



WINTER RIVER - TRACADIE BAY WATERSHED ASSOCIATION

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To PEI Department of Environment, Energy and Climate Action,

We are writing to reiterate our concerns regarding the prioritization of water use. Since there are no changes proposed for section 5(6) of the Water Withdrawal Regulations, we assume that agricultural irrigation supplied by independent wells is within the same priority category of Industrial/Commercial as water used by industrial and commercial uses supplied by a municipal water supply system.

We do not want more water to be removed from our watershed, but we would like to see the water use be allocated in a similar manner here as will be done elsewhere in the province. Farmers within our watershed should not be penalized by the actions of the City of Charlottetown.

Any individual wanting to set up a high water use business in our watershed would have difficulty getting a high capacity well permit. Other business types have the option to move their operations to Charlottetown and access water there. So far, we have not seen evidence of efforts by the City to limit industrial water use or deny access to new high volume users. It seems businesses who want to set up within the city would be able to access industrial water supply, while a farmer who can't move their land into the city tax base is out of luck.

The draft Irrigation Policy states on page 10:

To ensure adequate stream flows are in place for aquatic habitat, the Water Withdrawal Regulations under the Water Act prescribe the amount of water permitted to be withdrawn in any given watershed. These permits can be granted for groundwater or surface water extraction. With the amount being allocated to any given watershed being capped, certain watersheds could see the total demand for water withdrawal exceeding the amount available.

*Recognizing this and the reality that not all growers who may wish to irrigate in the future may be ready to do so today, the permitting process needs to be flexible. To accomplish this in situations where a new water user wishes to access permitted water and the watershed is fully allocated, the amount of water permitted for each user will be scaled back to accommodate [sic] the new user provided the new user can meet the requirements in the strategy. *Emphasis added*

Winter River clearly experiences high water demand, primarily from the City of Charlottetown, however, the above section doesn't specify only irrigation users need to scale back, but broadly "each user". We have been told that efforts are underway to determine how much water is being used within the City specifically for commercial and industrial uses versus residential. So the next questions should be to determine "the degree to which the use serves the public interest" (Water Withdrawal Regulations section 5 (6) (c)) for each industrial user within Charlottetown. If it is determined that car washing or beer brewing in Charlottetown serve the public interest less than growing food, it

should follow that Charlottetown would have to reduce their total water use by a commensurate amount to allow water allocation for agricultural irrigation.

We have repeatedly been told staff from the Department of Environment, Energy and Climate Action that interested farmers within our watershed would not be able to irrigate their fields because all the groundwater capacity is being used by the City of Charlottetown. We are seeking greater transparency in what criteria are used to determine which water uses are most in “the public interest” and who will make these decisions. This increased transparency will benefit any area where demand for water exceeds available capacity.

We look forward to increased participation of watershed groups in this type of decision, as indicated on page 12 of the draft Irrigation Strategy:

In instances where the watershed reaches 90% of its allocation, a committee of regional stakeholders will be involved with watershed specific decisions. This will ensure the relevant regional considerations are factored by the central body in making the final determination on permitting. This regional group will also be made up of local water users, watershed groups, and any other relevant stakeholders.

Sincerely,



Clare Martin
Chair of the Board of Directors
Winter River – Tracadie Bay Watershed Association