From: nobody@scribe.env.gov.bc.ca
Sent: Thursday, April 29, 2010 3:02:43 PM
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 15:02:43

PERSONAL IDENTIFIERS REMOVED
ContactMethod: Email

Principles_Support: Strongly Disagree

Principles_Comments: Goal 1: Of course, everybody wants water usage to remain within "sustainable" limits, but what does that mean, and who will define it? Taken as a whole, the eight principles are so extremely broad, most are self-evident (who could possibly disagree that "science informs WR management and decision making"?) as to be utterly meaningless. As governing principles, they amount to a giving very broad powers along with a completely blank cheque for whoever ends up making policy decisions.

Goal1_Support: Support

EnviroFlow: Standards

EnviroFlow_Comments: The standards should be strictly defined, after a lengthy period of public input. Unfortunately, with the **VERY LATE** and **PRACTICALLY NON-EXISTENT** public notice about the public input to this process, the entire public input process strikes me as neither fair, transparent, nor timely. It appears to me that the policy makers waited until the last possible moment, hoping only their invited guests would contribute. It seems only an accident the the news of this process has finally been published in a newspaper -- the Strait of Georgia Island Tides.

WaterAllocationPlan: Optional

DecisionMaker_Comments: Re-open the public comment period, and get journalists from ALL regional and provincial newspapers involved in this issue. It seems that somebody is hiding something here.

WaterAllocationPlan_Conditions: Policies should be developed with a years-long look into the future, and then followed, considering the needs of residents, farmers, and the environment.

DumpingProhibition: Amend

Goal2_Support: Support

Goal2_Comments: These are rather vague principles, which seem subject to whoever is on the governing bodies making the decisions. There need to be very strict requirements for public notice so that decisions are not made "under the radar."

Goal2_Options: Delegated

Accountability: Permanently keep as many public associations and organizations on a list to be emailed ahead of time with all announcements. Publish, and put up on a website, clearly-worded and concise summaries of all proposals.

BenefitsOfSharedRoles: Enforcement for violations should be consolidated and locally accountable so it will be FAST. Decision-making about policies should run through more than one agency, so that nothing sneaky can be done. I am hearing from many of my neighbours that in BC, decisions are rammed though in secret, and this is how it looks to me.

Goal3_Support: Support

Goal3_Comments: These look difficult for anyone to disagree with. But, respecting #2 above (Water users and decision makers have flexibility to quickly adapt...), this depends on which agency is making the decision, and on how accountable it is. Bottom line for me is that any VARIANCE in the policy should get a public airing.

WaterUseEfficiency_1: Codes for efficient infrastructure and practices

WaterUseEfficiency_2: Use of incentives and economic instruments

WaterUseEfficiency_Comments: I am not sure I entirely understand choices A-D here. Once this part of the policy gets brought up for drafting into a law, it all depends on who is drafting the law. I don't trust that it will be a good result. I would like to see this issue discussed in the regional newspapers, and to include the very different political opinions about the topic. Presently, the language does not strike me as transparant or understandable. It depends on how the final legislation is written.

AdminEfficiencyOptions_PermittedUse: Permitted use different

AdminEfficiencyOptions_WaterUse: Combine admin and efficiency

AdminEfficiencyWaterUse_Comments: These look like good steps. I don't think we know enough presently, so there should be a provision to collect data, and then a built-in review within a specified number of years, say 5 years.

Flexibility_Support: Disagree

Flexibility_Comments: I strongly disagree with the second provision to "bring more land into productivity.. or to use water for a higher economic purpose". These terms are MEANINGLESS and thus they allow the governing body to allow any sort of activity. Environmental concerns -- conserving natural habitat, water supplies, anti-pollution -- should be paramount -- NOT making more money for investors.

WaterAllocationSystem_Options: Priority use

WaterAllocationSystem_Comments: FITFIR should be revisited. I don't believe there was enough information in the discussion paper for me to make an informed choice here.

WaterScarcityTemporary_Comments: Establish ecosystem values as the top priority, and phase out FITFIR beginning in ten years, until 25 years from now (that way, no existing business is harmed, and property owners have time to adjust to the new order).

WaterScarcityPermanent_Options: Water Management Planning upon request

Goal4_Support: Support

Thresholds_Options: 500+100

PriorityAreas_Options: Combine priority areas

FedAndProvLegIntegration: Make a greater effort to involve small communities reliant on well-water or local water supplies (lakes, streams, etc.) in the process of developing the new policy. A province-wide "one size fits all" approach may be good for large cities and for large industrial users, but causes needless harm to small communities.

There should be a policy favouring preserving the autonomy of small farms and the avoidance of consolidating small water districts into larger ones.

AffectOnCommunity: I have no idea, because yesterday (April 28) was the first time that anyone I know heard about this new law and the April 30 deadline. NOT FAIR, NOT TRANSPARENT, and NOT TIMELY.

Improve_InterestsTakenIntoAccount: Extend the period of time for public input. Publish results that you have so far, and allow another three months for input.

KindsOfCollaborativeProcesses: You mean, you think that this has been followed now? I don't think it has.

AdequatelyEquipFutureGenerations: Reduce FITFIR for largest users. They can waste water too easily.
Take all possible steps to discourage, or better yet prohibit, the practice of "bottled water."

WhatHaveWeMissed: Bottled water. CocaCola and Pepsico, they get their hands on a local water supply, and then it can never be stopped.