

Making a Collective Splash

Context and Guidance for Watershed Security Strategy Submissions to Government¹

by Oliver M. Brandes, Rosie Simms Jon O’Riordan,² POLIS Water Sustainability Project
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Getting to the Point

Messages to Emphasize to Government

1 Watershed Security is front of mind as communities grapple with catastrophic fires, floods, and droughts. Strengthening Watershed Security is fundamental and integral to economic, public health, climate, biodiversity and wild salmon, and reconciliation priorities.

2 A provincial Watershed Security Strategy, accompanied by action, is a powerful and useful step to guide implementation, government priorities, and cross-government coordination. Early action is necessary alongside Strategy development to help avoid or reduce future costs, kick-start implementation, and strengthen public confidence. We support the emphasis in Minister Heyman’s opening message and in the Discussion Paper’s introduction on the severity of risks and need for urgent action on climate and watershed security.

3 Although often linked with the prospective Watershed Security Strategy, a Watershed Security Fund is a significant standalone priority.⁵ Communities and Indigenous nations across the province do not have sufficient resources to respond to increasing watershed insecurity in their regions. Funding must be initiated in 2022 in advance of formal Fund establishment in 2023 to ensure communities and Indigenous partners have the necessary resources to build resilience and respond to local challenges.

Document Overview

Who is it for?

This is a resource for water champions, community leaders, other levels of government, and organizations focused on water and healthy watersheds. It is intended as guidance to inform submissions and responses to the provincial government’s recently released Watershed Security Strategy Discussion Paper.³

What does it do?

This document provides initial analysis of the Provincial Discussion Paper and offers insight and summary of key points. It is organized so that groups and water leaders can easily access content and adapt the material to enhance their own understanding and inform their submissions to government as part of the public engagement process.⁴

Why now?

We encourage broad engagement and comment on the provincial Discussion Paper as a pathway to collectively influence the future direction for watershed security and water management, policy, law, and governance in B.C.

How is it organized?

- At a Glance Summary of Provincial Discussion Paper
- Why Responding Matters
- Key Messages to Consider in Submissions
 1. *Prioritize “no regrets” action*
 2. *The Discussion Paper’s Outcomes and Opportunities are generally positive but require focus*
 3. *Watershed security needs to be better integrated with other priorities*
- Conclusion and Next Steps

Read the B.C. Government’s *Watershed Security and Fund Discussion Paper* at

https://engage.gov.bc.ca/app/uploads/sites/722/2022/01/Watershed_Security_Strategy_Discussion_Paper_Jan_19_2022.pdf



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At a Glance Summary of Provincial Discussion Paper

Strengths

- The prospective Watershed Security Strategy is useful to help government organize itself, secure internal priorities and resources, and drive a cohesive cross-ministerial (pan-government) approach to watershed security.
- Overall, we agree that the “Outcomes” identified in the Discussion Paper are good, despite being high-level at this stage. We support a significant positive emphasis on place-based planning and governance across the themes.
- The Discussion Paper profiles powerful examples of effective local water governance initiatives. These place-based examples provide direction and offer a viable starting point for many other regions, and are exactly the types of initiatives that the Strategy must accelerate and advance in a comprehensive approach to watershed security.
- The Discussion Paper supports government’s commitment to reconciliation and the implementation of the United Nations Declaration on the Rights of Indigenous People (UNDRIP) and B.C.’s *Declaration on the Rights of Indigenous Peoples Act* (DRIPA) by better acknowledging Indigenous nations’ authority, laws, and knowledge systems and by emphasizing the need for new relationships and governance approaches, including a collaborative approach to engagement in Strategy development.

Weaknesses and Areas of Focus

- The Discussion Paper lacks specifics on timelines and implementation. Accelerating implementation is especially critical for flood and drought risk management, climate adaptation, reconciliation, safe drinking water protection, groundwater licensing, wild salmon and environmental flows, and critical funds and resources to support ongoing local action and success. Communities need action now—delays without clear progress erode public confidence.
- Many priority actions have already been clearly identified and should simply be implemented, including Water Sustainability Act tool implementation, accelerating water as a point of emphasis in modernized land use pilots, review of water rentals, State of Watershed reporting, and improved accountability for drinking water source protection.
- A Watershed Security Fund is currently listed last of the ten Outcomes. We emphasize the Fund as fundamental to success on any level and for the Fund to be accelerated in the budgeting cycle. The Discussion Paper’s positive emphasis on partnerships falls flat unless resources flow to Indigenous nations, local governments, and communities to be meaningful partners on Strategy implementation, action, and follow-through.⁶
- The Strategy is positioned primarily as a Ministry of Environment and Climate Change Strategy priority, when water is fundamentally a cross-cutting concern with implications for economic recovery, land and resource planning, fisheries and food security, Indigenous relations, safe drinking water, and public health—as well as being integral to other strategies currently in development (including wild salmon, coasts, and climate adaptation). The Premier’s Office needs to send a strong signal that water and watersheds are a top provincial priority.
- It is unclear how government will ensure the necessary capacity to deliver. We provide advice to help focus attention on critical policy elements, the stepwise progression to get the work done, and the critical funding and resources to help drive ultimate success.

Why Responding to Government Matters

Watershed security threats are front and centre for most British Columbians. The sense of urgency is rapidly mounting, especially after the past year of sustained emergencies: record drought, fire, floods, and mounting water quality challenges all in rapid succession.⁷ Even a cursory scan of daily headlines reveals a dire situation that is only getting worse.

Yet, this state of affairs does not have to define the future.

Water and watersheds are critical cross-cutting priorities that link all the current issues: security, prosperity, economic recovery, public health (including safe drinking water), wild salmon and biodiversity protection, climate adaptation and resilience, and reconciliation and social justice. We are at a threshold moment in which significant change has the potential to set us on a different trajectory.

Many organizations and individuals working on watershed sustainability have eagerly anticipated action to fulfill the important cross-ministerial mandates to “lead work to protect clean water, including through the creation of a Watershed Security Strategy and the associated Watershed Security Fund.”⁸ The provincial government’s Discussion Paper is one step of many actions that will be needed to realize this mandate.

In our view, coordinated and aligned responses from diverse water leaders at this early stage of engagement will only strengthen government policies and funding commitments and help provide accountability to advance the Watershed Security Strategy and Fund in 2022.

Supporting Government’s Mandate

The POLIS Water Sustainability Project supports government’s Watershed Security mandate and has consistently worked to elevate attention on watershed security, governance, policy, and law in relation to sustainability.

We have led or supported foundational work on the theme of watershed security and the B.C. Watershed Security Fund, including:

- *BC Watershed Security Fund: A Collaborative Vision* (Strategic Direction Paper from the Sustainable Funding Working Group, 2021)²⁰
- *Watershed Security Agenda for British Columbia* (2020)²¹
- *Towards Watershed Security: The role of water in modernized land use planning in B.C.* (2020)²²

Key Messages to Consider in Submissions

Key Message #1: Prioritize “no regrets” action.

Strategies such as the one proposed in the Discussion Paper have several useful functions: they can provide direction, coordinate government action, and give a clear signal of government priorities for Indigenous nations, federal and local governments, communities, businesses, and industry. We also appreciate that co-developing the Strategy and Fund with Indigenous nations will take time to ensure that a robust process is followed.

Nonetheless, preparing for the challenges ahead requires immediate action concurrent with such strategic planning efforts. Simply put, British Columbians cannot wait until 2023 for a Strategy without specific and dedicated action in the meantime.

We note that many recommendations and commitments have already been made over the last decade, consistent with Living Water Smart (the existing provincial water strategy).⁹ Many of those recommendations are more relevant today than ever, yet we see relatively little evidence of action or follow-through.¹⁰

We suggest that water leaders emphasize the following five “no regrets” actions in their submissions to government. Immediate action in these key areas will accelerate progress, reduce the inevitable future costs of implementation, and demonstrate tangible improvements in watershed security.¹¹

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,¹² 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)¹³ and Hullcar Aquifer Review (2017)¹⁴ 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 back better” in disaster response efforts.** The more cost-effective and robust climate security and resilience options are nature-based solutions.¹⁵ 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 (see Key Message #3, p.7).
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.

Fire, floods, drought, and related emergency planning are increasingly critical to Indigenous people as reserves are often along major water bodies and forestry interface areas, thus disproportionality impacting Indigenous people. This underscores the importance of building climate resilience as a reconciliation and social justice priority.

Getting It Done

How Government Should Ensure a Good Process and Impact

Watershed champions and leaders may also want to emphasize the following three process recommendations in their submissions to government. These actions will support effective Strategy and Fund completion, buy-in, and government capacity to execute.

1. **Co-develop the Watershed Security Strategy and Fund with Indigenous nations and prioritize the Fund** to ensure that resources are being channelled into local partnerships with Indigenous communities. A co-development approach will model effective collaboration, ensure that shared authority helps expand the range and creativity of actions and outcomes, and build deeper trust and support for ongoing implementation and collaborative action.
2. **Ensure adequate and ongoing funding is available to build on local planning, monitoring, and restoration efforts that are already underway** (many of which were accelerated and amplified through the successful Healthy Watersheds Initiative) as the longer-term Watershed Security Fund is established.²³
3. **Prioritize watershed planning and governance as core functions in the reorganization of the Ministry of Forests, Lands, Natural Resource Operations and Rural Development.** This eventual reorganization will help government deliver better integrated planning and management activities on the ground locally around watersheds in collaboration with Indigenous partners, local government, communities, and stakeholders.²⁴

Key Message #2: The Discussion Paper's many Outcomes and Opportunities are generally positive but require focus.

The Discussion Paper's comprehensive lists of "Outcomes" and "Opportunities" align well with priorities in current ministerial mandates and cross-government priorities. In particular, they reinforce core commitments made by this government around reconciliation, economic recovery, environmental stewardship, and climate response.

The ten Outcomes are certainly among the priorities needing attention, and are generally consistent with previous submissions and recommendations from POLIS, water leaders, and the various organizations working on water sustainability across the province.

We suggest that water leaders emphasize the following in their submissions to government. These must be areas of immediate focus for the provincial government (along with Indigenous partners in a collaborative partnership approach) as crucial to the development and launch of the Watershed Security Strategy and Fund.

1. **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.
2. 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.
3. Outcomes (4-6) touch on the **importance of critical tools under B.C.'s Water Sustainability Act (WSA) and other related resource legislation**, including efforts to address reallocation within existing legal frameworks, water objectives, and increasing participation in planning and managing water scarcity. These tools must rapidly move from concept to action. We also emphasize the need for a more substantive WSA legislative update to not only align with UNDRIP and DRIPA, but specifically to also modernize the current outdated and ineffective water allocation system (FITFIR), among other identified necessary changes.¹⁶

Key Message #3: Watershed security needs to be better integrated with other priorities.

Beyond largely agreeing with the ten Outcomes and various Opportunities identified in the Discussion Paper, we also identify gaps that should be addressed in the next phase of work as government seeks Cabinet and budgetary approvals.

In submissions to government, we suggest that water leaders note the following three areas where deeper integration will drive success, and collectively emphasize the need for watershed security to be a priority from the Premier and across cabinet, as well as from the Minister of Environment and Climate Change Strategy, to advance watershed security in a cohesive and robust approach.

1. **Strengthen accountability and coordination.** Successful watershed security will require coordination not only between provincial ministries, but also across all four levels of government—Indigenous, local, provincial, and federal. The provincial government has many avenues to support integrated action, accountability, and coordination. Clarity regarding roles and responsibilities and the need for effective oversight is ultimately critical for success in such an integrated approach and has long been identified in various independent expert reviews and recommendations to government, including numerous investigations from the Auditor general.¹⁷ An explicit priority on effective oversight and accountability is fundamental to the long-term success of a Watershed Security Strategy and Fund (see Provincial Watershed Security Officer box, as one possible example).
2. **Prioritize watershed security in new forestry tools and the wild salmon strategy.** The importance of water in modernized land use planning is quickly emerging and increasingly well understood. In addition, several recent forestry reforms offer further building blocks for watershed security, including new forestry legislation (including Forest Landscape Planning), updated forest practices and management, and provincial priorities around old growth deferrals.¹⁸ The provincial government's approach in a Watershed Security Strategy should establish explicit linkages to these forestry initiatives.¹⁹

Provincial Watershed Security Officer

A Provincial Watershed Security Officer position is one possible innovative option that would provide a cross-government advocate. This champion and a supporting office, modeled on the role of the Provincial Health Officer, would be a new provincial position with explicit responsibilities to plan, implement, and oversee the watershed security regime and coordinate action while being responsive to public complaints and coordinate across levels of government. Such an officer would have the capacity and expertise to provide expert direction and lead investigations and reviews, all while raising the profile and importance of watershed security and ensuring that the public is kept informed and engaged.²⁵

Effective water management and watershed health and function are also well understood as essential for fisheries and wild salmon and their healthy habitat. Explicitly advancing this aspect of a Watershed Security Strategy and the emerging provincial salmon and coastal strategies offers further synergies and another meaningful opportunity to help drive an integrated and more sustainable approach to effectively managing and governing water and watersheds.

3. **Connect watershed security with climate.** Climate change and associated community insecurity is a critical driver of change, from households and neighbourhoods all the way through local government, Indigenous, provincial, and federal governments, and even internationally. A robust Watershed Security Strategy must have strong and explicit link to climate efforts and the necessary related provincial roles and responses (see Climate Actions Linked to Watershed Security box for a sample of specific climate-water actions).

Climate Actions Linked to Watershed Security

Flood risk management and response

- Update provincial flood maps.
- Ensure Climate Adaptation Strategy explicitly includes increased flood protection by addressing nature-based solutions (natural infrastructure) in addition to engineered or hardscape solutions.
- Sufficiently resource critical management and science institutions such as the River Forecast Centre.²⁶
- Provide better accounting for costs for reparation following flooding.

Drought risk management and response

- Update 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, such as critical flow protection, environmental flow provisions, or fish protection orders under the *Water Sustainability Act*.
- Improve streamflow monitoring and link more directly to the specific local responses (thereby promoting policy and legal tools to be deployed).

Conclusion and Next Steps

This response provides some context and creative ideas, and we hope it will support to the broader community to sustain momentum on a comprehensive approach to watershed security in B.C.

We encourage water leaders—professionals, communities, and groups concerned about water and watershed health and function—to comment on the provincial Discussion Paper and help set the future direction for policy, law, and governance. In particular, we encourage and emphasize the need for *action* alongside a strong co-development process for Watershed Security Strategy development with Indigenous nations.

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Endnotes

- 1 On January 25th, 2022, the B.C. Minister of Environment and Climate Change Strategy launched public engagement on the Watershed Security Strategy and Fund. See <https://news.gov.bc.ca/releases/2022ENV0007-000103>; Submissions can be made through the Engage BC website. See <https://engage.gov.bc.ca/watershedsecurity/process/>
- 2 The authors thank Caleigh Aalders for research and review; Laura Brandes for review, editing, and design; Deana Machin (POLIS advisor); and others who offered review comments.
- 3 British Columbia Ministry of Environment and Climate Change Strategy. (January 2022). *Watershed Security and Fund Discussion Paper*. https://engage.gov.bc.ca/app/uploads/sites/722/2022/01/Watershed_Security_Strategy_Discussion_Paper_Jan_19_2022.pdf
- 4 In addition, this document provides the foundation for the POLIS team as it develops its own detailed submissions and direction for engagement with provincial partners and influencers over the coming months and years as watershed security is advanced as a cross-cutting provincial imperative.
- 5 British Columbia Ministry of Environment and Climate Change Strategy. (2020). *George Heyman mandate letter*. https://www2.gov.bc.ca/assets/gov/government/ministries-organizations/premier-cabinet-mlas/minister-letter/heyman_mandate_2020.pdf;
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- Brandes, O.M. (2014). *Detailed Response from the POLIS Water Sustainability Project to the “Pricing B.C.’s Water” Discussion Paper*. Victoria, Canada: POLIS Project on Ecological Governance, University of Victoria. <https://poliswaterproject.org/polis-research-publication/polis-water-sustainability-act-submission-pricing-b-c-s-water-discussion-paper/>
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- 9 Government of British Columbia. (2008). *Living Water Smart: British Columbia’s Water Plan*. <https://www2.gov.bc.ca/gov/content/environment/air-land-water/water/water-planning-strategies/living-water-smart>
- 10 Simms, R., & Brandes, O.M. (2018). *Taking the Pulse: B.C. Freshwater Policy Monitor*. Victoria, Canada: POLIS Project on Ecological Governance, University of Victoria. <https://poliswaterproject.org/polis-research-publication/taking-the-pulse/>
- 11 This summary list is generated based on clearly identified priorities that also meet the test for immediate action:
- 1) Things that *accelerate* regional efforts/pilots to deliver success on initiatives underway.
 - 2) Dealing with acute conflicts/problems.
 - 3) Foundational work that will be required for (and support) any successful strategy as it rolls out three to four years from now.
- 12 This can most easily be initiated by ensuring full cross-ministry support of the current watershed and modernized land use pilots already underway—to not only address local hot spots and demonstrate solutions, but to help test and develop new co-governance models and existing watershed planning and security policy and legal tools.
- 13 Office of the Auditor General of British Columbia. (2019). *The Protection of Drinking Water: An Independent Audit Report*. https://www.bcauditor.com/sites/default/files/publications/reports/OAGBC_Protection-of-Drinking-Water_RPT.pdf

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For details on new Forest Landscape Planning see <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/forest-landscape-plans>;

For details on old growth deferrals see <https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/old-growth-forests/deferral-areas> and the detailed report <https://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/forestry/stewardship/old-growth-forests/strategic-review-20200430.pdf>

19 Significant concerns exist around privately managed forests in British Columbia and substantial reforms are still needed, especially in light of the impacts of poor private land forestry practices on water and watershed security in key places across B.C., including Vancouver Island. See for example <https://elc.uvic.ca/wordpress/wp-content/uploads/2019/08/Private-Managed-Forest-Land-Act-Reform.pdf>

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