

From: Coral Brown ***Personal Identifiers Removed***

Sent: Friday, November 15, 2013 8:21 AM

To: Living Water Smart ENV:EX; Davis, Celine ENV:EX

Cc: Polak.MLA, Mary LASS:EX; MLA Linda Larson; water@polisproject.org; Polis Project Ann Zurbrigg

Subject: Response to the Summary Water Sustainability Act

To the WSA Committee,

We have attached the following documents in response to the Summary Water Sustainability Act:

1. 2012 TL Area Historical Water Facts as presented to the RDOS.
2. Response to the Water Sustainability Act Summary
3. A Proposal to Mitigate the Flood/Drought Situations in the Twin Lakes Waterway – (a WSA test case opportunity)
4. The Twin Lakes Area Aquifer.

We will forward a hard copy by mail. We look forward to your reply.

Submitted by both the Greater Twin Lakes Area Stewardship Society and the Lower Nipit Improvement District

Coral Brown Secretary for the LNID and Director with GTLASS

Personal Identifiers Removed



Response to the Water Sustainability Act Summary

Presented by the boards of:

Greater Twin Lakes Area Stewardship Society (GTLASS) & The Lower Nipit Improvement District - 1965 (LNID).

November 14, 2013

LNID and 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.

We respectfully request the Twin Lakes Area Waterway be used as a pilot study or test case for the WSA. This is a confined, small area on an unconsolidated, semi confined sand and gravel aquifer feed by a northward sloping watershed of 7.1 km squared (1.3 square miles above 5000 ft.). Our only management plan is from the 1973 Botham Report. For many years control of the water has been managed by the ranch owner of the Upper Twin (Horn) Lake/Middle Horn Creek land and holder of the storage water licences. As of 2012, The Nature Trust owns the water licenses.

We have included a document called *Proposal to Mitigate the Drought/Flood Situations in the Twin Lakes Waterway*. This plan will demonstrate how to improve water sustainability for the Greater Twin Lakes Area and will fit into the criteria of the WSA.

We strongly agree with the three points made on page 12 of the Polis Water Sustainability project and wish to add further comments.

Point #2 from page 12 refers to 3 major water users metering and reporting their water consumption. We recommend the WSA expand the list of major water users to include golf courses and other commercial heavy water users.

~ **To protect the Greater Twin Lakes Area water, land, air and inhabitants** ~

176 Twin Lakes Rd., RR#1 Site 26B Comp 1, Kaleden, BC V0H1K0
250-497-5940

03/2012



Additional comments are:

- In areas where recharge of a water source is measurable, water users could be defined not only by the number of gallons of water used but also in relation to the amount of estimate recharge required. In arid areas (such as ours), the Summit research outlined only 30-35% of the estimated recharge should be used.
- In the 1904 Water Act, the word 'drainage' is used to describe land improvement. We recommend a descriptor such as 'water stewardship' be used instead of 'drainage'.
- Put into place a public arbitrator for water conflicts.
- Continue to expand the education to the BC public about water abundance and issues.
- Water is a public trust and should not be available for free to sell as a commodity.

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 and pump as many wells as they like.

In closing, the Water Sustainability Act and Summary indicates to our groups there is movement towards improvement to water sustainability in the province. GTLASS and LNID would be pleased to work with WSA to be a test area to implement a well rounded mitigation plan and an example for other regions to utilize.

~ To protect the Greater Twin Lakes Area water, land, air and inhabitants ~

176 Twin Lakes Rd., RR#1 Site 26B Comp 1, Kaleden, BC V0H1K0
250-497-5940

03/2012