

Terry Shannon
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APR 06 2010

April 8, 2010

Water Act Modernization Submission
Ministry of Environment
Water Stewardship Division
P.O. Box 9362 Stn. Prov Govt
Victoria B.C. V8W 9M2

Dear Sirs,

I am concerned about any attempts to couple 'value of the water resource' to its availability to agriculture, as well as any suggestions for changing the FITFER method of water allocation.

I attended the public consultation in Nanaimo on March 5th 2010. I chose to attend the session on 'Introducing more flexibility and efficiency in the water allocation system.' I was dismayed at the lack of information prior to this meeting, the short notice on the meeting details, and the small amount of time available for discussion in the sessions. I felt that the moderator steered discussion in directions of his choice more than he should have. There was some discussion about reviewing the FITFIR method of water allocation. An example was given of a situation where you have water allocated to an old hay field while across the road someone want to employ 40 people on a golf course. The clear implication is that the water will generate more value on the golf course.

Governments have chosen to place agricultural lands in the ALR resulting a dramatic reduction of their value in the recognition that it is in the long term good of society to preserve land for food production irrespective of current higher value uses for that land. A consistent approach must take place with water for land in the ALR. Any reduction in water licensing on ALR land has the potential to greatly limit its crop uses or even totally destroy its value as farm land in dry regions.

The concept of measuring water use in order to introduce efficiencies makes sense on the surface but is deeply flawed in application for agricultural use. This is not to say that the most efficient use of the water should not be made but the reality in agriculture is that use is very dependant on the weather and the crop presently grown. A reduction in water availability has the potential to greatly limit or effectively end the use of the land for agriculture. Imagine a scenario where economics favour a crop that lends itself to a significant reduction in water use. This would lead to a reduction in water licensing on those lands and reassignment of the water. A few years later this crop is no longer economically viable and the only economically viable crops require more water which is no longer available. What value is this ALR land now? Imagine a scenario where a

region has higher summer rainfall than usual for a few years, and water is not pumped by farmers because it's not required. This could result in a reallocation of the water under one of the proposals contemplated and a lack of water availability when normal rainfall patterns returned. What use is this ALR land now?

Our land has been farmed by our family for 130 years. During that period of time we have acquired numerous water licenses and invested close to one million dollars in water moving infrastructure. We recently acquired an adjacent farm property and paid a premium for the land because of attached FITFER rights of a very early registered date. These rights were key to the value we attributed to this land and the decision to purchase it. FITFER must be maintained for agriculture.

Agriculture is the only essential economic activity carried out by mankind. The people of BC recognize the importance of maintaining the limited agricultural lands the province has and the importance of being able to produce our own food. Agriculture needs to be at, or near, the top of the list in priority of water use.

In arid regions of the province mandatory use of low flush toilets, banning lawn sprinkling and other non essential water use to cut the high personal use of water in BC gives everyone a stake in addressing the problem. This should be a priority and the first tactic of addressing the issue. It cannot be a question of who can pay the most for the resource, because, if it is agriculture will lose its access to water and the province will lose its agriculture.

Sincerely yours,

Terry Shannon

A handwritten signature in black ink, appearing to read "Terry Shannon", written in a cursive style.