

"Water Sustainability Act", "Attn: Living Water Smart,

Thank you for the opportunity to comment on the proposed Water Sustainability Act.

As a volunteer streamkeeper in Burnaby, I think the proposed Act is tilted too much toward oil and gas extraction and privatization of a public resource and too little to ensuring flows for native salmon. I agree with following notes from Our Water BC:

There are some positive initiatives in the proposal, such as regulation of groundwater, improved conservation and efficiency requirements and protection of stream health and aquatic ecosystems.

However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

**Water Allocations:** The current water allocation regime, "first-in-time, first-in-right" (FITFIR), is not working, yet the Water Sustainability Act proposal does not tackle the FITFIR regime. Instead, it proposes water licence trading and water markets to deal with allocation that could open the door to the privatization of water, which most British Columbians, including me, do not want to have happen. Instead of moving BC towards water markets, the proposed legislation should consider:

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**Water Governance:** How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen

engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

\*\*\*Personal Identifiers Removed\*\*\*

BURNABY, BC \*\*\*Personal Identifiers Removed\*\*\*

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Thank you for the opportunity to comment on the proposed Water Sustainability Act.

PLEASE NOTE MY PERSONAL REMARKS< as a long-time BC resident, grandmother, community health nurse and involved citizen, seeking to be well informed and vocal about inequities when I see them.

I have lived all my life in British Columbia, from Vancouver , where I was born, to the far north and interior as well as Vancouver Island. I am acutely aware of the importance of healthy aquatic ecosystems to our overall bioregion and find myself having to speak up and demand better stewardship from our government-both of small and large bodies of water. Water will be a very precious resource in the future--indeed it already is. We must avoid activities that will poison or otherwise jeopardize our waters, which in fact are in need of recovery from various assault. OU

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Protecting our Indigenous people in Fort Nelson from Fracking, thus poisoning their drinking water and land.

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I appreciate the opportunity to comment on plans for rewriting legislation regulating water use in BC.

In a province that styles itself "Super Natural" the right thing to do is to regulate in such a way as to maintain this characterization as a reality rather than merely tourist propaganda. Thus, support of natural ecosystems should remain a high priority.

Provincial waters should not be used as sewers or as industrial and human waste receptacles. Processes for sewage treatment and other forms of amelioration should be in place before any outflow into public streams and rivers is allowed. Regulations for careful monitoring of standards with regard to this principle must be in place, as well, including penalties for infractions.

Here in the Northwest (the Skeena region) both sport and commercial fishing are significant economic drivers. It is critical that human interventions into stream and river habitats be limited, or in some cases, completely forbidden insofar as they are in any way likely to damage migration and spawning runs.

Wetlands (often adjacent to lakes and streams) have a critical role in maintaining water quality and creating flood control, not to mention serving as habitat for hundreds of species of birds, amphibians, and other wildlife. They, too, should be adequately protected in any legislation. Drainage of wetlands for industrial or real estate development is often very damaging and should be strongly curtailed.

Current proposals for pipeline development in the region seem rushed and somewhat ad hoc. Pressures from any particular project may fall within reasonable bounds of waterway protection, but the probability of many projects' cumulative damage is high. Legislative protections for water should be in place BEFORE construction permits are issued.

Only recently Rio Tinto Alcan received permission to increase its SO<sub>2</sub> emissions from the new Kitimat smelter. With proposals for LNG export, considerably more SO<sub>2</sub> (from burning gas for energy for compression) is likely to be added to the local air shed. This is, once more, a cumulative damage issue. Marginal acidification of fresh water in the region could prove extremely damaging to a variety of species. Given the complex webs of life in wild fresh water, allowing significant acidification could prove exceedingly costly. Thus protection against acidification should be part of water regulation.

Lastly, presumably the waters along our Pacific fjords, inlets and bays are also BC waters. BC should, if it is within its power, implement the ban on oil tanker traffic along the BC coast. Any significant oil spill there, whether conventional crude or dilbit, would likely make any upstream efforts to protect fish habitat pointless.

Thank you once more for this opportunity to comment.

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However, there are some significant gaps and concerns in the policy proposal that must be addressed if we are going to balance competing demands for water, ensure watersheds are healthy, and best serve the public interest through good decision-making and public participation.

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**In-Stream Flows:** While the policy proposal appears to recognize the need to balance the needs of water for people and water for nature, the proposed in-stream flow measures would only apply to new water users and not to the 44,000 current water licence holders. This is a significant weakness, as is leaving in-stream flow measures as only "guidelines" and not legislated with a robust regulatory framework. Strong regulations for stream flows are our best insurance against further degradation of our natural world and a new water law must have strong, legislated flows to meet the needs for human needs and the environment. A new Water Sustainability Act should:

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**Water Governance:** How decisions are made about water will define our future as a province. The new policy proposal attempts to enable a variety of governance approaches, but are vague and lacking in vision. A better system of water governance would recognize that citizen engagement, watershed management groups with multiple sectors represented, and empowered local governments is a better model to decide how we make decisions about water.

I look forward to a strong new law to protect BC's water, for current and future generations.

Sincerely,

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Water will be a key resource as population continues to increase. Humans, animals, fish and forests can survive without oil and gas, but not without clean fresh water.

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