



September 10, 2020

Emergency Management BC  
Attn: Citizen Engagement  
PO BOX 9484 Stn Prov Govt  
Victoria, B.C. V8W 9W6

[EmergencyProgramAct@gov.bc.ca](mailto:EmergencyProgramAct@gov.bc.ca)

**RE: Emergency Program Act Modernization**

To Whom It May Concern,

The Peace River Regional District (PRRD) respectfully submits the following feedback in response to the “What We Heard: Modernizing BC’s Emergency Management Legislation” report dated August 31, 2020.

In January 2020 the Peace River Regional District submitted comments in response to the discussion paper. While a number of the Board’s concerns appear to be addressed, or Emergency Management BC has identified them as needing further work to address them, there are some that were not. The Regional Board would like to reiterate its position with respect to the following and ask that they be considered as part of the new legislative framework.

**1) Changes to States of Local Emergencies**

The PRRD supports the concept proposed in the discussion paper whereby the duration of states of local emergencies (SOLE’s) would increase from 7 days to 14 days and provincial state of emergencies from 14 days to 28 days. Additionally, introducing a provision that would allow local authorities to utilize one or more of the extraordinary powers when transitioning to recovery and without the use of a SOLE, would reduce the administrative burden associated with response and recovery.

The “What We Heard” report notes that this proposal was generally supported by stakeholders and that the Province will be looking at adding additional extraordinary powers. The WWH report does not clearly identify whether extending SOLE’s to 14 days will move forward. The PRRD has been in a continuous SOLE with respect to Old Fort for almost 2 years. A 14 day renewal would assist in relieving some of the administrative burden of have to extend them every 7 days.

**2) Critical Infrastructure Operators**

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**PLEASE REPLY TO:**

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The discussion paper proposes that critical infrastructure (CI) operators be required to develop specific emergency management plans and to be inclusive of hazards created by CI. While this is a first step, it is also important for CI operators to educate the public and local authorities on the hazards that may be created through their infrastructure. Local authorities do not have the expertise to educate those that may be impacted as a result of a CI failure.

For instance, BC Hydro has constructed hydroelectric dams across BC and while they currently have emergency plans in place to respond to a failure, they do not educate the residents and businesses located within their inundation zones on the hazard and risks. Local governments do not have dam engineers that can speak to the possible causes of a dam failure, what might happen, the rate of release, etc. This information is best communicated by BC Hydro engineers to those who could be impacted. This approach is taken throughout northern BC with respect to oil and gas operators who are required by legislation to meet with anyone who could be potentially impacted by a failure in their infrastructure.

While the “What We Heard” report discusses ensuring there is not any duplication of requirements for CI operators to develop their plans, there is no discussion about their responsibility to inform the public of the hazards, risks and impacts as a result of their infrastructure.

Recommendation:

- 1) That the Province of BC require critical infrastructure operators, including Crown corporations, to educate the public on the hazards, risks and impacts that could occur should there be an infrastructure failure.

### **3) Financial Considerations**

The discussion paper notes that the “Province continues to work to improve its policies, procedures and administrative processes to ensure Local Authorities “are reimbursed for response and recovery costs.” While the PRRD supports this concept, the Province should also examine the expense authorization process that is utilized during response and recovery. Many local governments have voiced frustration with the process that requires emergency operations centres to receive pre-approval for expenses associated with response and recovery costs. Often approvals are delayed because they require multiple levels of approval from EMBC and can slow the ability of incident command and the EOC to respond.

As in previous responses, the 2020 Old Fort Landslide response was again slowed due to the multiple layers of approvals needed for expense authorizations. EMBC did, however, develop a “pilot” policy that outlined a funding envelop for services. This model assisted in providing approvals up to a certain threshold for “shelter in place” services such as water, sewer and garbage removal. Going forward a policy like this in future events could help to expedite the approval process to keep pace with the response.

Recommendation:

- 1) That the Province of BC examine the “expense authorization form” system utilized during emergency response and recovery to approve expenses, with particular attention being targeted at finding ways to speed up approval processes in order to keep pace with the emergency.

Should you have any questions regarding our feedback please feel free to contact Trish Morgan, General Manager of Community Services, at 250 784-3200 or [trish.morgan@prrd.bc.ca](mailto:trish.morgan@prrd.bc.ca).

Yours truly

Brad Sperling, Chair