From: Deborah Jones [mailto:inielsen@dccnet.com]

Sent: Monday, November 11, 2013 11:29 PM

**To:** Living Water Smart ENV:EX **Subject:** Water Sustainability Act

Perhaps I missed something .... but I couldn't find any provision in the proposed Water Sustainability Act that would systematically encourage/require stormwater management systems to maximize rainwater or snowmelt infiltration.

Specifically, I'd like to see the Water Sustainability Act require the UBCM to develop new stormwater management standards that will significantly increase stormwater infiltration. I would also like to see the Act require public and private non-urban structures throughout the province (e.g. highways, bridges, resource extraction sites) to maximize stormwater infiltration.

Fresh water is our most precious resource (after air). It falls for free from the sky. What do we do with it? In urban and suburban areas, we send it down storm drains, into creeks & rivers and out to the ocean as quickly as possible. This is insane.

In virtually all BC cities and towns, stormwater (mis)-management is a major contributor to:

- pollution of streams, lakes and the ocean
- erosion of streambanks
- destruction of salmon habitat
- depletion of groundwater
- stressing of large trees that depend on groundwater

Infiltration is a proven stormwater management technique -- whether through simple rain gardens and infiltration swales, or more highly engineered systems. "Pilot projects" have proliferated everywhere and perform well.

Unfortunately, development standards (UBCM and others) still dictate the incredibly wasteful curb-gutter-pipe system of stormwater management. Developers and local planning departments adhere to these standards because (a) it's easy and automatic and (b) they feel protected against any liability as long as they have followed the standards.

And thus, we're totally failing to address the huge problems caused by this archaic system.

Thank you for this opportunity to provide input.

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