

Commercial Concerns

The overall ask of the commercial sector is that absolute language is to be avoided and that commercial applications are site-specific, and supported by professional assessments and recommendations. Due to higher tenure fees paid and their role in supporting the larger community, commercial operators should not be bound by the same requirements as small dock owners. We support ecologically and archeologically sound development, but due to the amount of infrastructure involved a site specific approach is necessary.

Community Concerns	Commentary
<p>Site Based Science & Requirements for design layouts</p>	<p>Marinas and commercial facilities are specific to each location and must consider vessel and wind loading, access, and subsurface data for pile design and marina layout. A standardized DMP cannot possibly consider all these factors and establish a one size fits all criteria</p> <p>Recommendation: Do not design docks and marinas in the DMP. Leave this to applicants.</p>
<p>Financial and Social Impacts of the DMP</p>	<p>To be consistent with addressing cumulative impacts, further restricting marinas and commercial facilities would add to impacts by displacing vessels and increasing pressure to anchorages and putting vessels and the shorelines at risk.</p> <p>Recommendation: A DMP has a big financial impact on commercial facilities and operational economics. Exempt from DMP and allow for site specific flexibility and longer tenure terms so that marinas can invest in their assets and have certainty of long term operations.</p>
<p>Light Penetration</p>	<p>Structural limitations prevent meeting the 42% light transmissive on floating structures. Reducing structure to a point where the light penetration can be achieved will compromise the floats and create unsafe docks that will be susceptible to failure and frequent replacement. More study is required to prove ecological benefit in deeper sites with various types of ocean floors.</p> <p>Recommendation: only if habitat that supports eelgrass, kelp or other sea grasses is identified use these light enhancing mitigations strategies above this habitat (ie piers/walkways), but do not provide strict percentages, especially on float designs. Make requirements site specific.</p>



Dredging	<p>Maintenance dredging is required to maintain safe access to commercial facilities. All dredging activities are closely monitored by DFO and should not be regulated at the provincial level.</p> <p>Recommendation: Leave this for DFO</p>
Wheelchair/ Equipment Accessibility	<p>Need for ensuring that ramps aren't too steep, and they need to be wide enough to accommodate not only a wheelchair but sometimes equipment/ATVs wheelbarrows.</p> <p>Recommendation: no maximum width requirements</p>
Dock Designs Restrictions (ie: Max Lengths, Finger Lengths & Max Dock Areas)	<p>Restricting the sizes of infrastructure in a commercial setting will force larger vessels to overload facility design limits when trying to access shore. Allow flexibility in design to ensure safe harbors in an emergency, and for safe use by all members of the community</p> <p>Recommendations: no maximum requirements, at least make the language of current proposed regulations more clear.</p>
1.0 meter above high tides for infrastructure	<p>Raising on shore infrastructure will be necessary in the long term with rising sea levels, but tenure length is inadequate to plan for such vast expenditures. Foreshore may be adversely impacted by raising infrastructure.</p> <p>Recommendations: make a guideline that allows for site specific flexibility and lengthen tenures.</p>
1.5 meters above low tide/seafloor for floats	<p>These strict regulations for floats and infrastructure could reduce the size of some current marinas considerably. Various types of subsurfaces are impacted differently by having docks above them and a 1.5 m clearance may be excessive.</p> <p>Recommendations: make a guideline that allows for site specific flexibility, allow tenure areas to shift if movement away from shore is required.</p>
Tenure Lengths	<p>Commercial Marinas require huge investments for upgrades. Tenure lengths need to align with capital infusion and upgrades.</p> <p>Recommendations: 75+ year tenures</p>
Tenure Fees	<p>How do Commercial small business-like Fisherman, marinas, marine construction and yacht clubs in seasonal communities that don't make most of their fees from moorage make this feasible?</p> <p>Recommendations: Tenure fees need to work for all types of business and not be based on 'potential' income, but rather actual income with different classes of moorage types.</p>



	https://www2.gov.bc.ca/gov/content/industry/crown-land-water/crown-land/crown-land-uses/commercial-uses/marinas-yacht-clubs
60 Meters from the high-water mark	Absolute language creates situations where some marina sites are adversely impacted. Recommendations: Make requirements site specific