

January 24, 2020

File Ref: 7130-02

Attn: Citizen Engagement  
PO Box 9484 Stn Prov Govt  
Victoria, BC V8W 9W6

Lori Halls  
Deputy Minister, Emergency Management BC  
PO BOX 9850 Stn Prov Govt  
Victoria, BC V8W 9T5

Thank you for the opportunity to provide feedback to the proposed modernization of emergency management legislation. The City understands the Province's desire to shift emergency management from response to mitigation and better preparedness, and also the ultimate cost effectiveness of such an approach. Minimizing risk is cost effective in the long run.

Local authorities will require significant resources, support and time to shift the approach. Moving forward, mandating greater consideration of current and future risk when considering development in hazardous areas does not pose a significant issue. Stronger legislation to enable local authorities to say "no" would be helpful in this regard, as there is a real cost to mitigating against potential risks.

Proposed legislated and regulatory requirements of local authorities include the need to identify and assess hazards, risks and vulnerabilities, establish associated mitigation plans, develop response and recovery plans, develop business continuity plans, and undertake training and exercises and a review cycle. While much of this work is being undertaken for priority risks in our communities, there are no dedicated staff for this and funding comes from very tight municipal budgets over time. Additional staff resources and funding are required in order to move this issue forward in a timely fashion.

Recovery to reduce future risk and enhance resilience is everybody's goal, but local authorities have faced significant challenges with this in practice. The Province's desire to see "building back faster and better" is admirable, but a lofty goal from the perspective of local authorities. With minimal staff complements and bare bones budgets, many communities have neither the capacity nor funding to "build back faster and better" on a schedule dictated by disasters. Significant provincial support is required to realize this objective, including revisiting funding restrictions to restoration only to pre-disaster conditions and the eighty percent ceiling for approved recovery costs.

Additionally, it is concerning to read that the Province is considering requiring post-disaster needs assessments and post-disaster recovery plans as a condition of receiving provincial recovery funds and the renewal of recovery powers. Considerable time is going to be required for local authorities to build this capacity in their organizations. Provincial funding and training to help create and enable this function is desirable. As is a transition time to the implementation of the new legislation. If it comes into effect in 2021 as has been indicated, will post-disaster needs assessments and recovery plans be required to access recovery funding if there is significant flooding in the spring?



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The proposed requirements to consult with local First Nations and expansion of the definition of “emergency” to include actions to protect community well-being and indigenous cultural sites requires additional information in order for us to fully understand the implications.

The vast majority of our community is already constructed and wasn’t built recently. It will take a long time to adapt development designed for a different climate to address rapidly changing local conditions. Local authorities’ capacity to affect adaptation of privately held developed lands is limited. Finger pointing at local authorities with blame for enabling the development challenges of our times isn’t the answer. Nor is it necessarily correct, given the evolution of local development authority in BC.

A comprehensive and sustained provincial public awareness campaign would greatly assist the transition to an “all of society approach” to emergency management.

Yours truly,



Will Pearce, CAO

Cc: Mayor and Council  
UBCM Members

