



WATER SUPPLY ASSOCIATION OF B.C.

P.O. Box 22022, Penticton, B.C. V2A 8L1

Phone and Fax: (250) 497-5407

A Position Statement of the Water Supply Association of B.C. Regarding the Proposed Sale of Crown Leases on Drinking Water Reservoirs

At a meeting of the Board of Directors held at the office of the Black Mountain Irrigation District in Kelowna, BC at 2:30 P.M. January 29, 2009, the following position statement, originally adopted June 12, 2002, was passed unanimously by the Board of Directors.

Present:

Director Jack Allingham
Director Al Cotsworth
Director Nancy Howlett
Vice Chair Bob Hrasko
Director Brian Jamieson

Director Mike Mercer
Director Andre Miller
Director James Moller
Chair Toby Pike

The Water Supply Association of B.C. opposes the proposed sale of crown leases located adjacent to drinking water reservoirs. Further, in the interests of source water protection, the Board of Directors request the province of British Columbia not renew these leases past the current tenure.

Rationale:

- **Source water protection:** Water quality is inextricably linked to land use. Rainfall can pick up contaminants from the atmosphere, from natural sources, and from a whole range of human land uses before entering streams and lakes or seeping underground into aquifers.

The impact of recreation on water quality has been difficult to measure until quite recently. The use of ribosomal RNA analysis of *e-coli* samples has provided solid evidence of source water contamination from a variety of land uses, including recreation. Source water protection is not an exact science, however, and decisions forming public policy on the appropriate use of crown lands need not rely solely on science based evidence.

Common sense dictates the less activity that occurs within watersheds providing drinking water supplies, the lower the public health risk.

A number of reports have cited the need for water purveyors to develop a multi-barrier approach as the key to providing safe, potable water to the residents of B.C.



-2-

These reports include:

- Office of the Auditor General. 1998/1999 Report 5. *Protecting drinking water sources*. Victoria. 1999.
- Ministry of Health Planning. *Provincial Health Officer's Annual Report 2000. Drinking Water Quality in British Columbia: The Public Health Perspective*. Victoria. Queen's Printer. 2001.
- Ministry of Water, Lands and Air Protection. *Drinking Water Review Panel Interim Report*. Fraser Basin Council. December 14, 2001.
- Ministry of Water, Lands and Air Protection. *Final Report: Panel Review of British Columbia's Drinking Water Protection Act*. Fraser Basin Council. February 13, 2002.
- Ministry of Health Services. *Action Plan for Safe Drinking Water in British Columbia*. Victoria. 2002.
- Office of the Provincial Health Officer. *Progress on the Action Plan for Safe Drinking Water in British Columbia*. Victoria. 2006.
- Ministry of Health, Ministerial Technical Advisory Committee. *Turbidity and Microbial Risk in Drinking Water*. Victoria. 2008.
- Ministry of Environment. *Living Water Smart: British Columbia's Water Plan*. Victoria. 2008.

The multi-barrier approach to safe drinking water is one that applies a “best practices” method to each aspect of drinking water delivery. Source water protection, water treatment, water distribution and operator training each present an opportunity to enhance the safety of the drinking water supply. An effective multi-barrier approach will make sure each of these fundamentals are managed to maximize public health and safety. Clearly, land use decisions in community watersheds that minimize the potential for pathogen contamination of the water supply are at the core of source water protection.

- **Crown lease sales would promote development:** A change in tenure from lease to fee simple ownership would likely result in a higher level of investment in the properties. Landscaping, paving, fuel storage, the use of pesticides and more frequent visits all pose additional threats to water quality. The increased silt and phosphorous resulting from these activities, among other contaminants, would result in added algal growth – a primary water quality concern for both taste and odour.
- **Increased use:** Increased investment in these properties would almost certainly result in increased year round use. This would not only result in an incremental increase in the degradation of water quality due to the factors already mentioned, but increased winter use would require additional fuel storage for heating with the attendant risks to water quality.



-3-

- **Waste Disposal:** On-site sewage disposal is a threat to water quality and will only increase under the redevelopment of these sites expected from private ownership. Nitrogen and phosphorous pollution from septic tanks and drain fields will contribute to the eutrophication of sensitive foreshore habitat. The new Sewerage System Regulation does not recognize these impacts and makes it much easier for waste systems to be approved than in the past.
- **Low volume Reservoirs:** Many of the reservoirs in question are small in volume and have a limited ability to tolerate these types of human impacts.
- **Road Access:** Private ownership has implications on the right of access to the properties. Road access would be permanent with no possibility for deactivation. Roads have been demonstrated to have a negative impact on water quality in direct relation to the proximity to the drinking water source.
- **Fee simple rights:** Private ownership provides limited control over land use. Properties can be logged, graded or farmed. Fewer controls are typically in place for foreshore development. These activities can lead to excessive runoff and attendant water quality problems.
- **Reservoir level control:** Additional investment resulting from ownership of these properties would result in more piers, docks and other foreshore structures being built. These types of structures rely on consistent water levels and water purveyors would be under increasing pressure to maintain water levels for recreational purposes. This could result in regulations to protect private property from flooding and limiting the drawdown on water reserves.
- **Lease sales would set a precedent:** The sale of crown leases in community watersheds would set a dangerous and likely irreversible precedent. The ever increasing demands for recreational properties will not abate and the temptation for the provincial government to raise revenue through these types of offerings is not likely to subside for some time.
- **Lease sales could hinder future reservoir development:** Private ownership of these waterfront properties could hinder further reservoir expansion projects. Raising reservoir levels could require costly expropriations and the requisite compensation to the owners of these properties.

The majority of leases proposed for sale under this program are located next to drinking water reservoirs. The value of this land is derived from its waterfront location. These waterfront properties would not exist if not for the water purveyor who developed the reservoirs in the first place. The funding for the reservoirs comes from the taxes and tolls of the residents benefiting from the water supply. These same residents and taxpayers will be faced with the increased risk to public health and safety that would result from the sale of these crown leases.