



## PEACE RIVER REGIONAL DISTRICT

Office of the Chair

November 15, 2013

*Water Sustainability Act*  
Ministry of Environment Water Protection  
and Sustainability Branch  
PO Box 9362, Stn Prov Govt  
Victoria, BC V8W 9M2

Via Email: [livingwatersmart.gov.bc.ca](mailto:livingwatersmart.gov.bc.ca)

RE: *WATER SUSTAINABILITY ACT* FINAL DRAFT COMMENTS

On behalf of the Peace River Regional District, please accept the following comments on the *Water Sustainability Act (WSA)* final draft.

While the Peace River Regional District (PRRD) is generally in support of the direction that is being considered with the proposed *WSA*, there are some areas that give cause for concern:

- Protecting stream health and aquatic environments: ensure that entire water sheds are taken into account, including all minor tributaries, when considering new decisions on water allocation. It is very important that stronger language for the protection of headwaters be used. We also would suggest that the key outcomes are listed in the *WSA*, which are:
  - Water management is sustainable, efficient and adaptive;
  - Rights for water users, communities and industry are secure and transparent;
  - BC's water and aquatic ecosystems are healthy and protected.
- Regulating and protecting ground water use: it is imperative that more work be undertaken to inventory underground aquifers. It will be difficult to regulate and allocate underground licenses in the absence of this data. As well, this data should be shared with other agencies in making their water allocation decisions.
- Improving security, water use efficiency and conservation: while we are generally in favor of area based regulations, we suggest that the model should be fair and equitable and based on wide stakeholder input. Here again, more inventory work on both surface and underground aquifers, should be undertaken to manage the resource effectively. Agriculture water reserves should not solely follow the boundaries of the Agricultural Land Reserve (ALR). There are many grazing tenures that are on crown land and outside the ALR. As well water licenses should be reviewed every 10 years not 30.

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PLEASE REPLY TO:

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- Clarification is required on the definition of "Legal Access to Water"
- The PRRD continues to have concerns regarding the delegation of responsibilities in the allocation of water. We feel very strongly that water should be managed solely by a single governing agency. Currently there are a number of ministries that are managing within their own purview with little or no idea of the overall big picture. Delegation to agencies with multiple and competing mandates will ultimately fly in the face of what we believe the WSA is trying to achieve. For the WSA to have any success at all will depend on how it's administered. A single agency that is transparent and objective with no competing interest, is a model that we feel would best provide the provincial direction that is required in administering this valuable resource, now and in the future.
- The legislative proposal does not adequately address the implications where industry is developing huge water storage reservoirs (ALR) that interrupt natural drainages.

On behalf of the Peace River Regional District Board, Water Act Modernization Committee, we thank you for the opportunity to be included in this process and provide our input. We look forward to your positive response in addressing the comments raised.

Yours truly,



Karen Goodings,  
Chair