

PO Box 186, Bella Coola, BC V0T 1C0

Telephone 250-799-5291 Fax 250-799-5750

January 31, 2022

**MINISTRY OF FORESTS LANDS AND NATURAL RESOURCE OPERATIONS AND RURAL DEVELOPMENT**

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  
#400-3450 Uptown Blvd Victoria, BC V8Z 0B9  
localgovernment@bcassessment.ca

**MINISTRY OF FINANCE**

c/o Honourable Selina Robinson, Minister of Finance  
FIN.Minister@gov.bc.ca

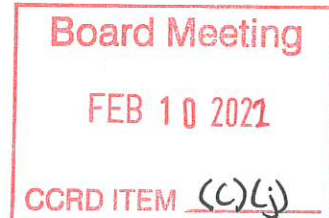
**RE: UNTAXED FORESHORE AND WATER LOT USERS**

The Central Coast Regional District (the "CCRD") was disappointed with the recent release of property assessments to see that there is still a large amount of untaxed docks, floating structures such as homes and camps, and log booms on the Central Coast. We previously brought this issue to the attention of BC Assessment and the Ministry of Forests Lands and Natural Resource Operations and Rural Development ("FLNRORD") by letter on July 8, 2020 and in an advocacy meeting at the Union of BC Municipalities Meeting on September 16, 2020. We were assured then that the FLNRORD and BC Assessment would work together to identify and then assess unlicensed foreshore and water lot users, but there appears to have been no progress in actually taxing these properties.

We are particularly disappointed as BC Assessment's public search by map function now has a satellite map overlay which clearly shows which properties are not being taxed. Attached to this letter (see Appendix A) are screenshots showing various examples of the untaxed structures. These screenshots of BC Assessment's own maps were collected in less than a half-hour and clearly shows that BC Assessment has the tools and capacity to identify these properties.

We have included the Minister of Finance as a recipient of this letter as the Minister was very sympathetic to the CCRD's financial position when she was the Minister of Municipal Affairs, having met with our Board of Directors in UBCM advocacy meetings on September 18, 2020.

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.

Some of these structures have been present and untaxed on the Central Coast for decades, and include residential, industrial, and scientific users. There are also users who have simply abandoned their structures, which raises environmental and enforcement issues such as those recently profiled in contempt of court proceedings in *British Columbia v. B & B Barges Ltd.*, [2021] BCJ No 323, concerning the abandonment of two floating camp barges in Kliktsotli Harbour. We are concerned that the Central Coast has garnered a reputation for being a tax-free haven for marine users and a place where people can simply abandon boats and barges.

We are also concerned FLNRORD's current approach of not requiring foreshore and waterlot users who do not qualify under the general permission policy to submit a Crown Land Use Application results in lost opportunities for the Heiltsuk to raise environmental concerns through the referrals process.

Accordingly, we respectfully request that:

1. the Ministry of Finance support the CCRD in pressing this matter with BC Assessment and FLNRORD;
2. BC Assessment promptly assess and tax all foreshore and water lot users on the Central Coast, and
3. FLNRORD actively enforce foreshore and water lot regulations.

Please contact our Chief Administrative Officer Curtis Slingerland, so that we can schedule a meeting to discuss these issues.

Sincerely,



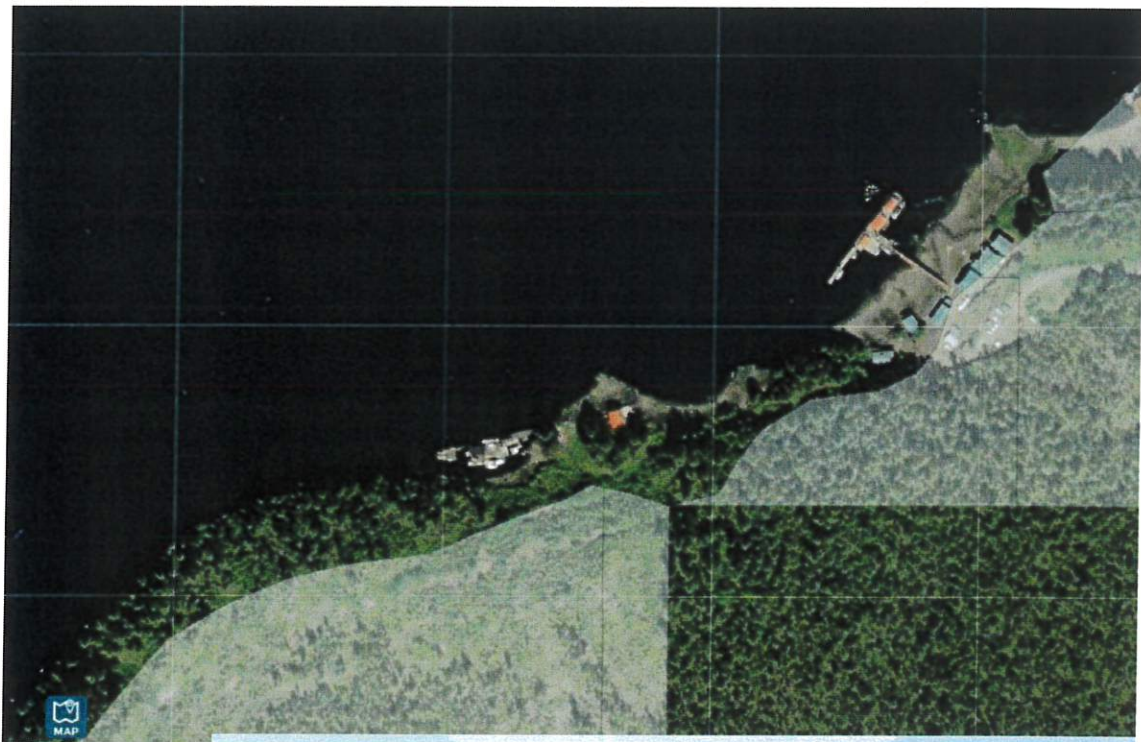
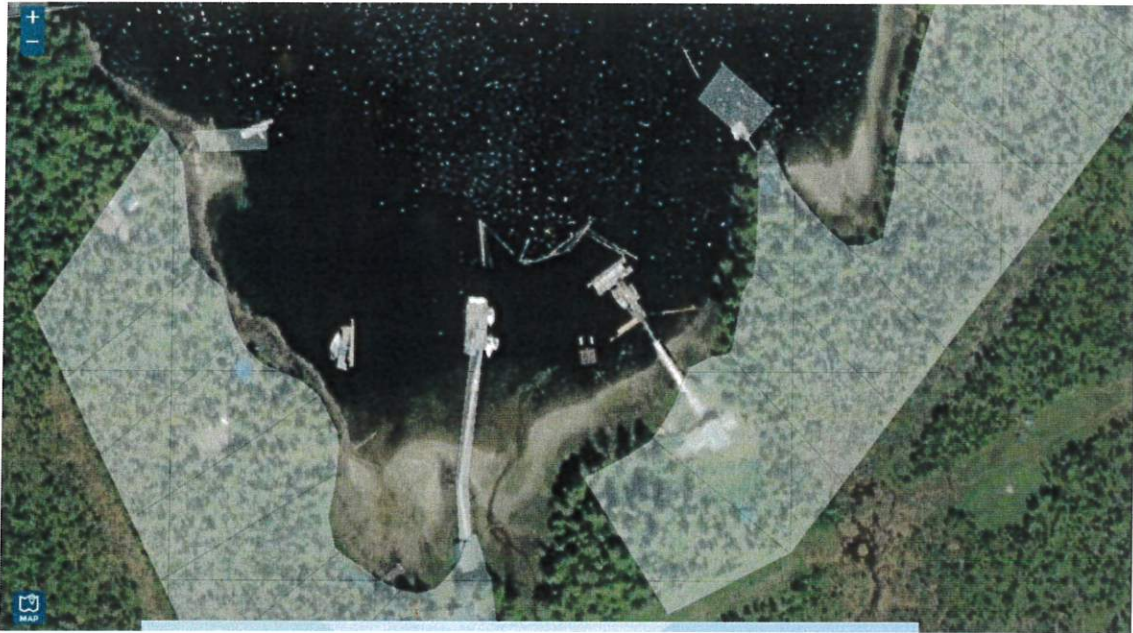
**Jayme Kennedy, Chair**  
**Central Coast Regional District**

Enclosure

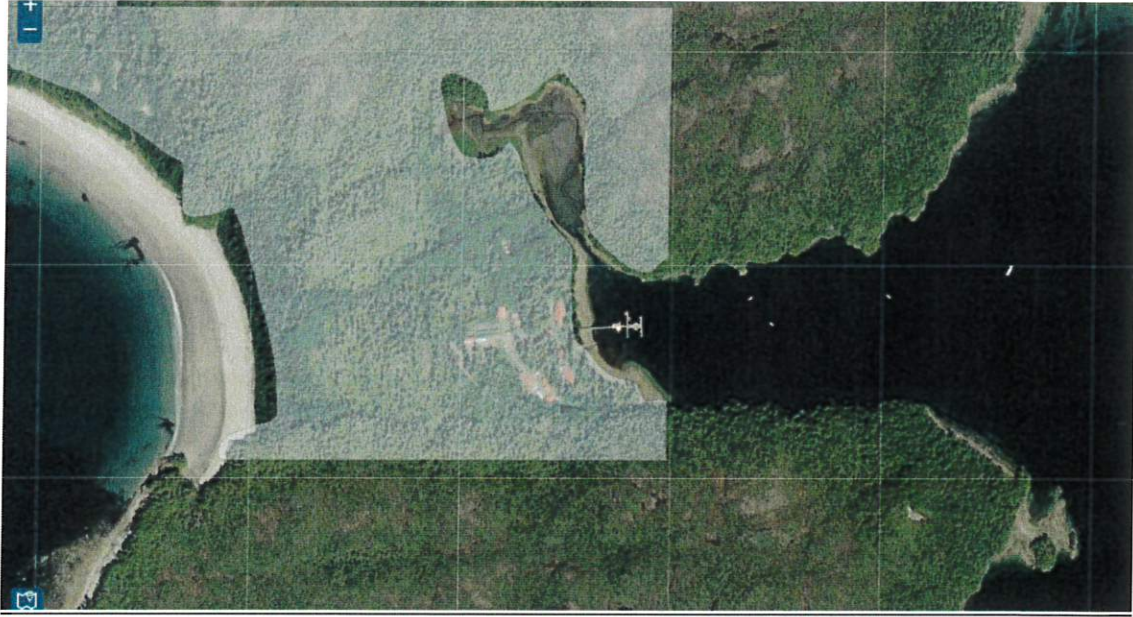
cc: Jennifer Rice, MLA, [jennifer.rice.mla@leg.bc.ca](mailto:jennifer.rice.mla@leg.bc.ca)  
 Nuxalk Nation, PO Box 65, Bella Coola BC V0T 1C0  
 Wuikinuxv Nation, c/o Jennifer Walkus, Stewardship Director, [council2@wuikinuxv.net](mailto:council2@wuikinuxv.net)  
 Heiltsuk Tribal Council, c/o Kelly Brown, Director, Heiltsuk Integrated resource  
 Management Department [kelly.brown@heiltsuk.ca](mailto:kelly.brown@heiltsuk.ca)  
 Kitsoo/Xai-xais Tribal Council, c/o Douglas Neasloss, [engagement@kksa.ca](mailto:engagement@kksa.ca)  
 Darren Johnson, Deputy Assessor, BC Assessment Northern BC Region,  
[darin.johnson@bcassessment.ca](mailto:darin.johnson@bcassessment.ca)  
 Central Coast Indigenous Resource Alliance

Appendix A: Examples

Denny Island



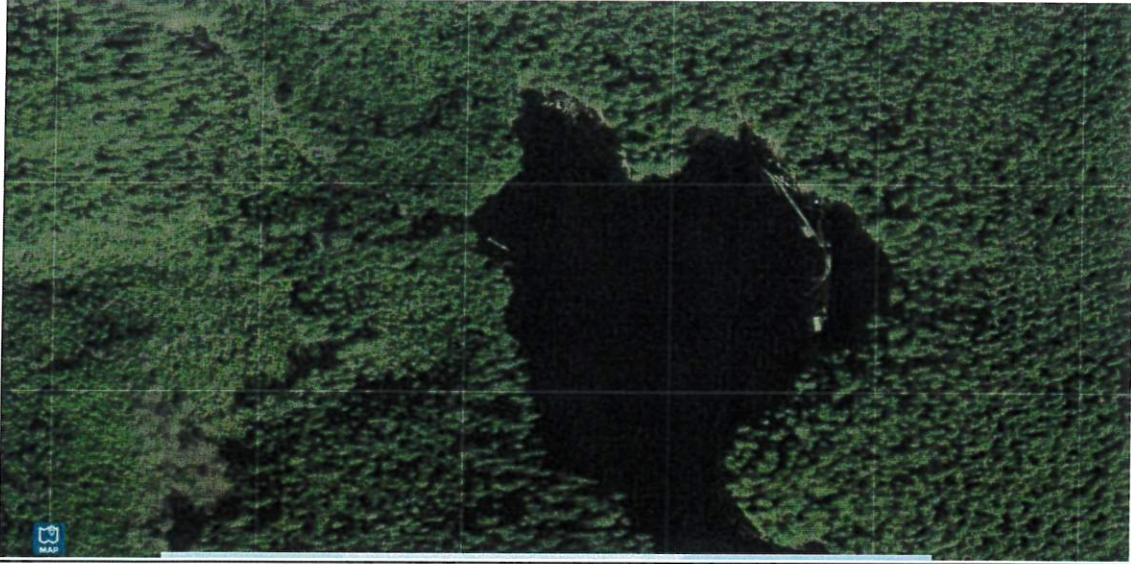
Haikai Pass



Lizzie Cove



River's Inlet





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January 31, 2022

**HEILTSUK INTEGRATED RESOURCE MANAGEMENT DEPARTMENT**

c/o Kelly Brown, Director

**RE: UNTAXED FORESHORE AND WATER LOT USERS**

The Central Coast Regional District ("CCRD") would like to bring to your attention the issue of untaxed docks, floating structures and log booms on the Central Coast.

Previous advocacy has taken place, which is detailed in the letter that was cc'd to your department and was sent to the Ministry of Finance, the Ministry of Forests, Lands and Natural Resource Operations ("FLNRORD"), and BC Assessment.

Accordingly, we have respectfully requested that:

1. the Ministry of Finance support the CCRD in pressing this matter with BC Assessment and FLNRORD;
2. BC Assessment promptly assess and tax all foreshore and water lot users on the Central Coast, and
3. FLNRORD actively enforce foreshore and water lot regulations.

We feel the general permissions structure currently in place results in lost opportunities for the Heiltsuk to raise environmental concerns through the referrals process.

We are seeking your support in this issue. Please contact our Chief Administrative Officer Curtis Slingerland so that we can schedule a meeting to discuss these issues. Thank you for your time in reading this letter and please do not hesitate to contact us for questions or concerns.

Sincerely,



**Jayme Kennedy, Chair**

**Central Coast Regional District**