

**MINISTRY OF FORESTS LANDS AND NATURAL RESOURCE OPERATIONS AND RURAL DEVELOPMENT
(the “Ministry”)**

c/o Lynn Brunsdon, Manager, Policy and Lands Operations Support
Rural Opportunities, Tenures and Engineering Division

BC ASSESSMENT

c/o Michael Spatharakis, Manager, Local Government Relations
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RE: UNREGISTERED FORESHORE AND WATER LOT USER

The Central Coast Regional District (the “CCRD”) is concerned with the large and growing numbers of unregistered foreshore leases and water lots on the Central Coast, and the impacts these have on the environment, our local government finances, and First Nation reconciliation efforts.

Unlike more populated regions of the Province, the Central Coast is subject to the attached Provincial General Permission for the use of Crown Land for Private Moorage (the “General Permission”) which does not require a foreshore lease application to the Ministry in order to approve the construction of private docks that meet certain provincial standards. The General Permission results in lost opportunities for the CCRD and the Heiltsuk, Nuxalk, Oweekeno and Kitasoo/Xai-xais First Nations to raise environmental and other concerns through the referral process.

We respectfully request a meeting with the Ministry and more information on this subject and alternatives to the General Permission so that we can have a regional discussion with the four Central Coast First Nations on whether the General Permission is still appropriate given reconciliation efforts and the designation of most of the Central Coast as belonging to environmental conservancy areas.

We are also alarmed by what appears to be an absence of Ministry enforcement against unauthorized foreshore users. A comparison of google maps’ satellite view and parcel map BC reveals that a substantial amount of foreshore users including buildings and docks that do not meet the requirements in the General Permission. Some of these docks and buildings have been present for decades.

In meetings with BC Assessment, we have learned that foreshore and water lot users should be assessed property taxes whether or not they have a foreshore lease. However, even though the Ministry may be aware of a foreshore or water lot user through a FrontCounter BC application, the Ministry has not been sharing this information with BC Assessment until a foreshore lease is approved. The lack of early information sharing or enforcement by the Ministry results in BC Assessment being unable to assess property taxes against foreshore and water lot users on behalf of the Central Coast Regional District.

Not being able to collect property taxes payable by foreshore and water lot users has a greater impact on the Central Coast Regional District than other regional districts or municipalities due to our high rate of waterfront properties and the fact that we are already the least funded Regional District in the Province by a factor of nine.

We also believe that if BC Assessment were better enabled to assess property taxes against unlicensed foreshore and water lot users that fewer persons would be inclined to abandon their vessels, docks, or barges as what recently occurred when a camp barge was abandoned at a clam beach on Denny Island.

Accordingly, we respectfully request that the Ministry:

1. promptly share knowledge of foreshore and water users in the Central Coast Regional District with BC Assessment, and
2. actively enforce foreshore and water lot regulations.

Please contact our Chief Administrative Officer Courtney Kirk so that we can schedule a meeting to discuss these issues. We kindly request that the four Central Coast First Nations and BC Assessment also be invited to attend.

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