

Water Sustainability Act Comments

To whom it may concern;

We are writing to request that the deadline for public comment on this draft legislative proposal be extended to March 01, 2014. The Province has been working towards developing this legislation since 2010; giving the public only one month to review and comment on the 127 page proposal is unreasonable.

After an initial review of the proposed legislation, the following comments should be taken into consideration:

Water is essential to all life and is a human right. It should be considered as a resource of the commons (i.e. belonging to all of the people), and the Public Trust Doctrine should be embedded with the legislation.

Protection of source water should be enshrined in the act and the Water act should take precedence over all other land uses and related acts (Forestry and mining acts etc.) Protection of drinking water at source is far more cost effective than allowing unregulated, unmonitored industrial activity to damage the watershed and then requiring communities to invest in exorbitantly expensive treatment facilities. Exemptions from the act must not be given to industrial sectors including the oil, gas, mining and forest industries.

A Ministry of Water should be established to manage this vital resource. Other legislation which contravenes the Act (e.g. Private Managed Forest Act, the Forest Range Practices Act) should not supersede the interests of protection of drinking water.

Water resources need to be mapped and quantified to guard against over-use. Ground water and surface water are interconnected and should be treated as one in the act.

Local communities must have local control to protect and manage their community drinking water supplies. Local communities should be supported in gaining ownership of their community watersheds.

First in Time First in Right (FITFIR) must be removed and a modern water rights model adopted. License review periods should be shorter - every 5 years.

Thank you for the opportunity to comment on the proposed legislation. Given that all life on the planet is dependent on water, this is a resource that **MUST** be managed wisely.

Sincerely, Linda Safford, Comox Valley Water Watch Coalition