



# THOMPSON-NICOLA

REGIONAL DISTRICT

The Region of BC's Best

300-465 Victoria Street

Kamloops, BC V2C 2A9

Tel: 250-377-8673

Toll Free in BC: 1-877-377-8673

Email: [admin@tnrd.ca](mailto:admin@tnrd.ca)

Department: Board of Directors

December 29, 2023

Premier David Eby

Via email: [premier@gov.bc.ca](mailto:premier@gov.bc.ca)

The Honourable Bowinn Ma

Minister of Emergency Management and Climate Readiness

Via email: [EMCR.Minister@gov.bc.ca](mailto:EMCR.Minister@gov.bc.ca)

The Honourable Anne Kang

Minister of Municipal Affairs

Via email: [MUNI.Minister@gov.bc.ca](mailto:MUNI.Minister@gov.bc.ca)

Dear Premier Eby, Minister Ma and Minister Kang;

**Subject: *Emergency and Disaster Management Act***

Further to a letter received from the Ministry of Emergency Management and Climate Readiness dated December 14, 2023 advising of an engagement period extension to January 31, 2024 for local authorities to provide input on some of the new regulations being developed for the newly adopted *Emergency and Disaster Management Act* (EDMA), on behalf of the Thompson-Nicola Regional District Board of Directors I would like to take this opportunity to write to you directly regarding our concerns related to the implementation of one overarching local authority regulation under EDMA to serve both municipalities and regional districts.

Many of the proposed changes in the EDMA are tailored to municipalities and do not take into account the immense geographic size and unique mandate of regional districts. Noted below are a few examples of our concerns:

- While municipalities have the flexibility and leeway to spend money for the development of mitigation infrastructure such as dikes, regional districts must work through the public assent process to establish a service to fund the infrastructure. Furthermore, while municipalities would have land tenure over their own infrastructure, regional districts would most likely have to work through Crown lease processes to secure required tenure.
- Proposed changes define new "emergencies" including terrorism, rioting and security threats". As regional districts do not have direct control over law enforcement, our role in these newly defined situations is unclear.
- The new EMDA will require local governments to consult, collaborate, and coordinate with adjacent local governments as well as neighbouring Indigenous governing bodies in all four phases of emergency management. While the TNRD supports the intent and upward trajectory of these new requirements, given the TNRD's geographic boundaries, this will require consultation with a significant amount of governing bodies far and above the 25 First Nations with reserve land within TNRD boundaries.

MUNICIPALITIES: Ashcroft | Barriere | Cache Creek | Chase | Clearwater | Clinton  
Kamloops | Logan Lake | Lytton | Merritt | Sun Peaks

ELECTORAL AREAS: "A" "B" "E" "I" "J" "L" "M" "N" "O" "P"

- Proposed changes call for a focus on intersectionality and supports for vulnerable populations, as well as animals (with the definition of animals now broadened to include pets). This is not a realistic expectation for regional districts to handle across a large geographic area. This again seems to be more municipally-oriented especially considering the TNRD does not engage in domestic pet licensing or undertake social support programs for vulnerable populations.
- Agriculture relocation is already a labour-intensive component for TNRD staff during emergencies and requires external consultants to liaise with the ranching communities and coordinate the claim process; adding further requirements for housing domestic animals will exacerbate an already complicated and onerous process.
- Regional districts represent rural and remote rural sparsely populated areas. The new requirements of EDMA will place a new and significant workload on local authorities, but regional districts will be particularly challenged. Funding proposed changes and required staffing increases will result in a negative if not unsustainable taxation impact for regional district residents.

The differences between the legislated authority of regional districts and municipalities was acknowledged by the Province in 2004 when many of the powers of municipalities were removed from the *Local Government Act* and incorporated into the *Community Charter*. At this time we respectfully request that the Province consider a similar approach through the creation of two local authority regulations under the *Emergency and Disaster Management Act*; one for regional districts and one for municipalities.

Staff from the TNRD will be providing a written submission with further details of our concerns regarding the new regulations to the [modernizeEM@gov.bc.ca](mailto:modernizeEM@gov.bc.ca) email account before the January 31, 2024 deadline

Yours truly,



Barbara Roden, Chair  
Thompson-Nicola Regional District

pc: All Regional Districts in BC