

March 18, 2022

Att: Water Protection and Sustainability Branch, Ministry of Environment and Climate Change Strategy

This is a joint submission of 11 organizations, who collectively represent over 100,000 community members. We have joined together to support you in the development of a Watershed Security Strategy and Fund that will be timely, integrated, informed and effective.

1. **Urgent action is needed to ensure communities are safe and watersheds are secure and able to withstand crises.**

This year alone, people in B.C. have had to endure fires, landslides, drought and floods, all while navigating through an unprecedented pandemic. The November rain storms and floods were devastating and were one of the most expensive natural disasters in Canadian history, with losses in the billions of dollars. For communities' safety, food security, local economies, and for the lands and waters that support fish and wildlife, action is urgently needed.

Many necessary actions are already identified. The Province has many useful tools, made many commitments and has received recommendations that are not yet implemented or effectively applied. The Strategy should accelerate immediate action to address community safety and watershed security, including issues such as drinking water, wild salmon, and more.

We recommend the Province:

- a. **Make water a core value in land use and forestry planning**, ensuring priority of UNDRIP and DRIPA commitments. At a minimum this requires implementing *Water Sustainability Act* planning and sustainability tools, including groundwater licensing, protection of critical and environmental flows, and supporting communities to establish legally enforceable Water Objectives, area-based regulations, and Water Sustainability Plans. It is also imperative to modernize the current outdated and ineffective water allocation system "first in time, first in right" (FITFIR), among other identified necessary changes.
- b. **Fulfill drinking water source protection recommendations** from the Auditor General (2019) and Hullcar Aquifer Review (2017) independent reports.
- c. **Implement the Watershed Security Fund swiftly with a commitment in the 2023 budget.** We appreciate your recognition within the discussion paper that the Strategy and Fund must be developed with deep collaboration with Indigenous Nations and local community partners. It is essential that these future partners have the resources needed to participate fully in the engagement process.
- d. Define "build back better" to include protecting and restoring natural defences and begin by including Indigenous governments in planning and decision making. We need to protect and restore **our natural defences** against floods, fires, drought, and threats to drinking water sources and the Province must **ensure strong and enforceable regulations** to protect our watersheds.

It's important to recognize that due to the varied natural defences and unique strengths of each community, there must be place-based strategies implemented when creating the Strategy.

- e. **Complete State of Watershed reporting** and an overall monitoring strategy to ensure data collected are linked and being to ensure that decision making is informed, locally relevant and that funds spent will have the greatest impact.

**2. This Strategy must be developed and implemented with consideration of existing commitments, recommendations, and complementary Provincial strategies and legislative commitments..**

To strengthen accountability and coordination, successful watershed security will require coordination and clear responsibilities across provincial ministries, and also across all governments— Indigenous, local, provincial, and federal with integrated cross-sectoral action on:

- New forestry legislation (including Forest Landscape Planning), updated forest practices and management;
- Implementation of all 14 Old-Growth Panel recommendations within the proposed three-year-framework. A paradigm shift centering on biodiversity instead of timber across forests in BC will hugely improve watershed security in most parts of the province, in addition to many other co-benefits
- The Wild Salmon Strategy, and Coastal Marine Strategy;
- The Climate Preparedness and Adaptation Strategy, which includes natural infrastructure as a key way to build safe communities and increase flood protection;
- Updating the B.C. Drought and Water Scarcity Response Plan to ensure a clear connection between drought levels, local responses, and legal and policy tools for controlling water use (i.e., critical flow protection, environmental flow provisions, or fish protection orders under the *Water Sustainability Act*);
- Species-At-Risk legislation; and
- Addressing all 121 recommendations on Professional Reliance Reform.

The provincial government's approach in a Watershed Security Strategy should take into account the Forest Practices Board's Recommendations:

- Making water a core value in forest planning, including the new forest landscape planning process;
- Creating a legal requirement to manage cumulative effects of forestry in all watersheds;
- Improving regulation of forest practices that contribute sediment to streams; and
- Renewing watershed restoration efforts to reduce the impact of historical forest practices.

**3. A strong focus is needed to ensure better decisions addressing community impacts, ecological and climate crises.**

The urgency for informed decision-making in watersheds cannot be overstated. Climate change is increasing risks for communities and ecosystems, and amplifying threats caused by economic activities. One critical blindspot is the relationship between industrial logging and climate impacts in watersheds, which has been ignored in the provincial climate risk assessment. We recommend review of Dr. Peter Woods report, '[Intact forests, safe communities](#)' to inform the provincial watershed security strategy.

Source drinking water protection (Outcome 4) and effective modernized land (and water) planning (Outcome 5) need immediate attention and should be reinforced by building capacity within local communities and resourcing Indigenous-led water initiatives.

A number of Outcomes (4-7) describe elevating water and related risk in the context of planning to inform an adaptive management approach. In particular, we support opportunities for the provincial government and Indigenous governments to develop unique, place-based watershed approaches that prioritize protection of aquatic ecosystems and drinking water sources in planning and authorizations.

**4. For the Strategy to be effective, there must be a recognition of the value of local knowledge, Indigenous science, and the tools and resources of the watersheds themselves as well as a commitment to defend these with proper regulation, enforcement and financial capacity.**

We need to ensure that there is long-term sustainability within watersheds. As such, there needs to be **consistent, stable funding in the range of \$50-100 million annually** over the long-term (as determined is needed by the Sustainable Funding Working Group in their December report, [BC Watershed Security Fund: A Collaborative Vision](#)). The province needs to make a **one-time allocation of \$600 million** to establish the Fund and create a permanent legacy endowment.

In conclusion, it is worth repeating that neither the Fund nor the Strategy will be effective unless it is **co-created with Indigenous Nations**, ensuring equal decision-making authority in the governance structure and working from the onset to develop the Fund and Strategy within Indigenous ways of working.

Thank you for the initiative you have taken to engage knowledge-holders, water stewards and British Columbians who care about their watersheds in the development of these important tools and strategies.

We look forward to being a support in further engagement and consultation opportunities with you as you delve into the work of developing the Strategy and Fund.

Sincerely, the undersigned:



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