The WMP is a step in the right direction but more needs to be done to restore water quality and quantity to adequate levels.

1) Our goal must be to restore water tables not just to stabilize them at a low state as suggested by the WMP
There are already major problems with wells and streams drying up. Tributaries of the Salmon River dry up in the summer with very little water in the main stem of the Salmon at 248th in 2006. This jeopardizes fish survival as coho live in the stream for a year before migrating to the ocean. Our goal must be to restore the water table rather than to stabilize the level at its present day low state. The public will connect better with this more optimistic goal.

2) Water Quantity (Water Table) issue not adequately addressed by WMP
The WMP says that a 30% reduction in water withdrawals will stabilize the aquifers in Langley. It is clear, however, from analyzing the report that a 30% reduction is not achievable with the measures recommended. The WMP is not a sufficient solution. We need additional measures and we need them quickly or the water table will continue to fall.

3) Water Quality issues not adequately addressed
We must do more to reduce the nitrate load (mostly manure) and other toxicity issues. Manure management needs more work to be adequately addressed. The WMP says little about fertilizer and pesticide issues.

4) Spend money "on the ground" investigating new innovative measures with pilot projects. Improve enforcement.
While there is a need for limited expenditures on planning and public relations we feel that a bigger percentage must be directed to innovative measures that will make a difference "on the ground". We will need pilot projects to see what works and what doesn't. Funding also must be redirected to enforcement by both TOL and the province. There is currently minimal enforcement due to skeletal staffing in the field (ex. only one person to address manure management for the entire area from Sechelt to Hope).

5) Implementation and innovative incentives
As discussed at the WMP feedback meeting on Thursday October 9, 2008 we must find ways to make it easier for people to do the right thing (ex. make manure storage easier and less expensive) and we need innovative incentive programs to help initiate change.

6) Early and authentic involvement of the public
We must engage people in a more authentic way. Some of the ideas presented at the October 9 meeting would have been very useful if there had been an opportunity for them to come forward at the beginning of the process. For further details please see the background to the third question on appropriate consultation.

7) Funding
We should access provincial funding as much as possible but we believe that TOL should provide monetary incentives. The Hopington area provides significant tax flows to TOL while receiving little in the way of services. It would be appropriate for TOL to return some tax revenues via new measures to provide "on the ground" protection of the aquifer.

8) Retain the moratorium until water issues are adequately addressed
The moratorium on development over the Hopington aquifer must remain in place. The WMP does not contain sufficient measures to improve the nitrate issue (the original reason for the moratorium) or measures that will return the water table to historic levels. Water quality and quantity must be shown to have improved before the moratorium is removed.

Appendix

1) **The Hopington water table has been falling 1 foot/year for over 30 years**. Much more severe problems than those already present may only be 5 to 10 years away.

2) **Low water levels in the main stem are likely reducing fish survival.** Although there are other factors, **smolt numbers in the Salmon River are dropping.** Smolt numbers have traditionally been in the 60,000 range but were less than 40,000 in 2007 and less than 16,000 in 2008. We must work quickly if the Salmon River is to continue to be one of the most productive coho rivers in the Lower Fraser. The Salmon has been designated a "key stream" by DFO and other agencies, is an "index" stream with coho numbers followed by DFO over more than a 20 year period and has been designated one of the Endangered Streams in BC 3 times in the last 4 years partly due to concerns over the dropping water table. **To return smolt numbers to where they were we must**

return the water table and thus stream flows to where they were 10 or more years ago.
3) Measures in the WMP are mostly targeted at reducing impacts from new wells rather than reducing withdrawals from existing wells. Given that we already have problems we need measures to reduce withdrawals from existing wells or the water table will continue to drop.

4) Target three areas to reduce the already high level of withdrawals. a) reduce evaporative losses by much more severely limiting sprinkling on lawns and golf courses and by enacting an incentive system for farmers to use drip systems rather than spray guns b) move quickly to reduce loss of water from the aquifer due to artesian wells in the aquifer area and in the surrounding area c) restore the water tables in surrounding aquifers as there is evidence that the Hopington is losing water to those areas so controls over only the Hopington land base may not be enough to solve the problem.

5) Do not exacerbate the problem by connecting large numbers of residences to Metro sewerage pipes. The small improvement in nitrate load (most nitrates are from agriculture) would be achieved at the cost of a further reduction in the water table since septic tanks help recharge the aquifer.

6) **We must look at ways to improve recharge of the aquifer**. This has not been addressed in the WMP but could include putting water back down wells into the water table, slowing down water exit in ditches and streams and finding ways to redirect some of that water back into the aquifer.

7) **We need much more restrictive rules for new wells and for total water usage per property.** The flow restrictors recommended by WMP for new wells do not provide sufficient protection as 10 gpm is still 24,000 cubic metres per year if a property owner decides to use a constant flow of 10 gpm for a fish pond etc. This would be a significant draw on the aquifer if even a handful of owners use the maximum flow allowed by the restrictors. We must control total water use per property (this would require water meters) in accordance with the land use. The WMP does not make this possible.

8) D**espite the measures listed in the WMP, new development over the Hopington will accelerate the drop in the water table and make water quality worse.**

9) **TOL and MOE must address the residential component of nitrate problems** by improving and enforcing measures to reduce the septic load (many illegal secondary suites have been put over garages and barns in the area but TOL has not enforced its own regulations) and prevent excessive use of fertilizers.
If there are concrete measures (including pilot projects) "on the ground" people in the area will take an interest and momentum will build to improve water problems.