

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, November 6, 2013 11:46 AM

Suggestions for Water Sustainability Act : from ***Personal Identifiers Removed***, Cariboo Regional District- ***Personal Identifiers Removed***

1. Restrict surface water usage for decorative purposes, especially from Green Lake and others with limited inflow.

Currently many lawns and acreages are watering from Green L. daily, for up to 12 hours plus. In 2013 this lake was down 50 inches since 2002, the last year of recorded outflow from Green L. Along with natural causes (eg. evaporation) some results of lower levels are : higher PH readings, fishing is not happening (was quite successful in years of higher water), many more rock hazards have appeared for boaters.

2. Correct other causes of debris in lakes and streams than those listed in the Proposals as human related.

This lake's main inflow is from 83 Mile Creek and Watch Lake Creek. Both have become restricted by numerous beaver dams which reduce water flow and fill the creeks with debris. The mouth of 83 Mile Creek at Green L. was totally blocked in 2012 by an 8 ft. high, beaver dam. This was an old spawning area that had been maintained by Fisheries years ago. Although the dam was eventually removed, the consequences were : the spawning bed was filled with sediment and now useless, debris floated down the lake onto the shore and other pieces sank to the bottom where it will decompose.

Thank You,

Personal Identifiers Removed

Tuesday, October 29, 2013 at 17:18:25

As irrigation is rarely regulated, takes up to half of the water we process for drinking and in almost every community in Canada is the predominant cause for stretching peak demand infrastructure targets, how can this topic be relegated to a second line issue? There are NO required licences, tickets or governing bodies placing stipulations on this key item and if water conservation and infrastructure spending are truly areas of concern for this province, we are again failing and now failing through our trusted Governing Bodies. Please look again as this topic....

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, November 5, 2013 10:10 AM

I understand from the overview that water is a crown resource of the people. Will this act disallow companies like Nestle from bottling our water for sale? Will it stop companies from using our water for fracking? Does this new act address these two issues? Concerned ***Personal Identifiers Removed***

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Monday, November 4, 2013 7:57 PM

HI,

It is important to me that any water use be regulated all across Canada., be it surface water, or underground water. Water is a precious commodity and should be sold to any commercial users. Water pollution should be more severely penalised. Even residential users should be provided with water meters to prevent water wasting. ***Personal Identifiers Removed***

Subject: Re: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Monday, November 4, 2013 5:06 PM

Good Afternoon:

I really appreciate your reply. It's good to know that there are people (I hope) involved and that it was not just an automated response.

One thing that I neglected to mention is that I believe a minimum "threshold" should be included in definitions so that valuable personell resources and unwarranted costs are not incurred. In the extreme, a puddle is not a wetland, and there are ditches that provide drainage for subdivisions. What is the minimum rearing area identified by Fisheries to support a fish population? What is the minimum water depth required to ensure survival from predation?

If independently certified "experts" ie QEP's, work within non specific parameters, virtually everywhere that there is water becomes subject to RAR criteria; this to the detriment of both development and allocation of resources to valid enhancement projects.

Thanks again for inviting the feedback.

Personal Identifiers Removed

Subject: Responses to: A Water Sustainability Act for BC, Legislative Proposal

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Monday, November 4, 2013 3:05 PM

Water Sustainability Act- Review of Proposed legislation

Submitted by : ***Personal Identifiers Removed***, Salt Spring Island, November 2013

Executive Summary-

-Provides a good overview and shows that an effort has been made to utilize the data from public meetings and responses

-Like any document covering a large scope of proposed action, the Devil will be in the details of how regulation/management will be implemented

-Increased water pricing is inevitable to cover admin, permitting, etc. but the public will really be put off if a large bureaucracy grows and leaves little for actual programs to be implemented

-Phasing in is understood and the Water smart issues are a good place to start to make conservation part of our culture going forward. Nevertheless; if the phasing in takes 10 years, there will be danger of another grand review and implementation will grind to a halt. Phasing in of the WSA should target less than 5 yrs.

Part 1-

-There are still too many jurisdictions (fig3). How can subdivision approval happen before any environmental or water use impact is evaluated and made part of the process? It is understood that modifying some or all of the existing pieces of legislation is not something to be considered. Is there any way of having some umbrella legislation (Possibly in the WSA or a stand alone) that sets out what dept has the lead that requires certain regulations to be co-ordinated with designated departments and, which departments must sign off.?

Part 2-

There needs to be public review of the details of water purposes defined in Appendix B

2.3.1 Pg 17. FITFIR can't stand as it is. The statement of allowances for basic human needs is a step. There should also be consideration of some quick assessment that might lead to revisiting the volumes/purposes on existing licences (not the order of priority in rights) particularly on the sale/transfer of land. This comment would apply to 2.3.4, regulation groundwater too.

2.3.2 More detail needed on the application of discretion for use of deep saline groundwater. Putting holes through the freshwater aquifer could still result in drastic changes to the freshwater table, either by draining it, or back pressure causing saltwater intrusion

2.3.3 Consideration should be given to developing templates/guidelines for Water Management Plans and Water Sustainability Plans . This would allow community groups to engage in developing the plans and help offset the resources needed .

2.3.4 Regulating Groundwater-

-Use of Saline groundwater should not be left totally unregulated. See comment for 2.3.2 . The specifications for wells, the construction and maintenance are all important. The use of saline water could be a serious problem if it is pumped to the surface and allowed to spread into the aquifer. More details of how this will be managed are needed.

-The Gulf Islands had at one time in discussion been considered for designation as an area for special protection and this is now gone. The indications that regional/local/watershed specific WSP's would be allowed is seen as a more general avenue for the entire province and that is acceptable as long as there is going to be pro-active enabling regulations/documentation that will make it easier for local areas and communities to apply for, develop and implement a WSP. Some of the suggested exempt wells in this proposal could be a problem to a community unless a local WSP can be developed.

2.3.5 See comment above for 2.3.1

2.3.6

- Reporting by high users is a good first necessary step. Actions regarding excessive use need to be transparent. Smaller users (with smaller budgets) down the chain need to see that the higher costs and increased regulation that come to them are being shared proportionally and fairly by all.

-Allowing area based regulations/WSPs is good.

2.3.7 Can see the merit in stressing measurement and reporting for high users first and having qualified people involved.

2.3.8

-How are the CWM, and RWMs chosen and put in place?

-Most understand that one size does not fit all. There should not be any unnecessary barriers to having WSPs for local areas

Part 3-

-everyone will have something to say here whether the rates are changed or unchanged. The rates for groundwater should probably move to be different than surface water even if starting with the same rates is considered more politically acceptable. The capacity data for groundwater is much less certain and is not visible. There will never be enough groundwater monitoring and the risk of overuse is devastating.

-Different approaches should be considered depending on the location, hydrogeology, resource, vulnerability and risk. There could be a sliding scale for very high users or excessive use under a licence. Alternatively there could be discounts for consumption below benchmarks agreed in the licence if conservation is the prime goal for the location.

Part 4-

-Must stick to the objective of higher users paying their share if the smaller users are ever to be folded in later.

-A large bureaucracy must be avoided

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Monday, November 4, 2013 8:53 AM

I am a rancher in the Chilcotin. I raise cattle. I have water rights including some to a small reservoir with low danger rating on my property. I have had my little dam re-engineered and rebuilt and do my best to meet the standards for dam safety. Why is it that my neighbours who make no beneficial use of their water rights and have bigger higher danger reservoirs are able to keep their licences without using their water or keeping their dams up to standard? During both dry seasons and flood events it is frustrating to know water licences are not used or managed properly.

More water is available to me upslope from my ranch on Crown Land but I understand I will never be able to obtain rights to it in my lifetime as the land surrounding mine is subject to Native Land Claims and all requests for water will be denied pending the settlement of these claims. This has enormous application to my ability to improve my ranching operation.

Best wishes,

***Personal Identifiers Removed**

***Personal Identifiers Removed**

Subject: Feedback on the Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Monday, November 4, 2013 8:19 AM

Minister Polak,

I am a rancher, in an arid part of the province, with water rights, dams, ditches, diversions, livestock watering developments and pumps, I grow forages and feed livestock.

I am in favour of Retention of First in Time, First in Right model of licensing, as long as beneficial use is made of the resource, many good water sources are held and have been for years by landholders that are not practising agriculture.

I have a sizeable investment in infrastructure, an extensive maintenance program, pay engineering costs, and pay substantial annual fees to make beneficial use of this resource. A Crown land Range tenure also overlaps this watershed, the Range holder benefits from my works does not pay me and I do not have the right to exclude his cattle from the reservoir or ditches.

The benefits of water storage in my locale benefit the whole community and biodiversity, government financial assistance would help me to increase storage. A reduction in Crown land rental fees would also help make water storage more feasible.

Sincerely,

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Sunday, November 3, 2013 12:37 PM

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

Sincerely,

Personal Identifiers Removed

, BC ***Personal Identifiers Removed***

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Sunday, November 3, 2013 9:16 AM

Hello, Our household water is supplied by a licensed shore well or seep pit on Chimney Lake.

You may know we had a few restrictions a few years ago.

The water engineer told us that the amount of water used on domestic licenses amount to about an inch of water level on Chimney lake.

By law we were not supposed to use any water on our license when the restriction were on.

It seems ridiculous that we could not do laundry, bath or flush the toilet so that fields of hay could be watered down stream from us on the older licenses.

The soils in this area I believe are some of the worst in the province as far as water use goes. i.e. gallons of water required for a ton of hay. Some of these overly wasteful users should have licenses curtailed. Also some of the hay farmers have their systems running during very rainy periods.

There should be a better way to restrict the domestic licenses during a shortage other than an outright suspension of rights.

A definition of ground water needs to be better also. Our water comes from a shore well that goes 15 feet below the lake surface and sometimes the water level in the well is higher than the lake surface and sometimes lower. To get to a lake depth of 15 feet at our location you would have to be approx 200 yds from shore.

Thanks for your time.

Personal Identifiers Removed

Subject: Re: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Saturday, November 2, 2013 3:49 PM

The most important step in water sustainability, as everyone knows, is protection of our watersheds.

I am adding this statement in repetition to the thousands made through the years to the fact that nothing is being done.

Also there is a growing concern in our province about food security as well as other concerns which all together are tied.

I have been farming for 50 years on the farm my grandfather settled in 1901. I have witnessed the decline to farming, the mismanagement of our forests, fishing and mining. All are managed with a boom and bust mentality.

I am a member of the Perry Ridge Water Users Association and we have documentation from hydrologists etc. as to this mismanagement.

Personal Identifiers Removed

Winlaw BC

Subject: Re: A Water Sustainability Act for BC: Legislative Proposal

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Saturday, November 2, 2013 1:55 PM

You must be kidding. How is this going to work? There are no benefits here for me. You do not have the resources to enforce or even track any of your grandiose ideas. This appears to be an exercise to create loopholes to allow whomever has the ear of government to legally blast ahead unimpaired.

The best predictor of future outcomes is past performance. Our agricultural land is disappearing – world wide – at an alarming rate and YOU know the state of our water. Just look at our other “precious” resources. I predicted the closing of mills over 30 years ago. I was told, over 25 years ago, by fisheries experts that our salmon was in deep trouble and that additionally, Atlantic salmon would cause trouble with our wild stocks. If government allows the above to happen to our renewable resources then why should we expect better for resources that are not renewable?

I am tired of being right. Stop the propaganda, you know full well what the political story is and how it will play out. Don't waste my precious time.

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Saturday, November 2, 2013 12:04 PM

My comments pertain only to central Vancouver Island where I live and where there is much discussion about water supply and sustainability. In the Oceanside area it would appear that the politicians and bureaucrats have been convinced that improving water supply storage, via aquifers, is the best way to manage supply and demand. It would seem that this is a growth industries with many well paid consultants involved motivated by their own best interest.

I do not have any formal training in water management but from a practical point of view I believe accessing the available water reserves in the many pristine lakes on crown lands is a far more efficient method to supply this commodity. I base this on my own observations while travelling the many logging roads while fishing in the for mentioned lakes. There are numerous remote and pristine lakes with elevations well above most communities requiring the water. Gravity fed pipelines would probably be more costly initially but would certainly seem the most long term efficient and secure way to access this resource.

As an example if the Oceanside area had a pipeline from one or more of the many lakes within 30 kilometers the need to create and protect aquifers in the area at great ongoing expense would be unnecessary. The security of these aquifers and the surrounding land is under constant threat of contamination and this will only increase as development occurs.

With water supplied by pipeline one time treatment is all that is required unlike what is being planned in Parksville where river water during the wet season will be treated and pumped into the aquifers, then during high demand periods will be withdrawn and once again treated. This just doesn't make sense.

As an example Cameron lake with a surface area of 4.77 hectares would produce about 1.5 million cubic meters of water by dropping the level 12 inches. Of course this drop would never happen as the lake is continually recharging. By comparison Qualicum Beach consumes in total 1.8 million cubic meters annually. That means this would supply 83% of Qualicum's annual requirement. As well there are many other lakes in the area which could be accessed for further supply.

To say, as some would, that we have a water crisis is absurd. We live in a rainforest and there should never be a problem with supply. The only threat to our supply is, management. Our potential has to be the envy to all those around the world with knowledge of it. Lets not allow this wonderful resource fall into the hands of those not motivated by the best interests of the people.

Personal Identifiers Removed Qualicum Beach

Personal Identifiers Removed

Personal Identifiers Removed

Subject: Water Sustainability Act
From: *****Personal Identifiers Removed*****
To: Living Water Smart ENV:EX
Sent: Saturday, November 2, 2013 10:28 AM

Good Morning:

Let me first state that I support the principles associated with protecting our water.

Literally all life on earth is dependent on water, and the technology associated with the human species has allowed this incredible resource to be both utilized and unfortunately, abused.

The aspect of the proposed Water Sustainability Act that causes me concern is contained in Section 7, Governance:

"Allow for delegation of some water management activities or decisions to people or agencies outside the provincial government".

In recent years, there have been cuts in government staff in both the Department of Fisheries, and Ministry of Environment. Legislation has been enacted that specifically downloads the responsibility for application of those regulations onto local government. Local government risk management strategies shift the responsibility to private individuals or companies; "consultants" who are "certified" to provide evaluations and recommendations which then are processed by local government as development permits.

This can be a time consuming and expensive process which is also subject to the personal opinions of the "consultants".

What I am suggesting is that application of regulations may have become more political than administrative, and that there is more concern about the process than the resource being governed.

I believe that regulations must address the utilization of, as well as the protection of this resource and request that if responsibility for application of the regulations is downloaded, there be adequate direction and staff to ensure their timely and economical application.

Respectfully,

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 8:33 PM

Re: New Water Act

At this current time, there are many threats to the water in BC. It would appear that you are skirting the serious issues. I believe the time is NOW to deal with:

1. the price of water that commercial interests have water rights to in public aquifers. we had a situation in Creston with Glacier water proposal who were going to use public water for their bottling company, Nestle does this all over, and lord knows who else is using water which belongs to the people of BC and they are not paying for the product. it is almost as valuable as Oil , and there will come a day when we may lack needed water supplies.
2. Fracking companies are also polluting huge areas of the province and using good drinking water to flush out gas. They destroy water wells, they create illness, and they do not pay for the water. there is lots of science indicating that this is not a good thing to be doing to the earth, but for some reason, the corporate group receive carte blanche.
3. Farmers and ordinary citizens are likely to see their water rates increase, but based on what I have heard so far, Your new Act is going to penalize the small guy and give free water access to the wealthy. This Robin Hood approach is too cavalier in my opinion.
4. Another issue was raised when the gasoline filled truck ended up in Lemon Creek. What plans are available for us all when our water resources have been polluted? We must have contingency plans, as we are destroying our water quickly....
5. next year, the Columbia Water Treaty will be back on the table.... Are we ready for that? Wacky Bennett gave away a lot of our water to the Americans... We may end up short of water...

Please look at all the issues, the controversial ones in particular..

Your job is only half done.

Sincerely

Personal Identifiers Removed

Trail, BC

Subject: Groundwater

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 1:38 PM

Thank you for allowing comment. I am a lifelong resident of the Similkameen Valley (Cawston). A great concern is arising for the storage of water and a delicate river system is in peril of being flooded in the upper reaches of the Similkameen. While these proposals and studies proceed people with wells beside the Similkameen River are providing huge amounts of water to this land well above and beyond the river. The land in question was never arable and is not owned by the provider of water. Highways allowed excavation under the highway near the Nighthawk Oroville WA turnoff and thousands upon thousands of gallons of water is either secretly sold or provided to the owners of what was once desert land away from the river. It is only a matter of time before the same pipeline of our groundwater is extended and the Similkameen Watershed is providing water for a ranch miles away from the river basically draining our aquifer. This needs to be addressed NOW. Thank you, ***Personal Identifiers Removed*** Cawston BC

Subject: re terminology of new water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 1:24 PM

It is my opinion that restricting the measurement of water to only ground water, it could be interpreted by extraction industries that they do not need to record the numbers of truckloads of water taken from surface water sources. It is also my firm belief that a very high price must be placed on water used by extraction activities, from fracking to conversion to LNG, among other businesses, in order to slow down these activities by making the businesses factor in the true cost of their business (which includes the environmental cost).

Therefore, change the act to reference both ground water and all forms of surface water in the same sentence.

Personal Identifiers Removed

Saanich, BC

Personal Identifiers Removed

Subject: **new groundwater legislation feedback**

From: *****Personal Identifiers Removed*****

To: "Polak, Mary ENV:EX" <Mary.Polak@gov.bc.ca>

Sent: 31 October, 2013 7:05:25 PM PDT

Dear Ms. Polak,

Thanks for the opportunity to provide feedback on the new proposed groundwater legislation.

I find this part very disturbing: The new legislation will also give industries that rely on heavy water usage, such as natural gas hydraulic fracturing, a fee exemption if they use non-potable water during production as reported by the CBC.

Regards,

*****Personal Identifiers Removed*****

Nelson, BC *****Personal Identifiers Removed*****

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 11:13 AM

British Columbia MUST OWN and PROTECT ALL of our water resources.

We cannot afford to allow them to be privatized or compromised.

An abundance of fresh water is the greatest resource we have and we need to sustain it.

The province must reclaim all water shed properties that provide BC communities.

We must disallow and industrial development that pollutes or compromises water quality.

There are ways this can be done.

Make the proponent bear the cost of sustaining water resources.

No compromise.

Personal Identifiers Removed

Consultant - Activist – Innovator

Working to help make good things happen

Personal Identifiers Removed

Subject: input to water act legislation

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 10:35 AM

Thank you for taking my input into this important legislation. I live in a rural area and obtain all of my water from a well, as do my neighbours. I understand that there is currently little or no protection for the ground water aquifer we rely upon. This needs to be addressed. There needs to be provisions to ensure these precious aquifers are not polluted or destroyed by industrial or residential development.

Personal Identifiers Removed

Subject: wateract

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 10:31 AM

Any new legislation needs to include protections for aquifers against contamination or disruption by development.

Personal Identifiers Removed

Mission

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 10:22 PM

Attn: Living Water Smart,

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

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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
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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

, BC

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 7:37 AM

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Sincerely,

Personal Identifiers Removed

Sechelt, BC ***Personal Identifiers Removed***

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Friday, November 1, 2013 5:51 AM

Attn: Living Water Smart,

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- 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

Ucluelet, BC ***Personal Identifiers Removed***

Personal Identifiers Removed

Subject: My 85 cents on the Water Sustainability Act
From: *****Personal Identifiers Removed*****
To: Living Water Smart ENV:EX
Sent: Friday, November 1, 2013 12:24 AM

Dear Ms Polak and team,

I would like to thank you first of all for undertaking to modernize the BC Water Act - it certainly is time to create legislation around our use of precious natural resources to ensure that they will be around to be enjoyed for generations to come. Water is the most precious resource that we have, as easy as it can be to take it for granted in a province like ours.

I understand that you are seeking input from members of the public regarding the Act as it is being proposed. While there is a lot that can and should be said about sustainable water use, I would like to focus my feedback on one particularly eye-popping number.

85 cents.

This is what I understand is being proposed as the price to be charged **per 2 million litres** of groundwater extracted commercially.

Another eye-popping figure: **0 cents**. This is what will be charged to industries that rely on heavy water usage, so long as they use what is deemed to be "non-potable" water, which unfortunately, largely due to the activities of those same industries, would include a large and growing portion of all of our water, especially once the natural gas fracking industry gets going for real.

The reason that those figures are so astounding becomes clear when another eye-poppingly small figure is considered:

0.3191%

This is the percentage of the Earth's water that is in the form of fresh water found in readily exploited lakes, rivers and groundwater.

While it is easy for us West Coasters to get the sense that fresh water is super-abundant, the reality is that it is anything but. Not even in this province, although we do have a very high endowment of it relative to other parts of the world.

As you well know, water is not only essential to life, but fresh water is a key ingredient to the quality of life that we enjoy here in British Columbia, more important even than energy. All over the world, water shortages are bringing communities and whole nations to the point of crisis, and it is often predicted that the next wars will be fought, not over oil, but over water.

Hence my confusion over the current proposal to charge such a small fee for mass groundwater extraction as to render it virtually free (or completely free in many cases). I am not sure how this pricing

was determined, but as an economist, I would like to recommend that whoever came up with those numbers be promptly dismissed from the public service. Unfortunately, economists are not bound by a professional code of ethics, but if they were, the economist (if it was an economist) that came up with those numbers would certainly be ousted from his or her profession both for breach of ethics and for sheer incompetence.

Any proper economist can tell you that the way in which a natural resource is priced is directly related to how profligately (or how mindfully and sustainably) that resource will be used. If the new Act is indeed intended to ensure the sustainable use of our groundwater for generations to come, 85 cents per 2 million litres simply does not cut the mustard - that is a price designed to encourage profligate, reckless use of our most valuable natural resource - especially given the profitability of the companies drawing that water. I don't know what the right pricing is myself, but I'm sure that it would be measured in **cents per litre, NOT cents per million litres.**

Should you wish to seek the input of competent economists who can help you arrive at a more optimal pricing in line with the objective of sustainable water consumption, I would be happy to recommend some to you.

Thank you for taking my 85 cents into consideration.

Sincerely,

Personal Identifiers Removed

Ecological Economist

Personal Identifiers Removed

Subject: A Water Sustainability Act for BC
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Thursday, October 31, 2013 9:36 PM

Hi Living Water Smart

I am very glad that Ministry has considered many of the recommendations which many like myself and many others.

The proposed act still focuses on streams and aquifers rather than source. It is important to define and protect watersheds or catchment areas. More emphasis is needed protecting them from pollution. Grave yards, landfills, auto wrecking yards, septic tanks and industrial waste dumps are found upstream of municipal wells. All of these are found uphill of the Parksville city wells.

In the defined community water sheds, conservation of forests are needed to keep the water for the drier months.

I hope these points will be considered in the final act.

Sincerely

Personal Identifiers Removed

Nanoose Bay

Subject: Thank you for modernization of the water act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Thursday, October 31, 2013 9:04 PM

From the highlevel points that I've reviewed I think this is a good step in the direction that's needed.

I support the 7 areas that will be strengthened. I am happy to see stronger push towards the creation (and implementation) of watershed plans. I work in local government in environmental planning and local governments should be mandated to govern for those goals. Bill 27 and the Greenhouse Gas legislation is a step in the right direction and it's the only reason that we can talk about GHGs to our Council and communities. Otherwise it would have never received any kind of attention in our community (Courtenay).

I would add that with the enabling legislation to work on these initiatives that Local Governments should also have access to more funding to conduct these processes. I hope that the Provincial Government will invest in better mapping of the water resources (and I would hope resources of all kinds including Environmentally Sensitive Areas, but that's for another set of regulations).

Good consistent province wide communication materials are also helpful for us in communicating out as we don't have the resources to make our own communication tools. We can definitely use some of these materials in the Convening for Action on Vancouver Island (CAVI) work.

Thx,

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Thursday, October 31, 2013 2:23 PM

My input on the Water Sustainability Act:

First Nations Engagement? Municipal Government Engagement?

As far as I know the Provincial Government again has failed to engage First Nations and how the extraction of fresh water at no charge to industry has failed again with engagement to First Nations. The Carrier people from Fort George where the Fraser & Nechako meet provides every household in Prince George (who pay for this water) where is the partnership on resources for First Nations? Yet the reserves in Shelly have to no city sewer and water?

The Liberals are doing this to for fracking (another lesson by Mr. Harper to Ms. Clark) the devil is in the details and this impacts SALMON a traditional foods of First Nations so again totally disrespecting First Nations culture, assimilation – assimilation – assimilation. No wonder First Nation have little to no trust with Government.

Every Municipality charges homeowners for cubic litres plus infrastructure and yet multi-billion companies pay 0 for water and 0 for pollution.

The Liberals appear to “deliberately” withhold information that impacts every family in BC and play this wait and see game. Canadians are being forced everyday to rely on media to expose the details – it is extremely disheartening for all of us.

Water sustains life and until a politician can stand up at their podium and tell me I can now drink, water garden, and have water life live in polluted water, only then will I support this gold rush mentality to benefit a few. It is absolutely unconscionable and proves there is not one governing politician “LISTENING” to the people.

Optics, optics, optics.....lucky us!

Personal Identifiers Removed

North Saanich

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Thursday, October 31, 2013 1:39 PM

Hi there,

My comments pertain to oil and gas exploration, specifically hydraulic fracturing (fracking), and its potential negative effects on BC's groundwater resource.

I am aware that other resource sectors such as mining requires groundwater baseline assessment prior to most site activities. Why is it that the oil and gas industry does not requires the same? If we want to protect the groundwater resource, why don't we require baseline aquifer data collection and impact assessments in areas vulnerable to fracking?

Let's not sit on our hands and let the industry potentially contaminated our valuable aquifers/environment (like we did with so many mine up until a few decades ago). Lets introduce front-end environmental requirements to assure that 1) baseline conditions are known, 2) potential negative impacts are assessed, managed and mitigated, and 3) have the ability hold the potential polluters responsible.

Thank you. Please feel free to contact me to discuss these points further.

Cheers

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Thursday, October 31, 2013 12:43 PM

I believe we should regulate our deep aquifers as much as the shallow aquifers. I believe the cost of water should be much higher than is now suggested by the regulation. I believe that all water use should be controlled by the water act, including those powers now given to other organizations of government such as oil and gas.

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Thursday, October 31, 2013 11:41 AM

After reviewing the draft document, there is little question that the majority of issues surrounding water quantity and water quality have been addressed by previous respondents that have included a wide range of stakeholder interests. From a legislative and regulatory perspective, the WSA has identified the important issues to British Columbians and modernization efforts are a welcome change to long outstanding issues; any deficiencies that remain can likely be dealt with through an adaptive learning approach in future. To this end, I am not as concerned as to what is or what isn't in the document, I am more concerned as to future governance and delivery of water stewardship under the existing framework.

As a consequence of government down-sizing at federal and provincial levels, the roles and responsibilities of government toward natural resource management, in general, are diminishing. Water management is no exception. Regional water stewardship staff within MOE are overwhelmed by a burden of increasing development proposals through the referral process to the point where certain roles and responsibilities are no longer possible; more specifically, staff are tied to a desk and have little time to spend in the field. With respect to future allocation of water, the challenge becomes one of balancing the consumptive needs of humans with the non-consumptive or ecosystem needs of the natural stream environment, yet, I question the effectiveness of a modernized act if decisions are being based on surface flow data in streams that is no longer available due a lack of monitoring or historical streamflow data that is no longer relevant in the face of hydrologic regime changes due to climate change. I am most concerned about the smaller streams in the province that may already be or could be over-allocated, particularly those that haven't been identified as sensitive streams under accompanying legislation (Fish Protection Act). It is the cumulative effects of continued allocation in small streams that becomes problematic if the data is not available to make sound management decisions.

Some of these data deficiencies are likely being met by NGO stewardship groups that have taken on a monitoring role, particularly in community watersheds. To this end, there is likely an opportunity to strengthen environmental capacity building within communities whereby credible data (scientifically-supported monitoring programs) can be provided by stewardship groups in situations where the province no longer has the ability to extend its responsibility. Accordingly, government should consider incorporating local monitoring data where applicable and possibly extending the role of water governance to community-based advisory groups who have a current knowledge of annual instream flow conditions and can provide meaningful input to either allow or deny further water extraction depending on available supply and ecosystem needs. If government is serious about sustainability into the future, then an ecosystem-based approach to allocation is warranted; government needs to focus on ensuring that surface and groundwater supplies do not become over-taxed by consumptive use and simply learn to say "no" when it is appropriate.

Thank you for the opportunity to provide input.

Sincerely,

Personal Identifiers Removed

Fisheries Biologist

What is the reason behind that mining sector becomes separated from industrial sector in the new Act?

WSA may not enforce Environmental Flow Assessment on water that can be highly impacted by big projects. According to the proposal, "as part of the process for considering EFNs on an application, the RWM (including RWMs within the Oil and Gas Commission) would complete an initial simplified Environmental Flow Needs assessment." It sounds like the Act is fair to all industry. However, this also implies some mining project can get a license only with simplified assessment if the watershed somehow is not sensitive? Mining projects are 99% at large-scale and considered to seriously impact on watercourse. If oil and gas project can get away with only a simplified(computer-based) assessment, how many and what project will actually go through a thorough assessment? It is probably right to take a watercourse-based EFN approach, however when WSA does not attempt to assess all streams, NO mining project without detailed EFN assessment should be allowed.

In Box 6, under the WAS, Regional Water Manager is designated as one of WSA decision-makers, and "recently staff in Oil and Gas Comissions have been designated as RWMs for the adjudication of applications supporting oil and gas activities." This would give a certain industry power over regulating and practicing WAS. And, the goals of WSA, protecting water quality, quantity and aquatic ecosystem, may face rocky obstacles. Reconsideration is needed to decide whether a private sector can become a WSA decision-maker. If yes, how much their power should be limited and monitored, so that water can be fairly and sustainably managed.

Also, I believe ecologist or hydrologist should be included in a decision-making group to make sound science-based decision. This way would allow ecological aspects of issues to be factored in licensing, Environmental Flow Needs, other regulations. First Nations should be able to participate in decision-making and applying their knowledge of the water where their right or title is concerned. Now in the proposal First Nations and local government are categorized as "others" decision-makers.

Thirdly, the proposal lacks of precautionary approach and aggressive effort to fix the current water issues. According to the proposal, "as rights have already been granted to existing licensees, environmental flow need consideration would not be applied retroactively...." This would leave the problems of EFN in existing water use the way it is and will not fix problems that we have to deal with now. Current water problems in water quality, quantity and ecosystem are caused by current water uses which need changing. Without improving the current use practice, this problem will not be

fixed and probably get worse. And, the existing licenses will be regulated only to protect the environment during times of drought and scarcity. Isn't the aquatic ecosystem suffering already? Isn't better to regulate now and prevent worse-scenario from happening.

Fourthly, the Water Sustainable Act proposal does not mention about reducing water consumption. No thought to encourage development and implementation of technology and technique for water consumption reduction is taken.

Fifthly, there needs to be more study on the impact of deep saline water on shallow water and there should be a license system to control saline wastewater treatment, storage and disposal. In 2010, 51 per cent of the water used by in situ oil sands was saline water from deep underground zones according to "water use in Canada's oil sands" report by Canadian Association of Petroleum products. The "saline wastewater should not be sent to public water treatment plants or diluted into surface water courses (Potential impact of shale gas exploitation on water resources

By Dr. Tom Al & Dr. Karl Butler)." In Australia, the issue of safe disposal is a big issue because it affects downstream and adjacent ecosystem.

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, October 30, 2013 7:54 PM

Water is a basic human right. We, in BC, are very lucky to have a plentiful supply of good ater. It should not be allowed for ANYONE or COMPANY to take our water and SELL IT...

Get smart or we, the people of BC, will be the thirsty losers.

Personal Identifiers Removed

Subject: Re: Water Sustainability Act comments
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, October 30, 2013 6:29 PM

As a concerned citizen and rights holder as defined by Section 35, I am extremely concerned about some of the weaknesses of the draft document on Water Sustainability.

I am encouraged to see that shared decision making and local control are included.

I am disappointed to note it lacks any teeth regarding:

- Establishing legally enforceable ecological flow protections;
- Engaging with First Nations to determine policy and legislative objectives;
- Recognizing First Nations rights and responsibility as they are associated with water;
- Protecting water as a Public Trust; and,
- Ensuring proper environmental assessment before issuing groundwater licenses.

respectfully,

Personal Identifiers Removed

Penticton BC

Subject: Re: A Water Sustainability Act for BC: Legislative Proposal
From: ***Personal Identifiers Removed***
To: Living Water Smart ENV:EX
Sent: Wednesday, October 30, 2013 4:46 PM

Dear Honorable Minister Polak,

Thank you for forwarding this information on the Water Act Proposal. I have given an initial look at the Legislative Proposal and have some initial feedback regarding First Nations.

This topic is of great interest to me as I have recently completed my PhD and the focus of my research was on the engagement of First Nations in collaborative water governance in BC. If you are interested, I have an article in press with Water Policy Journal on this topic.

<http://www.iwaponline.com/wp/up/wp2013046.htm>

My first-pass feedback on the Legislative Proposal document you have forwarded is the following:

Early in the document in your letter you state: "Over the past four years we've consulted with citizens, First Nations, industry groups, environmental groups, local governments—everyone who has an interest in our water resource.". However, later in the document you say that "In their submissions, First Nations told us that the Water Act Modernization process does not meet the standards set in the New Relationship, nor constitute meaningful consultation". It is therefore unclear whether the Province has asserted whether or not there has been adequate consultation with First Nations. I suggest you will need to be clear about this in the final document or legislation.

Please feel free to be in touch if you would like to talk further about these matters.

Regards,

Personal Identifiers Removed

PhD Environment and Resource Studies

University of Waterloo

Subject: Corporate Usury !!

From: *****Personal Identifiers Removed*****

To: Living Water Smart ENV:EX

Sent: Wednesday, October 30, 2013 9:29 AM

I don't know what your water bill looks like....but I'm not getting a rate ANYWHERE near 85 cents for 1000 cubic meters of water. Nestle Canada in Hope B.C. is sucking up 320 MILLION litres of groundwater per year....and paying \$246 in new water charges !?!? We need to stop corporate usury while we still have natural resources left to defend.

http://www.huffingtonpost.ca/2013/10/18/bc-water-act-climate-change-nestle_n_4124163.html?utm_hp_ref=mostpopular

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, October 30, 2013 9:16 AM

To Whom It May Concern,

I move here from Germany 23 years ago. I have never in my life tasted tap water that good. I still prefer it over any other beverage. In Germany, water gets reused over and over - blackwater and greywater are separated (good idea!). But more to the point: PLEASE protect this most PRECIOUS RESOURCE! Don't sell it for bottling (bottled water: bad idea) or fracking at all. But if you must, make sure the price is high.

In decades to come, it wont be oil, coal or gas that ill be most coveted - it will be water. fresh water. Please ensure that future generations will have it available just like we do now. When my teenage children and I return from abroad or even just sit at the dinner table and drink BC water, we often say: "This is the best water in thew world."

Let's drink to that!

Sincerely,

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Wednesday, October 30, 2013 7:33 AM

I am concerned with the proposed CETA that the federal government is working on. Will we be able to protect our rights to controlling the access to and the sale of our water and water sources? Will we lose our say in what happens to our most important resource?

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, October 29, 2013 9:11 PM

Please don't sell our water. Look into the future and do what is right. Corporations should not have more rights than people. Our resources are dwindling.

You can't drink money.

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, October 29, 2013 7:00 PM

Hello,

This is my feedback. Please don't allow an aggregate company to dump contaminated soil in the Shawnigan watershed for the next 50 years! I drink this wonderful water and the only way to ensure that I, and my children, can continue to drink this water is to not contaminate it. The permit now in place puts the drinking water of all southern Vancouver Island residents at risk. Not an acceptable plan. Locals must control their drinking water source!

Thank you for your time,

Personal Identifiers Removed

Subject: Water Sustainability Act

From: ***Personal Identifiers Removed***

To: Living Water Smart ENV:EX

Sent: Tuesday, October 29, 2013 4:40 PM

This may seem silly this year 2013 -- however I believe that we need to seriously look at a delivering potable water separately from "water" for general use" use and would not require tested potable water standards!