

Hon. Minister Randene Neill, MLA Powell River-Sunshine Coast  
Ministry of Water, Land, and Resource Stewardship

February 25th, 2025

## Policy Brief – Supporting freshwater salmon habitat under the Water Sustainability Act

Raincoast Conservation Foundation is a team of conservationists and scientists empowered by research to protect the lands, waters, and wildlife of coastal British Columbia. As a charitable, non-profit conservation organization that operates a research lab at the University of Victoria, a land trust, a conservation genetics lab at the Pacific Science Enterprise Centre, and a research/sailing vessel, we are unique in Canada.

### **Wild salmon are foundational**

Wild salmon are the foundation of ecosystems and communities across British Columbia, and yet their habitats continue to be threatened, degraded, or destroyed by human activity. As a new legislative session gets underway, we urge the Minister to further implement the Water Sustainability Act to reduce the adverse effects of land use on salmon habitat.

Here, we outline recommendations that the Minister can take to **1) advance conservation measures, 2) support local economies, and 3) work collaboratively with First Nations to protect and restore critical salmon spawning habitats.**

### **Water Sustainability Act**

#### **1. Reform existing regulatory tools in the Water Sustainability Act (WSA) to address impacts of drought on salmon habitat now and into the future.**

Droughts are becoming more frequent and intense with the onset of climate change, and their impacts harm both adult and juvenile salmon.

#### **Recommendation**

The Ministry of Water, Land, and Resource Stewardship (WLRS) should work to acknowledge the disproportionate impacts that water use regulations have on smaller farmers and ranchers. We recommend WLRS overhaul Section 22, precedence of rights (First in Time, First in Right), which gives larger, older, and often corporate water users priority to use their entire water allocation during drought. A more equitable approach would be to focus restrictions first on larger users, giving smaller, often independent users time to prepare while protecting water flows for at-risk salmon populations.

#### **2. Use the sensitive stream designation to prioritize high-risk watersheds.**

The Sensitive Stream Designation is a tool that highlights streams that are highly vulnerable to human impacts and/or have threatened or endangered fish populations. The designation places enhanced

regulatory measures and restrictions on water use for the stream. However, the list of streams currently designated as a Sensitive Stream has not been updated since 1992. Since then, climate change, land use, and a host of other impacts have profoundly altered many streams that are not listed as sensitive.

### **Recommendation**

WLRS should utilize existing databases, such as the Pacific Salmon Foundation's [Pacific Salmon Explorer](#), to identify watersheds and streams where at-risk salmon populations occur to update the Sensitive Stream Designation list. Salmon life history strategies should also be considered; streams that support populations that require year-round freshwater habitat such as steelhead, stream-type<sup>1</sup> Chinook, and coho salmon should be given priority in the Sensitive Stream listing process, due to the increased vulnerability of these populations to low summer flows and high temperatures.

The Ministry could also work with Indigenous communities to perform a new risk assessment on streams throughout the province to determine if new streams should be added to the designation and receive greater protection.

### **3. Incorporate water temperature data and monitoring into decision-making.**

In addition to streamflow, water temperature is a critical feature that dictates the behaviour, growth, reproduction, and survival of fish. Yet, the WSA does not contain measures that allow water temperature to be incorporated in decision-making. Additionally, there are large gaps in water temperature monitoring throughout the province.

### **Recommendation**

WLRS should fund, install, and maintain an improved network of water temperature monitoring stations and create provisions within the Water Sustainability Act that allow the data to inform decision-making.

### **4. Increase funding for Indigenous Guardian programs.**

Indigenous Guardian programs are the “eyes and ears” of many watersheds across BC and are vital to research, monitoring, and habitat restoration projects.

### **Recommendation**

In the pursuit of its mandated alignment of provincial policy with the United Nations Declaration on the Rights of Indigenous Peoples, WLRS should increase funding to Indigenous Guardian programs, so that they can continue to provide important employment for Indigenous communities in a way that supports Rights and Title to their lands.

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<sup>1</sup>Stream-type Chinook salmon spend at least one year rearing in freshwater habitats as juveniles before migrating to the ocean. Adult salmon return to their natal rivers to spawn in the spring and summer months which can expose them to low summer flows and high temperatures. Land use activities like water extraction and logging exacerbate these conditions. Most stream-type populations in BC are at-risk, with many listed as threatened or endangered under COSEWIC.