

November 14, 2025

Heritage Conservation Act Transformation Project
Forest Resiliency and Archaeology Division
Deputy Minister's Office
Ministry of Forests
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Victoria, BC
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Sent via email to: engageHCA@gov.bc.ca

To whom it may concern:

RE: Local Government Feedback for the Heritage Conservation Act Transformation Project – Engagement Phase 3

The Fraser Valley Regional District (FVRD) supports efforts to modernize the Heritage Conservation Act (HCA) and embed reconciliation into legislation, and appreciate the opportunity to provide comments as the province moves forward with the Heritage Conservation Act Transformation Project (HCATP).

Consistent with the findings identified through the UBCM consultation, we also support the intent to streamline processes, reduce delays, and improve clarity on the processes related to heritage conservation. Recognizing the scope and intent of this initiative, the FVRD offers the following feedback. Key concerns relate to implementation, resourcing, and practical application at the local level.

1) Permit Timelines and Implementation Clarity

Current delays create significant cost and scheduling impacts for local governments, particularly in small rural areas with limited tax bases. In rural and regional contexts like the FVRD, reducing permit processing times is essential to maintain project delivery schedules and budgets, meet grant timelines, support economic stability, and respond quickly to community needs.

Clear guidance will be essential to ensure that local governments understand what is required of them to help protect heritage more effectively and how to apply any changes consistently in day-to-day work. With the legislative changes, we request that specific processes are developed that outline what steps are required of local governments prior to issuing development or building permits and what responsibilities fall to private property owners, clearly defining what responsibilities lie with local government versus the proponent. This will ensure consistent and efficient application of the legislation.

2) Data Access and Availability

Improved access to accurate archaeological data is critical. Current data systems are restricted and often inaccessible to local governments and private landowners. If legislative changes increase the responsibility of owners or local governments to identify heritage resources, improved mapping and data tools must be provided. Better data access will help meet expectations set out in the HCA.

3) Alignment with other local government and/or Provincial processes

Where alignment is proposed between the HCA, Site Disclosure Statements, and Development Permit Areas (DPAs), roles and responsibilities should be clearly defined:

- The Site Disclosure process is provincial; responsibility regarding heritage conservation should remain with the Province.
- In Regional Districts, DPAs are not universally applied. If alignment relies on DPAs, consideration should be given to property owners outside designated DPA areas, where no equivalent permitting framework exists.

4) Archaeological Capacity and Resource Limitations

There is concern over the limited availability of archaeological professionals and escalating pricing. In the FVRD, where development occurs within Stó:lō territory, referrals proceed through the People of the River Referral Office (PRRO). PRRO requires the sole use of the Heritage Stewardship and Archaeology Unit within the Stó:lō Research and Resource Management Centre (SRRMC) to complete Cultural Heritage Overview or Impact Assessments (CHOA/CHIA). While we respect and value the expertise and authority of SRRMC in cultural heritage protection, the Province must recognize the impact on capacity and cost of investigations. Any additional permitting requirements or expanded scope of review should be matched with increased investment in training, staffing, and shared resources.

5) Emergency and Disaster Management Integration

From an emergency management perspective, disaster-related prioritization under the HCA should align with the Emergency and Disaster Management Act (EDMA) framework. Specifically:

- The trigger to escalate HCA priorities in a disaster context should remain under the authority of the Ministry of Emergency Management and Climate Readiness (EMCR), using existing mechanisms such as a State of Local Emergency or Local Recovery Period.
- The Ministry responsible for the HCA should develop internal prioritization processes to ensure that disaster-related applications are processed distinctly from regular business.
- This approach ensures alignment with the Province's disaster recovery framework and maintains consistency with ongoing modernization of the EDMA.

- Disaster recovery must remain flexible. Event-specific recovery plans driven by impacts to critical infrastructure, key resources, incident complexity, impact to populations and local conditions should guide heritage permitting priorities rather than a single, uniform approach.
- The Ministry responsible for the HCA should also be familiar with EDMA-related Local Recovery Periods and the authorities available to local governments under these provisions to ensure harmonized intent and outcomes.

6) Regional District Governance

The FVRD wishes to highlight the structural and legislative differences between Regional Districts and municipalities. Regional Districts do not have broad, general authority. All functions must be established through specific service bylaws approved by participating areas and the Inspector of Municipalities. This framework limits the ability of Regional Districts to take on new regulatory responsibilities or absorb unfunded mandates. It is important that the province considers how any proposed changes to the Heritage Conservation Act will apply within the unique governance context of Regional Districts. Any new requirements under the HCA must reflect this governance structure and be supported by appropriate funding mechanisms.

Thank you for the opportunity to provide these comments. We look forward to further engagement as the Province advances this important work.

Sincerely,

Melissa Geddert
Manager of Integrated Planning and Engagement