

**From:** Azadeh Marzara [mailto:Amarzara@udi.org]  
**Sent:** Tuesday, March 15, 2011 1:27 PM  
**To:** Living Water Smart ENV:EX  
**Cc:** Jeff Fisher  
**Subject:** UDI's response to Policy Proposal on British Columbia's new Water Sustainability Act

Dear Water Sustainability Act Group,

Please see below the submission from the Urban Development Institute to the Living Water Smart – Water Act Modernization Group.

As requested, I have copied below excerpts from the letter that was sent by UDI to the Minister of Environment on March 14<sup>th</sup>, 2011 as well as your Group a few hours ago (please see sent emails below).

Thank you,  
Azadeh

**Azadeh Marzara**  
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Dear Group:

***Re: Policy Proposal on B.C.'s new Water Sustainability Act (WSA)***

UDI is an association of the development industry and its related professions. Our members contribute \$30 billion and 250,000 jobs to the provincial economy each year. The over 500 corporate members of UDI Pacific represent thousands of individuals involved in all facets of the development and building industry, including: developers, property managers, financial lenders, lawyers, engineers, planners, architects, appraisers, real estate professionals, local governments and government agencies.

As a Partner in Community Building, UDI is committed to working with governments, communities and developers to encourage quality urban development throughout Canada. UDI activities support development that is environmentally friendly. In fact, we are embarking on an Environmental Leadership Initiative to promote practical sustainable development practices in the industry. It is in this context that we share our comments on the WSA.

Our UDI Environmental Committee has reviewed the *Policy Proposal* on the new *Act*. We agree with the comments provided by the Business Council of British Columbia (BCBC) that the *Policy Proposal* is too general a document for stakeholders to provide meaningful comments. The December 2010 proposal does not include sufficient information for our industry to understand what new requirements are being proposed. It is not clear to what extent, if at all, the proposed Policy Directions will impact developers – or other sectors of the economy.

We share BCBC's concerns that the Ministry is intending to bring forward the *WSA* legislation without any consultation on the details of what will be required under the *Act*. Our industry, as well as other sectors, needs to see the proposed requirements as well as information on the costs and benefits of implementing those requirements. At the very least, a consultation regarding the legislative options available to the government should be done.

We note that our industry has had difficulties with other Ministry regulatory initiatives. UDI submitted a December 20, 2010 letter to the Minister of Environment outlining our concerns on the Administrative and Technical Guidance notes on contaminated sites and groundwater that have been recently released. UDI was not consulted prior to these being approved, and there have been implementation issues and repercussions on the industry that are impacting affordability.

We would not want similar problems to arise with the *WSA*, and ask that another round of consultation occur when the Ministry has more details on possible legislative options. We look forward to working with you on the *WSA* as it progresses.

Yours truly,

Original signed by:

Maureen Enser  
Executive Director