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Gambier Island Local Trust Committee
200 – 1627 Fort Street Victoria, BC V8R 1H8

Dear Members of the Gambier Island Local Trust Committee,

Subject: Concerns Regarding Proposed Dock Regulations in the Gambier Island OCP Amendments

I am writing to express my deep concern regarding the proposed amendments to the Gambier Island Official Community Plan (OCP) and Land Use Bylaw (LUB), specifically the new dock regulations, which present significant financial and logistical burdens on property owners with minimal demonstrable environmental benefit (see **Appendix A**).

While the protection of Gambier Island's natural environment is a priority we all share, it is critical to ensure that policy decisions are balanced, evidence-based, and considerate of the community's socioeconomic realities. The proposed regulations, including limiting dock width to 1.5 meters, mandatory light transmissive materials, and extensive archaeological and environmental assessments, appear to impose disproportionate costs on residents without sufficient scientific justification.

Minimal Environmental Impact of Existing Docks:

Research indicates that small-scale residential docks, particularly those already in place, have minimal impact on aquatic ecosystems when basic environmental guidelines are followed. Existing docks allow for adequate light penetration, and their footprint does not significantly disrupt sediment patterns or aquatic vegetation (**Appendix A**)

Inconsistent Application of Environmental Standards:

The proposed regulations appear inconsistent when compared to other nearby jurisdictions managing similar environments without such stringent requirements. This inconsistency raises questions about whether the measures are proportionate to the actual environmental risks, suggesting a need for more regionally harmonized policies that reflect realistic environmental impacts.

Negative Impact on Community Well-Being:

Docks are integral to the recreational, cultural, and social fabric of Gambier Island's community. Overly restrictive regulations could diminish community access to the waterfront, reduce opportunities for outdoor activities, and negatively affect the local lifestyle that many residents and visitors cherish.

Safety Concerns:

Restrictions on dock width and structural designs may unintentionally compromise safety, especially during adverse weather conditions when wider, more stable docks provide better access and security. Narrower docks can become hazardous in emergencies, limiting the ability for safe evacuation or rescue operations. Additionally, these restrictions may disproportionately impact individuals with disabilities, as narrower docks reduce accessibility for mobility aids such as wheelchairs or walkers. Ensuring safe, stable, and accessible docks is essential to accommodate all members of the community, including those with physical limitations, and to comply with broader accessibility standards.

Undermining Stewardship and Voluntary Conservation:

Property owners often engage in voluntary conservation efforts. Overly prescriptive regulations will discourage proactive environmental stewardship if residents feel their efforts are overshadowed by rigid mandates, reducing the likelihood of collaborative environmental protection initiatives. It's important to focus on larger environmental issues that can lead to real, lasting change, rather than imposing restrictive measures that target minor concerns with limited impact. History has shown, and most recently in the U.S., that when policies swing too far in one direction, there can be a strong reactionary shift in the opposite direction. This can undermine decades of progress in environmental conservation. To ensure sustained positive outcomes, it's critical to adopt balanced, inclusive policies that foster long-term community support and environmental responsibility.

Financial Burden on Property Owners:

The financial implications of these changes are considerable. Replacing or retrofitting existing docks to meet the new standards would cost property owners thousands of dollars, an undue burden given the minimal environmental gains. Furthermore, the requirement for professional archaeological and environmental assessments for even minor dock modifications adds unnecessary complexity and expense.

In conclusion, while the goal of environmental preservation is commendable, it should not come at the expense of reasonable use and enjoyment of private property, especially when the environmental benefits are marginal. I respectfully request that the LTC reconsider these amendments in favor of a more balanced, evidence-based approach.

Thank you for your attention to this matter.

Sincerely,

James Coles

Appendix A

Key Findings Supporting Minimal Environmental Impact:

1. Water Quality Plays a Larger Role Than Docks:
 - Turbidity (water cloudiness) and Secchi depth (water clarity) had a more significant effect on SAV diversity than the presence of docks themselves. This suggests that broader water quality issues (like nutrient runoff or pollution) are far more impactful than dock structures.
2. Dock Shading Effects Are Localized:
 - Shading from docks primarily affects areas directly underneath, with no significant impact observed beyond the dock's footprint. This localized effect limits the overall ecological impact when compared to more widespread environmental stressors.
3. Cumulative Impacts Are Limited in Scale:
 - Even when considering cumulative effects, the report estimates that dock shading accounts for **less than 1% reduction** in marsh grass cover in broad estuarine areas. This suggests that docks do not contribute significantly to regional ecological degradation
4. No Significant Loss of Species Diversity:
 - While SAV density was reduced under some docks, species diversity remained relatively consistent between dock sites and natural reference areas. This indicates that docks do not cause severe habitat degradation or loss of biodiversity.
5. Minimal Impact Compared to Natural Variability:
 - The study noted that natural factors, such as lake trophic status (nutrient levels), seasonal changes, and weather events, had greater influence on SAV health than dock structures.
6. Natural Recovery is Rapid:
 - In cases where dock construction has temporarily disturbed vegetation, natural regrowth occurs quickly, often within one to two growing seasons, provided the habitat is not further stressed

Cost-Impact Considerations:

- High Costs for Marginal Gains: The study implies that requiring expensive dock modifications (like light-transmissive materials, structural redesigns, or forced dock removals) would yield minimal additional environmental benefits, especially when compared to addressing broader water quality issues.
- Better Environmental ROI Elsewhere: Resources and efforts might be more effectively directed towards managing nutrient runoff, controlling invasive species, or improving

shoreline buffers, which have demonstrably larger ecological impacts than residential docks.

Sources:

1. **Biological Research Associates**, *The effects of residential docks on light availability and distribution of submerged aquatic vegetation in two Floridalakes*, Division of ENTRIX, Inc., 3905 Crescent Park Drive, Riverview, Florida 33578, USA
2 Orange County Environmental Protection Division, 800 Mercy Drive, Suite 4, Orlando, Florida 32808-7896, US
2. **Environmental and aesthetic impacts of small docks and piers**
Primary Contact(s): ruth.kelty@noaa.gov Citation: Kelty, R.A., and S. Bliven