



Council of BC Yacht Clubs



Advocating for Recreational Boaters

Concerns about the proposed amendments to the Pender Harbour Dock Management Plan

The Council of BC Yacht Clubs (CBCYC) represents 15,000 BC recreational boaters that are members of the 44 yacht clubs and boating organizations belonging to the CBCYC. CBCYC has recently become aware of the initiative to amend the *Pender Harbour Dock Management Plan* (the “Plan”). CBCYC has several concerns about the proposed amendments to the Plan and their impact on member organizations with facilities in Pender Harbour. Furthermore, we understand that the proposed regulations build off regulations from other jurisdictions (e.g. Burrard Inlet) and are very likely a harbinger of a regulatory framework that is destined to cover all of coastal BC, and our lakes. Of major concern is the lack of proper consultation and assessment of the potentially, far-reaching impacts of the policy changes on the BC recreational boating community that would limit access to recreational boating opportunities and have significant economic impact.

Several CBCYC representatives attended the recent meeting between the Province and the Sunshine Coast Regional District either in person or via Zoom. The following is just a summary of some of the concerns the CBCYC has as a result of the meeting:

- Lack of grandfathering of existing docks and boathouses during the renewal of tenures with proposed regulatory changes that will result in exorbitant rebuilding costs. This coupled with the costs of environmental and archeological assessments, the drafting and implementation of management plans, annual assessments and reporting that for some will amount to expropriation without compensation.
- An apparent willingness by the Province to proceed with regulations that are suspected to create economic hardship without a proper economic impact assessment on existing tenure holders and the local economy.
- The anticipated need to manage the disposal of “non-compliant” docks that is expected to have a similar impact on the environment as is currently experienced from derelict vessels.
- The imposition of engineering requirements to ramps and docks that may impact on safety to dock users while failing to recognize the growing recreational demands for moorage particularly for boats greater than 30’ in length.
- The apparent lack of fully reviewed and balanced scientific support for the proposed Plan changes. The engineering report prepared by McElhaney engineers proposes biological methodology in relation to BMP’s that are outside their area of expertise. The findings in a biological report from M.C. Wright have been challenged by several more recent scientific publications since its completion several years ago. The state of our scientific knowledge does not provide scientific basis for such drastic changes to existing requirements.
- An unwillingness to engage the public in opportunities to seek creative solutions to address the environmental and anthropological concerns raised by the Province.

The CBCYC requests a meeting with the Province to discuss our concerns and provide input. We wish to propose participation in a coast-wide planning process that embodies consistency and fairness while recognizing the unique societal and environmental imperatives that exist in BC. Should this not be possible, we respectfully request that the Lieutenant Governor in Council not approve the current draft amended DMP. Approval should only be considered after all public concerns are fully reviewed and the current draft amended DMP is further amended.

Roger Hind

President
Council of BC Yacht Clubs