

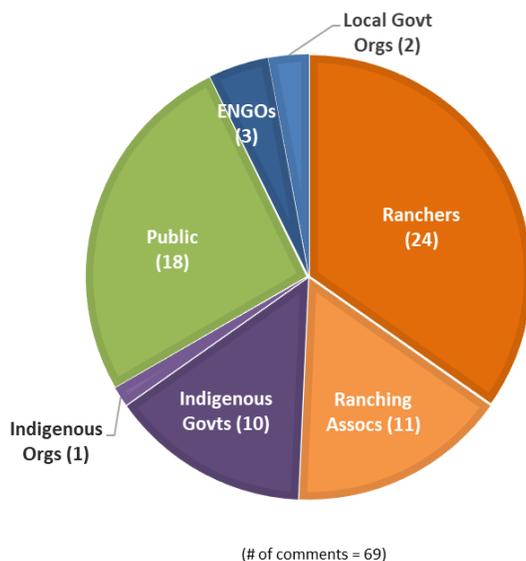
# Proposed Livestock Watering Policy Under British Columbia's *Water Sustainability Act*



## What We Heard on Livestock Watering

### Overview

#### WHO WE HEARD FROM



An [intentions paper \(IP\)](#) for proposed Livestock Watering Regulations under the *Water Sustainability Act* (WSA) was publicly posted in January 2018. Sixty-nine (69) comments were received over the five week IP comment period which closed on February 16, 2018. One half of the comments received were from ranchers (24) and ranching associations (11). Ten Indigenous governments and 1 Indigenous organization submitted comments. The remaining 23 comments were from the public (18), environmental non-government organizations (ENGOs) (3) and local government organizations (2).

All ranchers and ranching organizations (35) generally supported the proposed regulation but expressed concerns about limits to dugout size and access to water during drought along with other suggestions.

Most Indigenous respondents expressed concerns about current livestock watering practices, particularly impacts associated with direct access by cattle to streams and impacts from these activities on their Constitutional rights.

Concerns were related to impacts of/on:

- livestock on aquatic ecosystems and riparian areas (e.g. trampling)
- water quality (e.g. manure, dead animals in streams)
- human health as resulting from livestock contamination of drinking water sources; and,
- cattle drinking streams dry during times of water scarcity.

Most comments from the public (13/18) opposed the proposal and expressed a range of concerns including why water use for livestock sector would not require an authorization, impacts from cattle in streams and challenging the appropriateness of self-regulation by ranchers.

All of the ENGOs (3) questioned the removal of the authorization requirement for water diversions and/or uses of surface or ground water sources. The feedback was that livestock should not be allowed to consume water directly from any stream, nor should water be diverted from any stream or aquifer to an off-stream watering system, without due diligence to ensure the stream and its water and associated environmental values are protected.

Both (2) local government organizations were concerned with the complexity of assessing impacts from direct access and did not support providing authority for direct access livestock watering “provided that they do not cause pollution” to address the issues.

## Where are we in the process?

This document summarizes the comments received on the IP organized by ‘who we heard from’. Respondents identifiable in the document provided their consent to include the quote. Since the release of the IP, staff have researched options to incorporate “What We Heard” into policy options for government’s consideration. Final policy direction is expected in late 2019.

## Feedback

# Ranchers and Ranching Associations

Comments were received from 24 ranchers and 11 ranching organizations listed below:

1. BC Cattlemen’s Association
2. BC South Peace River Stockmen’s Association
3. Bear Mountain Grazing Association
4. Cariboo Cattlemen’s Association
5. Kootenay Livestock Association
6. Nicola Stock Breeders Association
7. North Okanagan Livestock Association
8. Okanagan Similkameen Stock
9. Peace River Regional Cattlemen’s Association
10. South Kamloops Stockmen’s Association
11. Sunset Prairie Livestock Association

All 35 comments from ranchers and ranching organizations have been combined as all respondents were in support of the proposed livestock watering regulations as “a step in the right direction” and “We are very pleased with the intentions paper because it recognizes the ways in which we currently use water and provides exemptions from licensing for livestock.” However, concerns were also raised about licensing requirements, size of dugouts and access to water during drought along with other suggestions.

### General

- Most comments from ranchers and ranching organisations said they “fully support eliminating the need for a license to water livestock from groundwater sources, recognizing the environmental benefits of off-stream watering and removing the requirement for a license, allowing livestock to continue to directly access and drink from surface water (streams etc.), grandfathering existing livestock dugouts (regardless of the water source) that fall below the threshold of 2500 m<sup>3</sup> with a berm height less than 2 meters, and reducing the red tape for activities in and about a stream for minor diversion works.”

- Several comments emphasized, “It is crucial to retain the ability for livestock to drink directly from watercourses. While supporting the adoption of best management practices that may include off-stream livestock watering facilities, these waterers should not be a mandatory.”
- A general concern expressed by one rancher was “I find it a sad state of affairs that we must have a regulation to allow livestock to drink water – an essential element of life - but after reading the comments on the Intentions Paper Blog, I have a sense of the perceived need for this regulation. It seems that the term “livestock” really means “cattle”. It also seems that there are some very negative views about cattle and ranchers out there. I hope that further development of the regulation is based on science and good management.”
- Another general concern expressed by one rancher was “I am all for protecting our water and having clean water. This is a must for everyone. But I sincerely hope that you will consider both sides, especially the ranchers who depend on this water for their livelihood and not just the people who use the water for recreation. Ranchers go above and beyond to be stewardships of the land, so please remember this when making your decisions.”

### **Licensing Requirements**

- Most comments strongly supported reducing red tape by eliminating licensing requirements for all types of livestock water use and construction of livestock watering systems stating that “to remove licensing for diversions is a helpful measure, and a good idea that will encourage future developments to help alleviate pressures placed on waterways.”
- One comment emphasized voluntary versus mandatory licensing requirements. “Cattle producers who wish to license their water use should have the opportunity to voluntarily apply for a licence under the Water Sustainability Act.”

### **Dugouts**

- Many comments supported the proposals for dugouts “that licensing will not be required for existing livestock dugouts that meet the identified criteria (i.e., volume less than 2500m<sup>3</sup>, berm less than 2m high, etc.) and the allowance to construct a new livestock dugout without an authorization provided the identified criteria are met (i.e., maximum volume threshold of 2,500 m<sup>3</sup>, etc.).”
- Six comments from ranchers in Northeast B.C./Peace region said that the proposed 2500 m<sup>3</sup> size limit for dugouts is too small. They requested “that all dugouts on ALR land, for the purpose of livestock watering, be exempt from licensing, regardless of size. The principal weakness of this draft Regulation is that it does not adequately address licensing dugouts within the ALR. The ALR significantly reduces permitted land uses but one of the approved uses is livestock production. Livestock production cannot take place without secure access to water. Requiring a water license under these circumstances is an additional unnecessary expense and is not acceptable. These dugouts are the main source of livestock water for all these animals for approx. 5 months of the year.”
- Several comments highlighted how “developing dugouts and grazing areas on the range that benefits both our cattle and wildlife. This increased usability of the crown land allows us to maximize the lands potential.”

### Access to water during drought

- Four comments from ranchers in the Cariboo and Thompson-Okanagan regions said they “strongly urge the province to clearly state in the proposed livestock water regulation that livestock will have continued access to water during drought.”

### Other suggestions

- One rancher stated that “It is our view that all authorized livestock watering on Crown land where an authorization (tenure) is in place should be exempt from licensing. It is imperative that this is not limited to managed direct access sites as there are many potholes, ponds etc. that livestock access while on Crown range that need to be included under this provision. The livestock watering regulation needs to clearly state that all livestock use under an authorization is exempt from requirements for a water licence. The right to use available water must be included with the range tenure agreement.”
- One rancher stated that “the livestock water regulation should recognize the expertise of other Professionals, such as Professional Agrologists and Environmental Farm Planners in the dispute resolution process.”
- One rancher suggested “recognizing the national livestock animal care standards and the need to provide for an animals’ basic need for water.”

## Indigenous Governments and Organizations

All 203 Indigenous governments were sent letters inviting feedback on the proposal. Indigenous organisations were also invited to comment. Ten Indigenous governments and 1 Indigenous organisation (the First Nations Fisheries Council) provided comments. Indigenous governments who commented were:

1. Saluteau First Nations
2. Cowichan Tribes
3. Ktunaxa Nation Council
4. Halfway River First Nation
5. Nooaitch Indian Band
6. Nicomen Band
7. Office of the Wet’suwet’en
8. Nadleh Whut’en
9. Bonaparte Indian Band
10. Matsqui First Nation

The following concerns and suggestions were raised in written and oral feedback. Quotes have been used where written feedback was provided.

### Impacts of livestock watering on stream health and associated impacts on Constitutional rights of Indigenous peoples

Most Indigenous respondents to the proposal expressed concerns about current livestock watering practices, particularly related to direct access by cattle to streams. Concerns related to impacts of livestock on aquatic ecosystems and riparian zones (e.g. trampling), impacts on water quality (e.g. manure, dead animals in streams) and concerns with cattle drinking streams dry during times of water scarcity. Indigenous respondents also raised concerns related to impacts from these activities on their Constitutional rights:

“From a First Nations perspective as they relate to rights and title as well as wildlife, the potential problems with a licence-free livestock watering program are substantial and include (but are not limited to)

- community and human health,
- regulating water volumes used in arid regions or during periods of drought,
- downstream impacts to wildlife,
- capacity limits on smaller streams and springs,
- the rights of First Nations to freely access water, and
- the impacts to First Nations in general, who have a spiritual connection to water and hold the belief that water is sacred.”

A number of Nations pointed to existing challenges related to water quality and flows in their traditional territories “At present, in many areas of Nadleh Territory, water resources and the aquatic resources they support are in a diminished and undesirable state of quality, health and/or quantity”.

Concerns were raised relating to impacts of diversions for livestock watering:

- “Diversion work cannot reduce water requirements during low flow, and temperature requirements for fish and fish habitat.”
- “We (first nations, public, other users etc.) need to know how much water is being used by livestock. How will the province know how much water is being diverted and being used? How will this volume be recorded? How will excess water be treated e.g. will it be allowed to flow to land and not be put back in to the stream/water body?”

#### **Impacts of groundwater diversions for livestock watering on aquifers and connected streams**

- “Is there a cut off of well developments - Is there a capacity report of aquifer/groundwater sources and how many wells will it take to run them dry?”
- “What provision is there for Groundwater flow necessary for temperature control for Fish Habitat?”

Some types of waterbodies were identified as being especially vulnerable to impacts of livestock watering “Livestock should not be allowed uncontrolled access to small enclosed water bodies e.g. small lakes and should not be allowed within the channel of mainstem streams.”

Climate change: “climate change trends within and outside of Nadleh Whut’en Territory are adversely effecting both water quality and aquatic resources such as fish, which are integral to Nadleh’s Rights”.

#### **Impacts on drinking water sources**

Several Indigenous respondents raised concerns about impacts of livestock accessing streams on drinking water sources:

- “Our community members practice their Treaty Rights throughout our traditional territory. In so doing, they use local springs, streams, and creeks as their source of drinking water. We, therefore, ask that no animal waste is introduced to the watercourses. Access to safe drinking water is our Treaty Right and we kindly ask the government to take this into consideration.
- “Matsqui has mentioned and questioned livestock concerns where water is being utilized. Concerns are of contamination and spreading of environmentally and unhealthy outcomes to the water systems.”
- “We have been observing and documenting a number of cows upstream of our community. We also rely on the river for water consumption.” [sent in photos of dead cows in a river].

## **Oversight, consultation and notification, monitoring, compliance and enforcement**

A number of Indigenous respondents voiced concerns about a lack of oversight associated with allowing water use by livestock under a regulation, rather than requiring a water licence. Concerns were also raised that allowing water use under a regulation removes consultation opportunities.

- “I do not think that changing the WSA to allow livestock watering to occur without a water licence or authorization would be acceptable to the Nation”
- “Allowing livestock direct access to streams, even when the access is 'managed access', contributes to manure loading, streambank erosion, trampling of riparian vegetation and other detrimental impacts to streams. Cowichan Tribes opposes the use of managed direct access to streams, and particularly allowing such activities to occur without the proper oversight and accountability afforded by requirements to obtain an authorization.”
- “While we do understand that livestock need clean drinking water we also believe that allowing water users to interpret the WSA and associated regulations to conduct “minor” in-stream works without going through the approval process may cause more problems than it solves. There needs to be a clear set of criteria to be followed. Any diversions/minor works etc. that are not required to seek approval/permit should still be reported to the province and that the information provided to the province must also include “as-built” diagrams, volume of water being diverted and timing (week, month, duration). Any minor works should also have GPS locations identified.”
- “How will specific requirements be identified if no notification or authorization is required. In stream works still require consultation with the Wet'suwet'en.”

## **Non-compliance**

- “There are already many livestock users that do not comply with existing regulations. How will putting the onus on the user to follow new regulations improve compliance? There needs to be direct oversight on compliance. How will this be handled by the province?”
- “How will the new changes cover locations which are currently in contravention and will remain in contravention once the WSA is fully implemented? Will these locations be ‘grandfathered’ or will they have to take compliance measures?”

Concerns that there is not enough known about the current health of streams: “Looking at the Provincial water quality monitoring documents listed; for Wet’suwet’en territory the latest reported monitoring is 2005 (13 years ago)”.

Questions about monitoring: “What about water systems from streams, creeks etc. – Is there an environment monitoring system in place, are there actual tests being done, who is liable for contamination and destruction of the waterways?”

## **Dugouts**

- “Dugouts are the preferred method of watering”

- “First Nations need to be notified anytime a dugout or off-stream watering system is proposed to be constructed because they may hold knowledge about nearby unrecorded archaeological or cultural heritage sites”

### **Linkages with Indigenous led water management**

One First Nation referenced their own water management policy documents: “Water resources within Nadleh Whut’en Territory are fundamental to the health and status of fish and other aquatic and terrestrial biota, and Nadleh’s Rights and Title. This is reflected in Yinka Dene ‘Uza’hné Surface Water Quality Policy and Standards, which outline water management objectives, a water classification system based on cultural and ecological values, and quality standards for our territory... Nadleh would like to meet with you to discuss: How the proposed approaches to livestock management, and the WSA more broadly, aligns with Nadleh’s water management objectives...”

### **Request to work with the province to designate additional sensitive streams**

Several Indigenous respondents commented that there are streams in their territory that are ecologically and/or culturally sensitive that are not included in the list of 15 sensitive streams identified in Schedule B of the WSA and indicated a desire to work with the province to designate additional sensitive streams.

- “Many First Nations have also articulated urgency to designate a stream in their territories as sensitive but have not felt heard by the British Columbia Government. As rightsholders, First Nations must be included in discussions to designate sensitive streams that may hold spiritual and/or cultural significance.”
- “The Province needs to come to the table with the Wet’suwet’en to determine which Streams/Rivers in House territories require designation of "Sensitive streams".”

### **Consultation and UNDRIP (United Nations Declarations of the Rights of Indigenous Peoples)**

Several respondents stated that they were unhappy with the WSA consultation process. Some referenced the government’s commitment to implement the UNDRIP and asked how their feedback would be taken into account in development of the regulation.

- “The province must immediately come together with First Nations to co-develop a framework for engagement on the remaining WSA regulations.”
- “Intention papers and online submission forms are inadequate tools to meaningfully consult with First Nations on the development of regulations to implement the WSA. It is not possible for most First Nations in British Columbia, who have limited capacity to engage in a thorough analysis of the potential exceptions on Treaty Settlement or Title Lands, especially in the absence of actual draft regulations and lacking adequate resources and time.”
- “In closing, I request a response that outlines how the information we have provided and other information you may have gathered related to aboriginal interests and environmental stewardship were considered in the decision-making process.”
- “Due to the short timelines for First Nations to review the proposed changes to watering regulations under the water sustainability act, we are relying primarily upon the work completed by the First Nation Fisheries Council of BC in preparing a submission for consideration by the provincial government.”

### **Other matters raised in feedback:**

- Concerns about other impacts on Aboriginal rights and title, particularly asserted Aboriginal rights to water.
- Requests for clarification of terms used in the proposal, including ‘pollution’, ‘significant adverse effect’ ‘low density’ and ‘minor diversion works’.
- Abandonments: “In an application for abandonment, what is the provision for reclamation of the diversion?”
- A suggestion to adopt a performance based protocol: There should be a “performance based” protocol with a term. E.g. 5 years. A user’s performance in terms of water/land use and compliance with specified regulations/terms should be reviewed on a term basis and if the performance is not satisfactory the user should be directed to make compliance within a proposed time period before the term is renewed.
- Recommendations to make more use of non-regulatory approaches to improve range practices, including education and Indigenous Nation/leaseholder stream health monitoring programmes.
  - “There are many well-known/understood best practices to mitigate/reverse potential impacts of livestock to water quality (and programs like cows and fish), and education of and working with livestock owners provides some proactive opportunities. In addition, some type of a monitoring/education program (i.e. to engage landowners, communities, cattleman’s association, etc.) would also be quite useful. Things to monitor include water quality, water temperature, vegetation, invasive species, etc. Overall, a program that is proactive rather than punitive/legislative (WSA) will go a lot farther to gaining support and trust which will ultimately lead to greater successes.”

## Public

Of the 18 comments received from the public on the proposed livestock watering regulations, 13 respondents were strongly opposed, 3 respondents were supportive and 2 requested additional information.

Supportive comments (3) were brief and generally felt that “the proposals are a step in the right direction. We need to ensure our water is protected from contamination.”

Comments from respondents who were strongly opposed (13) to the proposal expressed a range of concerns including a lack of justification for exempting water use for livestock sector, allowing cattle in streams, and limiting oversight to self-regulation by ranchers.

### Why water use for livestock sector

Several comments raised concerns and questions about why water use would be allowed under the proposed regulation for the livestock industry:

- “Growing beef is the worst waste of water on the planet, do not make it easier to use the water. Leave our waterways as they are.”
- “Cattle production is a for profit business that has been allowed the advantage of lack of regulations in supplying water for their product for far too long. They do not have the right to treat the water as a private resource.”

- “Why does livestock watering have to be unregulated? What is wrong with this activity needing permits and oversight? What short-term benefit outweighs long-term careful planning and management of our water and fisheries?”
- “These proposals give far too much freedom to the range licensees to exploit BC’s water resources with very little oversight, checks, balances and auditing etc. and all for free.”
- “Will there be a review process like other private uses of crown land where the public will have the ability to voice their concerns? After all, water is a public resource therefore the public deserves a right to know how it is being used.”
- “We can only give or allocate our water and associated use permits away once and we should not do this within the framework you have suggested. Why would the government even contemplate doing this? It appears your report has been unduly and inappropriately influenced by [sector association]”.

### **Cattle in streams**

Several comments raised concerns about the impacts of cattle in streams to fish, riparian areas, water quality and downstream users.

- “Unrestricted access, by cattle in particular, into any riparian zone for the purpose of livestock self-watering is destructive. Even the BC Cattlemen’s Association recognizes that cattle self-watering is not a favourable practice.”
- “This seems like an improvement over cattle directly in streams, which I thought was already illegal. If the water diversion returns to the stream, the danger of pollution persists. If the diversion does not return to the stream, then a deleterious effect on aquatic ecosystems is inevitable.”
- “Overflows on off stream watering systems should be piped back into the streams and not just left to overflow onto the ground. There are many licenced downstream users that could use the water, in lower flow seasons. The systems should be monitored to make sure it is being done.”

### **Self-regulation by sector**

Several comments raised concerns and questions about self-regulation by ranchers:

- “Restricting cattle from access to the riparian zone cannot be left up to some kind of voluntary participation by livestock producers. Any access into the riparian zone needs strict regulations and most importantly there needs to be effective enforcement.”
- “I live in a rural community where cows freely enter [the rivers and lake]. Even if cows are restricted from going into the water there doesn’t seem to be anyone to regulate this. This is an area where there are other ways to water cattle.”
- “I have a simple concern for the all too frequent use of the phrase “Authorization not required for diversion and use of water from a stream”. Simply put I believe this provision will grant too much permission and leaves far too much room for abuses and in the process will damage wild fish stocks. The local cattle industry has frequently polluted streams...which suggests there will be ranches that will not respect the intent of this law.”

# Environmental Non-Governmental Organisations (ENGOS)

Comments were received from the 3 ENGOS listed below:

1. POLIS Project on Ecological Governance
2. BC Nature Federation of BC Naturalists
3. Boundary Environmental Alliance

## Impacts of livestock watering on stream health and the environment

All of the ENGOS questioned the removal of the authorization requirement for water diversions and/or uses of surface or ground water sources. The position was taken that livestock should not be allowed to consume water directly from any stream, nor should water be diverted from any stream or aquifer to an off-stream watering system, without due diligence to ensure the stream and its water and associated environmental values are protected.

“We are very concerned that the Province, through this intentions paper, is not showing adequate leadership nor proposing effective regulations that will manage livestock, in particular cattle, to meet appropriate water quality and quantity objectives and protect the environmental values of all water bodies with regards to all forms of access to and use of water by livestock in BC.”

ENGOS also raised a number of specific concerns with the proposed regulation:

- Allowing for direct access to streams raised concerns about impacts on water quality and impacts on aquatic ecosystems and riparian zones.
- There are studies suggesting that high E. coli counts are almost entirely related to range-cattle presence or absence and E. coli counts attributable to wildlife (in this and similar dry-land areas) are generally negligible or nil.
- The proposal did not restrict access to sources of water that are being used for drinking water.
- The restriction of the regulation to “low density” areas ignores the preference of cattle to spend 80% or more of their time in the cooler riparian zones when the weather is hot.
- Impacts from water diversions and riparian damage increase as stream size decreases, but stream size was not listed as a criteria.
- Lack of authorization will impact government’s ability to manage water use during periods of water shortage or drought.
- Sources that are subject to CEFT orders should be restricted sources (in addition to sources subject to fish protection orders).
- The actual volumes of water needed for each cow/calf pair is closer to 68 Litres of water per day or more, which is 51% or more than stated in the proposal.
- The exemption for diverting water into a dugout is equivalent to an Olympic swimming pool and is too high, especially when the proposal did not limit the number of dugouts or the size of the stream being diverted from.
- Existing dugouts should be reviewed to ensure they are meeting the legal objectives and standards of the *Water Sustainability Act*, especially if they were constructed in streams in contravention of the Act.

## Oversight, notification, monitoring compliance and enforcement

- Generally, the responses from the ENGOS questioned the need to remove the activities from the oversight and assessments that take place under an authorization.
- ENGOS specific concerns regarding the lack of oversight and enforcement under the regulation for private land were:

- Inappropriateness of self-regulation by this sector, given the technical nature of water management. For example, how will they determine when there is “unrecorded water”, and when “snowmelt” or “rainfall freshet flow” are happening from year to year.
  - The exemption under the regulation would maintain the gap in key baseline and site specific information.
  - Provincial resources (e.g., best management practices, staffing) are not adequate to ensure proposed changes are reviewed and completed appropriately.
- One ENGO criticized moving the oversight on Crown land to the range program under FRPA and the “trend for MOE to hand-off responsibility for oversight/interventions to the “extractive” industries”. In this case, Range Branch has shown itself to be primarily interested in advancing the interests of ranchers rather than the interests of protecting public assets.”
  - One ENGO suggested that the notification process for stream diversion works be improved by making public the criteria to be used by habitat officers.
  - One ENGO suggested that the Province should establish a routine inspection and review process for all dugouts (existing and new).

### **Consultation and UNDRIP (United Nations Declarations of the Rights of Indigenous Peoples)**

One ENGO suggested that government take action to implement UNDRIP and promote reconciliation with Indigenous nations through:

- Acknowledging the high probability of significant implications to Aboriginal and treaty rights for regulations under the WSA.
- Allowing Indigenous leadership bodies to review (and co-develop) draft regulations.
- Providing an opportunity for individual nations to identify sensitive or priority areas or sensitive water bodies within their traditional territories, supported with sufficient resources and appropriate direct engagement.
- Implementing the commitment to modernize land use planning in partnership with Indigenous nations, with an emphasis on a water-centric approach to promote resilient watersheds and sustainable rural economies.

### **Other matters raised**

- One ENGO noted that there was a fundamental lack of fairness in exempting only this sector when activities that required less water and created fewer impacts would still require an authorization. For example, supplying water to a small number of horses in a corral would still require a licence.
- One ENGO suggested that the work on the regulation should be “shelved” until an independent, objective analysis is done to assess the full cost of range use on Crown lands which they felt would demonstrate that the costs exceed the benefits, to the point that it would be cheaper to pay ranchers to relinquish grazing permits.
- That ENGO included the following in their list of significant public costs associated with cattle grazing:
  - grassland and riparian degradation,
  - water consumption raising low value crops,
  - water contamination,
  - cattle contribution to weed spread, cheat grass and other invasive species,

- public fencing costs,
  - ecological-restoration costs,
  - lost opportunity costs,
  - increased fire risk (and fire season) from cattle induced cheat grass infestations, forest regrowth damage, conflicts with wildlife, habitat, food, growing awareness of cattle contribution to global warming
- One ENGO suggested that the Province should provide incentives to encourage off-stream water use such as financial, regulatory streamlining, and increased penalties for in-stream impacts.
  - There was also concern that the proposal did not mention the need for proponents to ensure the protection of Species at Risk.

## Local Government Organizations

Comments were received from the 2 local government organisations listed below:

1. Regional District of North Okanagan
  2. City of Dawson Creek
- Both organizations were concerned with the complexity of assessing impacts from direct access and did not support providing authority for direct access livestock watering “provided that they do not cause pollution” to address the issues.
  - One organization expressed the desire to be notified of the construction of any diversion works (even minor).
  - One organization identified the need for ongoing work to identify vulnerable and sensitive areas that would be best serviced by off-stream watering sites.
  - There was also concern with the staff capacity required to manage stream health, or the information needed for effective compliance and enforcement.
  - It was requested that the Province consider adding community watersheds to the list of water sources that would not be under the regulation – similar to sensitive streams.
  - Instead of the proposed regulation, specific suggestions were to:
    - Streamline water licensing for private land owners adopting off-stream watering.
    - Provide funding necessary for cattle producers to implement off-stream watering, low flow and hard surface crossings, agroforestry (debris barriers), and riparian revitalization.