March 19, 2026

We write on behalf of the commercial marina owners, marine industry vendors, group moorage operators, strata docks, and yacht clubs of the Sunshine Coast, British Columbia. As key stakeholders in the region's marine economy, our members contribute significantly to local employment, tourism, and recreational boating sectors that generate millions in annual revenue and support hundreds of jobs in coastal communities. However, the ongoing delays in renewing expired marina tenures and finalizing the Dock Management Plan (DMP) are severely undermining our ability to operate sustainably and invest in the future.

It has been nearly a year since our last formal engagement session regarding the Dock Management Plan (DMP) and over a year since the government's extensive surveys of all marinas on the Sunshine Coast. At that time, we were assured of a swift turnaround, with promises to prioritize the issuance of updated and renewed tenures to provide the necessary stability for our operations. Despite these commitments, no progress has been made, leaving many commercial marina tenures expired or in limbo.While we appreciated the initial dialogue, and the report that was published, this prolonged uncertainty is creating significant operational and financial risk for our members and stifling economic growth in the region.

A clear consensus has emerged from strata communities, yacht clubs, industry and commercial marinas: absolute or prescriptive language must be replaced with site-specific flexibility and robust grandfathering provisions to reflect the diverse needs of our operations. Without these adjustments, the plan imposes unreasonable demands for upgrades at enormous expense, equating to costs that are particularly burdensome given the current tenure insecurity.

We are requesting a formal update on the following critical areas:

1. Grandfathering: A clear consensus has emerged: absolute or prescriptive language must be replaced with robust grandfathering provisions.

2. Tenure Security: Many operators and owners are currently facing expired or expiring leases. We urgently require our "as-is" tenures to provide the stability demanded by financial institutions for securing loans and future capital investments. Without a minimum 30-year tenure in place, banks and lenders view our operations as high-risk, making it nearly impossible to finance necessary upgrades or expansions. Compliance timelines must be flexible, potentially extending beyond a single 30-year lease term, to allow for phased implementation. We remind the Ministry of its obligations under the Land Act to process tenure applications in a timely and fair manner.

3. Area Maximum (40m²) Revisions: The strict area cap hinders efficient design. We recommend removing the area maximum for commercial moorage, as operators are already incentivized to minimize dock footprints to control costs.The strict area cap hinders efficient, safe, and economically viable dock designs, particularly for commercial moorage where larger

vessels and higher traffic volumes are common. We strongly recommend removing the area maximum.

4. Decking & Light Transparency: The cost-to-benefit ratio of requiring grid decking on large-scale commercial, group moorage or concrete docks is unsustainable with installation and maintenance expenses **often exceeding $100,000-$500,000 per facility.** Furthermore, grid decking can exacerbate environmental risks in high-traffic areas (e.g., fuel spills or debris accumulation). We recommend allowing exemptions or alternatives (e.g., solid decking with enhanced mitigation measures) unless infrastructure is directly above sensitive sites identified (ie environmental & Archaeological).

5. Waste Management (Styrofoam): The marine industry is committed to environmental stewardship but lacks adequate infrastructure for responsible waste disposal. We require government partnership to establish a central collection and disposal facility on the Sunshine Coast specifically for marine-related foam, styrofoam, and other wastes. This would align with provincial goals under the Environmental Management Act and help prevent marine pollution while supporting compliance.

6. Dredging: Dredging is essential to maintain commercial viability of marinas that currently exist and needs to be continued in the future. We recommend not including blanket bans on dredging on our operations.

We can no longer afford to remain in a "holding pattern" indefinitely while awaiting a finalized DMP and tenure renewals. These delays are not only contrary to the government's earlier promises but also risk violating principles of administrative law, including the duty to act expeditiously on applications that affect livelihoods and economic interests. What specific reasons account for the delay in processing the survey data and issuing new tenures? We expect a detailed response outlining the steps being taken, responsible parties, and a concrete timeline for resolution, including any interim measures to mitigate financial hardships.

Thank you for your immediate attention to this urgent matter. We look forward to your prompt response and collaborative action regarding the schedule on grandfathering and issuing grandfathering tenures to our structures.

Sincerely,

The Commercial and Group Moorage Committee
In partnership with the Waterfront Protection Coalition (WPC)

Representing the following confirmed signatories and the broader coastal community of the Sunshine Coast that helped collaborate on this letter:

Marinas
Secret Cove Marina
Poise Cove Marina
Bel Investments (Marina Sinclair Bay Road)
Liaison Marina (Mouth of Pender Harbour Marina)
Pender Harbour Resort
Madeira Marina
Duke Marina
Painted Boat Resort
Buccaneer Marina
Latitude49
Coho Marina
Farrington Cove
Secret Cove Landing Marina
Sunshine Coast Resort
Tillicum Bay
John Henry's Marina
Whiskey Slough Marina
Headwater Marina
Mackenzie's Marina

Strata & Group Dock Owners
Council of BC Yacht Clubs
Pender Harbour Landing (Flagship Moorage Association)
Sunny Harbour Estates
Little Bay Resort
Madeira Park Estates
Whittakers
Tideways
Bowsprit Wharf

Marine Industry
Garden Bay Marine
Thunderbird Marine Corp
RK Fishing Limited (Commercial Fishing Operation)
Quantum Coastal Marine Ltd
Coast Metal Works
BC Grates Composite Ltd
Hanson Land and Sea
Sunshine Coast Air
Green Wave Marine Services
Island Marine Construction Services

Additional Representation: This letter reflects the collective concerns of the broader Sunshine Coast marine community. Due to the high volume of affected marinas and group moorage holders, many stakeholders share these views but have not yet been formally reached for sign-off. As our outreach continues, this coalition grows, further magnifying the significant economic and community impacts currently at risk due to these delays.