



TOWN OF LADYSMITH

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November 12, 2013

Our File: 0125-02

Water Sustainability Act
Ministry of Environment
Water Protection and Sustainability Branch
PO Box 9362 Stn Prov Gov
Victoria, B.C., V8W 9M2

To Whom It May Concern:

On behalf of the Town of Ladysmith, I am writing to provide comments on the proposed changes to the *B.C. Water Act*.

The Town would first like to acknowledge the Provincial Government for making a number of long-overdue key changes to the Water Act. In particular, we are pleased to see that the new *Water Sustainability Act* will include the introduction of licensing for non-residential groundwater extraction, the introduction of Water Sustainability Plans, the modernization of the water allocation process, a commitment to water efficiency and conservation, and the inclusion of water issues in the planning process for all stakeholders.

Council also noted with interest the consideration of the “delegation of some water management activities or decisions to people or agencies outside the Provincial Government”, including the possible creation of local “Advisory Groups” for both surface and groundwater.

Council would like to make the following specific comments regarding the proposed new legislation:

1. Lack of Commitment to Municipal Ownership and Management of Open Community Watersheds

Council has long been concerned about the preservation of watersheds for future generations in the face of population growth, development and climate change. In 2011, we spearheaded a resolution that was endorsed by the Union of British Columbia Municipalities calling on the provincial government to develop a program to facilitate local government acquisition of both the watershed and adjacent land for those local governments with water systems on privately owned land (UBCM 2011-B129).



2. Local Government Involvement in Watershed Management

Council noted with concern that the provisions for delegation of watershed management contained in the proposed legislation do not guarantee local government involvement. We therefore respectfully request that local governments be guaranteed involvement in watershed management when such management is delegated by the provincial government.

We respectfully request that the *Water Sustainability Act* formally recognize the importance of local government ownership and management of local water supplies, and that it contain specific measures to ensure local government ownership, and further that local governments be guaranteed involvement in watershed management when such management is delegated by the province.

These improvements should assist the Town of Ladysmith and other local governments throughout British Columbia to support the provincial government in our collective efforts to preserve and protect our watershed and provide abundant, safe drinking water for future generations.

Thank you for the opportunity to provide input into this important new legislation.

Sincerely,



Ruth Malli
City Manager