From: nobody@scribe.env.gov.bc.ca
Sent: Tuesday, April 13, 2010 9:12:35 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 13, at 09:12:34

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ContactMethod: Email

Principles_Comments: Please see comments at the end of the survey.

WhatHaveWeMissed: Rather than answering questions in order, I have chosen to discuss the following topics.

1. Governance Arrangements: All the discussion about including the First Nations are not specific. Terms such as "including" and "consultation" need to be defined. Currently there is too much uncertainty in the province as to who has ultimate control and responsibility. Rules need to be clearly defined, and enforcement roles known. I support B, the shared approach. There is a need for one central oversight body, that can share or delegate some management to secondary levels of government. 1st nations could hold a similar level in hierarchy as an Improvement District, or Regional District.

2.Funding solutions: If you maintain some sort of local control, local taxation is an acceptable form of funding. The ID model works well.

3.Water Allocation: FITFIR is the only viable method of water right allocation. This is also the case for ground water. If licencing of ground water occurs (it should), then there needs to be a benefit to the licence holder. That benefit (for funds paid) is the security of supply by not having another well drilled beside your well. Possibly no new wells can be drilled in an area that has a public system.

4. Transferring of water rights: Can only be transferred back to the governing authority, who can then re distribute. If transfers are allowed between property owners, the value of water accrues to the land, and shortly you have the California scenario of over use (inefficient) of water in some areas, and vast tracts of land with no water. This is not sustainable.