

**From:** Stefan Joyce [SJoyce@kwI.ca]  
**Sent:** April-30-10 2:09 PM  
**To:** Living Water Smart ENV:EX  
**Cc:** Graeme, Ian ENV:EX; Mason, Wenda ENV:EX; Brian Fast  
**Subject:** CWRA BC Branch BC WAM Submission  
**Attachments:** CWRA\_BC\_WAM\_Submission\_Apr30\_2010.pdf

Good Afternoon:

The BC Branch of the Canadian Water Resources Association (CWRA) is pleased to provide you with the attached Water Act Modernization submission.

Please feel free to contact me at 604-293-3215 if you have and questions or would like additional input from the BC Branch of the CWRA.

Best regards,

Stefan Joyce  
CWRA BC Branch President  
c/o

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<b>Stefan Joyce, PEng</b>	604-293-3215 Direct	<i>The information in this message and/or its attachments is confidential. Use or disclosure of the contents by anyone other than the intended recipient is prohibited. If you have received this in error, please notify the sender immediately.</i>
Project Manager	604-294-2088 Office	
Hydrotechnical Engineer	604-294-2090 Fax	
Kerr Wood Leidal Associates Ltd.	604-250-4842 Cell	
200 – 4185A Still Creek Drive	<a href="mailto:sjoyce@kwI.ca">sjoyce@kwI.ca</a>	<a href="http://www.kwI.ca">www.kwI.ca</a>
Burnaby, BC V5C 6G9		Please consider the environment before printing this email.

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**CWRA ACRH**Canadian  
Water  
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Canadienne  
des Ressources  
Hydriques

B.C. Branch

April 30, 2010

Ministry of Environment

Sent by email to:

[livingwatersmart@gov.bc.ca](mailto:livingwatersmart@gov.bc.ca)

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**RE: WATER ACT MODERNIZATION - CWRA BC BRANCH SUBMISSION**

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The BC Branch of the Canadian Water Resources Association (CWRA) applauds the Province of British Columbia for undertaking the modernization of its Water Act. We appreciate that this process is no small undertaking, and as such, the CWRA makes this submission and offers our further assistance in this process as needed.

The CWRA is a non-profit organization whose membership consists of water users and water resource professionals including managers, administrators, scientists, academics, students and young professionals that strive to promote effective water management with a commitment to environmental, economic and social sustainability. The CWRA also encourages the recognition of the high priority and value of water. We believe that our organization can provide an insight into the Water Act Modernization (WAM) that would be of assistance to the Province of British Columbia.

We would like to thank the Province for presenting and participating in the March 30th, 2010 WAM workshop that the BC Branch held in an effort to engage its membership and provide feedback to the Province. In the March issue of Runoff, the BC Branch newsletter, we also encouraged our membership to participate in the WAM process and to fill out the online survey the Province set up on its Living Water Smart website ([www.livingwatersmart.ca](http://www.livingwatersmart.ca)).

The BC Branch collected feedback during the March 30th WAM workshop and we have done our best to capture it in this letter. On behalf of the BC Branch, we respectfully submit this letter presenting our strategic views related to the modernization of the BC Water Act.

We believe that there needs to be an effective and flexible decision making framework. We offer the following elements of such a framework:

1) An Effective Decision Making Process - We suggest the following:

- Base it on peer reviewed science so that decision makers are properly informed.
- Manage surface and groundwater as one water resource.
- Balance the values of water in an environmental, economic and societal context.
- Consider that the value of water may change in the future.
- Make the process scalable and adaptable to watershed and stream size, characteristics, level of water use, and land use practices.
- Retain accountability within the Provincial government, be informed and utilize a collaborative process, where practical.
- Abandon First-In-Time-First-In-Right (FITFIR) for a fair and balanced approach.
- Anticipate change including, but not restricted to, streamflow variability, climate, land use practices and aquifer recharge.

- 2) Adequate Resources - We suggest that the following be acknowledged and incorporated in the implementation of the new, modernized Water Act:
- Adequate information is the foundation for scientific and engineering decision making. This includes information such as: water quantity, water quality, climate, groundwater, water consumptive and diversion quantities and rates, and other influencing factors.
  - Adequate monitoring includes, at a minimum: collection, quality control and record keeping, with the consideration of continuity and network density.
  - Access to qualified staff and other individuals is required in order to implement a range of technically sophisticated decision making processes.
- 3) Ongoing Improvement – We suggest the following:
- Consider a range of options to charge an appropriate price for water licenses.
  - Verify water license implementation and use, including measurement and enforcement, if required.
  - Consider adaptive management as an approach for water licences, where practical.
  - Encourage the efficient use of water as a priority.

We believe that while there are many aspects of the Water Act and its implementation that should be improved as noted above. We re-iterate these key priorities:

- Remedy the inadequate surface water, groundwater and climate gauging network and databases.
- Increase administrative and technical resources available for implementing the new, modernized Water Act.
- Modify the decision making process to be adaptable to watershed and stream size, characteristics, and level of water use.
- Review and modify the costs for water licenses such that they reflect the regional values and stream health (environmental, economic and social sustainability) as well as the cost of enforcement.

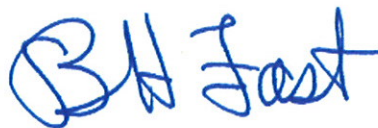
Through our involvement in activities relating to the Water Act, we have come to appreciate the extensive expertise of existing staff within the Provincial government who are involved with implementing the Water Act. We hope that the Water Act Modernization process will take every opportunity to solicit input from such individuals.

We would be pleased to discuss the modernization of the BC Water Act with you further. Please contact either of the undersigned if you would like to solicit additional input from the CWRA BC Branch.

Respectfully,



Stefan Joyce, P.Eng.  
BC CWRA President  
Tel: 604-293-3215  
Email: [sjoyce@kwl.ca](mailto:sjoyce@kwl.ca)



Brian Fast, P.Eng.  
BC CWRA Past President  
Tel: 604-525-5317  
Email: [b\\_fast@shaw.ca](mailto:b_fast@shaw.ca)