



March 10, 2025

To Gambier Island Local Trust Committee:

Douglas Bay Strata Plan BCS 1539, located at the Northeast corner on Gambier Island, is a water access only Community consisting of 53 water and non-waterfront acreages. We are a Community of proud, conscientious stewards of the land and an adventurous group ranging from young Families with babes in arms, to Seniors enjoying active lifestyles.

Our Douglas Bay Community Strata has shared docks for Owners use located in the waters surrounding the shoreline. Gambier Island OCP/LUB amendments requiring changes to docks and upland structures have the potential to cause our existing docks to become out-of-compliance and impede Owners safe access to their property. We are eager to engage with the Islands Trust, Gambier Island LTC and APC so that we may continue to manage our Community holdings in an environmentally conscious manner and contribute real world experience of safe boating and docking practices in the waters that surround Gambier Island.

1. Lack of Public Engagement:

We have come to understand that the Gambier OCP has been under review for some time. In this time, there has been no Public Engagement that we have found in the way of any notice sent to Landowners. The Local Islands Trust Committee (LTC) and appointed Advisory Planning Commission (APC) have not reached out to our Community. Gambier Island must be accessed by water. Non-engagement with Land Owners, and subsequently the Boating Community, creates the risk of Land Owners not being able to access their properties.

2. Changes to Size and Structure Requirements Making Community Shared Docks unsafe and therefore unusable:

We understand that the Gambier OCP/LUB is not a Dock Management Plan (DMP) as per the Pender Harbour Plan. It is clear however, that the Provincial Government is looking at the Sechelt Swiya DMP as a template for enacting changes in waters Province wide, thus potentially influencing decision making and the language implemented at the local level.

The reduction in Dock size to 1.5 meters is of particular concern and does not take into account that our waters are much more open and unprotected than in areas such as the Sechelt Swiya. We have concerns about the overall structural integrity on a “dock” that is 1.5 meters wide and has a 43% (or more) light penetrable surface. The definition of “dock” vs a complementary main dock “finger” is completely different, and needs to be addressed separately.

Our Docks serve our Community well, and losing access to them at the size they are presently constructed, would pose significant increase in risk to Land Owners and our Boating Community. Currently we have multiple boats docking at any one time. A 1.5 meter size restriction on docks would make this an unsafe practice. Considering that many Owners arrive by way of water taxi, the 1.5 meter width restriction would also inhibit the number of people able to load or unload at once. This has the potential to jeopardize water taxi's willingness to continue to provide service to our Community.

3. Environmental Concerns:

Alternatives to safe Docking includes anchoring in exposed and unpredictable waters. Anchor chains repeatedly sweeping the Ocean floor cause disruption to Sea beds and other habitat damage. Potential for catastrophic loss of boats at anchor in severe weather is a very real threat. We have witnessed this at the neighbouring Kayak Beach. Some commonly proposed design changes to docks are based largely on the preservation of eelgrass. Eelgrass is less common on Gambier and the existing docks provide habitat and refuge for other sea plants and animals.

4. Legacy Status for Previously Approved Docks

We propose that existing pre approved Docks and Upland Structures receive a Legacy status until such time as their current moorage license expires. Doing so will lessen the Environmental impact on the area in many significant ways. This includes lessening disturbance of the ocean floor, disrupting existing animal habitat, mitigating risk of catastrophic boat loss and the derelict boat situations that follow, as well as the rural disposal of existing docks. **Instituting a Legacy status for existing previously approved docks preserves safe access** for Land Owners and their Families to access their property.

Moving forward with the safety of our Community in mind, and Environmental stewardship at the fore front, we would like to continue to propose and assist with possible changes to the Gambier Island OCP/LUB amendments.

Respectfully submitted,
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