

Sent: Wednesday, April 28, 2010 10:53 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 28, at 10:52:34

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Principles_Support: Strongly Support

Goal1_Support: Strongly Support

Goal1_Comments: This goal will require increased stream monitoring and sampling on more waterways than are currently monitored. The number of Regional Water Managers should be increased to ensure that all regions of the province are included.

EnviroFlow: Standards

WaterAllocationPlan: Required

DecisionMaker: Must Follow

WaterAllocationPlan_Conditions: Water allocation plans should be developed for all watersheds in which there is human use of the water resource (residential, industrial, commercial, agricultural, resource extraction). It should be followed without exceptions and enforcement should be in place to ensure that it is being followed.

DumpingProhibition: Amend

DumpingProhibition_Comments: Appropriate resources for Enforcement Officers must be in place in order for this to be successful.

Goal2_Support: Strongly Support

Goal2_Comments: I like the model that is used in the Province of Ontario, where watersheds are managed by Conservation Authorities. Long term provincial funding is a necessity for this model to be successful.

Goal2_Options: Delegated

ScaleForWatershedPlanning: Water district is most appropriate (not Regional District)

GovernanceFundingSolutions: Charging more for commercial and industrial uses, metering residential areas and charging a higher rate for water use over and above daily needs (similar to BC Hydro rate scales). New residential, institutional, and commercial developments should be required to install water meters in the new developments and retroactively install meters in pre-existing buildings as an amenity benefit.

Accountability: The delegated approach must include extensive public engagement, consultation, and visioning exercises at the outset. The Okanagan Basin Water Board has done a good job of this. Transparency must require all decision-making to be open to the public and all documents to be available online.

BenefitsOfSharedRoles: I don't believe that the shared approach is the best option as it will increase likelihood of redundancy and confusion over actual roles of each partner.

Goal3_Support: Support

Goal3_Comments: I'm somewhat concerned that Objective 2 may allow for standards/regulations to be weakened in order to promote business objectives (changing economic conditions) at the expense of environmental and social goals.

WaterUseEfficiency_1: Government determines actual needs

WaterUseEfficiency_2: Use of incentives and economic instruments

AdminEfficiencyOptions_PermittedUse: Permitted use consistent

AdminEfficiencyOptions_SelfReg: Required self-registration

AdministrativeEfficiency_Comments: The best option is to regulate licencing so that all water uses and extraction rates require a licence.

PermittedUseConsiderations: Without licencing all uses (doing away with the concept of permitted uses) we could see watersheds dying the death of a thousand cuts.

AdminEfficiencyOptions_WaterUse: Combine admin and efficiency

AdminEfficiencyWaterUse_Comments: Combination of all of the above.

Flexibility_Support: Strongly Support

WaterAllocationSystem_Options: Priority use

WaterScarcityTemporary_Options: Hierarchy of uses

WaterScarcityPermanent_Options: Through a mandatory Water Management Planning process

Goal4_Support: Disagree

Goal4_Comments: I think that all sizes of withdrawals should require regulation and that most (if not all) aquifers should be considered, not just the priority aquifers.

Thresholds_Options: 500+100

Thresholds_Comments: All withdrawals should be considered as having an impact on groundwater. I am concerned that some aquifers will be left out and that the number and frequency of smaller and medium-sized withdrawals will increase in order to avoid being labeled as "large." I would prefer if all withdrawals were regulated.

PriorityAreas_Options: Combine priority areas

PriorityAreas_Comments: Combination of B + C + E

Groundwater in the Northern parts of the province may not service high population levels but the amount of water being used and contaminated due to oil and gas extraction warrants those aquifers being included as 'critical.'

AtRiskWatershedCriteria: - watersheds and aquifers that we do not have reliable or sufficient amounts of data for (flow, chemical/physical parameters) should be labeled at risk and priority by default, until proven otherwise;

- domestic (human) and ecological reliance (salmon) should indicate priority;
- transboundary;
- point source and non-point source contamination (industrial, agricultural sources);
- high levels of forestry activity.

AffectOnCommunity: It depends how the final proposal is laid out. I am hoping that groundwater will be further protected and salmon habitat will be enhanced.

KindsOfCollaborativeProcesses: I am keen to see Water District Agencies set up to create management plans for watersheds that include public consultation.

AdequatelyEquipFutureGenerations: I think it is a good step forward. We desperately need to move on to the next Phase in order to determine how the policies will be enacted and enforced.

WhatHaveWeMissed: I hope that the province will provide adequate resources (human and financial) to ensure that the WAM is a success and that regulations can and will be enforced for the long term.