From: Joe Gardner [mailto:jgardner@douglaslake.com]

Sent: Friday, November 15, 2013 10:00 AM

To: Living Water Smart ENV:EX **Subject:** Water Sustain Ability Act

To Whom it may Concern:

Please accept this e-mail and attachment as a submission under the Water Sustain Ability Act. We believe that FITFIR has worked well in the past and should be kept as part of the new Act. We agree with the regulation of water use at times of Critical Environmental Flows, as long as all users are regulated equally.

Sincerely,

Thank-you,

Joe W. Gardner, M.Sc., P. Ag. Vice President & General Manager Douglas Lake Cattle Company

Water Sustainability

- Water should not be treated as a commodity and sold to the highest bidder.
- Strategies should be in place to allow for more public/private storage opportunities.
- Water storage licensees should have input in discussions in relation to water released in low flow situations.
- All users should have a level of participation in watershed governance at a local level.
- Water should be managed on a watershed by watershed perspective.
- Surface and groundwater should be managed as a single entity.
- New development of all kinds should be tied to actual water availability.
- When it is decided to release flows from private storage facilities, there should be some kind of government quid pro quo.
- Costs of water metering and efficiencies should have government support, be that tax incentives or some other means of mitigating costs to the industry.
- Security of water rights for agriculture and FITFIR must be maintained for agriculture to survive.
- Water for livestock in range situations is essential and has to be maintained for agriculture to be viable.

Benefits to FITFIR:

- It is easy to understand and administer and does not require ranking of uses, except for allowing essential household use, and water for wildlife and livestock.
- Newer users come into the system knowing they have the lowest priority and may be required to curtail water use.
- Senior licensees have the most secure access to water, but under the new Act may have to regulate water use at times of Critical Environmental Flows.