From: nobody@scribe.env.gov.bc.ca
Sent: Monday, April 26, 2010 1:15:21 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 26, at 13:15:21

PERSONAL IDENTIFIERS REMOVED
ContactMethod: Email

Principles_Support: Support

Goal1_Support: Strongly Support

Goal1_Comments: It's important to protect both ECOSYSTEM SERVICE PRODUCTS (water) AND PROCESSES (the biotic relationships that create the watershed/riparian/wetland ecosystems). It's critically important ensure the components are not destroyed by industrial activities -- "mining" of groundwater or aquatic ecosystems, logging in watersheds, as well as mining, oil drilling, construction of roads for oil/gas exploration, highways, docks and linear infrastructure, hydroelectric dams, toxic waste storage and disposal sites, as well as urban sewage, industrial effluents and agricultural chemical run-off. None of the above activities has a history of respecting sensitive aquatic ecosystems. In addition, the needs of wildlife must be part of the the flow allocations.

EnviroFlow: Standards

EnviroFlow_Comments: Ecosystem-based, conservation planning STANDARDS are the only way industry will recognize the critical importance of maintaining watershed/riparian/wetland ecosystem services (products and processes) and groundwater storage that results from intact, high elevation ecosystems

DecisionMaker: Must Follow

DecisionMaker_Comments: The decision maker must follow the plan because this plan will have been arrived at with the input of all stakeholders. An "Exceptions" option could be included that would have the burden of proof be placed on the proponent who would present the rationale for an exception; decision-makers would then consider that exception, using the Precautionary Principle.

WaterAllocationPlan_Conditions: Water allocation plans must begin with a review of current total water extraction and cumulative impacts for each ecosystem involved. Ecosystem maintenance is the major condition for allocating water. Ecosystem-based conservation planning would take into consideration all the factors critical to the processes of aquatic ecosystems. Water allocation planning should be applied to all users of water - especially heavy industry, agriculture and municipalities.

DumpingProhibition: Amend

DumpingProhibition_Comments: NO DUMPING of debris and materials into streams. There are no examples of this practice contributing to the maintenance of aquatic ecosystems!

Goal2_Support: Support

Goal2_Options: Shared

ScaleForWatershedPlanning: all watersheds in which water is currently extracted or projected to be impacted by future development,.

GovernanceFundingSolutions: Funding for water allocation planning - the Province and industrial users are most responsible for this planning and for funding the research and planning. Municipalities and domestic water users can contribute through taxation.

Accountability: a balance of stakeholders involved in decision making at the watershed level.

BenefitsOfSharedRoles: real consultation

Goal3_Support: Support

WaterUseEfficiency_2: Review rules for transfer and apportionment

WaterUseEfficiency_Comments: This includes the ability for all stakeholders to be consulted BEFORE users transfer or extend rights to other user groups or for other purposes

AdminEfficiencyOptions_SelfReg: Required self-registration

AdministrativeEfficiency_Comments: The current volumes of water extraction are unsustainable to many ecosystems. This must be reviewed and can only be reviewed when actual volumes are known.

PermittedUseConsiderations: There should be no unconditional "permitted uses". Water licences should be required for all large volume users (industrial, agricultural, municipal) in order to maintain the ecosystem services.

AdminEfficiencyOptions_WaterUse: Combine admin and efficiency

AdminEfficiencyWaterUse_Comments: Public education. And use of the Precautionary Principle when working with Industry.

Flexibility_Support: Support

WaterAllocationSystem_Options: Priority use

WaterAllocationSystem_Comments: Priority of use based first on ecosystem-based conservation planning to ensure the maintenance of the ecosystem, followed by priority of use determined in the Water Act in consultation with stakeholders.

WaterScarcityTemporary_Options: Discretional

WaterScarcityTemporary_Comments: Decision making MUST be expanded to include the protection of ecosystem values and to include consultation with stakeholders on a watershed level!

WaterScarcityPermanent_Options: Through a mandatory Water Management Planning process

WaterScarcityPermanent_Comments: with input of stakeholders on a watershed level

Goal4_Support: Strongly Support

Thresholds_Comments: Thresholds can only be determined on a site-specific basis, taking into consideration the specific conditions of the region - precipitation, groundwater storage capacity and priority of uses,.

PriorityAreas_Options: Combine priority areas

FedAndProvLegIntegration: for the southern Gulf Islands: the Islands Trust

AtRiskWatershedCriteria: The maintenance of the ecosystem and its services must come first. Appropriate criteria for determining risk and priority uses must be based on understanding the structure of ecosystem and its processes. Priority uses must begin at the biotic relationships of the ecosystem. Without intact, functioning ecosystems, there will be no water to allocate.

AffectOnCommunity: Development of my community is already constrained by declining groundwater levels. Agriculture is also impacted. It's critical to determine what is sustainable extraction and to allocate (or reallocate) what is available.

Improve_InterestsTakenIntoAccount: Ensure the public is educated about Ecosystem services and processes so that we are better informed when we decide how much we can take. Ensure that no large-scale, international sale of water occurs.

KindsOfCollaborativeProcesses: Consultation with regional districts and municipalities on all questions of resource extraction. Examples: consulting with Islands Trust before implementing Private Managed Forest Lands Act which minimizes protection for water resources in the Southern Gulf Islands.

AdequatelyEquipFutureGenerations: We MUST become achieve water sustainability. There is no choice for the future.

WhatHaveWeMissed: A real understanding of ecosystems' ability to continue providing the services we expect (in this case, water) without understanding the need to protect the processes which have created these ecosystems. In effect, we are continuing to "mine" resources (water, forests, oceans) unsustainably because we lack that understanding.