

From: Dana Hibbard [mailto:dana@skeenawatershed.com]

Sent: Friday, November 15, 2013 3:31 PM

To: Living Water Smart ENV:EX

Subject: Feedback on A Water Sustainability Act for BC

To whom it may Concern,

I am writing to submit my feedback on the proposed Water Sustainability Act.

As a resident of British Columbia I have grave concerns about how our water is currently being managed and it was with great interest that I reviewed the proposed Water Sustainability Act.

I am concerned that the province of BC has not adequately consulted First Nations throughout the Water Act Modernization process. I urge the government to ensure that First Nations of BC are actively involved and consulted during every step of the modernization process.

I have summarized my feedback into three main recommendations: protect the public trust, give the public a voice, establish a fair return on water.

Recommendation 1: Protect the Public Trust

The fresh water supplies of BC belong to the public and must be managed accordingly. The public interest must be the priority when allocating private rights to water use. The province of BC has so far refused to join other countries and states around the world in recognizing that water is owned by the public and must be managed on the public's behalf. The current way in which water rights are given to industries such as the oil and gas industry reveal that water is not currently being managed in the best interest of the public and that the needs of industry is being prioritized over the needs of communities. I urge the government to uphold the public's interests and formalize their commitment to protecting the public in how they manage our water resources.

Recommendation 2: Give the Public a Voice

I strongly disagree with how the current proposal does not allow for public input about how water is managed. Local residents must be able to give input on how decisions are being delegated. When someone applies for a license to take water public notice should be required and the public should be able to partake in the decision. For the government to deny public participation in these decisions is a serious step backward for our province and should not be allowed.

In earlier consultations the government was told by the public that the province needs binding standards that will ensure water for fish, wildlife and stream health, not weak guidelines. It is disappointing to see that under the new act decision makers will only have to "consider" environmental flows. The term "consider" does not equate to binding standards and will not ensure that the flows our fish and wildlife need are maintained. Additionally, under the new act older water licenses will be considered higher priority than environmental flows. All water licenses should be subject to ensuring that environmental flows are maintained to protect fish, wildlife and stream health.

Recommendations 3: Establish fair return on water

Currently, across the province, fresh water is being put under great demand by industries such as oil and gas. The Council of Canadians identifies fracking as the most serious threat to freshwater in Canada.

The proposed Water Sustainability Act falls short of ensuring that BC's fresh water is protected from over use by industry. There is growing concern about the aggressive increase in fracking that will be required to feed the proposed LNG projects and the massive amounts of water that will be withdrawn and contaminated as a result. I am concerned that the Water Sustainability Act has little to say about fracking. Currently, millions of gallons of freshwater are being withdrawn from rivers and reservoirs in northeastern BC for use in fracking operations for almost no cost. Running the administrative system for water use in B.C. is expensive, but user fees fail to even cover the cost of running the system, which means that the public is subsidizing the water use of major commercial interests. The Water Act must

apply to all fresh water users in the province and must be binding to all decision makers, ministries and industries including oil and gas and forestry.

A strong Water Sustainability Act is important to me and my family and I support that government is modernizing the Water Act. Considerable progress has been made in certain aspects I live in an area where the water is clean and abundant and want to see it remain that way for generations to come.

Sincerely,

Dana Hibbard
Skeena Watershed Conservation Coalition
dana@skeenawatershed.com
250.842.2494
skeenawatershed.com