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Ministry of Environment and Climate Change Strategy  
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**RE: Watershed Security Strategy and Fund**

Dear Minister Heyman,

Thank you for inviting the Sunshine Coast Conservation Association (SCCA) to comment The BC Watershed Security Strategy and Fund. We are thrilled that the BC Government is moving forward on its commitment to establish both the strategy and the funding required to implement it. We thank you for emphasizing so clearly the severity of risks and need for urgent action on climate and watershed security in your opening message at the announcement of the Strategy and Fund and in the Watershed Security Strategy and Fund Discussion Paper's introduction.

Watershed Security is top of mind our communities grapple with fires, floods, and droughts and we would like to be engaged and consulted on the development and delivery of the Strategy and Fund at every opportunity. Strengthening Watershed Security is essential and integral to addressing economic, public health, climate, biodiversity, wild salmon, and reconciliation priorities.

*Background and History of SCCA Watershed Conservation Efforts*

The Sunshine Coast Conservation Association (SCCA) is BC non-profit Society and a federal charity established in 1997. Our mission is to protect the biodiversity of the Sunshine Coast region for the benefit of humanity and all life. Our area of interest includes over 2 million hectares in the Sunshine Coast Natural Resource District (SCNRD), the territories of the Sk̓wx̓wú7mesh, shíshálh, Tla'amin, Klahoose and Homalko First Nations. We pursue our mission through research, mapping, scientific, legal, and strategic analysis, strategic campaign development and implementation, alliance and capacity building, education, and outreach and government relations. We engage First Nations, all levels of government, NGOs, industry, and the public, and utilize a variety of legislative tools to achieve our goals. We are a unifying voice for conservation and watershed protection on the Coast.

The SCCA has a long record of bringing innovative strategies, scientific, legal and policy advice to the watershed governance conversation.<sup>i</sup> Our organization originated from the successful campaign to protect the head waters of the Chapman Creek Watershed within the Tetrahedron Provincial Park in 1997. Since then, we've worked consistently to protect the public's right to control activity in our watersheds and manage them strictly for the purpose of providing safe, clean drinking water.

For twenty years the biggest threat to our watersheds was logging and mining, now we also have urgent climate change impacts to contend with. For generations forestry was a cornerstone of our provincial and regional economy but chronic mismanagement of our forest resources over the last 150 years<sup>ii</sup> has left us with a dwindling resource.<sup>iii</sup> Forestry used to account for up to 150,000 jobs and generate billions for the BC economy. Now, the sector costs an average of \$365 million per year and accounts for only 2% of BC jobs.<sup>iv</sup> BC forests, once crucial for renewable carbon sequestration, have now become our single largest carbon emitter.<sup>v</sup> All of this is a direct consequence of overlogging our forests to the point that new stands can't regenerate fast enough to sequester carbon and provide a sustainable supply.<sup>vi</sup>

In the SCNRD mismanagement of the Crown Forest land base has led to a chronically depleted Timber Supply. Nearly all the forest on the Sunshine Coast (outside parks and protected areas) is younger forest, vii 60% of the Timber Supply is under 100 years old and the minimum harvest age in the SCNRD is 40 years. What's left of the Old Growth is primarily in the Mountain Hemlock Zone, a BEC zone which is extremely vulnerable to logging and critically important for carbon storage in fibre and soils<sup>viii</sup>.

A defining moment for the SCCA was in the summer of 2007. Logging in the Chapman Watershed sparked a public uproar, with residents blockading logging roads and staging large demonstrations. In response, the SCCA initiated a citizen's public health complaint, which led to a series of ground-breaking legal actions – in partnership with the Sunshine Coast Regional District (SCRD) and West Coast Environmental Law (WCEL). Subsequently, we undertook research and mapping, developed, and submitted 17 nominations to the Province (2012) for Fisheries Sensitive Watersheds (FSW). The FSW designation was created through the Forest and Range Practices Act (FRPA) to ensure that forestry activities don't compromise fisheries values in major fish-bearing watersheds. The FSW designation mandates consideration of the cumulative hydrological impacts of forestry and it results in changes to the pace of logging so that logging does not destabilize fish bearing streams. The designation itself won't restore the fisheries, but it's a necessary step toward ecologically responsible management and incremental recovery of populations. Unfortunately, government has never designated any FSWs in the greater Sunshine Coast region.

Ten years ago, the long predicted and ominous threat of climate change impacts became increasingly apparent in Sunshine Coast Watersheds as we began experiencing prolonged droughts in the summer months, which affected water levels in Chapman Lake. By 2015, a looming "water deficit" had reared its head as the SCRD enforced Coast wide emergency water restrictions for nearly six weeks. Throughout this period, SCCA supported the SCRD to engage the public around water conservation and pressed them to focus on investigation of groundwater options to diversify supply, which it initiated in earnest in 2016.

In 2017 and 2019 we reached Stage 4 drought levels in the SCRD and in September 2021, on the verge of Stage 5, the SCRD and Town of Gibsons struck a deal to share water from the Town's supply, Gibsons Aquifer. Throughout these years, we have worked to support the SCRD's groundwater efforts, inform and engage the public, share strategic ideas, fill research and capacity gaps, help breakdown silos between levels of government to support watershed protection. Currently, we are collaborating with the SCRD to determine stop gap measures for protection of critical of source areas, as we collectively explore effective long-term measures to preserve our critical watersheds for multiple values.

The forested ecosystem on the southeast slopes of Mount Elphinstone in the West Howe Sound Watershed is the main Recharge Area for two prolific drinking water aquifers (552<sup>x</sup> and 560<sup>x</sup>). These aquifers yield large volumes of high-quality potable water that will make up more than half of the SCRD's anticipated water deficit for the next 50 years. The Recharge Area plays an integral role in moderating these aquifer systems by providing landcover which absorbs and releases water, slowing the release of snow melt, supporting soil structure and slope stability, mitigating against both drought and floods. Removal of the forest cover by clear cut logging in the Aquifer Recharge Area could dramatically disrupt the recharge process, result in less water entering the system, increase erosion, turbidity, slope instability and landslides. Meanwhile, we continue to fight against the threat of the sale and logging of proposed cut block by BCTS in the Gibsons/SCRD Aquifer Recharge Area.

**In our opinion, a provincial Watershed Security Strategy, accompanied by action and funding will serve as powerful and useful tool to help guide implementation, government priorities, and cross-government coordination in our region and throughout BC. Early action and funding through development of the Strategy is imperative to help avoid or reduce future costs, kick-start implementation, and strengthen public confidence. It's our hope that the Strategy and Fund will provide support and capacity to help us move this work forward.**

## QUESTIONS/ANSWERS

### Definition of Watershed Security

We agree with the Province's definition of Watershed Security, with some additions. We believe that Watershed Security implies the availability of good quality water for healthy ecosystems and communities including, safe drinking water for all, healthy and resilient aquatic, riparian, wetland, and whole watershed ecosystems; sufficient water to support food security, fisheries, recreation and tourism, sustainable jobs and economies and biodiversity preservation; sufficient water for First Nations and sustainable stewardship of traditional values and resources; natural asset management and reduced risks and liabilities from increasing water related hazards such as flooding and drought. A fundamental concept we want the government to consider is to "make room for water." In wetlands, riparian areas, aquifers, coastline foreshore areas. Be real about how much room water takes up, and how much geography needs to be maintained for water to manage for the values we want to ensure.

### Enable watershed governance, advance reconciliation, protect provincial, regional, FN and local

The Watershed Security Fund is a significant standalone priority. Communities and First Nations in BC don't have sufficient capacity or funding resources to respond to increasing watershed insecurity in our regions. The work we do on the ground is core to achieving the goals of the strategy. The work we do will increasingly become a huge part of the new green economy of the future as we deal with increasing impacts on our natural systems caused by the climate and biodiversity crises. Funding for this work must be initiated ASAP to ensure we the necessary resources to build resilience and respond to local challenges.

### Collecting and sharing data, watershed analysis/characterizations

To be more successful in accessing, collecting and share water data, we need funding, shared platforms, collaboration with and support from provincial government staff. Our organization does do watershed characterizations/analysis to help understand the status, drivers, and stressors in our watersheds including use pressures, climate impacts, status of fish and aquatic health, cumulative effects, cost benefit analysis. However limited organizational capacity, funding and support prevents us from doing as much as is needed to characterize the status and risks to water in our local watersheds.

### Principles to underlie source water protection and how to work together better

Fundamentally, we need a holistic approach. Stop managing for resource extraction values as a priority above all others. Make room for water. Include all stakeholders. Engage us at the watershed scale. Fund us to do the work we are already doing. See and treat us as partners. Work with us to assess and prioritize opportunities to support regional groups. Create Regional Watershed Management Round Tables. Provide funding for data collection, mapping, modeling, and cost benefit analysis to evaluate management of natural assets in relation to the protection of drinking water sources.

We value our watershed for ALL the values they provide including water for drinking, water for aquatic species, water for recreation, water for business, wild food harvesting. All these values are threatened by development and resource extraction in all of our watersheds. Supporting legal tools to protect the watersheds like the WSA and providing funding through the Watershed Strategy would help us solve these problems. Communicating information about WSA tools with us in all the forms suggested in the paper would help. We must consider water first in all land use planning and #makespaceforwater.

### Resetting the supply/demand relationship

Water conservation is all about education, monitoring, and enforcement. Provide local governments and NGOs funding to do more outreach and education, monitoring, and enforcement on the ground.

Support the restoration, rehabilitation and improvement of water and aquatic habitats

Create a branch of the new ministry whose job it is to collaborate with local, regional groups already working on projects, and support them to access funding and build capacity.

Indigenous-led efforts

Require inclusion of Indigenous Knowledge Keepers and Indigenous Knowledge in water management decisions at every level. Full stop. Fund First Nations, NGOs, and local governments to ensure requirements are met.

Prioritize investments in Watershed Security

1. Resource and implement a coherent and integrated provincial planning regime for land and water that is consistent with UNDRIP and DRIPA. 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. A coherent provincial land and water use planning regime is urgently needed – this must include deployment of new planning tools and mechanisms to deal with cumulative impacts.
2. Fulfill drinking water source protection recommendations from the Auditor General (2019) and Hullcar Aquifer Review (2017) independent reports. These reports offer a comprehensive blueprint on how government can better ensure safe drinking water across B.C. and build public confidence through oversight and accountability.
3. Initiate the Watershed Security Fund immediately. The Fund unlocks the local capacity to partner and drive implementation. This collaborative approach will be key to success and is a point of positive emphasis in the Discussion Paper, but without new resources is unlikely to be meaningfully achieved.
4. Emphasize “build/restore back better” in disaster response efforts. The more cost-effective and robust climate security and resilience options are nature-based solutions.<sup>15</sup> This immediate linkage (in response for example to the November 2021 flooding emergencies) is one of many points of connection and synergy with the Climate Preparedness and Adaptation Strategy that must be elevated.
5. Provide State of the Watershed reporting that draws on collaborative monitoring with communities and Indigenous nations to ensure that baseline information and trends can be tracked, creating a system of evidence- and knowledge-informed decision-making that maximizes the impact of both funds spent and actions by government and communities.

Thank you again for the opportunity to comment on the BC Watershed Security Strategy and Fund, we look forward to further engagement and announcements on this important initiative of the BC Government.

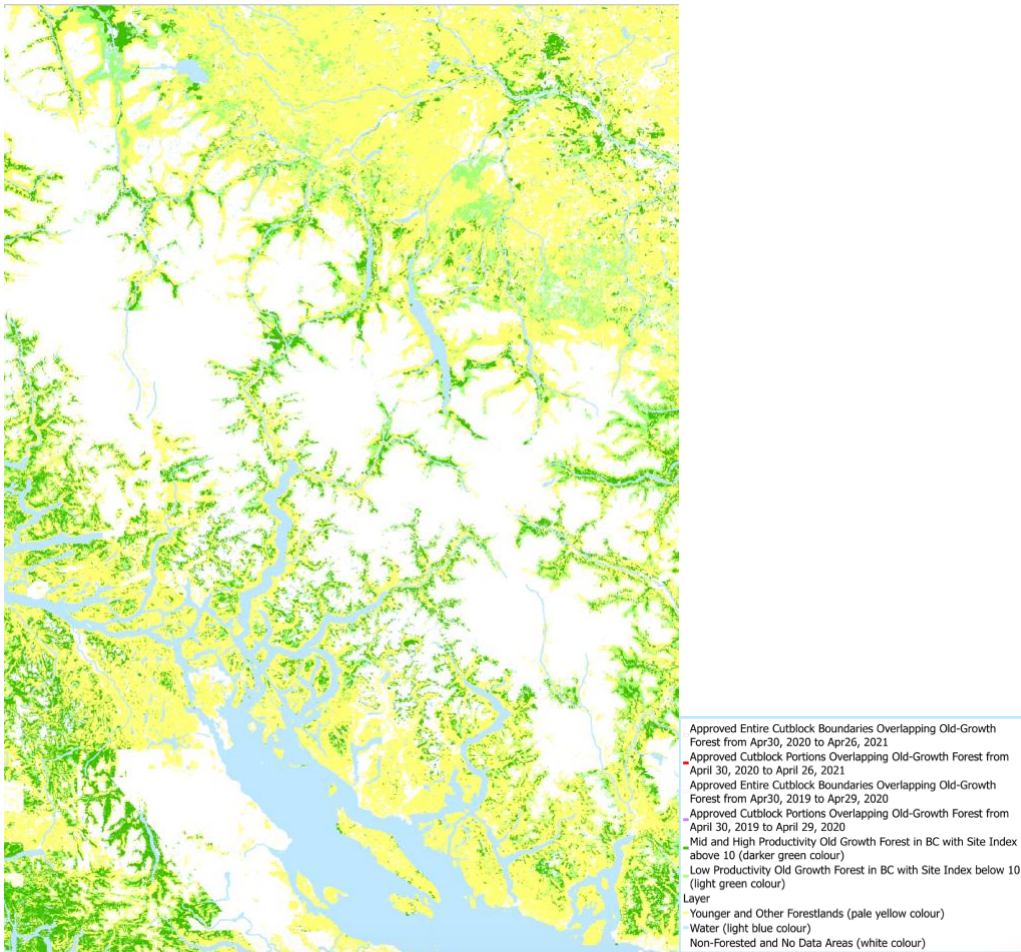
Kind Regards,  
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- <sup>i</sup> [https://thescca.ca/index.php?option=com\\_content&view=article&id=70&Itemid=108](https://thescca.ca/index.php?option=com_content&view=article&id=70&Itemid=108)
- <sup>ii</sup> <https://drive.google.com/file/d/1TZKQdh8N0emeCWBsR0wb1LNfos-APIJ/view?usp=sharing>
- <sup>iii</sup> <https://globalnews.ca/news/7354867/bc-forestry-watchdog-forest-regeneration/>
- <sup>iv</sup> [https://www2.gov.bc.ca/assets/gov/data/statistics/employment-labour-market/lfs\\_employment\\_by\\_industry.xls](https://www2.gov.bc.ca/assets/gov/data/statistics/employment-labour-market/lfs_employment_by_industry.xls)
- <sup>v</sup> [https://www2.gov.bc.ca/assets/gov/environment/climate-change/data/provincialinventory/2018/bc\\_provincial\\_ghg\\_inventory\\_1990-2018.xlsx](https://www2.gov.bc.ca/assets/gov/environment/climate-change/data/provincialinventory/2018/bc_provincial_ghg_inventory_1990-2018.xlsx)
- <sup>vi</sup> <https://sierraclub.bc.ca/7-myths-about-forests-carbon-and-climate-change/>



- <sup>viii</sup> Silvicultural Analysis of the Subalpine Mountain Hemlock Forest (1992) by K. Klinka, R.E. Carter, G.F. Weetman, and M. Jull
- <sup>ix</sup> <https://apps.nrs.gov.bc.ca/gwells/aquifers/552>
- <sup>x</sup> <https://apps.nrs.gov.bc.ca/gwells/aquifers/560>