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From: ***Personal Identifiers Removed***
Sent: Wednesday, November 13, 2013 6:36 PM
To: Living Water Smart ENV:EX
Subject: Water!

Greater Twin Lakes Area Stewardship Society (GTLASS)
RR#1, S26B, C1, Kaleden, BC V0H1K0.

Incorporation Number S-0061146

Lower Nipit Improvement District (LNID) RR#1, S26A, C1, Kaleden, BC
V0H1K0 since 1965

Response to the Water Sustainability Act Summary by GTLASS and LNID

The LNID and the GTLASS agree with the concept of a Water Sustainability Act for BC. We reside in an upland valley of the South Okanagan, a semi arid area, which is ground water limited. We have for many years realized the hydraulic connection of surface and ground water - WSA states the surface and ground water are one. This fact is easily observed in our Twin Lake Waterway. We know water in this area is more likely to be sustainable if there is ground water legislation. The LNID, in partnership with the Regional District, had an Aquifer Capacity Study completed by Summit Environmental Consultants in 2010 which estimated the annual aquifer recharge - how much 'water in' or is available for use. We know the 'water in' estimate but not the 'water out'. Our largest water user has 5 wells - an 18 hole Golf Course with a pending 208 residence development.

Robert Sanford, of the Adaptation to Climate Change Team of Simon Fraser University, has stated the single most important policy to sustain water is "Do not over allocate". If we are not measuring 'water use' we cannot understand what is sustainable or over allocated. Surface 'water use' is measured to some extent by the surface water licences, but ground 'water use' is a mystery and there for the taking. At present a land owner can drill as many wells as he likes and pump as much water as he likes - there is no control and developers know this. Developers have enjoyed rural development with free, uncontrolled, ground water in BC (the only province without ground water legislation). Since 2011 ground water can be monitored by the 2 new ground water monitoring wells.

We have read the Polis Water Sustainability Project and agree strongly with the 3 points made on page 12 as follows:

"The following three recommendations are viewed as an essential starting point for the Water Sustainability Act related to monitoring and reporting:

1. Grant one provincial agency sole responsibility for gathering and reporting all information on water use and have an independent auditor periodically verify the agency's performance;
2. Require immediately that all major (the threshold of 250m³ appears to be too high) water users meter the water they consume and report that data to the provincial agency responsible for water use data collection; and
3. Increase water---use fees and use a portion of the revenues collected to pay for a province---wide water---use database and increased environmental monitoring and enforcement efforts."

The LNID and GTLASS do have some additional comments:

1. We would like assurance that a large water user is not defined just by the number of gallons used, but it must be relative to the water source.
2. Land improvement is described in the 1904 Water Act as "drainage". This is not a definition to sustain water. Please ensure that a more appropriate term such as 'stewardship' is used.
3. Will there be a public arbitrator for water conflicts?
4. Public Education is a key component as most in BC still follow the myth that water is abundant and thus they are paying little attention to water issues.
5. Water is a Public Trust not a commodity to be sold - we know that water from the Hope well is being bottled and trucked to Alberta, refiltered, rebottled and labelled as Premium Spring Water. We do need to be concerned about sustainable water and energy?
6. Finally, we ask that the Twin Lakes Area Waterway be used as a pilot study or test case for the WSA. This is a relatively confined, small area on an unconsolidated, semi confined sand and gravel aquifer feed mainly by a northward sloping watershed of 7.1 km squared (1.3 square miles is above 5000 ft.). Our only management plan is from the 1973 Botham Report and water here was and still is controlled by whatever rancher owns the Upper Twin (Horn) Lake/Middle Horn Creek storage water licences. We have included an attachment with a Management Plan Proposal to Mitigate the Flood/Drought in the Greater Twin Lakes Area. This plan would fit the WSA and prove how to improve sustainability of water in this area. We do not have funds for such a plan and have been denied assistance by our local authorities.

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Twin Lake, Kaleden, BC