: Groundwater extraction and use is regulated in priority (critical) areas and for large withdrawals.
 - Groundwater extraction should also be monitored in addition to being regulated.
 - Local governments should have the authority to regulate the number of new wells drilled in all areas, not just priority areas (precautionary principle)

Thank you for receiving our submission. We look forward to receiving the results from this stage of the Water Act Modernization process.

Yours truly,

SUNSHINE COAST REGIONAL DISTRICT

A handwritten signature in black ink, appearing to read 'Donna Shugar', with a long horizontal flourish extending to the right.

Donna Shugar, Chair
ms/ds