

GRASSLAND and RANGELAND ENHANCEMENT PROGRAM

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To: Water Protection & Sustainability Branch, Ministry of Environment **14th Nov, 2013**

From: Brian Zak
Project Coordinator
Grassland and Rangeland Enhancement Program

Re: Water Sustainability Act

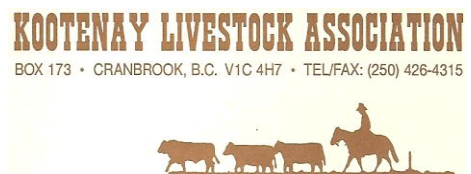
Thank you for the opportunity to comment on the forthcoming Water Sustainability Act.

The Grassland and Rangeland Enhancement Program (GREP), for Crown Range Tenures, was initiated in 2011 as a three year pilot program. This Program becomes on-going in Fiscal 2014 in partnership with Columbia Basin Trust and the Kootenay Livestock Association as the delivery Agent

In the first two years of the program we have invested over \$628,000 of rangeland enhancement projects on the Crown Range land base and we are on track to deliver over \$325,000 of projects in 2013. These projects include infrastructure, elimination of invasive weeds, forage development, riparian protection with offsite watering programs, and water development projects.

GREP comments with respect to the Water Sustainability Act (WSA) are being addressed specifically towards Crown Range Land Tenures and their enhancement of water development and the protection of riparian areas with accompanying offsite watering. These specific water-related projects are beneficial to wildlife, the endangered and all other species associated with riparian zones, as well as to livestock.

GREP Committees are responsible for evaluation and approval of projects. Upon approval these projects are forwarded to the Ministry of Forests District Range Branch for their consultation and approvals. This is when water development and offsite watering programs become stalled and delayed for 6-9 months associated with the water license time frame for approvals.



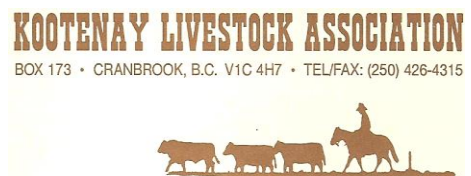
I must stress that enhancement projects for water development on Crown Range tenures are not an industrial or commercial- based development as inferred or described in the WSA. This new Act does not consider the “small” nature of these projects when small amounts of water are being transported short distances and should not be construed as commercial:

- In the case of riparian areas (or natural springs), it should be pointed out that this water is already being utilized by cattle and wildlife. Through GREP this water is now merely being re-directed to an offsite watering trough thus protecting the riparian area and providing clean water for both livestock and wildlife,
- In the case of a drilled well development, this water is normally being directed to a trough only 10 to 20 meters away and the volumes being generated are very small and do not equate to volumes associated with irrigation programs,
- The Water Licences for these projects are retained and owned by the Government through MOFLNRO and not by the tenure holder,
- These water developments also allow for better rotational distribution of livestock AND wildlife throughout the Range which prevents over-grazing. Over-grazing can also lead to the spread of invasive weeds.

We are asking that the WSA provide “special consideration” for water development and offsite watering associated with riparian protection on Crown Range tenures.

We are uncertain if “special considerations” can be incorporated into the WSA at this point in time. We would like to recommend that policies or procedures be amended that would allow “project approval” be signed off by the District Manager to allow timely utilization of funds for the water development project to proceed. The issuance of the water licence to the Ministry of Forests would then follow in its normal due course and time frame.

These Crown Range enhancement projects are unique with regards to water transportation and being very short in distance. The resource values associated with these developments are extremely high and in fact the Forest Practices Board when doing audits in the East Kootenays had mentioned that improvements were needed for riparian zone protection on Range Tenures.



The timeliness associated with approvals will facilitate completion of these projects and enhancement of the range tenures to the benefit of many resource values and livestock.

On behalf of GREP and the Crown Range tenure holders, we respectfully request your fullest consideration in facilitating water development on Crown Range Tenures.



- cc: Ian Graeme, Manager Watershed Sustainability, Ministry of Environment, Victoria**
- cc: Ray Morello, District Manager, Rocky Mountain Forest District, Cranbrook**
- cc: Ken Walburger, Senior Range Officer, Rocky Mountain Forest District, Cranbrook**
- cc: Randy Reay, President Kootenay Livestock Association, Cranbrook**
- cc: Jordy Thibeault, Past President and KLA Liaison to GREP, Cranbrook**
- cc: Rick Allen, CBT Liaison to GREP, Cranbrook**
- cc: Kevin Boon, General Manager, BC Cattlemen's Association**
- cc: Elaine Stovin, Committee Coordinator, BC Cattlemen's Association**

