



The Corporation of the Village of New Denver

P.O. Box 40, New Denver, BC V0G 1S0 • newdenver@netidea.com

PHONE (250) 358-2316 • FAX (250) 358-7251

Comments on the proposed Water Sustainability Act for BC

November 15, 2013

- Need to allow sufficient funding to gather data on water use, availability of supply, recharge rates etc. in order to support good decision making.
- With new rules, enforcement will be important – need to ensure necessary financial resources are allocated to this
- Support the position that Climate Change impacts will vary greatly across the province – adequate monitoring is necessary to avoid overgeneralization.
- Increased/altered local government reporting requirements must be accompanied by financial assistance for implementation
- Support incorporating information about EFNs into decision-making but need reliable data which may prove costly to obtain (how reliable are “desktop” assessments in the absence of data?)
- Concern that “time-frames” could be grounds for not conducting EFN assessments.... Would this not reward entities that wait until the last minute thereby conferring a financial advantage for this type of approach?
- Support prohibition on dumping of debris into streams/aquifers
- Concern that wells for oil and gas drilling are not addressed
- Does the designation of RWMs in the Oil and Gas Commission (for the adjudication of applications supporting oil and gas activities) give that industry an advantage? An appearance of an advantage?
- Unclear how municipally-owned/operated wells would be affected
- Water Sustainability Plans “require significant resources” – small local governments will need assistance (financial, technical) to achieve compliance with additional regulations
- Support regulation of geothermal drilling (geoexchange wells)
- Blanket conservation requirements should take into account measures already implemented when determining baselines. Also need to allow for rural/urban differences.
- Given changing climate and changing precipitation patterns 30 year intervals between reviews may be too long, allowing environmental damage in interim
- Need to balance economic interests of power-purpose licences with changes in environmental conditions... 40 years is a long guarantee in a changing world
- Take steps to minimize financial burden of reporting requirements while ensuring adequate information is gathered. Consider relaxing requirements for users with longstanding, consistent use patterns, especially small local governments.
- Enforcement requires resources to ensure violators are caught, penalties are applied fairly
- Drinking water protection must be the number one priority, preference for achieving this through watershed protection/management

- Concerned that the 5 year transition timeframe for existing groundwater users is too long, will confer unfair advantage on existing users
- How does the proposed WSA impact trade agreements?
- How would water scarcity affect municipal development/growth? How would this be determined? Enforced?
- Timeframe for regulatory implementation is vague
- Support for greater local contribution to water stewardship and input into decision process
- Feel government should set the standards, as opposed to “keeping pace with industry standards” when it comes to drilling requirements. Why don’t we have well drilling standards that are up to date?
- Additional government personnel needed in order to improve service and regulation of our current laws, as well as additional staff to handle the new proposed regulations