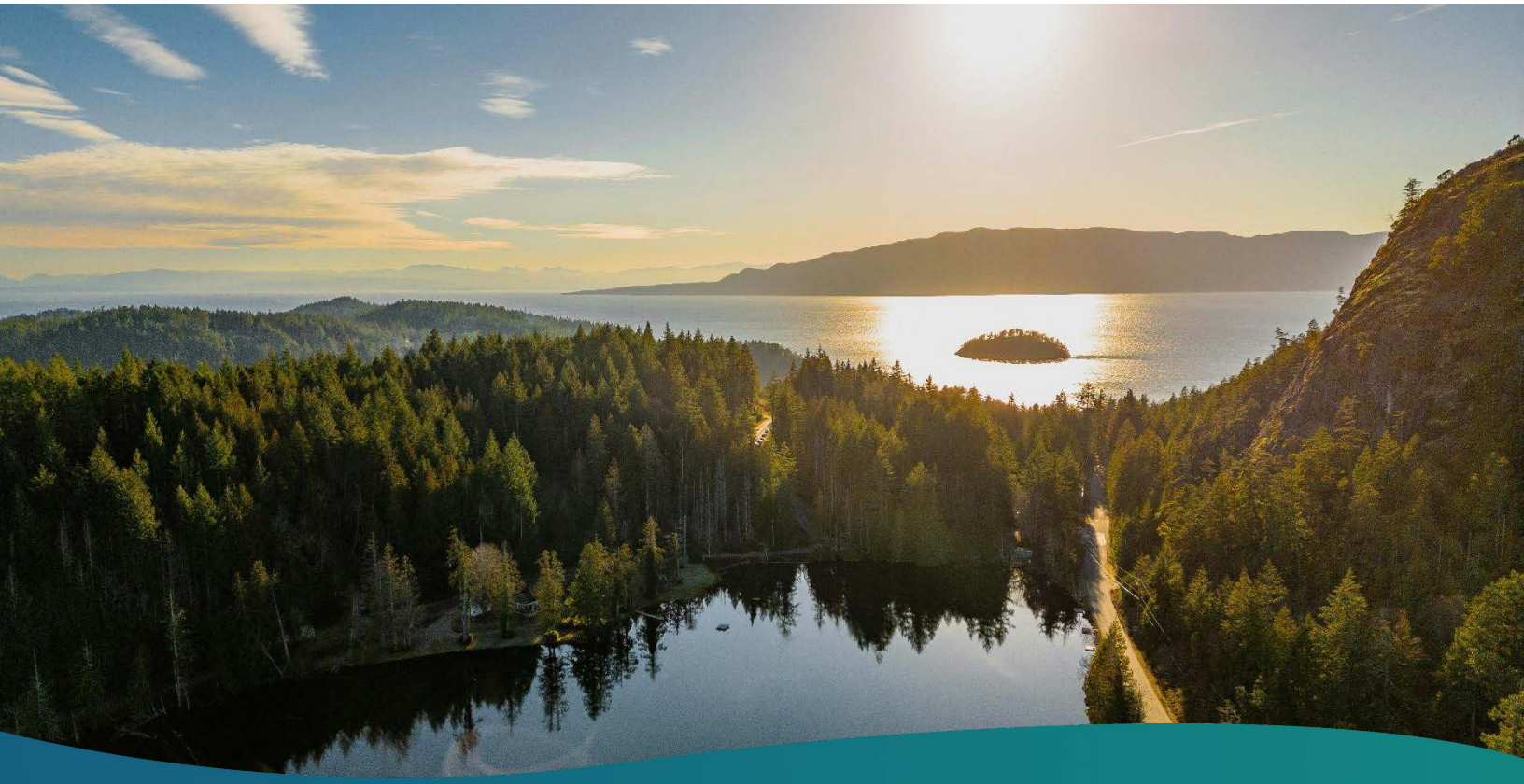
Waterfront Protection Coalition

Environmental Perspectives

Dock Management Plan

March 5th, 2024



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Waterfront Protection Coalition

The Waterfront Protection Coalition believes the environmental science used to inform the Dock Management Plan is inadequate

- It is the Waterfront Protection Coalition's (WPC) view that the environmental data used for the draft Dock Management Plan (DMP) is insufficient as it was only sourced from select limited locations in Pender Harbour. Data was collected in October 2017 at a single point in time.
- The available data lacks coverage of key habitats and sensitive areas within Pender Harbour. There is no scientific information for the broader area, as reports commissioned to date focused solely on Pender Harbour.
- The DMP fails to provide biophysical justification for the delineation of zones in Pender Harbour, with no environmental criteria developed to identify sensitive areas needing restrictions, such as salt marshes, tidal lagoons, mud flats, and eelgrass beds.
- There is a complete absence of scientific data and environmental justification for imposing restrictions in freshwater environments.
- A full evaluation comparing the impact of other competing human factors, such as climate change, marine pollution, commercial fisheries and the impact of docks and boathouses is needed.
- The significance of water depth beyond the 20-foot Mean Lower Low Water (MLLW) mark is overlooked, ignoring the fact that light penetration (and therefore, mitigation measures for docks and boathouses) is unnecessary at these depths.

- The DMP neglects to mention potential environmental benefits of docks and boathouses, such as the artificial reef effect which enhances habitat and overall benefits the ecosystem.
- The impact of permitted fisheries and invasive species on herring stocks and eelgrass meadows has not been adequately studied. These external factors and their environmental impacts remain unaddressed in government-commissioned research.

Why have environmental management concepts not been incorporated?

- Net environmental benefit and impact analysis must consider whether the benefits outweigh the potential harm in implementation. This involves assessing potential environmental damage, ecosystem disruption and other potential adverse effects of dock/boathouse removal.
- Any mitigation strategy needs to clearly assess risk, sustainability and ecological considerations regarding existing dock and boathouse structures.
- The use of Significant Adverse Effect (SAE) and Adverse Effect (AE) should be used to help quantify environmental effects and determine appropriate responses.

Inconclusive data to substantiate light penetration requirements

- The draft DMP oversimplifies the significance of light penetration while failing to consider the potential positive benefits of providing aquatic life with a cooler place to shelter.
- Water depth is not considered for light penetration requirements. Site-specific environmental data should confirm if a dock/boathouse is in water deeper than 20 feet Mean Low Lower Water (MLLW); if so, light penetration should not be factored into requirements.

- Light penetration requirements should only be considered for key sensitive habitats, such as eelgrass beds.
- Light penetration data from the southern USA and marsh environments are not suitable for broad application in British Columbia and was used in the initial environmental reports that supported the DMP.
- Applying light penetration requirements to all docks and boathouses is impractical and yields questionable benefits.
- Shading provided by docks and boathouses benefits many species by creating diverse habitats and offering protection from predators.

Possible environmental Solutions for the DMP

- Existing facilities not causing a Significant Adverse Effect (SAE) should be grandfathered. Using Net Environmental Benefit Analysis (NEBA) and assessing 'more harm than good' for existing structures will better evaluate their environmental impact and the consequences of their removal.
- In most cases, removing a dock or boathouse will cause more harm than the perceived benefit, leading to a net loss of habitat and biodiversity.
- Requirements should account for the beneficial habitats created by docks. Removing these habitats may harm the environment, compounded by the challenge of disposing of the materials.

Conclusion

In conclusion, the WPC is concerned that the environmental data used for the DMP is outdated and lacks details for key habitats in the shíshálh swiya region. The absence of clear reasons for zoning in Pender Harbour, a lack of scientific basis for freshwater restrictions, and no recognition of the significance of water depth over 20 feet results in unnecessary facility constraints. The WPC believes that tangible environmental advantages of docks and boathouses have been overlooked. To address these issues, further comprehensive studies are needed. It is important to incorporate environmental management strategies such as NEBA, assessments of more harm than good, and mitigation tactics.

Grandfathering

Leaving the existing structures that don't cause significant harm and performing NEBA evaluations could prevent loss of habitats and biodiversity, emphasizing the need for a more environmentally conscious approach to dock management.

Disclaimer: *The information provided above has been compiled with the assistance of community volunteers, who possess extensive knowledge in biology and environmental management. The views and conclusions expressed herein represent those from the WPC alone and do not necessarily reflect the perspectives of other organizations or individuals involved in environmental research and policy-making. While every effort has been made to ensure the accuracy and reliability of the data and analyses presented, the WPC acknowledges that interpretations and opinions regarding environmental management and protection can vary. As such, the WPC remains open to further discussion and research to refine and enhance the Dock Management Plan (DMP) for the benefit of our waterfronts and their ecosystems.*