From: nobody@scribe.env.gov.bc.ca
Sent: Friday, April 30, 2010 1:54:29 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 30, at 13:54:29

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ContactMethod: Post

Principles_Support: Disagree

Principles_Comments: 1. What is sustainable limits? Defining sustainability is important here.

3. Science and traditional ecological knowledge. Poorly administered Science cost us the cod fishery in newfoundland, when the inshore fishermen knew it all along. We need respect for people familiar with our water resource.

What about "Access to water is a fundamental human right?"

Goal1_Support: Support

Goal1_Comments: Is wetland health included under aquatic and stream health?

EnviroFlow: Standards

EnviroFlow_Comments: Minimum standards must be introduced, guidelines are easy to ignore if you don't feel like following them, or your investors pressure you not to follow them to meet the bottom line.

However, standards can be changed on a case-by-case basis based on sound peer reviewed science accepted by qualified enviornmental professionals, who are held accountable for providing accurate information.

WaterAllocationPlan: Optional

DecisionMaker: Must Consider

DecisionMaker_Comments: must consider is ok to add flexibility. However, decision maker, must CONSULT stakeholders involved in water allocation plan formation.

WaterAllocationPlan_Conditions: All stakeholders on a river must form a "watershed advisory group" only on the watershed level can appropriate allocation plans be made

DumpingProhibition: Amend

DumpingProhibition_Comments: Engineer is not sufficient, perhaps Registered Professional Biologist must sign off on such an order as well?

Goal2_Support: Support

Goal2_Comments: Water flows through many jurisdictions. Local governance groups may create conflict between users.

Goal2_Options: Centralized

ScaleForWatershedPlanning: Both ends of the scale are appropriate for different functions.

GovernanceFundingSolutions: You have funding its called income taxes, sales taxes, and numerous "fee for service schemes" that go into general revenue. Water must continue to be funded by the province and not at the pathetic levels it is right now.

We do not appreciate the true cost of clean and reliable water sources. Its an investment for most other activities in the province. pay up.

Accountability: Process must be transparent which leads to accountability.

BenefitsOfSharedRoles: Sharing must come with funding and trust in appropriate management.

Goal3_Support: Disagree

Goal3_Comments: 3. Groundwater and surface water resources are the same. You can't just manage in "problem areas". You need to prevent the formation of new problem areas, which you will get with the above approach.

WaterUseEfficiency_1: Government determines actual needs

WaterUseEfficiency_2: Use of incentives and economic instruments

AdminEfficiencyOptions_PermittedUse: Permitted use different

AdminEfficiencyOptions_SelfReg: Required self-registration

AdministrativeEfficiency_Comments: Open to option for permitted uses, as new innovative solutions are out there. However, such a use, if consider acceptable, must go through a water allocation plan and public consultation.

PermittedUseConsiderations: Currently the BC Oil and Gas Commission Schedule A and Section 8 approval process are not working. They are creating widespread conflict, distrust in government and industry. This was done by the government in an attempt to increase administrative efficiency. One agency must be responsible for all water use permits and that agency should be the MINISTRY OF ENVIRONMENT - not a crown corporation created to make life easy for the oil and gas industry.

AdminEfficiencyOptions_WaterUse: Measure and report actual water use

Flexibility_Support: Strongly Support

WaterAllocationSystem_Comments: Water allocation plans should decide this on a watershed level.

WaterScarcityTemporary_Options: Discretional

WaterScarcityPermanent_Options: Water Management Planning upon request

Goal4_Support: Strongly Disagree

Goal4_Comments: Who defines priority areas? It should be regulated (at least at a reporting level) everywhere so we can better understand our groundwater resource.

Thresholds_Comments: Thresholds must be based on groundwater level monitoring and consider cumulative impacts of many smaller withdrawals.

PriorityAreas_Options: Combine priority areas

PriorityAreas_Comments: Need more understanding and mapping of groundwater. Its an out of sight resource.

FedAndProvLegIntegration: Consider better communication with the Transport Canada and the Navigable Waters Act. Integration and delegation of responsibility to the Province with this act may be a good thing.

AtRiskWatershedCriteria: Environmental Impact Study should determine that. Need flow monitoring data and apply environmental guidelines.

AffectOnCommunity: Our community is not satisfied with the delegation of short term water licenses into the hands of the Oil and Gas Commission. In an effort to increase efficiency and streamline and investment climate, many water stakeholders are against the two tier approach. The OGC issues permits with poor consultation with water experts and no consultation with stakeholders (such as cities that depend on water),

KindsOfCollaborativeProcesses: A stronger Ministry of Environment that supports local watershed stewards (chosen and partially supported by regional water stakeholder groups) with technical advice and expertise would be a good start.

We still need an agency of water experts who communicate with each other and make water decisions. We just need to give them a Water Act that will allow them to be more creative and flexible for the decision makers, yet still hold them accountable and rigid under certain conditions.

WhatHaveWeMissed: If you delegate powers to a regional level. You must provide funding with those powers to allocate water resources so that skilled and ethical people can be trained and retained. You cannot give that regional water board powers over some water use (eg. long licenses) but withhold other uses (short term section 8 and schedule A) as is the case with the Oil and Gas Commission. This process only serves the self interests and does not consider other interests and the common public good.