

January 30, 2024

File 7130-01

Premier David Eby and The Honourable Bowinn Ma  
Ministry of Emergency Management and Climate Readiness  
Parliament Buildings  
Victoria, BC V8V 1X4  
Via email: [premier@gov.bc.ca](mailto:premier@gov.bc.ca) | [EMCR.Minister@gov.bc.ca](mailto:EMCR.Minister@gov.bc.ca)

Dear Premier Eby and Minister Ma:

**RE: Emergency Management Act and Regulatory Discussion Papers**

Congratulations receiving royal assent on the Emergency and Disaster Management Act (EDMA). FVRD agrees that the Emergency Program Act required updating and we commend the commitment of the Province to reduce disaster risk and incorporate climate change considerations into the Act.

The province is seeking public input on two upcoming regulations related to the EDMA. The Act and regulations will have a big impact on our day-to-day operations, budgets, work plans and the expectations of our residents. It is important that we have a commensurate opportunity for meaningful input into the regulations. Respectfully, our input into the development of the Act appears not to be adequately addressed and, as a result, the realities of emergency management in regional district electoral areas are not adequately considered, nor do we understand how to apply the requirements to services we provide to municipalities and critical infrastructure we own/operate beyond the electoral areas. The new Act appears tailored to municipalities. We are looking for a more robust opportunity to work with the Province on the development of regulations.

Regional districts administer unincorporated (electoral area) lands outside municipalities and First Nations lands. We provide emergency management services in an exceptionally challenging landscape. Our eight electoral areas cover over 12,000 square kilometers with major floodplains (Fraser, Harrison), high-energy rivers (Chilliwack, Coquihalla, Nahatlatch), innumerable streams, valley slopes, and critical utility/transportation corridors. Our communities are distributed along valley bottoms with large distances between them that often rely on a single route for access and egress. These landscape features bring many unmitigated hazards with high risks – landslide, flooding, erosion, debris flows, rock avalanche, snow avalanche, wildfire, highway closure, train derailment, and others. We have experienced events with multiple concurrent and cascading hazards.

Overlapping jurisdictional authorities are a defining feature of emergency management in electoral areas. Hazards often originate from Crown lands and are influenced by resource activities that we have no control over and no ability to mitigate. Roads, forests, and Crown slopes/streams – which we do not have jurisdiction over - are associated with most of our emergency events. In addition, we share our landscape with 30 First Nations with 146 reserves and First Nations that own fee-simple lands adjacent to reserve lands in the electoral areas. Critical Fraser River dike infrastructure is administered by autonomous Improvement Districts registered with Letters Patent via Municipal Affairs. As a result, all phases of emergency management require extensive coordination and communication which requires significant time and resources.

These challenges are exacerbated by limited first responder services to rural areas and modest community infrastructure. Electoral area communities experience long wait times for RCMP and ambulance services. Local fire departments are volunteer-based and do not serve all parts of the electoral areas. We have large areas without adequate internet and cellular services and, we have no public works crews or heavy equipment so all physical response works rely on contractors or other authorities.

We rely extensively on a small property tax base (represented by less than 12,000 people and about 6,400 homes according to the 2021 Census) to provide emergency management services in this exceptional context. This is a very limited tax base to draw upon to contend with a vast landscape with high risks, many hazards, and pervasive jurisdictional complexity beyond our authority.

We do an admirable job despite these challenges. We have been rebuilding our emergency management program to respond to our environment, allocate our resources in the most effective way, and focus on the EM activities that most benefit our residents. Unfortunately, we do not see this reality reflected in the EDMA.

We are still working to understand the proposed Act and regulations and we have some serious initial concerns. The Act seems to:

- expand requirements for plans, process, and policies rather than capacity development;
- increase FVRD's responsibility for planning and emergencies on Crown land with no ability to collect revenues from those lands or ability to mitigate the considerable risks associated with these lands to support these expectations;
- impose statutory and regulatory requirements which expand legal responsibilities for local government emergency programs and increase exposure to liability and risk; and,
- foster greater expectations on the part of residents and other organizations without adequate resources to address the expectations;
- fundamentally lack understanding of the Regional District governance model and Service Establishment legislation and requirements under the Local Government Act and Community Charter.

We are concerned that new requirements will be unachievable and unfundable. We ask that the Province provide meaningful opportunities for FVRD and other regional districts to provide input on the proposed act and regulations. And we ask that the Province respond directly to our input. Other regional districts have made similar requests. We join them in asking you for the creation of a Regional District disaster & emergency management working group. This collaborative effort will enable us to work together with the Ministry, ensuring that the regulations adequately addresses the unique challenges of disaster and emergency management in rural areas.

FVRD is committed to collaborating positively and productively with the Province to advance the modernization of BC's emergency management legislation. I'd be pleased to bring my team to Victoria or to host your team at FVRD to discuss this further.

Yours truly,



Jason Lum  
Chair, FVRD Board

cc:

- » Hon. Anne Kang, Minister of Municipal Affairs
- » Tara Richards, Deputy Minister, Emergency Management and Climate Readiness
- » Trish Mandewo, President, Union of BC Municipalities
- » All 27 Regional Districts