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Sent: Friday, November 15, 2013 2:24 PM
To: Living Water Smart ENV:EX
Subject: Submission from Hagensborg Waterworks District

November 13, 2013

Comments regarding the proposed new Water Sustainability Act:

1) I agree that “groundwater should not be treated any differently to surface water because the two are in fact one” and I can understand the need to regulate and protect groundwater use. However, regarding domestic use no licencing will be required:

- a. So how does the Province improve information on wells and aquifers and provide certainty of access for groundwater users and the improved understanding of aquifers without licencing and allocation targets?
- b. If licencing is required, how is the information to be gathered in a consistent and cost effective manner?
- c. Will the necessary funds be allotted particularly for Improvement Districts and small water users (as presently defined by the Province) belonging to the Small Water Association for implementation of required equipment?

2) To improve security, water use efficiency and conservation the Province intends to:

- a. Provide for Area-Based Regulations to address local issues and conditions. Does this include existing Water Boards as elected under Improvement Districts, which are considered as a local government under the Local Government Act?
- b. In the statement “make most water licences reviewable after 30 years” indicate that all domestic users will require a licence or permit to access water which may be a contradiction with statement made by the Province and referred to in #1 above?
- c. What will happen to existing small water systems within Improvement Districts (as presently defined by the Province) or under the Small Water Associations, would

there be an automatic approval after 30 years for existing systems?

d. How would the licencing costs be established or is this a further tax grab by the Province?

3) The Province intends to regulate the measurement and report water use by: requiring large-volume water users to report water use. Does this include users presently defined as by the Province within the Small water Association or under Improvement Districts?

4) The new Water Sustainability Act eludes to enabling a range of governance approaches:

a. Support the creation of advisory groups for surface and groundwater, does this include groups already existing such as Water Boards elected under Improvement Districts?

b. Allow for delegation of some activities or decisions to agencies outside of government, like existing Water Boards?

c. Most existing Water Boards for small water systems in the Province are under Improvement Districts, which is defined as a government under the Local Government Act, exclude them from being an advisory group for surface and groundwater?

d. There may be conflict created between existing governance structures such as elected Water Boards and an advisory group in small communities where there exists a small water system?

e. The new Water Sustainability Act alludes to opportunities for increased local participation with strong provincial oversight, however does not reflect implementation and maintenance costs, as Improvement Districts do not have access to funding as Regional Districts or Municipalities do. How will this be funded?

5) The proposed new Water Sustainability Act would address these issues by:

a. Allowing the government to set water conservation targets and carry out audits

to determine whether targets are met. Will the necessary funds be allotted for implementation of required equipment (see question #1c)?

b. Making water licences reviewable every 30 years indicates that all domestic users will require a licence or permit to access water which may be a contradiction with statement made by the Province and referred to in question #1a and #2b?

6) In keeping with the views we heard from British Columbians on this topic, the proposed new Water Sustainability Act would require smaller-volume licence holders may be required to measure, record and report water use, but only in specific circumstances, such as under Area-Based Regulations.

The new Water Sustainability Act alludes to that the duty to measure and report rests with the local government or supplier that holds the water licence, along with providing important information about water usage, measuring and reporting. . Will the necessary funds be allotted for implementation of required equipment (see question #1c)?

7) Ultimate accountability and responsibility for water management would remain with the provincial government; it would decide the roles and responsibilities for any delegated activities or decisions.

Expected benefits of the proposed legislation include:

a. Increased protection of water resources and aquatic ecosystems.

b. More flexibility and efficiency to meet the needs of water users.

c. Increased certainty, especially in areas of intensive water use and where there are chronic water scarcity problems.

d. Clarity around legal access to groundwater for people and businesses who rely on it.

e. Wider participation in decisions and water governance approaches.

8) Water is owned by the Crown on behalf of all British Columbians. And it is critical that the proposed new Act would reaffirm water as a public resource and would not privatize B.C.'s water resources or enable water markets and prohibits bulk water exports from B.C.

Further to this we would like to see an end to situations like;

9. Nestle, (American Company) being able to suck ground water out in enormous amounts without **oversight, cost** or **legislation** to protect our provinces precious resources. For too long

Corporations have been given free reign over critical resources for our survival as a province and a people. Please ensure any new legislation does not further entrench rights and liberties of corporations in terms of use and access to our water.

b). One of the seven points is to "measure and report large scale water use" This does not go far enough. Large scale water use needs a lot of oversight and a big cost to corporations and companies such and oil and gas that are sucking huge amounts of water out of the earth. Limits need to be put on this practice and definitely more oversight about what exact chemicals are going in, the impact to the environment including the local fauna and flora in the area. There should be big penalties to companies using more water than they should, for not reporting the amounts they use and a big charge for large amounts of water used.

c). Mining should have the same environmental regulations apply to them that do to the rest of us. There is a gold mine presently on the Quesnel River that is operating a meter from the bank of the river. We need legislation that includes a riparian zone for operations and disallows chemicals that can leach or be dumped into the Quesnel River or any river, creek or water source in the province.

Thank you for this opportunity to comment.

Yours Truly

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Hagensborg Waterworks District