Sent: Saturday, May 01, 2010 1:47:32 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 05 01, at 01:47:32

PERSONAL IDENTIFIERS REMOVED

Principles_Support: Disagree

Principles_Comments: I find some of the language in these principles troubling. For example, what does "sustainable limits" mean? Also, is it actually possible to provide a "predictable investment climate" when working with nature. Further, language recognizing water as being exhaustible vulnerable resource that is necessary for life is not mentioned. There is also no mention of wildlife within these principles. The recognition of ecosystems and natural capital should be taken into account.
I appreciate the recognition that various levels of government need to be involved in any discussion about water. It is important to recognize the need for consistency amongst various levels of government as well as within the community and by water use sectors. For example, how effective will WAM be when legislation around industry practices eg. forestry, mining is not in harmony with the new Water Act? As well, how will these principles be implemented and by who?
The social and cultural practices of First Nations peoples are recognized, but not their economic interests.

Goal1_Support: Neutral

Goal1_Comments: We need to take a broad approach by looking at big picture and watershed health. This includes issues like water quality for humans and non-humans, species at risk, going beyond the stream edge as current goal states.

WaterAllocationPlan: Required

DecisionMaker: Must Follow

DecisionMaker_Comments: This is not an either or situation. We need to be flexible and adaptable while maintaining water health for humans, wildlife, and plant life alike. Different communities have different needs we must take this into account. We need to look at the successes that exist within current water allocation plans on both a regional and provincial level. Furthermore, we need to address gaps that are present between existing legislation and other legislation (eg forestry practices, mining, fisheries and oceans) whether it be regional, provincial, or federal. These gaps need to be analyzed as do consistency issues.

DumpingProhibition: Amend

Goal2_Comments: Needs and usage is variable across province the legislation needs to reflect this. For example, what is the context of the land use. Also, it is necessary to look at gaps between levels of governments as well as within First Nations community interests. Aboriginal peoples need to have a strong voice in this process.
Watershed/ecosystem vulnerabilities need to be addressed.
Within the Shared approach public interest must be protected. The language "government and partner-led planning" is problematic for me. Who the government considers a "partner" versus what a community may consider a partner could be very different.

Goal2_Options: Shared

GovernanceFundingSolutions: Could implement a user pay system for those who drain heavily on the system. Also, need to look at rural use versus urban usage.

Accountability: Determining baselines for sustainability. Enforcement and compliance is an important part of staying accountable. Information sharing amongst those parties involved is necessary. Transparency is paramount. Proper protocol and policy for dispute resolution eg. neutral third party to help resolve.

BenefitsOfSharedRoles: Preservation of an exhaustible vulnerable resource. Allowing the public to have a voice rather than only business and industry. To really have community be a steward for water and watersheds rather than water allocation being determined by forestry or mining interests. To give control back to water districts rather than forestry districts.

Goal3_Comments: We need to be able to adapt as information and changes arise. Conservation practices need to be followed and ecosystem health is of the utmost importance. Implement incentives for efficiency of allocation.

WaterUseEfficiency_2: Use of incentives and economic instruments

AdminEfficiencyOptions_PermittedUse: Permitted use different

AdminEfficiencyOptions_SelfReg: Required self-registration

AdminEfficiencyOptions_WaterUse: Combine admin and efficiency

AdminEfficiencyWaterUse_Comments: Especially points I, J, and K

WaterAllocationSystem_Options: FITFIR

WaterScarcityTemporary_Options: Sharing

WaterScarcityPermanent_Options: Through a mandatory Water Management Planning process

Goal4_Comments: Again some clarification around language here... what is considered a priority area? Domestic vs. industrial vs. agricultural use - regulations need to reflect the different use patterns from each of these sectors. Want to be able to recognize the importance of food security. Areas under increased environmental or developmental (increased development and growth/urban sprawl) stress must be taken into consideration.

Thresholds_Comments: We need to set thresholds based on groundwater availability which will fluctuate and change. We cannot use arbitrary numbers if we want to properly manage our groundwater resources. Without obtaining hard data and reviewing this information regularly we will not have proper resource management.

KindsOfCollaborativeProcesses: Before any new legislation is enacted public must be consulted and be allowed to give more feedback.

AdequatelyEquipFutureGenerations: No more work needs to be done.

WhatHaveWeMissed: Penalties for non-compliance needs to be great enough to encourage compliance to regulations.