

Sent: Thursday, April 29, 2010 8:07 AM  
To: Living Water Smart ENV:EX  
Subject: Water Act Modernization Discussion Paper Feedback

Below is the result of your feedback form. It was submitted by  
( ) on 2010 04 29, at 08:06:53

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Principles\_Support: Strongly Support

Principles\_Comments: We strongly support the proposed changes to protect water in BC, provided that any changes are based on the best available science, and that the economic importance of water is given appropriate attention.

Goal1\_Support: Strongly Support

Goal1\_Comments: Strongly support the goal of protecting stream health while recognizing the importance of environmental flow and consumptive use

EnviroFlow: Guidelines

EnviroFlow\_Comments: Guidelines are preferred due to the additional flexibility. However the government decision makers must be willing to make good risk based decisions base on available science.

WaterAllocationPlan: Optional

DecisionMaker\_Comments: Optional is preferred as the local water managers should be able to determine the need base on real and perceived supply and demand in their area.

WaterAllocationPlan\_Conditions: Water allocation plans should be developed in priority areas where over allocation is a problem

DumpingProhibition: Maintain

DumpingProhibition\_Comments: Maintain is preferred. The current situation is working well and there are enough other changes required in this modernization initiative.

Goal2\_Support: Support

Goal2\_Comments: The above statements lack enough substance to understand the full ramifications. Centralized should lead to more uniform regulations across the province. It would also result in the least change and decisions would likely be science and risk based without undue influence from local stakeholders who may not have broad support.

Goal2\_Options: Centralized

ScaleForWatershedPlanning: Water Act Water Districts

GovernanceFundingSolutions: The province currently takes in huge sums of money directly from water (hydro) and indirectly (oil, gas and Agriculture), for this reason the funding should come directly from the provincial government. Down loading delivery of services like this to industry, will harm BCâ s competitiveness.

Accountability: The decision making process must be transparent to ensure consistent policy in different regions. Rules need to exist to ensure that small groups donâ t experience a level of power that is disproportionate to their base of support.

BenefitsOfSharedRoles: Appropriate involvement from local people with the right technical understanding of the issues could result in decisions that give proper weight local concerns and local economic development.

Goal3\_Support: Strongly Support

Goal3\_Comments: Provided the decisions regarding reducing consumption are risk based and made with the best available science without political intervention

WaterUseEfficiency\_1: Codes for efficient infrastructure and practices

WaterUseEfficiency\_Comments: Codes of efficient water use developed in different sectors could lead to the best custom approach for each give industry. It would also even the playing field within a given industry.

AdminEfficiencyOptions\_PermittedUse: Permitted use different

AdministrativeEfficiency\_Comments: Permitted is preferred because the permitted uses could be different in various areas of the province based on the risk

PermittedUseConsiderations: Current level of allocation in the waterbody; term of use (short vs. long). Volume of use should still be reported. Permitted uses

should be granted until data is available to show permitted use is unsustainable or impacting stream health.

AdminEfficiencyOptions\_WaterUse: Measure and report actual water use

AdminEfficiencyWaterUse\_Comments: Both L and M are preferred as they would serve the dual function of addressing stakeholder concern while allowing MoE to track water use and potential over use of groundwater

Flexibility\_Support: Neutral

WaterAllocationSystem\_Options: Priority use

WaterAllocationSystem\_Comments: FITFIR doesn't seem able to address the economic changes or the changing needs of water users. Priority is preferred, however the natural gas industry should be placed higher in the order of precedence give its importance to the BC economy and local economies in the NE

WaterScarcityTemporary\_Options: Sharing

WaterScarcityTemporary\_Comments: Although a shared option would introduce some uncertainty to water users it does seem the fairest approach to managing scarcity. It would also be viewed positively by many stakeholders.

WaterScarcityPermanent\_Options: Through a mandatory Water Management Planning process

WaterScarcityPermanent\_Comments: Mandatory water management planning is more likely to be based on real data and real risk; not perceived risk, for this reason it is preferred.

Goal4\_Support: Support

Goal4\_Comments: Priority areas are must be defined.

Thresholds\_Options: 250+100

Thresholds\_Comments: The larger thresholds would be preferred due to the potential delay involved in using the lower threshold for defining a large withdrawal. Differing thresholds could also be used in different regions, based on % allocation.

PriorityAreas\_Options: Known areas of concern

PriorityAreas\_Comments: B and D is the most defensible risk based approach to determining priority areas.

AtRiskWatershedCriteria: Criteria for allocation should be specific to the water body and based on stream flow at the time of water diversion. This would allow some industrial uses to be planned around high stream flow, if scarcity is a concern.

AffectOnCommunity: Large areas of NE BC are rich in both surface water and natural gas. Decisions to restrict water use must be based on good science conducted within the specific water shed in question. The provincial government must ensure BC remains competitive with other gas producing regions in North America.

AdequatelyEquipFutureGenerations: The BC government needs to properly staff the MoE and OGC to ensure that appropriate base data is captured and the administrative process is fast and efficient. Only by doing this can the need of industry and concerns of stakeholders be properly address. If this important staffing isnâ t conducted, much of the modernization work will be of little value.

WhatHaveWeMissed: The order of precedence set out in the water act is out of date and doesnâ t reflect the importance of the gas industry in BC, the should be modified, and tailored to specific regions to give proper priority to the various uses important to each region.