

**From:** Karena Shaw \*\*\*Personal Identifiers Removed\*\*\*

**Sent:** Wednesday, November 13, 2013 4:45 PM

**To:** Living Water Smart ENV:EX

**Subject:** Water Sustainability Act

I am very pleased that we are finally seeing movement towards better water regulation in BC, and there are many promising elements to the proposed legislation. In particular, the potential for watershed scale governance and shared decision making are very welcome, although obviously success will depend very much on how it is designed.

However, I have several outstanding concerns:

1. I do not see any reference to the protection of critical environmental flows in the provincial water objectives. Protecting these is an essential foundation to a sustainable water regulatory regime; ecosystem needs must be protected.
2. The "First in time, first in right" principle is unaltered, which makes it very difficult if not impossible to ensure that water allocation actually meets the needs of the public, which should be essential to any water regulatory regime.
3. There is excessive reliance on statutory decision makers to ensure that minimum flow requirements and public values are respected.
4. There are no provisions for oversight and accountability, such as might be offered by an independent Resource Practices Board.
5. Monitoring and reporting requirements are weak at best.
6. Groundwater fees and rentals are set at a ridiculously low rate: would these even cover administrative expenses? These fees must be set at a level that encourages prudent use of valuable water resources.
7. All decision makers should be required to consider provincial water objectives that include key priorities of efficiency, conservation, and environmental flow requirements.

It seems to me that many of these issues must be, and can be, addressed before the proposal is advanced.

Sincerely,

Kara

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