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**Sent:** Friday, November 15, 2013 6:48 AM  
**To:** Living Water Smart ENV:EX  
**Cc:** Graeme, Ian ENV:EX  
**Subject:** Water Sustainability Act

Attention: Ian Graeme

On behalf of the Partnership's Board of Directors and Leadership Team, please find attached our feedback on the Legislative Proposal for a "Water Sustainability Act for BC".

We thank you for this opportunity to share our thinking. We trust that you will find our perspective to be informative and helpful in your deliberations.

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# the partnership for water sustainability in bc

34951 High Drive, Abbotsford, BC, V2S 2X7

## Feedback on the Legislative Proposal for a “Water Sustainability Act for BC”

### CONTEXT

The Partnership for Water Sustainability in British Columbia, a not-for-profit society, is pleased to respond to the invitation by the Province to offer feedback on the proposed Water Sustainability Act (i.e. “WSA”).

The context for this submission is that “watershed health” is a priority for local governments throughout the Georgia Basin bio-region (i.e. generally defined as lands tributary to the Salish Sea). Of relevance:

- ▶ In 2012, the Regional Boards for the Comox Valley, Nanaimo Region, Cowichan Valley, Capital Region and Metro Vancouver Region agreed to collaborate under the umbrella of the *Georgia Basin Inter-Regional Education Initiative*.
- ▶ All five regions have over-arching plans that are watershed-based and establish a vision.
- ▶ Everyone is primed to move from talk to “implementation and integration”.
- ▶ Collaboration will accelerate affordable and effective outcomes within each region.

Currently, the Partnership is facilitating inter-regional collaboration. The process has brought together provincial and local government staff for the purpose of aligning efforts. The deliverables encompass elements of a performance monitoring framework that can be used by local governments to adjust actions **and inform community planning** that maintains and/or restores healthy streams and watersheds. Refer to Exhibit A for a picture of the inter-regional collaboration process.

### BUILD ON THE PAST & LOOK TO THE FUTURE

The Partnership applauds the Province for developing the Legislative Proposal with the objective of introducing a final version of WSA in the legislature in 2014. We are especially pleased that:

- WSA represents a quantum leap forward.
- It sets a direction for the province.
- Policy development and implementation will follow.
- WSA moves BC beyond a traditional “water allocation” way-of-thinking and acting.

We are aware that some stakeholders may have unattainable expectations as to what may be achievable via a single piece of legislation. We do hope that they will keep in mind that “Rome was not built in a day”. This way-of-thinking helps maintain perspective because it allows one to judge progress in terms of the distance travelled rather than the distance remaining to reach the destination.

We urge all stakeholders to view WSA in context; be inspired by the opportunities it opens to make a difference; and align efforts to ensure incremental progress that creates a legacy over time.



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## INTEGRATION OF EFFORTS & WATERSHED HEALTH

The Partnership also commends the Province for recognizing the connection between land use actions and the implications (consequences) for both the water cycle and watershed sustainability in the local government setting. We are excited because WSA would put a strategic water lens in front of decision-makers so that they integrate:

1. Water Quantity Objectives
2. Water Quality Objectives
3. Watershed and Stream Health Objectives

Because these objectives address cumulative effects (or conversely, cumulative benefits) in a watershed context, we envision that WSA would create new opportunities for stakeholders to work together and facilitate desired outcomes for watershed and stream health in populated areas.

### Drivers for Coordinated Action on the Ground:

The invitation to provide feedback also creates an opportunity to urge the Province and other stakeholders to view WSA as but one element, albeit very important, within an overall provincial policy and legislative framework. In this context, we wish to draw attention to the following existing and complementary elements:

- Environmental Management Act
- Green Communities Initiative / Sustainable Service Delivery
- Green Communities Initiative / Regional Growth Strategies
- Green Communities Initiative / Climate Change Adaptation

We suggest that WSA working in tandem with the Environmental Management Act would be a powerful regulatory combination. When the two are coupled with Sustainable Service Delivery, we believe the latter would become the ultimate integrator because it would bring the financial accountability lens into focus.

Sustainable Service Delivery revolves around asset management. Hence, it is an effective way to engage local governments about how to view watershed health through the asset management lens; and how to provide a higher level-of-service at a reduced level-of-cost over time.

### Funding and Resources:

WSA is enabling legislation. Thus, achieving a vision for **watershed and stream health** in populated areas means that the onus would be on local governments to “get the job done”. To do this, local governments would need to partner with and mobilize the stewardship sector in the spirit of “shared responsibility”.

A challenge for the Province lies in how best to support the champions in local government and non-government organizations while representing the “provincial interest”. Without provincial funding and resources to support local government leaders and their stewardship partners, reliance upon local government staff and community volunteers to accomplish what is needed will not be fully realized, and as a result, effective province-wide WSA implementation would be at risk.

*This submission was prepared by Kim A. Stephens, M.Eng., P.Eng., Executive Director, and was approved by the Partnership's Board of Directors and Leadership Team in November 2013.*

## THE PROVINCE:

**DESIRED OUTCOME:** Support local governments that are demonstrating leadership and innovation in evolving standards of practice that protect/restore Watershed Health

**WHY:** So that communities can showcase how to implement a watershed-based approach that: 1) strives for greener communities; 2) saves money while providing a higher level of service; 3) reduces a community's water footprint; 4) improves water quality and protects aquatic habitat; 5) adapts to a changing climate; 6) results in cumulative benefits over time; and 7) achieves a balance between economy and ecology.

**HOW:** Align provincial drivers so that they are mutually reinforcing

## Provincial policy framework enables action to achieve the Watershed Health Goal:

- Rainwater Component of Liquid Waste Management Plans
- Living Water Smart / proposed Water Sustainability Act
- Green Communities / Sustainable Service Delivery
- Green Communities / Regional Growth Strategies
- Green Communities / Climate Change Adaptation

**Get the water part right, and the rest will follow:**

- **WHAT:** "Design with Nature"
- **WHY:** nature provides services at a reduced cost
- **HOW:** "mimic the Natural Water Balance"

## Collaborating regions view Watershed Health Goal through complementary lenses that together form a complete picture:

- Metro Vancouver Region – ISMP effectiveness
- Capital Region – water quality standards
- Nanaimo Region – partnerships
- Cowichan Valley – climate change
- Comox Valley - stewardship

## COLLABORATION OUTCOME:

"Ensure that where we are going is indeed the right way"

## LOCAL GOVERNMENTS IN THE GEORGIA BASIN:

**DESIRED OUTCOME:** Understand the elements of a performance monitoring framework that can be used to adjust actions and inform community planning that maintains healthy streams

**WHY:** So that an **Adaptive Management Framework for Watershed Health** will be affordable, effective and result in consistent application of evolving standards of practice

**HOW:** Community development activities and alteration of the Built Environment will result in cumulative benefits, not impacts

## Georgia Basin Inter-Regional Collaboration for Watershed Sustainability Elements of an Adaptive Management Framework for Protecting Watershed Health

### Exhibit A

(as updated on Oct 22/13)