Water Advisory Committee comments on the Regional Sustainability Strategy (RSS) (October 2014 draft)

The CRD Water Advisory Committee (WAC) provides advice to the Regional Water Supply Commission on water supply, water quality, and the stewardship of the lands held by the Regional District for water supply purposes and water conservation measures. The WAC is comprised of volunteers who have been appointed to the Committee to represent a variety of perspectives related to the supply and management of water resources, including agriculture, fish habitat protection, commercial and residential industrial rate payers, the Vancouver Island Health authority, and the scientific community. We appreciate the opportunity to provide feedback on this very important initiative.

HIGH-LEVEL COMMENTS ON THE DRAFT RSS

Strategy fails to recognize the necessity of a secure and abundant supply of water

As a group, the Water Advisory Committee (WAC) believes the security, quality, and availability of potable water for the Capital Region District is critical to support a robust and growing population and local economy. Since the RSS is premised on continued economic and population growth, the WAC recommends the addition of a fourth keystone initiative to the strategy (in addition to renewable energy, transportation and communities) that speaks to the provision of an adequate supply of safe water to accommodate domestic, agricultural, industrial and disaster-planning needs. In this part of the world we take our supply of clean, safe water for granted. This complacency is risky and we need to place greater focus on conservation, safety and delivery of our limited water resource, particularly in the event of a natural or man-made disaster. We must not lose sight of the fact that water is one of the most important responsibilities of the CRD and that humans can only survive for a few days without water.

Lack of emergency preparedness targets encompassing water supply and infrastructure

WAC recommends the Strategy address the need for emergency preparedness planning to ensure delivery, at minimum, of subsistence levels of safe potable water for human consumption. A natural or man-made disaster such as a major earthquake, a wildfire in the watershed (which is increasingly likely in light of climate change impacts) or an act of terrorism could completely disrupt the water supply to virtually all residents of the CRD. The CRD does not presently have adequate plans to deal with such an emergency and needs to direct resources to such contingency planning. Explicitly recognizing such a need in the RSS would help provide the public and political support necessary to do so.

Inaccurate use of 'sustainability'

As it is considered an updated Regional Growth Strategy and hinges on continued economic and population growth in the CRD, WAC recommends that the Regional Sustainability Strategy retain the name 'Regional Growth Strategy'. The RSS is focused on accommodating growth and providing for quality of life, and does relatively little to promote sustainability.

Further, WAC feels that the words "sustainable" and "sustainability" are misused and that their frequent use throughout the Strategy, as well as in the name of the document, is misleading. The definition of sustainability, as used in this document (see p120), is not the common dictionary definition of the word and does not conform to the scientific/environmental community's understanding of the word. For example, in the CRD we are not "…living within the limits of supporting ecosystems". We have profoundly changed these ecosystems to the point where they are no longer proper functioning and will not support us. To suggest that we can continue to accommodate growth while, at the same time, live within the limits of supporting ecosystems is incorrect and misleading.

Absence of prioritized and measurable targets

A cornerstone of any strategy is the establishment of realistic, measurable targets that are achieved by actions that have timelines. Each target must clearly state how outcomes will be measured or it will not be possible to gauge success or failure. In addition, action items should be prioritized, or at least a subset of the most important actions identified, so that limited resources can be directed at critical actions first.

The wording of targets in the document is sometimes confusing and the intent unclear, and a description of how success will be measured is frequently lacking. For example, the target for water is to "defer the need for the expansion of regional water supply areas or reservoirs". It is ambiguous whether this means to defer the acquisition of new water supply lands or to defer the development of the Leech or some other intent. WAC feels the target would be better stated if it was to promote conservation so as to defer the need to bring Leech on line as long as possible. Again, speaking to water, which is the focus of WAC, a number of potential targets come to mind: ensuring an adequate and affordable supply of water for agriculture; improving water conservation by reducing domestic consumption to x litres/person/day; emergency preparedness planning to ensure a supply of potable water in the event of an earthquake, wildfire, terrorism etc.

COMPILED COMMENTS & SUGGESTIONS SPECIFIC TO POLICIES/ACTIONS IN THE RSS

Policy/Action 1.3.4

- Add at the end the words "and encourage all CRD local governments to implement them".

Policy/Action 1.3.5

- This is what I call a "no regrets" action that should happen anyway.

Policy/Action 2.1.1

- Minimize risks to infrastructure from climate change: mention water infrastructure specifically (most essential infrastructure).

Policy/Action 2.2.1

- Be specific, e.g. list water infrastructure and commit to a measurable. Water is key to our habitation in the CRD and is not given nearly enough prominence in the RSS.

Policy/Action 2.2.2

- Define the decision-making framework and command structure for regional resource allocation after a major emergency or natural disaster.
- The time line for 2.2.2 and 5.2.1 should fall within the 50% to be achieved by 2020. Targets, P. 11.
- Suggested addition "assess water supply variability in the light of climate change and recommend actions to prevent water shortages during multi-year droughts".
- Is this risk study the disaster plan? The Plan B (water supply) initiative? It's hard to tell.
- My chief concern with the draft RRS plan is a lack of disaster response planning. The Kapoor tunnel is very vulnerable during an earthquake. We may need some short-term temporary water supply facilities if we lose Kapoor. Zenon of Canada has a functional, portable system for producing drinking water from brackish sources such as Elk Lake. This scenario is one potential situation.

Policy/Action 2.3.5

- Protect and maintain access to well-priced water (piped, ground or surface) suitable for agriculture and food production, consistent with provincial regulations.
- Again, the need for disaster planning specific to water supply is critical to protecting and maintaining water supply for agriculture and should be mentioned.
- Add "Assess feasibility, benefits and costs of using treated wastewater for agricultural use".
- Add "Assess groundwater as a local source of water for agriculture.
- I would add: protect and maintain access to ***affordable*** water for agriculture…
- Why benchmark the provision of water for agriculture to provincial policies which may not be as enduring as the RSS?

Policy/Action 3.1.1

- The restriction on water service expansion may be too restrictive. Municipalities may autonomously expand their urban containment boundaries, in which case the CRD may want to consider options for water service provision that guarantee cost-recovery at a minimum.

Policy/Action 3.1.3

- Containing growth can reduce system expansion costs, but there also needs to be containment of water demand – more conservation programs.
- Section 4 on individual and community wellbeing is the place to have specific objectives with respect to water as it relates to healthy living. Individual and community health are directly affected by the quality and quantity of the water

supply, and this in turn reflects the management of the water system. How did the drafters miss this?

- Section 5, p.94 re integrated watershed management; add First Nations in the sentence starting "Local governments and stakeholders work.

Policy/Action 5.1.13

- Re - managing wastewater; add manage wastewater to augment water supply to agriculture, parks and golf courses

Policy/Action 5.2.1

- This must include the potential impacts of climate change and natural disasters on water resources
- The time line for 2.2.2 and 5.2.1 should fall within the 50% to be achieved by 2020. Targets, P. 11
- Aren't these actions already happening?
- Is the plan to map/evaluate potential impacts of developments worthwhile given the limited authority of the CRD to regulate and enforce activities?

Policy/Action 5.2.2

- Great to see.
- Aren't these actions already happening?

Policy/Action 5.2.3

- Maintain a program to monitor and assess the condition and health of marine and fresh water resources, including watersheds and groundwater resources, and identify priority actions to protect water quality.
- The only comments I offer following my mostly cursory review of the RSS is to wonder about the costing associated with the various shifts and policy statements. I think this needs to be considered to provide a reality check on what is proposed. One item with which I have some particular familiarity is around the costs associated with monitoring water quantity and quality.

Policy/Action 5.2.8

- Add depth and yield to well data that will be collected. GIS is recommended to store, display and analyse the regional groundwater database.

Objective 6 and Policy/Actions 6.1.2 and 6.2.4

- We should ask that full cost accounting includes the value of ecosystem services.

Policy/Action 6.1.1

- Actions 6.1.1 to 6.1.4. Does energy efficiency include water use efficiency? If so, that's not clear and should be added. If not, this should be included.

Policy/Action 6.1.3:

- Add water conservation.

Policy Action 6.1.4

- Why not expand to include water use efficiency? Or add a separate action item to work on water use efficiency with significant (i.e. commercial and agricultural) water users.

Policy/Action 6.2.2

- Add "assess the security and vulnerability to natural disaster of the water supply infrastructure and prepare contingency facilities and an emergency response plan".
- Does fire suppression really require the use of potable water? Are there alternatives?
- Seems to me that in Section 6.2 there should be a provision for the "worst case scenario" study that we have been encouraging CRD IWS to undertake.

Policy/Action 6.2.3

- The use of the word eliminate implies we are eventually going to reuse and recycle all our water. Eliminate seems a bit bold when compared to the other actions. Is this intended? Should the word eliminate be replaced by defer?
- They really are motherhood type objectives and Island Health supports all the Action items below except 6.2.3 where mention is made of greywater reuse being encouraged. Greywater is categorized as sewage by the Public Health Act and must be dealt with appropriately. The risk to public health can be significant if greywater is not properly treated first. Any greywater reuse systems must meet the appropriate regulations under the *Public Health Act*, the *Waste Management Act* or relevant building and plumbing codes/bylaws. As long as those conditions are included, we would support that Action item as well.
- "To eliminate the need to expand the water treatment facilities and the water supply area". There needs to be a requirement to protect and manage the water supply watershed properly, including restricting access.