From: ***PERSONAL IDENTIFIERS REMOVED***

Sent: April-29-10 2:24 PM
To: Living Water Smart ENV:EX
Subject: Comments re Water Act Modernization

Here are my comments. I am a full time rancher, on the same ranch since 1963.

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April 29,2010

Comments re Water Act Modernization

Why is the Province in such a hurry to upgrade this Act? If it has been in place for one hundred years, there should be enough time given for all present license holders to know what is occurring. I don't recall seeing any information with our last water license bill, dated June 30, 2009. License holders were not advised of the Regional meetings on the subject. The Goals and Objectives as stated in the draft, "Agriculture and British Columbia's Water Plan" have huge financial implications for agriculture. Cheap food policies on the one hand and over regulation and increased input costs on the other are on a collision course, and Agriculture will be the loser.

There seems to be the assumption in government that information on WAM is readily available to everyone because it is available electronically. I have talked to a number of rural people lately who have never had internet service, some who have given up on it because dial-up is too slow, and others who can't download large files.

I am concerned in particular about broad statements like "Keep animals out of waterways." If this is taken to extreme, it will eliminate cattle from mountain permits because water streams are everywhere and impossible to fence. Some of these permits are 25 or 50 square miles in size and allow 200 or 300 head in the area for July through September. What damage are they causing? A mega dairy, on the other hand, that concentrates 800 or 900 cows in a small area, closer to centers of population, and on a year round basis is another matter. Waterfowl and wildlife will never be contained and can carry disease.

I am concerned about water meters. If we must install them, they have to be reliable. Are there water meters available that will work on non filtered water? Is everyone honest enough to report his or her actual consumption?

I would welcome some changes in the First in Time model. Why should legitimate bona fide farms be shut down due to a water shortage but small holdings owned by professionals with substantial incomes be allowed to continue irrigating their horse pasture? I am told that in spite of the Agricultural Land Reserve, the present Act has no priority for Agriculture. In 2004, we were shut down by Water Rights personnel from storing 60 acre feet to use with an irrigation license granted in 1974. We could not irrigate at all. Meanwhile, downstream, licenses granted after ours were able to irrigate because their storage license was 1938. That essentially changed all the licenses now granted downstream or any to be granted in the future to 1938 priority, and will leave us forever with the last water license on the creek. Storage is not an end use for water and shouldn't be considered as such. Storage for a 1990 license should be 1990.

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