



WATER SUPPLY ASSOCIATION OF B.C.

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February 14, 2005

Okanagan Basin Water Board
c/o 9848 Aberdeen Road
Coldstream, B.C.
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Attn: Mr. John Slater, Chair

Dear Sir:

RE: Referral re: Okanagan Partnership Discussion Paper on Okanagan Water Management

On behalf of the members of the Water Supply Association of B.C. we thank you for the opportunity to comment on the Discussion Paper on Okanagan Water Management prepared by the Okanagan Partnership.

We applaud both the OBWB and the Partnership on this initiative. Not only do we believe that basin-wide collaboration in management of our limited water resources will be absolutely necessary, discussions on how we achieve this are very timely.

On page 3 of their Discussion Paper, the Partnership makes a strong case for the need for collaboration. We concur with this assessment. We believe that population growth will only increase the demands on our water resource, a resource that is already showing signs of stress. Climate change will likely aggravate this problem. The WSABC recognizes that we will not be able to close our doors to prevent the population growth. Nor will climate change impacts be reversible at any time in the foreseeable future. The challenges therefore will be to find sufficient water to meet our needs, protect its quality, use it efficiently and allocate it fairly. These challenges cry out for collaboration.

Because the OBWB is presently mandated to examine basin-wide water supply issues, because of its representation from all three regional districts, and because of its unique taxation ability, the WSABC agrees that the OBWB is the correct body to be dealing with the above challenges. All of the water suppliers and individual users are represented in one way or another on this Board.

We note that the Partnership has proposed that the structure of the Board be changed to include two First Nations representatives and one water purveyor representative. We concur with these proposals. First Nations participation as water users will be important

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in ensuring the effectiveness of any new initiatives. Also, the direct management knowledge of the water industry will be extremely useful to the Board in its deliberations and in review of recommendations from the proposed stewardship council. **Should the Board adopt this structure, the WSABC formally requests that they be able to nominate the water purveyor representative, subject to ratification of the Board.**

The Partnership has suggested that a 2/3 majority of Board members be required to adopt resolution. This is a substantial improvement over the current system whereby progress is hamstrung by the need for unanimity. The WSABC does not believe that “opting out” of any initiative will be workable. This would simply allow partners to “cherry pick” those resolutions they favour. True basin-wide collaboration will not be achieved by this process. It may be more appropriate to allow any one partner to completely withdraw from the OBWB if it no longer sees a benefit to the process. Any such withdrawal should require a lengthy notice period to allow the organization to adjust to the new structure or, preferably, to make the necessary adjustments to allow the withdrawing partner to reconsider. A minimum one year notice period after an initial three to five year commitment may be appropriate and workable. This type of arrangement is consistent with current local government legislation.

It is presumed that the Water Stewardship Council would act as an advisory committee to the new Board, or “Council” as suggested by the Partnership. Presumably this stewardship group would have representation from the following:

- 1) Local Government Planning Departments
- 2) Provincial Government experts in the areas of licencing, water quality, habitat protection and basin hydrology
- 3) Groundwater management experts
- 4) Water suppliers
- 5) Agricultural users such as the Fruit Growers, Wineries and Ranchers
- 6) Interior Health Authority
- 7) Federal Government experts on climate change, international water issues and fisheries
- 8) Economic Development interests

It is suggested that the size of this body be limited to perhaps 15 or less to aid in its effectiveness.

While the overall initiative and proposed structure have the overwhelming support of the WSABC, the proposed mandate as laid out in the Discussion Paper does not. Many of the items considered are currently the responsibility of federal and provincial ministries, crown corporations and agencies, all with adequate authority to manage water resources. At the local level, water suppliers also have adequate authority to provide for local water servicing requirements. The mandate as proposed is too broad, too detailed and too



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intrusive. What is required, rather, is an entity with a basin-wide perspective on water resource management with the capacity to develop public policy from which guidelines and directives can be developed and applied across the broad spectrum of regional water resource interests and authorities.

The WSABC recognizes that to facilitate buy-in from member municipalities, regional districts and improvement districts, the mandate should not allow the OBWB to dictate land use policy. There should also be a clear recognition that the OBWB does not plan to take over assets from any of the water utilities. It is suggested that the mandate be revised to include the following:

- 1) As listed under #9 under “Mandate” in the Discussion Paper, the WSABC agrees that the OBWB should oversee the necessary research and studies to determine the overall balance between water availability and water demand in the basin. In part this would be an update on the original Okanagan Basin Study of 1974. However, the study would go significantly further. It must now incorporate the most probable projected impacts of climate change and it must examine our groundwater availability and incorporate the role of groundwater in our supplies. The WSABC is uncertain whether this should lead to a new Okanagan Basin Agreement or Water Stewardship Charter as suggested by the Partnership. However, the results of this study should identify clearly the specific challenges that must be met in setting future policies. The WSABC notes with alarm the possibility of withdrawal of provincial funding for hydrological data gathering, data that is crucial for an effective review of available water supplies.
- 2) At present many of our surface water sources are fully licenced and perhaps over-subscribed. As demands for water continue to increase with growth, more and more pressure will be put on our groundwater supplies, supplies over which we have little knowledge and almost no regulation. Based on the knowledge gained from an updated Water Basin Study that includes groundwater, the Board should have the mandate to take a key role in setting policy for groundwater regulation. The WSABC believes that, if this is not done, the present free-for-all policies will lead to chaos in the water supply industry.
- 3) In addition to recommendations regarding groundwater regulation, the Board should have the mandate to take a key role in setting policy for water licencing. This should include policies for groundwater licencing.

The WSABC believes that the OBWB is not the appropriate body to regulate, allocate and administer all water licences in the basin at this time.

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Present licencing administration by the Province must be changed and improved to be effective. At this time there is evidence that the Province is not fulfilling its responsibilities in this area. In our opinion, other areas where the provincial government is not currently devoting adequate resources include:

- a) Stream monitoring and hydrological data gathering;
- b) Monitoring of actual withdrawals;
- c) Monitoring point and non-point discharge volumes;
- d) Administration of dormant licences; and
- e) Updating of legislation.

A basin-wide entity would be able to influence the province's commitment in these areas and ensure water resources are managed in a way that reflects established regional public policy.

- 4) The WSABC recognize that, as population growth and domestic demands increase in the valley, availability of water for agricultural irrigation may become strained. This could simply be caused by the intrinsic value of the water increasing to levels where certain agricultural activities would become uneconomic. The potential for conflict in this area will be very high unless specific policies and practices can be incorporated to sustain the industry. These policies cannot be considered on a utility or even local government basis. It will be necessary at some point in the near future to have a valley-wide dialogue leading to clear policies regarding agricultural allocation and water pricing for the industry. The OBWB should play the leadership role in determining the political objectives and the subsequent initiatives required.
- 5) The OBWB, in spite of its limited mandate up to now, has been very successful with its Sewer Grant and Milfoil programs. The programs have resulted in improvements to overall water quality on our basin lakes. The WSABC would like to see the OBWB continue its advocacy role in Source Water Protection. As part of a basin-wide approach to ensuring water supplies, source protection is key. The WSABC thanks the OBWB in its efforts to date on the LWBC Reservoir Lakes Proposal and would suggest that the mandate specifically incorporate the ability to advise on provincial policy regarding source protection. The WSABC believes that continued provincial cutbacks have reduced the level of protection on all of our supplies. Ultimately an enhanced role in enforcing this protection for the OBWB may be in order.
- 6) The OBWB could make recommendations on local government and water purveyor programs that would encourage water use efficiency. The focus

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of the Board's mandate should be on finding solutions and making recommendations rather than enforcement of policy at this time. Examples of possible solutions could be as follows:

- a) Proposing common standards for water saving devices
- b) Support of leak detection studies and water audits and providing credits on licencing fees for implementation of these studies and standards
- c) Support of drip irrigation programs and funding thereof
- d) Development of incentive programs and pricing programs to ensure efficient use.
- e) Providing public education programs to promote and enable compliance with water conservation standards.

The WSABC recognizes that basin-wide implementation of these programs may be required to ensure success. Once the programs are developed and universally endorsed, the mandate of the OBWB **could be expanded in the future** to include implementation and administration.

- 7) Once the actual total water availability in the basin is determined, it may well show that new water supplies will be required to meet the demands of continued growth. Typically these supplies could come from a new major groundwater source or a large surface water source outside the basin. Development of such a source would likely be beyond the capability of any single water purveyor. The OBWB may be the appropriate body to develop, finance and administer this project to provide new supplies to existing purveyors. While the mandate to undertake this development should not be provided now, the Board should have the mandate to undertake the studies that may prove necessary to identify this solution.
- 8) Similar to the mandate to seek additional supplies, the WSABC recognizes that some purveyors are water-rich while others are water-poor. A project wherein basin-wide transfers and trading of supplies between individual utilities and licencees may prove the most cost-effective means of dealing with localized shortages in the near term. The OBWB should be given the mandate to examine the value of setting up such a program, along with methods of implementation and mechanisms for administering such a scheme.

Overall, the WSABC fully supports an expanded mandate as listed above. It also recognizes that this mandate may change over time. However, further expansions should only be considered as the benefits become clear to all participants. Currently knowledge and understanding of issues appears to be insufficient to substantiate this need at this



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time. The WSABC therefore recommends that the OBWB have the ability to provide effective leadership in promoting policy change, with the question of ultimate implementation and enforcement of any such policies to be dealt with as needed at a future date.

The WSABC thanks the OBWB and the Partnership for being included in the development of this needed initiative and looks forward to dialogue with the Board on these matters.

Yours very truly,

Bruce Wilson
Chairman