

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Tuesday, February 15, 2011 2:01 PM

To: Graeme, Ian ENV:EX

Subject: No to water market

I do not want the introduction of a water market to allocate water under the new Water Act. The government needs to support an allocation system that provides hierarchy of use prioritizing ecological and social needs.

The Water Act is increasingly focusing on 'economic efficiency' rather than prioritizing a regulatory framework that **protects ecological needs and equitable access ensuring the human right to water.**

A water market would **prioritize economic rights over human rights** allowing corporations involved in water bottling, hydro-fracking, private 'ruin-of-the-river' power projects, and mining operations to proceed unchallenged with abusive use of water resources due to their vastly superior financial ability to purchase licences in a deregulated market.

I oppose water markets in British Columbia.

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Tuesday, February 15, 2011 3:53 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Water is a miraculous and precious natural resource that belongs to all British Columbians. It should be managed on behalf of all British Columbians and not be available for private ownership whatsoever. Water will become increasingly valuable over time. Don't sell off our inheritance and our future.

I look forward to a strong new law to protect BC's water, for current and future generations.

Thank you!

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Tuesday, February 15, 2011 6:17 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

I am writing to express my views on the modernization of BC's water regulations through the Water Sustainability Act.

Like many others, I am very concerned about the sections of the proposed Act which refer to water markets and water trading. I do not believe that holders of water rights should be able to sell those rights without government approval. If they could, it is clear that a large corporation could buy up many single water rights, which would be an important and most undesirable step toward the privatization of water. I remember how talk of sustainability was used during the Conversation of Health as a pretext to test public support for privatization of some health services.

If the idea of a (small) water market is included in the law, it is really important that those who have water rights are only the renters and not the owners of those rights, and that the government can withdraw those rights if someone abuses them.

I am very concerned that the province should carefully incorporate the water rights of First Nations, and not treat them simply as "stakeholders", alongside individuals and corporations.

I think it is very important that local users within a watershed be given a significant say in the allocation of water during times of scarcity, and that BC relies on tools other than the market as far as possible.

I welcome the initiatives in the proposed act to regulate groundwater, improve conservation and efficiency requirements and protect stream health and aquatic ecosystems. In-stream flow measure should apply to existing as well as to new licence holders. Environmental flow standards and minimum flow numbers should be established, and the province should collect the data needed to enforce them.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Tuesday, February 15, 2011 10:36 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Frankly I had not thought much about good water supplies, living in the Comox Valley with the Glacier feeding Comox Lake and that feeding the Puntledge River with its Hydro system and Fish hatchery and water for the population until recently. Significant population growth increasing the need for domestic water supplies, excessive snow melt causing overflow of Comox Lake, causing the Hydro to flush water away down the Puntledge to maintain the water levels they wanted made me more curious. It seemed to me that the allocation of water in the Puntledge River/Comox Lake system had been established a long time ago and was probably inappropriate for today's needs, and getting more so every year.

If we in this very well situated location can see current problems beginning to loom more strongly in future, much of BC must be in more parlous situations. Therefore it is my feeling that a new Law, developed from first principles rather than modifying an old and earlier Law is what is really needed. Existing rights must of course be given consideration, but not at the expense of a properly developed and mandated stream flow system. When water becomes a money maker rather than a basic human and fish right the probability is that decisions will be based on the former rather than the latter consideration. For that reason I believe that more power should devolve upon local municipalities and their communities and that this should be a significant feature of the New Law.

I am particularly concerned that private ownership of water rights should not feature in future decisions and that existing private water rights be reduced or eliminated in the future as the opportunities may arise.

I believe that we, all of us, animals as well as people are all entitled to clean air and for access to good, clean water, and in the case of water, fishes should be included in those rights. It will not be easy, world wide, but here in BC a start can be made in the matter of water rights, water Quality and local involvement in their stewardship.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 7:31 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

I cannot overemphasize that government and decision making bodiew must preserve the maximum amount of decision making for future generations and this likely means retrieving and limiting rights to present and future licensees rather than expanding this program.

The tenure system on forests is such an example of what can/could and will happen if checks, balances and solid controls are not in place. The banking/corporate industry will gobble up controls in such a similar way limiting future choices and destroying opportunity that we can not yet determine.

The forest example demonstrates this point extremely well as government finds itself in a bankrupting position to protect adequate habit for endangered species or to create large wilderness parks in logical areas close to urban centres. Instead they are restricted due to the compensation that is argued after the fact.

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

Water Allocations: The current water allocation regime, “first-in-time, first-in-right” (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs

of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only “guidelines” and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists, until more site-specific determinations can be made.

Water Governance: How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC’s water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 9:59 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

I support aspects of the proposed new water legislation, especially regulation of groundwater, improved conservation and efficiency requirements, and protection of stream health and aquatic ecosystems.

The proposed act falls short in several areas, and I hope that it can be amended.

Water Allocations: The prevailing water allocation system, “first-in-time, first-in-right” (FITFIR) does not adequately protect public interest, but the new act fails to alter FITFIR. The proposed water-license trading and water markets could lead to privatization of water, which most British Columbians would reject. Rather than this approach, please create a watershed based decision making process so that water users within a basin to determine an equitable allocation in times of drought.

Water Governance: Water governance should promote citizen engagement by enabling watershed management groups with representation of diverse interests. Local governments ought to have a significant say in managing water resources.

In-Stream Flows: The new law recognizes that we must balance the needs of water for people and water for nature, but the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water license holders. This leaves in-stream flow measures as only “guidelines” with no regulatory framework and would not prevent further degradation of riparian and lacustrine ecosystems. I urge legislated flow parameters to meet both human and ecosystem needs.

Other concerns:

- Improve transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- In the absence of adequate existing data, develop precautionary flow numbers for rivers and streams until the data are obtained.

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 10:58 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act. I'm sending the sample letter 'as is' because it reflects the issues and concerns with respect to what is arguably our most precious commodity. Please keep that in mind as you hammer out the details for our Water sustainability Act. It's not about opportunities for selling water, or bowing to business-related demands that would compromise our misuse our water and water systems, nor about the tired old rationale that we need to compromise for the 'good of the economy'. It's time to retool the economy for the good of the people, present and future. We can be the most sophisticated people in the world but we're nothing without water, and politically we're absolutely powerless without water. As our elected representatives, it is your duty to take the long term vision and safeguard the resources that really matter. The colonial period of exporting everything we have for an easy dollar is long gone.

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

Water Allocations: The current water allocation regime, “first-in-time, first-in-right” (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only “guidelines” and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against

further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists, until more site-specific determinations can be made.

Water Governance: How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC’s water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 1:25 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

The Precautionary Principle is the only method I approve of. It must take precedence over all discussions.

Water is necessary for all on this planet, not just for human use.

There are some positive initiatives in the proposal, such as improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are concerns in the policy proposal.

The privatization of water, which most British Columbians, including me, must not happen.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Wednesday, February 16, 2011 9:51 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater and the Water Smart Team:

I am writing to make comment on the new B.C. Water Sustainability Act. As a senior and a lifetime resident of B.C.,

I understand the need to protect our precious water resources and I feel strongly it is time to re-vamp the current water act. Full protection of public ownership of water and full continued establishment of public decision-making powers over that water is of paramount importance to me.

It is alarming to watch other countries allowing corporate ownership of a public resource such as water and the hardship that creates on populations when water should be the unalienable right of the people to use with conservation and environmental awareness.

I currently live in the Kootenays where we are embroiled in a battle to stop a non-canadian water bottler buy farmland and establish a water-bottling facility. Had our current water act been better written, we would not be in this battle.

Regulations are needed to require minimal flow evaluations and consideration as to environmental impact before any new water use allocations are even considered.

People need a water act that ensures conservation and one that establishes steps to ensure safe water when groundwater is consumed in areas where water purity is compromised.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 10:31 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Once it is given away, our water rights are gone. International business interests are smarter than our current government, otherwise the protection of our water would not be an issue.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 16, 2011 11:12 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Furthermore these are concerns that have been brought to my attention and they are certainly important.

Policy Direction 1 - Environmental Flows

ASK FOR: The Province to commit to conducting sustainability boundary assessments of watershed function BEFORE new water use allocations (licences) are given.

ABOUT: The previous government discussion papers and the engagement process acknowledge that environmental flows are crucial to the functioning of healthy watersheds. They indicate the emerging consensus that these "eFlows" must be protected as a priority over other human uses.

PROBLEM: Flow requirement guidelines are currently proposed to apply only to new licences. But for watersheds where minimum flows are below ecosystem requirements, constraints need to be placed on both existing and new licences.

SOLUTION: Water use and allocations should come only after a “sustainability boundary” outlining water needed for watershed function has been determined. The remaining water is what is then “available” for human use (i.e. licensing). This protects more than just minimum flows in streams, rivers, aquifers and lakes.

For example, it may include quality and timing of those flows. Ultimately there may be such designations in all of B.C.’s fresh water bodies; it’s sensible to start in priority sensitive (or critical) areas.

Policy Direction 3 – Groundwater Regulation

ASK FOR: The Province to introduce more regulatory controls over smaller groundwater extractions in chronic problem areas.

ABOUT: The proposal address groundwater regulation with a series of suggested thresholds. The suggested thresholds may be a little high but, overall, this is an appropriate approach to begin the process of groundwater regulation for all major users and priority areas in the province.

SUGGESTION: As groundwater and surface water are interconnected, it will be important that more regulatory controls over smaller ground water extractions be required in chronic problem areas.

Policy Direction 5 – Economic Instruments and Beneficial Use (Water Markets)

ASK FOR: The Province to draft legislation in such a way that it unequivocally asserts the public ownership of water. The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

ASK FOR: The Province to develop a regulatory system that ensures people don’t waste water, that mandates conservation during times of drought, and that prioritizes water uses based on societal criteria.

ABOUT: The current Water Act says water is vested in the Crown, “except” to the extent that “private rights” have been established through licences. Technically speaking, the proposed Water Sustainability Act may not formally alter this arrangement, but by making existing private water rights tradable, the proposal strengthens existing private right in water while denigrating public ownership.

PROBLEM 1: The current arrangements don’t sufficiently protect public ownership of water.

SOLUTION 1: Any new legislation should unequivocally assert public ownership of water and clarify that water rights are merely a temporary right to use a public resource, and that right is subject to public interest and environmental protections that will be imposed as appropriate. This needs to happen whether water markets are introduced or not.

PROBLEM 2: The proposal to allow the transfer of water rights across sectors does not ensure priority uses are based on societal and ecological criteria.

SOLUTION 2: Develop a well-designed regulatory system that ensures people don't waste water, that mandates conservation during times of drought, and that prioritizes water uses based on societal and ecological criteria.

All policy decisions should aim to keep control of water resources in the hands of government and the citizens of BC.

Businesses must not gain control of the peoples assets in the form of water rights.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

1443 Marina Way
Nanoose Bay, B.C.
V9P 9B6

April 27, 2010

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

Dear Sir or Madam:

I was lucky to attend the Water Modernization Workshop in Nanaimo, last year to discuss the proposed changes with others. Many attendees believed the workshop recommendations the brought forward would help to better manage this public water resource. However, I am very concerned that government is considering modernizing the Water Act to allow water privatization and deregulation of water rights.

Water is essential to life and has been recognized as a basic human right by the United Nations. Any water allocation system must include the equitable distribution of water rights, starting with basic human needs as top priority. These needs include basic needs of consumption, food preparation and sanitation. It does not include lawn and garden watering, golf courses, parks and industrial uses. If the law does not prioritize water use for basic human water needs it will leave many small communities at risk.

Water is a right, not a commodity. It is not to be sold to the highest bidder. Water should not be exported or removed from a watershed area. Let's consider water as necessary for all forms of life, which is no different that air we breath.

Agricultural water and essential domestic use should come before many uses to build a local sustainable economy. Local food growing must be higher priority than using to make pretty gardens and green lawns.

Exporting bulk and bottled water need to stopped. First-in-time first-in right need to be reassessed, on a continuing basis with public input, especially where shortages are possible. The precautionary principle is needed in the allocation of water. Eventually there will be not enough clean water to meet the demand. A complete review of 44,000 active water licences in BC don't have expiry dates, and almost a free right to use water with no review process. This practice needs to be based on priority use, that is subject to review.

As the Crown is the owner of the water, it has the ability to grant private rights of use subject to any conditions or terms it deems to be in public interest. The new act is not making water sustainable if it fails to protect the public interest in the granting of water licences.

Governance must include a Ministry of Water as well as some local government control. Public participation is essential. Water management must include monitoring of surface and ground levels and usage. Water allocation decisions should be transparent, accessible, open to public input, and subject to periodic review. However, water must be a public resource owned by the Crown and managed by the government on behalf of the residents. Water allocation systems do not grant ownership in water but rather only the right to use water for specified purposes. These details are missing even though they were strongly agreed to in the workshop.

In conclusion, water is a right, not a commodity. Water should not be exported or removed from a watershed area. Water is public resource which needs to be owned the Crown and managed by the government on behalf of its residents to make it a sustainable resource.

I hope that the above issues can be carefully considered in the rewriting the new water act.

Yours sincerely

A handwritten signature in cursive script that reads "David Helem". The signature is written in black ink and is positioned above the printed name.

David Helem

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 7:01 AM
To: Living Water Smart ENV:EX
Subject: Changes to Water Sustainability Act

I am a resident of BC and think that it is vital that water should be viewed as sacrosanct; fully protected by law, inviolate environmental protection of the waterways and plants and creatures within it, and fully within public ownership and oversight: The need to violate full protection only being considered where overwhelming public good and need are involved.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is always first and foremost a PUBLIC resource.

The legislation needs to legally establish "minimum" environmental flow standards in each major river or stream system. These flows must be fully studied prior to their allocation.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought- regardless of allocations, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 7:03 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I have read through the proposed water sustainability act, as well as the commendations and criticisms of this same act, both by supporters and those concerned. I must say, that I believe this is a good act and that it has a lot of forward thinking initiatives incorporated in it.

I ask to pose two questions.

Do you believe that this will completely protect what is quite possibly the worlds most valuable resource, and one that will be in the highest of demands in the not so distant future. As I say this, I truly believe that the need and demand for water will surpass that of oil and it's related by products. We as Canadian have an abundance of this resource, at nearly 7% of the worlds fresh water reserves flowing as the life blood of our country.

Do you believe that this is truly the best time to begin the process of selling off a portion of what we have, or giving the opportunity to privatize what is, by definition, a public resource. History being our teacher, it is very easy, once a resource has been given a price, to have those that may be greedy to continually take a larger piece of that resource. We supplement now our water needs now by paying more than \$1.00 per liter for bottled water, and those profiting from that industry would have us believe that such water is better/healthier/cleaner than our own reserves.

I believe in a world where we can drink tap water, and I remember a world where I could put my face down to a mountain stream for a long drink of the finest refreshment known to my soul. Do we want to pay for every drop we drink with, cook with, bath with, flush our toilets with, or water our gardens with? Is that price worth \$1.00 per liter? Is it worth more? I believe the intention of the proposed sustainability act is to maintain what we need, yet give us another valuable resource to draw profit from, but is this really the time, and are these the people we want to have controlling even a portion of what they will not give back. Water is the life blood of this Earth. For all extents and purposes, oil is a luxury we have mistaken for a resource we cannot live without, but you can't drink oil, I wouldn't want to bath in it, and flowers don't grow in it.

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 8:21 AM
To: Living Water Smart ENV:EX
Subject: Comment on Water Sustainability Act

Dear Minister:

Just a few comments on the Policy Proposal for a new B.C. Water Sustainability Act. I certainly believe that water is one of BC's key public assets. It has a long historical benefit to those who have lived here, and it has a great potential to benefit all British Columbians in the future.

Fundamentally, I would like to assert that water has its highest value to British Columbians only when its quality is protected, its quantity is preserved, and its ownership and control rests with the Crown.

The Government of British Columbia is the steward of public assets such as water, and is entrusted with their care over time. While a particular government may guide how such public assets are managed over time, it is dangerous ground when the keepers of the public trust consider relinquishing that responsibility to any other party.

Any legislation needs to be grounded in the principles that water rights are for temporary use for a given time, and that water is, and always will be a public resource under public ownership.

We should also give due consideration to the fact that water also belongs to other species that inhabit our watersheds and forests. These ecosystems in turn provide incalculable benefits to British Columbians, and we should always make a full assessment of how granting water use licenses impacts ecosystem functions.

Clearly, minimum flow standards should be developed for all watercourses that currently have, or are being considered for water licenses. Similarly, groundwater recharge levels should be monitored and standards set, so that groundwater use is not unsustainable.

Much of the above can be augmented by developing public awareness and policy around water conservation and prudent use. I know in Kimberley, we have introduced watering restrictions in the summer, and implemented building regulations to ensure that recreational properties are outfitted with water conserving fixtures. This is only scratching the surface of what could be done.

I don't wish to imply that the policy proposal does not contain many good aspects. It certainly does. I merely wish to point out that if the policy does not clearly entrench public ownership of this vital public resource, or if the resource is degraded in terms of quality or quantity, then either we lose our ability to manage it, or there is nothing left worth managing.

Thank you for your consideration.

Sincerely, ***PERSONAL IDENTIFIERS REMOVED***

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 8:28 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that any water rights are TEMPORARY, and that water is always a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system. It should establish regulations for groundwater extractions in chronic problem areas.

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act and Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 8:44 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of Nelson, British Columbia, I am thankful that water is primarily protected as Provincial Park, but I am concerned other sources of water and the long-term protection of these resources.

The new legislation should be more rigorous in its protection of water as a publicly-owned resource. The right of public ownership should be clearly expressed in the preamble and reiterated in the regulation. The legislation and any regulation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given. This assessment should prioritize ecological (non-monetary) requirements, then address social requirements, and finally have a clear position on misuse of the resource and to promote the efficient use of water.

Legislation needs to enshrine legally establish "minimum" environmental flow standards in each stream system.

It should address regulations for groundwater extractions in areas with chronic problems of contamination or supply.

Once again, I appreciate the opportunity to comment on this policy proposal document. Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 9:18 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for allowing me to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia and a former surface water quality expert, I am concerned about the long-term protection of streams, lakes and rivers.

One of my main concerns is that the proposed legislation would allow selling or trading of water or water rights. This legislation should be drafted so that it unequivocally asserts the public ownership of water. The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

I generally agree with the legislation, but am concerned that "economic prosperity" will over-ride protection of watersheds, in-stream flow needs, and water quality.

You should consider the implications of the legislation. It seems that with new "rules of the game", you would need to increase the number of environmental staff for inspection and enforcement.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 10:29 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act. Please read comments as written below which I agree fully with. We need to protect our water from corporate interests which do not care about the interests of the environment and endanger our own long term supply. It is our most precious item and not a resource to be sold or leased. It is our life line, it is basic to our farming, tourism industry and so many other economic uses when it is left alone.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given. It needs to take in the entire picture such as roads and factories that are built that also destroy the areas.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document. We should leave our water supplies alone.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 10:30 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Sustainable means balanced concerns for the environment, people and financial viability.

While there are some excellent parts of the proposal, other significant gaps need to be addressed.

The current Water Sustainability Act proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only Unregulated “guidelines” such as your proposed in-stream flow measures do not put forward robust enforceable legislation.

I am trusting you serve my needs as an organic grower to have continued access to the potable water I need to feed people. AND serve the needs of my grand children and theirs too by protecting BC's water as a publically stewarded resource.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 12:49 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act, ALR and denial of water licences

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection. I have taken the time to add a number of personal concerns to this e-mail.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource. Water rights should indeed be TEMPORARY, if you don't want them they go back into the PUBLIC pool, available for the next user on the list. No TRADES TO THE HIGHEST BIDDER, ie Run of River or Mining Company.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system. One already endangered river system is the Nicola River.

The ALR threw a blanket inclusion on the whole river system from Merritt to Spences Bridge. That land is useless for "farm" purposes without water. I want the government to make it possible to easily remove land from the ALR once water licences have been permanently denied based on an endangered river system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas. Regulations and studies are great BUT the government pays for them. Don't expect some poor rural person to pay for "Studies" so they can use a well for drinking, gardening and a few pets". More homeless seniors coming up, I can see it now when they don't have water.

Once again, I appreciate the opportunity to comment on this policy proposal document. Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 12:49 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act, ALR and denial of water licences

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection. I have taken the time to add a number of personal concerns to this e-mail.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource. Water rights should indeed be TEMPORARY, if you don't want them they go back into the PUBLIC pool, available for the next user on the list. No TRADES TO THE HIGHEST BIDDER, ie Run of River or Mining Company.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system. One already endangered river system is the Nicola River. The ALR threw a blanket inclusion on the whole river system from Merritt to Spences Bridge. That land is useless for "farm" purposes without water. I want the government to make it possible to easily remove land from the ALR once water licences have been permanently denied based on an endangered river system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas. Regulations and studies are great BUT the government pays for them. Don't expect some poor rural person to pay for "Studies" so they can use a well for drinking, gardening and a few pets". More homeless seniors coming up, I can see it now when they don't have water.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 1:05 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource. As a basic principle, I do not support the idea of water licences.

For the legislation to be more rigorous, I would like it to be drafted so that it unequivocally asserts the PUBLIC ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, for a SPECIFIC TIME PERIOD, and that water is a PUBLIC resource.

The legislation should include a requirement to conduct assessments of watershed function BEFORE new water use allocations (licences) are given. Since I do not support water licences, another way should be found to do this without handing over any rights to water, anywhere.

Where licences are given, it must be made clear to the licencor that he has a licence to a PUBLIC resource and that there will be "zero tolerance" for deviations from requirements. Fines must be punitive and licencors must clean up after themselves.

The legislation needs to establish legal "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure that no one wastes water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 2:09 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I am a Washington State resident who has often vacationed in B.C. I am considering moving to Kelowna in several years (I am retired). I have read over and over that water shortages are going to be the biggest environmental issue of the 21st century (of course, climate change may rapidly supplant water!). Please keep B.C.'s clean and plentiful.

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 2:12 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I am a family physician in the rural community of Invermere and I strongly believe that proper management of our water resources is vital to both the health and prosperity of our communities. Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 2:18 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new BC Water Sustainability Act.

Although I am a resident of Alberta, I am a biologist and therefore realize that ecosystem health in BC affects Alberta and vice versa. It follows that I am concerned about the long-term protection of BC's water resources.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of BC's water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 2:51 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, and a home gardener, I am thankful for our water resources and concerned about their long-term protection. Water is the most important ingredient in life, and while it may appear we have an abundance here in our beautiful mountainous home province, it is clear that it is still a finite resource and one that we should be using and cherishing very carefully.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource. It is a resource that shouldn't be owned by any particular person, so as to be used as a commodity, but rather a publically owned resource by the people of BC.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 4:14 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

The new Water Act needs to protect groundwater from contamination. Protecting quantity is not enough; quality must be protected.

To do this, permits must use specific measurable language and government must enforce the permits.

My experience comes from the City of Cranbrook's Sewage Disposal System (Permit # PE- 04148).

The permit stated no leaking from the storage lagoons, and no effect on ground or surface waters. However, the storage lagoon leaks an average of 330,000 cu m a year for 30 years(EAB Decision No. 1999-WAS-023). The spray irrigation fields were saturated with effluent forming lakes.

Extra liquid was pumped off the fields into crownland bordering the Kootenay River, all summer long. Effluent was diverted off site into Painted Turtle habitat. The rules are notadequately enforced and my community's wells are located nearby.

The present wording states "Minimal Leakage" from the storage. I guess the definition of "minimal" depends on whether you or your Grandchildren are drinking the groundwater.

Please respond and tell me how the new Water Act will protect the groundwater from contamination.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 4:15 PM

To: Living Water Smart ENV:EX

Subject: Groundwater Protection

**The new Water Act needs to protect groundwater from contamination.
Protecting quantity is not enough; quality must be protected.**

To do this, permits must use specific measurable language and government must enforce the permits.

My experience comes from the City of Cranbrook's Sewage Disposal System (Permit # PE- 04148).

The permit stated no leaking from the storage lagoons, and no effect on ground or surface waters. However, the storage lagoon leaks an average of 330,000 cu m a year for 30 years(EAB Decision No. 1999-WAS-023). The spray irrigation fields were saturated with effluent forming lakes. Extra liquid was pumped off the fields into crownland bordering the Kootenay River, all summer long. Effluent was diverted off site into Painted Turtle habitat. The rules are not adequately enforced and my community's wells are located nearby.

The present wording states "Minimal Leakage" from the storage. I guess the definition of "minimal" depends on whether you or your Grandchildren are drinking the groundwater.

Please respond and tell me how the new Water Act will protect the groundwater from contamination.

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 4:41 PM

To: Graeme, Ian ENV:EX

Cc: ***PERSONAL IDENTIFIERS REMOVED***

Subject: Water Act modernization

Dear Ian Graeme,

I am concerned about, and would oppose the introduction of a water market (tradable permits) to allocate water in the new Water Act. Public regulation of water resources, a vital public good, needs to be strengthened. I urge the BC Government to support an allocation system that provides public control and oversight, and hierarchy of use prioritizing ecological and social needs.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 8:48 PM

To: Living Water Smart ENV:EX

Subject: Water Act Modernization

In regard to the *Water Act Modernization*, I have the following comments:

1. regulation should be made that when community water (municipal) is available, private water wells should not be allowed, reducing the possibility of the well being abandoned by future owners and becoming a conduit for pollutants to reach the aquifer.

2. where a river is designated as endangered (such as the Kettle River), cattle should be fenced out, in order to reduce shore erosion, Ecoli and organic matter in the water.

3. every organization seems to be covered by these regulations except mining, which use and waste large amount of water.

4. since every community has a supply of treated drinking water, no new licences for water bottling plants should be given and existing licences should not be expanded.

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 9:02 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Water, or the lack of it, will shape B.C.'s future!

There seem to be two certain developments for us to be concerned about: climate change reducing the amount of water in rain events, less snow, and less water from glaciers; and, in the meantime, less well supplied countries, including the US, willing to exploit or capture our relative surplus.

So, I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 9:23 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

My interest in this issue is twofold. Firstly I work at ***PERSONAL IDENTIFIERS REMOVED*** In the spring and in the fall each year I teach students of all ages about the importance of salmon and how the salmon depend on the forest and the forest depends on the salmon. Clean, plentiful water is essential to their, both the salmon and the forest's survival and health.

Secondly, I live in Chemainus which is part of the Municipality of North Cowichan. The municipality put in wells next to the Chemainus River which is a salmon bearing river. The river is fed by aquifers. The wells tap into the same aquifers. The municipality only has permission to use the wells for non summer months. They are, however, applying to the federal government for permission to use the wells year round. I believe that the use of the wells year round will gravely compromise the Chemainus River and the salmon it supports.

In light of these two issues I strongly urge you to address changes as outlined below.

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

Water Allocations: The current water allocation regime, "first-in-time, first-in-right" (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only “guidelines” and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists, until more site-specific determinations can be made.

Water Governance: How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC’s water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 17, 2011 10:31 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

To Minister Coell, Mr. Slater, and the Living Water Smart team:

I am appalled to think that the right of water might be given over to the corporation. The 'corporation' has run reckless and it is time to put the governance back into the 'democracy', into the rights of People. I am very concerned about giving the rights of our water to corporations that could take precedence over the right of the public.

I hold a water license and I do not want to exchange it for a permit. There needs to be direct communication between the water licensing branch and the environmental protection branch. Allowing massive amounts of our water to be used for 'fracturing' and then the debris water piled in some pond, waiting to burst or leak some year later...or leeching back into the water tables is not acceptable... Oil is a dying business and it is destroying a massive amount of fresh water daily! ..

We need to think in a different direction and stop supporting the direction of destruction.

It takes people in position, such as yourselves, to make the right decision, to protect the rights of the public, who are after all, your neighbors. Making decisions based on moral rightness is a sign of Intelligence, high intelligence, of which this world is deeply lacking...all else is a sign of personal weakness - because one could not follow their own consciousness, but those of 'big brother'. I urge you all to participate in what is morally correct, and what your consciousness knows to be correct, for you are in public service to serve the people, not the soulless corporation.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Thursday, February 17, 2011 12:52 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

The Policy Proposal for a new B.C. Water Sustainability Act concerns me greatly.

As a member of a family that has lived in British Columbia for the past 101 years, I am particularly concerned about the long-term protection of our water resources.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource. I therefore urge that the legislation unequivocally asserts the public ownership of water. The legislation needs to be clear that any offered water rights are temporary and that water is a permanent public resource.

The legislation should include a commitment to conducting assessments of watershed function before new water use licences are approved.

Legally established "minimum" environmental flow standards must be established in each major river or stream system. This regulatory system needs to ensure people don't waste water and it must mandate conservation during times of drought and prioritize water uses based on societal criteria. The system also needs to establish regulations for groundwater extractions in areas with chronic shortages.

Thank you for any action that you take on behalf of the BC public that protects the public ownership and public control of B.C.'s water—one of our most precious resources. We, of this generation, should not be selling off our grandchildren's public assets and rights as citizens of British Columbia.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 7:45 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the concern and work done on creating the new B.C. Water Sustainability Act. I appreciate the opportunity to comment on the Policy Proposal before it's implementation.

As a sixty year resident of British Columbia, I am thankful for our mostly clean water resources and I am concerned about their ongoing protection.

I would like the proposed legislation to be drafted so that it unequivocally asserts the PUBLIC ownership of water and that acquired water rights are only temporary and are subject to governmental regulation.

The legislation should include a commitment to conducting assessments of watershed function by legally establishing minimum flow standards in each river system BEFORE new water use licences are given.

Further, the legislation should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

Also included should be regulations for groundwater extractions in chronic problem areas.

Thank-you for the opportunity to comment on this policy proposal document.

Sincerely, ***PERSONAL IDENTIFIERS REMOVED***

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 8:58 AM

To: Living Water Smart ENV:EX

Subject: Water Act Modernization

Thank you for the opportunity to comment on this policy proposal. The time has come for the government to step up to the challenge and more actively manage and protect our water and the natural environment.

My first suggestion is to drop the word “sustainability” from the title of the act. It is unnecessary and the meaning is not clear. It should go without saying that the government’s objective in managing water is to conserve or “sustain” the resource. Are we going to change all natural resource legislation to include the word “sustainability” or is it only water that has this management objective? There is no need to change the name of the Water Act!

Protect stream health and Aquatic environments

You have my support for this policy direction but I don’t feel it goes far enough. Protecting stream health should include protecting the natural values of free flow and periodic flooding wherever possible. I realize that a lot of us live on flood plains but we should make sure that there is no new development that requires restriction of seasonal floods. In addition there should be more emphasis on protecting water quality and making licensees more responsible for avoiding degradation of water quality. Does the government currently have a comprehensive system for monitoring the quality of ground and surface water in the province?

My main concern here is the reliance on guidelines. I understand the need to have some discretion but from my experience the use of guidelines will only protect stream health and aquatic environments in situations where there is no significant pressure or influence on the decision maker. Being constrained by law protects government managers and allows them to do what is right for the natural environment and for the future.

Enforceable standards are necessary to protect water and the feedback on the discussion paper showed a preference for standards so why are guidelines proposed?

Regulate ground water use

This is a necessary initiative. What is the plan for monitoring and protecting the quality of groundwater?

Regulate during scarcity

I can not support regulation by priority date. I understand that it will be difficult to make the change but this idea is no longer valid. Regulation by importance of use is a more defensible approach but this will require some in depth discussion with the public to reach a common understanding and acceptance of the ranking. Environmental protection and drinking water are obvious priorities but food production requires some definition. If “food production” includes stock watering then there are situations where I don’t agree that this is a priority.

I realize that cows need water but there are often a number of options available. Use of local surface water is the cheapest but that doesn't necessarily make it a high priority use. Uses with low environmental impact should be given a higher priority. Within categories of use, the more efficient operations should be given a higher priority. In times of scarcity we can not afford to use water inefficiently.

Economic Instruments

There is a fundamental principle that relates to this section:

No one other than the government on behalf of the public should benefit from the granting or transfer of rights to use a public resource.

I can understand rights to use water for commercial or industrial purposes being for sale by the government to the highest bidder. The public should be compensated whenever anyone uses water to make a profit but what is the justification for allowing individuals or companies to sell water that doesn't belong to them?

I understand the concept of using pricing to encourage efficient use but what safeguards will be in place to ensure that individuals with limited financial resources will still have access to water during times of scarcity?

Enabling a range of governance approaches

The principle mentioned above has to be kept in mind when delegating responsibility. The responsibility for environmental protection should remain with the provincial government. If this is delegated it becomes difficult to hold anyone accountable. Enforcement of standards contained in legislation is essential to ensure protection of the environment and this function can not be delegated. In addition the province should retain responsibility for the fair allocation of this limited and valuable public resource.

One last comment on the policy proposal:

This is the first time I have come across the word "*incent*". I assume that the author is taking liberties with the English language and creating a verb form of incentive??

Thanks for listening

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 12:06 PM

To: Living Water Smart ENV:EX

Subject: BC Water Sustainability Act

To Minister Coell, Mr Slater and the Living Water Smart team,

Greetings to the planners/preservers of BC water,

I applaud your attempts to preserve and regulate the excellent waters of BC. Many of the statements in the proposed act sound excellent. I do, however, have some concerns.

Water is a PUBLIC resource and should be protected as such by accountable public bodies. Water should not be allowed to be sold, directly or indirectly by renting out the land over which the public water runs.

Are the controls and penalties strong enough to prevent some loophole being used by some clever private company?

As transportation costs sky-rocket, local agriculture becomes key to survival of BC citizens. Local fish become an increasingly important source of food. Once we allow our precious resources to be stolen, it is hard to return to a wiser approach.

In conclusion, please be stricter regarding enforcement and maintaining public control on behalf of the future of BC citizens,

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 1:18 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I'm asking you to ensure that the new Water Sustainability Act legislation is clear in declaring that water is a publicly-owned resource and that licences represent temporary access only, not inviolable right.

I have read the policy proposal document, and the back grounder.

Bravo to the Living Water Smart team for your excellent work.

My comments:

I would also like to see strong, clear regulations around:

- tracking and rewarding water conservation efforts at the municipal level
- the establishment of minimum environmental flow standards in each major river or stream system.

But the vital part,
the part that will help our descendants avoid problems in the future,
is the outright, crystal-clear declaration of water as a publicly-owned resource.

This legislation MUST make it clear that water licences represent temporary access, not ongoing right.

It MUST make it clear that water licences are subject to the realities of ecological and societal need.

Best wishes to you as you tackle the next part of this complex project,

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 2:53 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

Positive initiatives in the proposal include regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems. Education of our population and regulation of development, supporting chemical free waste water treatment etc would all help.

However, there are some significant gaps and concerns in the policy proposal that must be addressed in order to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

The current water allocation regime, “first-in-time, first-in-right”, is not working, it must be tackled. Proposed water licence trading and water markets to deal with allocation could open the door to the privatization of water. Do not let this happen. How can we treat our precious life supporting natural waterways as something to be bought and sold at will? Instead of moving BC towards water markets, the proposed legislation should consider:

- Increased community involvement through a watershed based decision making process allowing water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources, particularly in the light of climate change.

In-Stream Flows: regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows applied to ALL licence holders to meet the needs for people and the environment.

A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists, until more site-specific determinations can be made.

A better system of water governance in B.C. would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC’s water, for the population and the environment it supports.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Friday, February 18, 2011 3:41 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I was wondering, have you heard of the "Cochabamba Water Wars" in Bolivia in 2000? I think it is not only a good example of the slippery slope of water policy but most importantly emphasizes the need for this basic human right to be maintained as a publicly owned resource. And I think its important to remember that public companies don't have to "make a profit" as the cost of them is more than repaid by the benefits they provide. Selling a fundamental human resource for short or long term profits should not be the goal of governments.

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Friday, February 18, 2011 9:09 PM

To: Graeme, Ian ENV:EX

Subject: BC's water

Dear Mr. Graeme,

I am deeply, deeply disturbed by what seems to be a kind of water licence market being proposed in the soon to be revised Water Act.

I want you to know that I oppose making water into a commodity and I would like the Act to prioritise ecological and social uses.

I want B.C. laws to protect water as a human right and definitely NOT subject it to market forces. Please consider it as a precious commons to be safeguarded for the use of humans present and future and for all creatures and the biosphere.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Saturday, February 19, 2011 7:27 AM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act. I believe that we are making our own history, so hopefully it will be looked upon in the future as a wise course of action, rather than another joke that negatively affects the lives of present and future British Columbians. As many people believe, clean water should be a global Human right, this is a very important series of decisions we are about to make.

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

Water Allocations: The current water allocation regime, “first-in-time, first-in-right” (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only “guidelines” and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists,

until more site-specific determinations can be made.

Water Governance: How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Saturday, February 19, 2011 12:03 PM

To: Living Water Smart ENV:EX

Subject: Response to Water Act Proposal

RESPONSE TO WATER SUSTAINABILITY ACT

Thank you for the opportunity to comment on the proposed Water Sustainability Act (WSA).

There are positive initiatives in the proposed WST such as the regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems. However there are concerns that have not been addressed.

If British Columbians are going to ensure that the watersheds are healthy, and that the competing needs for water are addressed fairly, there are issues that must be dealt with and the following are top priority:

Water Allocations:

The current water allocation regime, "first-in-time, first-in-right" (FITFIR) is out of date and must be changed. The proposed WST does not address this issue. The licensing system must protect aquatic environments. It must also place drinking water users and environmental needs ahead of industrial projects such as oil and gas developments, independent power projects and agriculture.

Water license trading and water marketing should not be part of the water allocation process because they would ultimately open the door to privatization of water which must be prevented at all costs.

Instead of moving BC toward water marketing, the legislation should consider a watershed based approach that allows water users within a watershed to determine an equitable allocation in times of water scarcity.

The legislation should also govern the ways in which licensees can exercise their water entitlement and ensure efficient and sustainable use of the resource.

In-Stream Flows:

It is important to balance the needs of water for people and water for nature. However, the in-stream flow requirements put forward in the proposal are only for new water users and does not apply to current water license holders--some 44,000 of them.

The in-stream flow requirements are only guidelines and are not support by a strong regulatory framework. Strong regulations must be put in place as insurance against degradation of the natural environment and to ensure that human water needs are met.

A new Water Sustainability Act must: ensure better transparency of hydrological/water licensing data to allow for a clear understanding of in-stream flows; set environmental flow standards; and develop "precautionary flow numbers" for rivers and streams where incomplete data exists until site-specific flow determinations can be made.

Water Governance:

The process for making decisions about water use will definitely define our future as a province. The new policy proposal suggests a variety

of approaches but overall it is lacking in vision.

A better system for water governance would recognize that citizen engagement, watershed management groups with multiple sector representation, and empowered local governments is a better model for making decisions about water use.

The BC government's Water Act modernization initiative, the proposed Water Sustainability Act will update and build on the current Water Act and has the potential to place BC as a leader in water stewardship.

Following is a list of changes to the Water Sustainability Act proposal that should occur:

- All groundwater withdrawals must be licensed;
- The quality, location and volume of water present in any aquifer should be determined before any rights are granted for its use and a maximum draw-down level must be established and enforced;
- Groundwater extraction that diminishes existing surface water rights or threatens the health of ecosystems of the region should not be allowed;
- All existing water licenses, especially older ones, that are not being beneficially utilized should be cancelled and renewed only if they meet the new requirements of the Water Sustainability Act;
- All municipalities should be required to install water meters over a phased in time-period;

- No new water licenses of any form should be granted within any watershed that is deemed to fully or over allocated under present

regulations;

- All new water licenses should have a clause stating that the provincial water authority can restrict or completely stop current or future

water withdrawals and/or revoke the water license with due cause and without compensating the water user;

- The allocation of rights of use for all licensees should be based on determined criteria as initially proposed in the Water Act

discussion paper;

- Ecosystem requirements essential for long-term sustainability must receive priority;

- Water for domestic use and/or essential services in municipalities must be of higher priority than industrial use;

- Water for agricultural use must be closely monitored to ensure that it is not being wasted;

- The use of water for the maintenance of human-made landscapes such as golf courses must be of much lower priority than the uses

for human consumption;

- Water withdrawals from rivers or streams to produce power for export must be severely restricted.

In Summary:

The practice of allowing British Columbians to use as much water as they please must stop. The new Water Sustainability Act can do this if it is carefully written with the idea of conserving an essential life-supporting resource. It must be a tough act that stops the drainage of wetlands, the diversion of watercourses, the diking of land for housing or industrial uses, damming for purposes of power production, divesting control over our water, digging and drilling wells as though ground water is free for the taking, and damaging, degrading and devaluing water courses and water bodies of any size.

Yours truly,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Saturday, February 19, 2011 6:04 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

Before commenting on the legislation, I would like to remind you of a book which, I am certain, sits on a shelf in your library. The title is, "BLUE GOLD - The Battle Against Corporate Theft of the World's Water," by Maude Barlow and Tony Clarke. (McClelland & Stewart Ltd., 2002). This book clearly documents the dangers and pitfalls of the commodification of water. Tradeable water rights are an open invitation for transnational corporations to take over. Let's not "sell our birthright for a mess of pottage."

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Sunday, February 20, 2011 9:24 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource. Any new legislation should unequivocally assert public ownership of water and clarify that water rights are merely a temporary right to use a public resource, and that right is subject to public interest and environmental protections that will be imposed as appropriate.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given. It needs to legally establish "minimum" environmental flow standards in each major river or stream system. Water use and allocations should come only after a "sustainability boundary" outlining water needed for watershed function has been determined.

The remaining water is what is then "available" for human use (i.e. licensing). This protects more than just minimum flows in streams, rivers, aquifers and lakes, and should include quality and timing of those flows. Ultimately there may be such designations in all of B.C.'s fresh water bodies; it's sensible to start in priority sensitive (or critical) areas.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely, ***PERSONAL IDENTIFIERS REMOVED***

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Sunday, February 20, 2011 9:27 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource. Any new legislation should unequivocally assert public ownership of water and clarify that water rights are merely a temporary right to use a public resource, and that right is subject to public interest and environmental protections that will be imposed as appropriate.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given. It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

Water use and allocations should come only after a "sustainability boundary" outlining water needed for watershed function has been determined. The remaining water is what is then "available" for human use (i.e. licensing). This protects more than just minimum flows in streams, rivers, aquifers and lakes, and should include quality and timing of those flows. Ultimately there may be such designations in all of B.C.'s fresh water bodies; it's sensible to start in priority-sensitive (or critical) areas.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely, ***PERSONAL IDENTIFIERS REMOVED***

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Sunday, February 20, 2011 10:22 AM

To: inquiries@canadians.org; Graeme, Ian ENV:EX; awaxman@canadians.org

Subject: Please read

Importance: High

Dear Maude:

Are the Council of Canadians aware of this site? Water War Crimes?

Does this site hold any truth?

I am aware that the current BC Government under Mr. Gordon Campbell (conservative hard-liner in a Liberal coat) was selling our lakes, streams and rivers to America, (former wonderful country now focused solely on becoming a Security Nation) but war with actual deaths of persons, not just our waters be stolen.

Please advise.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Sunday, February 20, 2011 5:15 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

"Under water markets, private interests with water licenses could sell their licenses for profit to the highest bidder. Currently, government grants licenses for water - a publicly owned resource - to individuals or organizations who will use the water for specific purposes deemed to be in the public interest, e.g. for municipal drinking water, agriculture, industrial uses, etc..

But unregulated water markets would allow individuals to speculate or directly profit from a water license by selling it to the highest bidder, rather than using it for a defined purpose.

The difference is that by granting licenses for specific purposes, government can ensure that water is allocated to priority uses; for example, food production.

In contrast, priority use in unregulated markets goes to whoever can buy the water rights - if a golf course is willing to pay top dollar, then water may go to watering a golf course instead of irrigation for food production.

Tight regulation of water markets might prevent this - but then why not just regulate water use without resorting to markets? The problem with markets is that once they're in place, it's easy to water down the regulations."

Having read this opinion from the Council of Canadians, a body for which I have a great deal of respect, I'm very concerned about the proposed changes to the Water Sustainability Act.

I would have assumed that B.C.'s water belongs to all British Columbians as common property and therefore would be regulated in such a way that it is used sustainably and where it is needed most, rather than having water licences going to the highest bidder. Can I be confident that this is the case?

Yours respectfully,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Sunday, February 20, 2011 5:27 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

I would like to take advantage of this opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act. Water is the most precious natural resource and we need to ensure that we use it sustainably in our province.

To that end, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water. The legislation needs to be clear that water rights are temporary permission to utilize a public resource.

The legislation should include a mandate to conduct assessments of watershed function before new water use allocations are granted. This would include establishing "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system that would prioritize water uses based on societal criteria, discourage wasting water and mandate conservation when necessary.

Thank you for your concern about this important issue.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Sunday, February 20, 2011 6:46 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act. I understand that you have a responsibility to Canadians to protect our water. Canadians trust you and are counting on you, as are your children.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection. I'm sure your families are too.

I can not imagine in a time where water is known to be increasingly sought after as a resource of power in the world, why we would pass new legislation that is not rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system, also ensuring water rights are not handed out with water licences for Independant Power Projects.

It should put the priority to safe public water for all Canadians over any private interest for monitary gain.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Monday, February 21, 2011 10:47 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

below is the letter explaining in detail why privatizing water is wrong. MOE already doesn't enforce the laws to protect water and fish habitat and now the government wants to take away even those laws. Water should not be made into a commodity. If you need proof of MOE's unwillingness to protect fish, fish habitat and legal water rights from illegal diversion, commercial use, and destruction of wetlands, Review the file on Paris Creek! The tax paying citizens of this country are getting fed up. This proposed change taking place in secret should be put to a referendum.
Leo Downey, e-mail leo@leodowney.com

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of British Columbia, I am thankful for our water resources and concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,
PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Monday, February 21, 2011 12:04 PM

To: Living Water Smart ENV:EX

Subject: Water Sustainability Act

Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

Water Allocations: The current water allocation regime, “first-in-time, first-in-right” (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

- A watershed based decision making process that allows water users within a basin to determine an equitable allocation in times of drought.
- Government regulation of the ways in which licensees can exercise water entitlement ensuring efficient and sustainable use of resources.

In-Stream Flows: While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only “guidelines” and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

- Ensure better transparency of hydrological/water licensing data to allow in-stream flow needs to be understood
- Set environmental flow standards
- Develop “precautionary flow numbers” for rivers and streams where incomplete data exists, until more site-specific determinations can be made.

Water Governance: How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I am particularly concerned at this time because I see the oil/gas patch using enormous amounts of fresh water in our area for fracking; at a time when we are, and have been in drought conditions for a few years.

I am truly afraid that our water will be sold in large volumes to "out of country" conglomerates while our own citizens will struggle to get enough. Please legislate to place Canada's water above the law which controls commodities. Our water is not a commodity - it is life!

I look forward to a strong new law to protect BC’s water, for current and future generations.

Sincerely, ***PERSONAL IDENTIFIERS REMOVED***

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Monday, February 21, 2011 4:08 PM

To: Living Water Smart ENV:EX

Subject: Comments on Water Act

Hi

I agree that water is very important and we need to protect it so that we have a sustainable resource for the future generations.

Suggestions:

All industries be treated equal.

Forestry and mining are the only industries exempt from a Sec 9 approval application for changes in and about a stream. I believe all should be treated the same.

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Tuesday, February 22, 2011 7:34 AM
To: Living Water Smart ENV:EX
Subject: Comment on the WSA (December 2010)

In general I agree with the principles all of which are laudable and believe the WSA group has done a very good job of presenting the cross section response of BC residents.

I think there was reasonable consultation and am particularly pleased that the MoE staff convened a special session for the AKBLG in Cranbrook last May. In particular I would like to see continued emphasis on watershed protection, user conservation, and frankly somewhere in the Act an explicit statement that use can be denied. I oppose legal commodification .

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Wednesday, February 23, 2011 12:36 PM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of Fernie, British Columbia, I am thankful for our local Elk River & clean, abundant mountain water resources and very concerned about their long-term protection.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water. I strongly believe that access to clean water is a human right & needs to be ensured for future generations.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I have taken the time to send you my comments because I believe strongly that your decision-making now profoundly affects the quality of our future. I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Wednesday, February 23, 2011 12:48 PM

To: Living Water Smart ENV:EX

Subject: Policy Proposal for Water Sustainability Act

In April, 2010 I made a submission to the gathering of public comment on the proposed Water Modernization Act. I welcome the opportunity now to comment further on the December 2010 Policy Proposal, Water Sustainability Act.

The Salt Spring Island Water Preservation Society is particularly concerned with protection of local drinking watersheds and drinking water ecology. You will know that we fall into the 'black' category (greatest challenge) of the three types of provincial watershed designations., The Society espouses a 'soft path' to water management practices (see POLIS Report), which respects the capacity of natural systems to continue supplying healthy drinking water. As such, the question of 'limits of supply' cannot be avoided. Natural supply means a given, finite, availability of sustainable drinking water. Demand for such water is, of course, conceivably infinite--presenting an impossible impasse.

Gulf Islands' local surface water purveyors are known as Water Improvement Districts (WID). WID's were first established by the province in 1880 to help in the planned development of dykes and irrigation along flood plains and farmland. Page 46 of the Water Improvement District Manual currently sets the direction Districts are required to follow with respect to growing demand. Essentially it says all future demand must be met unless there is no further capacity. An applicant who is refused may appeal to the Ministry where there is strong likelihood this condition must be proven..

Interpretation of the words '*no further capacity*' At least one of the current Salt Spring Water Improvement Districts appears to interpret meaning of these words as no 'hard' supply capacities exist, eg. extreme additional damming and annual drawdown of Maxwell Lake to as much as 16 feet and interbasin the diversions of water regardless of economic or environmental cost.

Once extreme manipulation of natural systems is established, one is no longer dealing with natural capacity Lake ecology, riparian health, and water quality are destroyed. Proper environmental and economic impact assessment would need to be followed by public consultation and decision, particularly ratepayers.

Such possible misinterpretation of 'no further capacity' needs to be addressed and removed.

Smart water practices respect the continued health of natural supply systems, advocate water efficiency, education, incentives and disincentives. They also recognize establishment of total supply limits of specific natural systems, based on recent and various dry year precipitation/evaporation planning. These would cap growth and demand limits on a given system if natural and human communities are to be sustained. It does not preclude future growth this point, ... simply that such demands would have to prove their own supply at their own costs: eg. rainwater collection, desalinization.

Once the matter of an operating directive is addressed, contemporarily-relevant thinking and planning may begin, much overdue, along water sustainability lines.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***
Sent: Thursday, February 24, 2011 11:48 AM
To: Living Water Smart ENV:EX
Subject: Water Sustainability Act

Dear Minister Coell, Mr. Slater, and the Living Water Smart team:

Thank you for the opportunity to comment on the Policy Proposal for a new B.C. Water Sustainability Act.

As a resident of Harrogate, British Columbia, I am concerned about the long-term protection of our water resources.

I am aware of the negative consequences of the long term leasing of water rights in the UK. Infrastructure problems not dealt with, increased cost of water, time and money spent on efforts to return their water asset back to the crown.

I would like the new legislation to be more rigorous in its protection of water as a publicly-owned resource.

To that aim, I would like the legislation to be drafted so that it unequivocally asserts the public ownership of water.

The legislation needs to be clear that water rights are TEMPORARY, and that water is a PUBLIC resource.

The legislation should include a commitment to conducting assessments of watershed function BEFORE new water use allocations (licences) are given.

It needs to legally establish "minimum" environmental flow standards in each major river or stream system.

It should establish a regulatory system to ensure people don't waste water, to mandate conservation during times of drought, and to prioritize water uses based on societal criteria.

It should establish regulations for groundwater extractions in chronic problem areas.

Once again, I appreciate the opportunity to comment on this policy proposal document.

Thank you for all your efforts on behalf of B.C.'s water.

Sincerely,

PERSONAL IDENTIFIERS REMOVED

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Monday, February 28, 2011 5:46 AM

To: Living Water Smart ENV:EX

Subject: Water under private land

I understand you are looking at this issue.

As you may know, at the time of the Reception of English Law, on November 19, 1858, the water which ran in an undefined channel under private land was the property of that land owner.

That law has never been changed, and water is not a "mineral" the ownership of which was capable of being transferred to the Province of BC, at the time of creation of the Province.

I hope you are not considering changing this law, because it would amount to a seizure of private property.

There is no water problem in the Gulf Islands. There is a leadership problem. The residents of these islands should be building community water systems, but rather they go to meetings and complain, and attempt to regulate their neighbour's lives.

Yours,

PERSONAL IDENTIFIERS REMOVED

People are part of the environment

From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: Monday, February 28, 2011 7:14 PM

To: Graeme, Ian ENV:EX

Subject: No to privatizing water

Stop the introduction of a water market in the BC Water Act!

The recently released framework for the Modernization of the British Columbia Water Act by the Liberal government proposes to introduce water markets, also called 'tradable permits', to allocate water licences in the province. The implications of such a framework are very serious. It would essentially remove regulatory control over the allocation of water and allow for allocation priorities to be determined by a market and purchasing power. Communities and various levels of government would be prevented from prioritizing social and environmental needs over corporate interests

PERSONAL IDENTIFIERS REMOVED