

## **BC Cattlemen's Association Comments on "Agriculture and British Columbia's Water Plan" Draft March 2009**

The BC Cattlemen's Association has reviewed the March 2009 Draft "Agriculture and British Columbia's Water Plan." Given that the Province is in the process of collecting comment and opinion from all BC water users, in an effort to take public opinion into consideration when drafting the modernized *Water Act*, this document is very timely. We appreciate the work done by Ted van der Gulik to recognize the importance of water to agriculture and we support many of the issues, methodologies and required actions detailed in this paper. We have several comments and suggestions that we would like to see included in a revised draft or final copy of Agriculture and British Columbia's Water Plan. The BC Cattlemen's Association main priority in regards to the *Water Act* modernization is to ensure that our ranchers have reliable and secure access to sustainable water for livestock production.

### **BC Cattlemen's Association Comments/Suggestions:**

#### #1: Reserve Water for Agriculture Lands

Beef cattle and/or cattle ranching is not listed as requiring a secure and sustainable supply of quality fresh water. This issue is not addressed completely without the inclusion of beef cattle ranching. Fresh water is of utmost importance to livestock production. Additionally, ranching in BC is given no recognition of its' present or future role as a source of food production for our citizens (land and water requirements are listed for other commodities but nothing for ranching).

#### #2: Water Purveyors Secure Water to ALR Lands

We agree with the statement, "The agriculture sector is not requesting an increase to the allocation but to maintain the historical allocation that was established for the agricultural land." This recognizes the importance of water allocation to agriculture and maintaining a system that continues to provide agriculture with necessary water. We would like see the proposed 10% risk factor re-evaluated to ensure that water users needs are sufficiently met.

#### #3: Expansion of Water Storage Facilities

Increasing water storage capacity is absolutely necessary, particularly in watersheds that are at high risk for droughts or water shortages. We would like to see the request for more infrastructure development and the required funding strengthened. Further studies are costly and not always necessary since many landowners and water users already know what storage facilities would be useful and where they need to be located within a watershed.

#### #5: Secure Access for Livestock Water

This issue should be given an "Extreme" rating in regards to importance and priority. This issue is particularly important to ranchers since access to water is absolutely necessary to maximize the use of grazing lands, and it is crucial that the grand-fathering of historical water use occur. Another point regarding the issue of livestock accessing streams and riparian areas for drinking water is that proper management of livestock in and around riparian areas is ecologically sound. Ranchers have worked hard to limit livestock access to streams and/or create off-stream watering locations, but often times

the cost of developing these is prohibitive. Therefore it is important that if the Province deems keeping livestock out of streams a priority, they must be committed to funding some or all of the costs of developing these systems.

#### # 10: Area Based Regulation of Groundwater Use Supported

The BC Cattlemen's Association supports the licensing of ground water use for critical areas but any regulation imposed needs to recognize existing agriculture wells and ensure that they are grand-fathered into the system. Many agriculture producers have devoted a great deal of time and expense to developing sustainable and proper wells, relying on ground water from aquifers to meet their needs. We also feel that the first-in-time first-in-right allocation system should be applied if ground water regulation and licensing occurs.

#### #11: Agricultural Water Purveyors Have Agricultural Representation

This is a very real concern and the BC Cattlemen's Association does not want to see water control be dictated by many small users (as opposed to fewer large users). Further to the Methodology and Required Action listed, there also needs to be provincial protection of agricultural water in the governance of water and the modernized *Water Act*.

#### #12: Transfer or Trading of Water Rights Remain within the Agriculture Sector

We fully support the initiative to insist that if transferring of water rights/licenses occurs, that water that is allocated to agriculture remain in agriculture. We would suggest that the BC Cattlemen's Association be involved in the development of a policy along with MOE and MAL.

#### #15: Social Benefits of Agricultural Storage Facilities Recognized

The BC Cattlemen's Association feels that the Required Action should call for more financial assistance to cover partial or complete construction and maintenance costs of this infrastructure. As pointed out in the paper, agriculture carries the financial burden of building and maintaining this infrastructure that provides numerous benefits to society as a whole with no recognition or assistance from other beneficiaries. We also feel this should be moved up to a higher priority since it also addresses the issue of necessary water storage.

#### #22: Develop Equitable Drought Management Planning Process

Drought plans need to be in place and shared with water users so that all priority levels of water users understand the measures that will be taken in the case of drought and can plan for it accordingly. Full transparency is crucial for all water users to understand and respect pre-planned measures. Preferably the Province and regional watershed groups will have drought mitigation plans and infrastructure development in place long before any conservation plans need to be implemented. This will minimize drought effects on water users and allow for the planning and building of infrastructure and water storage systems to prevent severe water use limitations during times of drought. Drought management plans should be developed with a watershed approach to infrastructure development and action plans that can be implemented within the watershed to minimize potential impacts of drought. We caution any movement away from FITFIR because we feel it works in most cases and may just require more transparency to water users.

#### #25: Water Use Related Carbon Offsets

Beef cattle ranching should be recognized in this section for the large amount of dry-land irrigation utilized to grow forage/livestock feed. This type of irrigation system does not use any fossil-fuel energy to pump water for irrigation.

#### #28: Balance Fish and Agriculture's Needs

Although agriculture water users generally have high priority water licenses, they are not consulted on decisions to shut water off to enhance water flows for the purpose of sustaining fish populations. It is also important that ranchers should not have to augment or maintain an unnatural flow in a stream when normally that stream does not flow during certain times or contribute to fish habitat. Furthermore, ranchers should receive full compensation for the value of the production loss associated with water rights (licenses) that are taken away (for fish, etc.) and also for developing and building infrastructure that contributes to improved/increased fish habitat, ecological flow, etc. Agriculture water users need a clear explanation from government on minimal flows required for fish and particularly how many fish. At what point is this question addressed, "how many fish is enough?"