

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Tuesday, March 1, 2011 9:25 AM

**To:** Living Water Smart ENV:EX

**Subject:** Submission \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

The Williams Lake Chapter of the Council of Canadians is opposed to the establishment of “water markets” to control water use. Water is a fundamental right of human beings; it is part of the Commons in a sustainable environment.

The Technical Background Report says that “The main advantage of water markets is that they can increase total welfare by directing water to the users who value it most highly.” This could mean those who are prepared to pay the most.

Later the report states that, in regard to a water market system, “This implies resource requirements for regulatory oversight, monitoring and enforcement.” However, the precise oversight mechanism is not spelled out.

Text Box 3a in the Report states that “Government will support communities to do watershed management planning in priority areas.” The Council of Canadians suggests that it is more than planning that is required.

The Province of British Columbia had in place for decades the mechanism for controlling and allocating water in the public interests. This was the “Community Watershed Reserve” policy, procedure and legislation which was given over to the interests of forest mining corporations.

The Council of Canadians calls for the establishment of Community Watershed Councils to provide oversight, monitoring and management. These Councils should have access to government resources as needed to mediate in the allocation of resources when the mechanisms of local discussion, study and compromise are exhausted.

Local Councils function effectively in a broad range of management requirements. Community Watershed Councils would provide the best water allocation system for the province of British Columbia.

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Thursday, March 3, 2011 1:24 PM

**To:** Living Water Smart ENV:EX

**Subject:** Proposed water rights and laws

*To whom it may concern,*

*Please remember you work for ME and the people of this province. Any new water regulations must ensure your employers always have access to the water they need no matter their economic circumstances. Water rights must not be bought and sold. I say again, **WATER RIGHTS MUST NOT BE BOUGHT AND SOLD!***

*The interests of business must be secondary. Conservation efforts must be advanced, even to the agricultural sector.*

*Start paying attention to the needs of the environment and the people or we are doomed. No amount of money will insulate anyone.*

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Thursday, March 3, 2011 3:56 PM

**To:** Living Water Smart ENV:EX

**Subject:** Re: proposed Water Sustainability Act

Dear Water Smart Team

Thanks for letting me know about the extended deadline for comments. Please find attached my submission.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

24 February 2011

SUBMISSION RE: WATER SUSTAINABILITY ACT

Importance of use is a complex idea. While I can see that drinking water is an 'obvious' choice to be considered a priority, this might conflict with established uses in rural situations.

In my own case, I spent considerable time, money and work to build a small-scale hydro system, while preserving the ecological integrity of the creek (by maintaining adequate flow during low-flow periods of the year). The system has been running smoothly for 16 years. It provides our household with power, but also allows us to pump drinking water to our house.

As our hydro system is situated at the lower reaches of the creek, I can imagine a situation in which demands for 'drinking water' in the watershed above us might reduce flow enough to impact our hydro system. This would result in a devastating impact on our lives by depriving us of the electricity which we worked so hard to obtain, but also of our drinking water which is pumped by the electricity. The ecological integrity of the creek would also be affected.

In other words, *treating drinking water as a blanket priority may sometimes deprive existing users of their own drinking water, and severely impact them financially.*

The only other comment I have is of a more general nature. It is most important to safeguard the integrity of all domestic and community watersheds from the deleterious effects of logging, mining, and the use of pesticides and herbicides.

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Friday, March 4, 2011 11:59 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.

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.

It is vastly important that the BC Government draw and implement water protection regulations that provide for meaningful input from all stakeholders including the public and for this input to be strongly considered in accordance with the resolve to protect and manage water resources in a healthy manner. New water regulations need allow for ties outside of BC's borders as well to help encourage other jurisdictions to put water conservation as a high priority in all its natural geography (swamps, lakes, rivers, streams and oceans, ground water).

Water is and forever will be more valuable than oil yet water is used to displace oil reserves underground. This, as just one example, is an insanity. Without water there is no life. Without oil humans will figure out something else to use as a resource which for the most part has already been done yet is stifled by oil production 'requirements'.

We have an obligation, if for no one or nothing else but ourselves, to be mindful of how we choose to manage our most integral-to-life resources for current and future generations.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Friday, March 4, 2011 5:06 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.

First let me say that there is no way in hell we should allow ANY legislation that would allow for the privatization of our water. I know this pressure is coming ultimately from the IMF as a condition to maintain credit with the international banks. These banks are in fact private corporations who invent money out of thin air and then lend it to our defacto governments which in effect turns the tax payers into corporate slaves to a corrupt system. Any country on the planet that became in debt this way and bowed to the demands of the IMF have lost or are losing control of ALL of their natural resources. And when there is nothing left, then what? We can't eat or drink money. And the money in circulation isn't worth the paper it is printed on.

If anything lets get some laws to protect our water from corporate miss use and pollution. If anyone should be paying it should be the corporations making a profit from the water they use. No human being can in common law ever be taxed or charged on the essence of life. Nor should they be under UCC.

Corporations need to be taken to task for the water they have dirtied in the course of taking profits and paying for it at all times. And they should not be allowed to use clean drinking water for industry at all. Instead, they should be using water already dirtied from industry or sewage. They can pay to clean that water up and use it instead of what we need to survive.

Further more, the secret on flouride is out. No more poison in our water!!!! That goes for chlorine too. We have the tech to clean our water without dangerous chemicals.

I look forward to a strong new law to protect BC's water, for current and future generations, so long as it is based on the fundamentals of life.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 7, 2011 11:01 AM

**To:** Living Water Smart ENV:EX

**Subject:** Water Sustainability Act

Attn: Living Water Smart,

I would like the proposed Water Sustainability Act to greatly strengthen our water protection and sustainability.

I believe a tiered system is important, one that would place the well being of the natural environment as the most important concern when considering water usage. Any and all water use should be done in a way that does not adversely affect the water body and watershed in question.

Sustainability means the conditions, viability, and health of the water (and the effects it causes) are sustained indefinitely. Avoidable degradation should not be allowed.

The second tier, after the well being of the water and environment itself, would be common and regulated usage for civilian usage. This is obviously an important use of water, but its importance should not allow unreasonable usage amounts - water conservation sometimes is the right course of action.

And the last tier would be allowance for other use (commercial/etc) which should be placed under extreme regulation and control. Ensuring NO run-off/disposal into water (or land) that is not drinkable.

Additionally ALL water sources, water ways, and watersheds should be kept within the public domain of control. Water should NEVER be sold or leased to private interests. The public is the steward of our land and water, private interests are not only inappropriate in such a role but they are inherently interested in their own private interests rather than the good of the public, let alone the good of the water and environment.

I very strongly ask that the Water Sustainability Act provide strong regulation, enforcement, and punishment for water abuse and destruction. As well as a simple ruling out of any privatization of water what-so-ever. Plus all current water users/holders should be phased into these new regulations/laws so as not to allow a abuse by those parties.

Thank you for reading, and I look forward to a strong and healthy BC Water Sustainability Act the protects the environment and places the stewardship in the public domain and not the private.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 7, 2011 11:30 AM

**To:** Graeme, Ian ENV:EX

**Subject:** The New Water Act

I am opposed to the introduction of a water market to allocate water under the New Water Act. I want Government to support an allocation system that provides 'hierarchy of use' prioritizing ecological & social needs. Water is a human right & need, not a resource for making money or to be indiscriminately abused to make money (i.e. mining etc.)

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*



**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Tuesday, March 8, 2011 8:27 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 have read Maude Barlow's book "Blue Covenant". I have viewed a film or two on the privatization of water and what it means for communities and countries. DISASTROUS RESULTS for the environment and the people of the areas which have been privatized are the norm!

I am absolutely opposed to the privatization of water in BC and Canada. The new "Water Sustainability Act" has many areas which seem weak to me. The form letter on this site has gone through these. I have decided to personalize this letter. But no doubt you will receive many of the form letters voicing the concerns of those who have done extensive research. I am taking the larger view here.

The Council of Canadians have done a great deal of research and I have tried to include their PDF file, but cannot seem to. They have excellent, specific recommendations on how to solve existing problems. Allocation of funds is key. This can be done if there is the will to do it.

Please see "Water Report 2010 by the Council of Canadians'.

Long term vision is what is needed here and humanitarian and ecological care for local communities over profits of global corporations. This new Act appears to be paving the way for giving away our water to outside interests.

With great hope for keeping Canada's water in the hands of the public trust  
Rev. Cedona Holly

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

From: \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*  
Sent: Thursday, March 10, 2011 9:59 PM  
To: Living Water Smart ENV:EX  
Subject: New British Columbia Water Act

March 10, 2011

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

Hello,

I am writing with comments concerning the proposals to a new British Columbia Water Act.

- 1) Ecosystem protection is essential and must have first priority. Ecosystem protection must be supported with enforceable laws and not with simple ?guide lines?.
- 2) ?Water Markets? and ?Tradable permits? should not be included in the new Water Act under any circumstances. To do so would result in irreversible tradable economic rights!

Do NOT include ?Tradable permits? in this legislation.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

From: \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*  
Sent: Thursday, March 10, 2011 9:59 PM  
To: Living Water Smart ENV:EX  
Subject: British Columbia Water Act Modernization

March 10, 2011

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

Hello,

I am writing with comments concerning the proposals to a new British Columbia Water Act.

- 1) Ecosystem protection is essential and must have first priority. This must be supported with enforceable laws and not with simple ?guide lines?.
- 2) ?Water Markets? and ?Tradable permits? should not be included in the new Water Act under any circumstances. To do so would result in irreversible tradable economic rights!

Do NOT include ?Tradable permits? in this proposed legislation.

Sincerely,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Friday, March 11, 2011 2:36 PM

**To:** Living Water Smart ENV:EX

**Subject:** Water Sustainability Act submission

Please find attached my submission to the discussion paper on the Water Sustainability Act.

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\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**COMMENTS ON BRITISH COLUMBIA'S PROPOSED  
WATER SUSTAINABILITY ACT**

March 11, 2011

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*, domestic water licensee  
Slocan Valley, BC

Submitted by email to: livingwatersmart@gov.bc.ca

Regarding the proposed Water Sustainability Act, I am encouraged that the government is undertaking needed reforms, but I have real concerns about the nature and extent of some of the suggested items.

I have been a licensed domestic/agricultural water user on the same stream for more than 30 years. Some of the licences on our stream date back to the 1920s. During the time that we have held our water license, it has been abundantly clear that our rights as water users are not protected. Logging and mining interests have priority over the rights of water users in the Slocan Valley. Recently, the Ministry of Environment and the EAB approved a micro-hydro installation above the domestic and agricultural water intakes of 12 licensed households, permitting the micro-hydro licensee to dewater the creek above the domestic water intakes. Similar experiences are repeated many times throughout the province.

The experiences of domestic water licensees underscore the need for area-based, watershed/ecosystem-based planning where all impacts to a water source are studied, and where the protection of water quantity, quality, and timing of flow are protected, not just considered. In the age of global warming and increased demand for water, protection of water is even more essential. The new Water Act needs to specify that protection of water supersedes any commercial interests in the watershed.

Water is a human right, it is not a commodity.

And how does the new Act intend to deal with global warming? The discussion paper is much too silent on this issue that will heavily impact future generations. The precautionary principle needs to be the focus of any new Act.

I have read and support the group submissions of West Coast Environmental Law, the Polis Project, Ecojustice, Watershed Watch Salmon Society, the David Suzuki Foundation, the University of Victoria Environmental Law Centre /the Land Trust Alliance of British Columbia.

The new Water Act needs to have extensive public involvement on the specifics of the proposed legislation before it becomes law. The current discussion paper is too general for specific comments. The province also needs to provide adequate funding to implement the changes proposed to the Water Act if we want to effectively protect and conserve our water resources.

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Sunday, March 13, 2011 11:38 PM

**To:** Graeme, Ian ENV:EX

**Subject:**

The proposed water act must have water remain in the public trust. Please do not put the allocation or management of water in a commodity or market based system. Such a move would give control and ownership to private interests under NAFTA and other like treaties. Access to water is a humane right and essential to ecological sustainability. Our elected officials must be free to make decisions presently and in future to changes in management of water without threats from multinational corporations. Bulk water must not be kept out of the jurisdiction of international treaties to do otherwise would be to give it away along with our democratic rights to manage it..

Respectfully

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Sunday, March 13, 2011 11:45 AM

**To:** Living Water Smart ENV:EX

**Subject:** Water Act Modernization Submission

Please give consideration to making the laws and regulations that govern water in BC uniform and enforceable on both public and private lands. This is particularly important on Vancouver Island where we must contend with the E & N land grant legacy and its effects on all matters pertaining to natural resources, ecosystems and water. The public interest has not been well served by this colonial relic.

Wholesale forest clearcuts, while they may (or may not) adhere to the rules established by the Private Managed Forest Land Owners Council and corporate certification bodies such as the Sustainable Forest Initiative, do not take into account water-basin wide management nor the compounding and cumulative effects of impacts on drainages by multiple private operators with a variety of agendas.

Southern Vancouver Island continues to experience an ongoing catastrophic decline in water quality and quantity because there is no common public oversight of watersheds. More than ever, the public interest requires a governance structure that takes into account the many values and services not now being recognized but on which all communities (ecological and human) depend.

The "water lens" is a great way to bring about a uniformity of purpose with comprehensive solutions that address our holistic environment. Our collective health and security (and even our economy) depend on it.

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\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Sunday, March 13, 2011 8:41 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.

As water and the purity of it are uppermost in my mind, I do not support any act that does not recognize and insure the need for pristine, untouched watersheds. These watersheds and the subsequent purity of water are the most important and valuable asset of British Columbia.

As soon as a watershed is damaged, sold or degraded in any way the worlds supply of pure and magical water is depleted. Although I understand that you are not aware of the true value of watershed perfect water, let me assure you that every time you drink less than pristine water, you hamper your own potential as a human.

May I remind you that you are made almost exclusively from water and any time the water you feed yourself with is contaminated in any way, you too become contaminated. You see this in the the contamination of mind and body of all your friends and relatives.

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.

I am not aware of the finer details of your Act but I am aware you approve of the sale of water. As water is the most necessary compound in the world, I personally, will never approve of you or anyone else making it only available to the rich and powerful. For this reason, remember who your friends are, and how many enemies you are making with your decisions, as most of the world is poor, fed up, itching to have equality and respect and ready for change. Please add

- A watershed based decision making process that allows all water users within a basin to have necessary and unlimited access in times of drought.
- Any person who contaminates water, pollutes water or disturbs the watershed to be no longer allowed anywhere near the watershed.

A new Water Sustainability Act should:

- Not allow water licensing
- Allow the river to always flow wherever it wants and not allow it to be contained or confined
- Develop a comprehensive watershed replanting scheme to be sure all water in BC remains pure

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. Failure to allow citizens to oversee the purity of water will bring voices to the forefront.

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, March 14, 2011 8:54 AM  
To: Living Water Smart ENV:EX  
Subject: FW: water

-----Original Message-----

From: \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*  
Sent: Friday, February 4, 2011 4:49 PM  
To: Graeme, Ian ENV:EX  
Subject: water

Dear Mr. Graeme:

I do not want a water market of any kind. Water is a public asset and should be controlled by the public through its government.

It should be allocated on the basis of ecological needs and then social needs.

Water exports should be prohibited.

I understand the legislation currently being proposed would severely limit the ability of the government to act in the best interests of BC Citizens. This does not sound good. Surely water allocation should be done by a non-partisan independent commission.

Sincerely

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 14, 2011 1:24 PM

**To:** Living Water Smart ENV:EX

**Subject:** NO WATER METERS

TO:

livingwatersmart@gov.bc.ca

No to water meters!

No to privatization of water!

No to excessive water for frill golf courses.

No to watering lawns.

No to watering drive-ways.

Yes to allowing water to local food sustainability, food gardens, and local community gardens.

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

“Small acts, when multiplied by millions of people, can quietly become a power no government can suppress, a power than can transform the world.” -The late people’s historian Howard Zinn (August 24, 1922 – January 27, 2010)

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 14, 2011 2:00 PM

**To:** Living Water Smart ENV:EX

**Subject:**

BC has the responsibility of protecting it's water for nature first, BC's citizen second, and all Canadians next.

There needs to be water available for species in the abundance that is required for their health and welfare. The residents of BC, need to have minimums available for their households maintained and free. These minimums need to include drinking, food preparation, sanitation, and natural spaces preservation. All other water use should be paid for to a maximum usage, not an endless usage. The payment for water needs to go to the local governments supplying the resource through regional supplies.

Industry must not own water resources. Maximum usages for industry must be applied and determined by the industries value to the province. The price of water to industry needs to be calculate using volumes, degradation of the resource, and product need. The more they use, the more they pollute the more they pay.

All profit from the provinces water resource must go to the province.

Water exists where it does and where it doesn't exist it should not go.

People and industry must learn to live within the laws of nature, do not export our water to irrigate deserts or hydrate mass populations living in arid climates. If they need water they can come and live in the rain forest with us.

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 14, 2011 3:21 PM

**To:** Living Water Smart ENV:EX

**Subject:** Water Act Modernization

Water Act Modernization

We need legally binding STANDARDS, not simply guidelines.

Allocation for water for wildlife within the standard. Need to know the flows we are dealing with today and then continue to monitor so we can spot trends that may cause for allocation disruptions.

Watershed is area of land, all encompassing, not just surface water.

Where will this Act fit in the overarching authority of regulations?

Water must remain a public resource, protected through regulations put in place by the government of the day for the protection for future generations.

Agree with the principal of the comment below.

*Management of any of our collectively owned natural resources is the prime charge of government. It is a charge vested in them by the Crown. The government of the day is not the Crown.*

This is a difficult process to make comments. Each one line needs to be a conversation. While I have taken part in past workshops, I am not sure how all will fit together.

Main concerns are that “we” do not know how much water we have (but believe it to be “lots”) Not sure under who’s jurisdiction it is as it seems to change as the water travels across the lands with a multitude of land use practices. I turn on my tap and while someone may be able to educate me to turn it back off, or add a monitor to charge me extra for each drop. I still get to turn on my tap for as long as pleases and my municipalities water transfer infrastructure (pipes) can leak and break all the way here. This allows for loss of water and habitat destruction.

I would have liked to spend more time (on top of the meetings attended) typing out more but recent development plans that are in contradiction to RAR have taken my time. As well as a wide variety of policy changes that will affect community.

I have always had hope that government employees would be hired for their expertise and the ability to do their jobs (well) That they would work together with their peers to determine a set of “rules” that if we lived by them we could make use of the environment and her resources while protecting the function so that life will remain with us for the future.

Please work to the best of your ability to set out a strong vision for the future that includes water, people and wildlife. Wishing you the best, but getting tired. So many issues, so many opportunities to write in, not seeing as many examples of guidelines protecting our precious resources. Good Luck

Take care \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 14, 2011 3:57 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.
- ~ No privatization of water 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 also, support all the comments in the "STATEMENT OF EXPECTATIONS on Reform of the BC Water Act from BC Nongovernmental Organizations" dated December, 2009. Please see their letter. In particular, a modern BC Water Act will:

1. Protect stream health and aquatic environments.
2. Improve water governance arrangements.
3. Improve the water allocation system.
4. Regulate groundwater use.

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, March 14, 2011 5:21 PM

**To:** Living Water Smart ENV:EX

**Subject:** Water Act modernization comments

Please find below my comments on the updating of the water act:

1. It is important that there are some clearly enforceable rules in regards to balancing human water use with ecosystem use – including both flora and fauna. Currently water impacts on fish are taken into account, but the rest of the ecosystem needs to be taken into account as well.
2. Ground water – people should be required to submit information to the government about their well(s): depth of well, depth of water table and flow rates. There needs to be better tracking of ground water extraction.
3. I think that many surface water courses have been over-allocated; there is zero accountability or tracking of how much water people are actually extracting under their water licence. Your proposed changes say “Domestic licencees and small private domestic well owners will not likely be required to measure and report, except in problem areas” . To me that sounds like waiting until there is a problem before you do anything about it. A more proactive approach , which I would support, is for all water users(surface and ground) to be measured and reported. I think this should also include irrigation water users – of which there are many in the Okanagan. There should be some kind of limit on the amount of water used by well users, and if we go over that limit (will have to depend on what you are using water for) then we would pay for whatever amount is used above the set amount. I don’t feel that people who have wells (and I am one of those people) should be able to extract limitless supplies of water once they have put in their well. We are still using the resource and we really don’t know what impacts all of this extraction is having on the aquifers.
4. “First come, first serve allocation of water rights”. With increases in population and demand on our water resources I think that “first come, first serve” system needs to be modified. Many of the original water licences were allocated many years ago when as a society we were less aware of water conservation issues and the demand for water was much less as there were many less users. I don’t see how this current system is sustainable. There should be some sort of prioritization of water uses to help determine who gets water if the demands exceed the supply. Someone irrigating 3 acres of lawn, should not have priority over someone who wants to grow food – even if the person with the lawn had their water licence first. There needs to a system that places importance on growing food and providing enough water for nature, higher than domestic users who may have a huge lawn or big swimming pool.
5. Need better information about how much water allocation a water system (creek, river, pond, lake) can sustain in terms of the ecosystem impacts.
6. More tracking/enforcement on water useage.
7. I support having agricultural water reserves.
8. Water should NOT be privatized.
9. Ban sale of 13 L flush toilets.

It is definitely time to update the water act! Thanks,

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**From:** \*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*

**Sent:** Monday, March 14, 2011 09:22 PM

**To:** Graeme, Ian ENV:EX

**Subject:** Keep Our Water Publicly Owned and Controlled ...Provincial Water Act

We MUST keep our water for the benefit of our citizens. It MUST remain a publicly owned and controlled resource.

Our WATER MUST NOT become a commercial, privatized for profit commodity.

\*\*\*PERSONAL IDENTIFIERS REMOVED\*\*\*