



Waterfront  
Protection  
Coalition

To: Hon. Nathan Cullen  
Minister of Water, Land and Resource Stewardship  
PO Box 9012 Stn Prov. Govt.  
Victoria, BC V8M 9L6

February 2, 2024

Dear Hon. Nathan Cullen,

**Subject: Request for extension of comment period and meaningful engagement on Dock Management Plan**

We are writing as a community-based coalition of citizens, groups, and non-profit societies from the Sunshine Coast, with a membership expanding to all areas of BC. Our membership includes property owners and residents throughout the swiya.

We are reaching out to express our extreme concern about the current iteration of the Dock Management Plan (DMP) and our collective desire to engage with you, and the shishálh Nation, in working toward a collaborative plan that includes impacted parties.

At the heart of the issue, and as originally intended, the DMP was an effort to clean up and standardize recreational and commercial docks. Unfortunately, the DMP has evolved to where its rules and administration are punitive, and the impact of the DMP will be significant. The effect of the DMP's stringent requirements would be to eliminate our members' ability to use, enjoy, and access their property in the manner they have, in some cases, for generations.

The proposed DMP has far-reaching effects on local residents, their way of life, and the economic impact on the community. We are concerned that our communities have not been adequately engaged in the process and that our concerns have been largely ignored for almost a decade.

Providing some form of assurance regarding the inclusion of a grandfathering clause could significantly ease concerns about the potential impact on community members. This approach would offer a sense of security and stability, acknowledging the investments and adjustments already made by individuals and local businesses.

**About the Waterfront Protection Coalition (WPC)**

Our Coalition ([waterfrontprotection.org](http://waterfrontprotection.org)), is committed to reconciliation and building a stronger understanding of the values and concerns of the shishálh Nation and other First Nations. We seek a respectful dialogue and join you in condemning the abusive behaviour and threats that

waterfrontprotection.org  
info@waterfrontprotection.org

the Nation has faced from a small minority. Our motivation is to bridge the gap on the DMP through constructive engagement.

We acknowledge and respect the shishálh Nation, and other First Nations', concerns for the protection of BC's coastline and waterways, and we respect the interests of all communities and stakeholders in the shared use of our marine environment. The WPC supports the long-term stewardship of all of BC's waterfront and waterways, and are eager to engage with shishálh Nation to identify opportunities to support their stewardship initiatives.

Our goal is to work alongside the Nation, the Province, and key stakeholder groups to find a path forward in the short term, and reach long-term solutions to meet the needs of future generations. We all care deeply for the Coast and our community.

### **Flawed Engagement process**

Right now, however, those impacted by the DMP – people from all walks of life – are angry and frustrated by the lack of meaningful engagement between the BC government and affected parties. We believe the BC government has a duty to properly understand and represent community interests in matters involving the use of Crown Land.

The current comment period, now extended, again, by 30 days, was insufficient to begin with and remains very inadequate in terms of engaging those impacted by the DMP. The consultation process has been largely behind closed doors and absent of a balanced approach.

The current flawed process is also a barrier to building stronger local relationships with the shishálh Nation and BC. The Sunshine Coast Regional District has also expressed its strong concerns about the engagement process and limited comment period.

We are aware that frustration with the BC government's lack of engagement thus far has caused some impacted community members to seriously consider litigation challenging the DMP. Our preference would be to avoid that outcome, through a robust public engagement process that fairly considers the multiple overlapping interests that are affected by the DMP.

### **Opportunity to engage**

We are encouraged by your comments in the Vancouver Sun (January 31, 2024) about engaging groups concerning decision-making on Crown land: Specifically, you were quoted as saying:

- "I'm happy to engage"
- "We're keen to talk about this"
- "We've got to get our process right"

Minister, we agree, this is an opportunity to get the process right. We are formally requesting that the WPC be invited to participate in any meeting including stakeholders.



Waterfront  
Protection  
Coalition

**We urge you to accept our invitation to engage.**

We urge you to extend the current comment period to September 30, 2024, to create the space for meaningful discussions. We urge you, along with the shishálh Nation, to work with us to identify our shared values and common ground, and work toward a solution that the shishálh Nation and impacted parties can all get behind.

This DMP is closely linked to proposed Land Act amendments. How the process here unfolds will be an example and set a precedent for other regions and interests. We are seeking to work with you to set a positive example, not a divisive one.

We appreciate your attention to this matter and look forward to hearing back from you at your earliest opportunity. We will be reporting to our members on February 8th and are hopeful for your positive response. Thank you for your time and consideration.

Sincerely,

Denise Brynelsen  
President, Waterfront Protection Coalition

cc. Chief Lenora Joe

Honourable David Eby