



November 15, 2013

**Re. Water Sustainability Act Legislative Proposal Submission**

Dear Sir/Madam:

One Cowichan is a citizens group based in Cowichan Valley, BC. We have been active on local water issues, among other activities, over the past year. We would like to provide the following feedback to the *Water Sustainability Act* legislative proposal:

- We believe that First Nations Rights and Title must be respected both in the drafting and implementation of any new law. We are concerned that tight timelines for review of proposals may compromise proper consultation.
- We are encouraged by the general direction towards ecological factors and local governance, but are concerned about the overall low level of ambition in this regard in proposals to date. The province has waited about 100 years for a better water law, and in light of climate change we must raise the bar significantly with a strong law. This is our chance; we must seize it.
- Locally, the Cowichan Watershed Board is a potential model for local management, with First Nations as a full partner. A new water law should enable bodies such as this to assume authority over significant local watershed decisions, from the headwaters to the ocean. A new law should enable this kind of delegation.
- To avoid “downloading,” local bodies should be given either/both the necessary resources to manage effectively and/or the ability to generate revenues themselves to do so. In particular, a new water law should charge corporations using significant quantities of surface or groundwater a rate that actually reflects the full value of the resource, thereby raising revenues for this function.
- The proposed retention of FITFIR coupled with the lack of binding standards for ecological flows in an age of climate change adds up to mismanagement of our streams and of the fish that depend on them. Because water quality is related to water quantity, clear and enforceable water quality standards should also be mandated as part of a new law.

We look forward to a much strengthened legislative proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Price', written in a cursive style.

Matt Price, Director