

MOUNT PARKE ESTATES IMPROVEMENT DISTRICT

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Islands Trust 200-1627 Fort Street Victoria BC V8R 1H8

Attention: Narissa Chadwick (via email)

Re: Flexible Housing Options for Mayne Island

Mount Parke Estates Improvement District (MPEID) wishes to provide you with our written input on the Flexible Housing Initiative discussed during the Zoom meeting on March 29, 2021. We see this issue as one which could potentially result in significant negative impacts to any water district.

We assume that you are aware that the use of water be it ground or surface sourced is regulated by the Water Sustainability Act (WSA). A license is required for any entity distributing water for residential use greater than one home. Licenses issued under the WSA strictly dictate the volume of water that can be used by the licensee. The allowable volume for a license is prescribed in the WSA and is calculated on the average of 3 years of historical water consumption as measured just <u>prior</u> to the license being issued. Once a license is issued, it is exceedingly difficult to increase the volume assigned to a license. The result is that within an improvement district there is in essence no guaranteed way to provide more water than what is specified in the original license.

Our district has a license issued on July 2, 2019 which took almost 3 years of tough negotiations to obtain approval of. The license allows us to draw an average maximum of 70 imperial gallons per day for each of our 72 lots. That volume of water is the amount of water that is consumed by 2 people provided they take great measures to conserve. A comparison volume for 2 people in an urban setting is 180 gallons per day (Vancouver 2019). In an urban setting there is no limit on the volume of water used although there could be a charge for increased usage. Under the WSA the volume available is finite. It is obvious that the water allotment licensed to MPEID is substantially less than that used by people in urban settings (39%).

It could be possible for any individual landowner to supplement their allotment of water provided by an improvement district with a rainwater collection system or private well. We are not versed in the legality of this or legislation that regulates this method. However, there are health risks should a landowner attempt to do this. In this regard, MPEID has existing bylaws that prohibit these practices such as:

- The district does not allow the connection of the water piping to any additional building or trailer other than the principal residence.
- The district has the right to restrict the volume of water drawn by any homeowner so that the district can ensure equitable distribution of water within the district.
- the district prohibits the connection of a home to an improvement district's infrastructure if there is any possibility of cross contamination including properties with any private pumped systems.

MPEID is strongly opposed to zoning changes within the improvement district that would allow landowners to build any form of accommodation that will increase the population density. We are not licensed to provide a water volume beyond our current licensed volume and at this point we would not support any homeowner within our district should they request water for additional density.

Yours truly

Don Berkeley

Chair

Mount Park Estates Improvement District

cc. Dan Rogers (via email)
Jeanine Dodds (via email)
David Maude (via email)