

**From:** Kriwoken, Lynn ENV:EX  
**Sent:** Friday, November 15, 2013 5:46 PM  
**To:** XT:Bavis, Paul FLNR:IN  
**Cc:** Shannon Janzen; Graeme, Ian ENV:EX; Living Water Smart ENV:EX  
**Subject:** Re: CFPA Sustainable Water Act Response

Hello Paul,

Thank you for your email submission on the proposed Water Sustainability Act. All comments received by [November 15th](#), will be reviewed and considered as the government prepares a final version of the new legislation.

Thank you again for taking the time to provide your feedback.

Regards,

Lynn

On 2013-11-15, at 4:30 PM, "Paul Bavis" <[PBavis@westernforest.com](mailto:PBavis@westernforest.com)> wrote:

Hello Ms. Kriwoken,

Thank you for inviting me to your consultation call on November 5 regarding a proposed WSA.

I recall that in your consultation summary that the CFPA responses had been counted only once and left the impression that the forest industry was not overly engaged or concerned with the proposed legislation. I would like to re-iterate that Western Forest Products is a major tenure holder managing in excess of a million hectares of coastal forest and as such contributed to and supports the comments provided to you by the Coast Forest Products Association in the attached and earlier submissions.

In the conversation of November 5, I also tried to articulate the following:

1. Decisions such as allocation of water rights and issuances of water licences should include a legislative test weighing the benefits versus the costs.
2. Existing land use should be considered. For example, decisions should consider activities already present upstream and the potential for creating conflict with those activities or land uses. A specific example might include issuing a licence downstream of unstable terrain that contributes to natural turbidity events, potentially creating a false impression that forestry operations elsewhere are the causal factor.
3. Small water uses shouldn't be allowed to trump other activities with significant socio-economic or public benefits.
4. Cost evaluation must include the opportunity cost of foregone alternative activities, not just implementation costs.

Paul Bavis, *RPF*

Manager, Forest Policy & Practices  
Western Forest Products Inc.  
118-1334 Island Highway  
Campbell River, B.C.  
V9W 8C9  
Telephone: **250-286-4124**