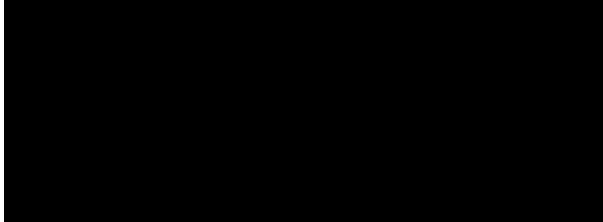


**From:** [REDACTED]  
**To:** [Planning Public Email address](#)  
**Date:** May 27, 2019 4:54:13 AM

---

Public Hearing Submission – Bylaw No. 900-25

I support the proposal to increase the maximum size for residential docks to 30 m<sup>2</sup> and increasing the maximum size for docks related to public park use to 40 m<sup>2</sup>.



Submitted at  
Public Hearing

## SWOA Presentation to CSRD Public Hearing on Bylaw 900-25

May 27, 2019

My name is [REDACTED] Wilson Creek on the east side of Anstey Arm. I am here tonight to ask that the CSRD consider the needs and safety of boaters as a priority.

Madam Chair and other elected decision makers who have attended to ensure they hear from their constituents, I have a copy of my presentation for the meeting recorder.

Thank you for this opportunity to address this public hearing. I am President of the Shuswap Waterfront Owners Association. We are here today representing the interests of all residential waterfront property owners on the lakes within the CSRD. Our more than 1245 members who own 520 waterfront and semi-waterfront properties around the lakes have valuable experience in boating and moorage on our wonderful lakes.

Personally, our family has owned waterfront property in Area E for more than 45 years. The property only has water access and therefore the matter of docks and safe access to the property is important to me personally as well as all other SWOA members.

As you may be aware, SWOA has provided advice to staff in relation to the revisions to Bylaw 900-25 and have also acted as a referral group once the Bylaw passed second reading. During that process you heard from our members as to the adequacy of the proposed changes from two perspectives:

1. Safe access/egress during all weather
2. Simplifying the application process for dock registration and thereby minimizing the cost for dock registration, particularly the costs incurred by the CSRD.

SWOA was invited by staff to provide input on the issues of docks and regulation last year. On June 25, 2018 we provided our input in the form of a Power-point presentation which I would like to table to this hearing. We do not believe this information was shared with the Board in this form and we would like to provide a copy for their consideration. In the presentation we provide technical information related to the sometimes, complex issues of both siting of docks and safe operation of the docking, unloading, and loading of boats in all weather conditions.

Our conclusion was that there would be enough flexibility under the specifications of the Provincial General Permission for the Use of Crown Land for Private Moorage to meet these issues at almost all locations around Shuswap, Little Shuswap and Mara Lakes. Making the CSRD Bylaw consistent with the General Permission would also simplify the two, sometimes confusing, application processes and we have recommended adoption of these measures by the CSRD. We anticipate that the dock application once approved by the Province would need minimal time by CSRD staff to confirm local expectation thus a significant cost saving in administration time.

We note in the available documents related to the issues contain a significant volume of data on boats for sale by our local dealers. We believe that the staff use of the length of "pre-owned boats" in their analysis of the length of boats typically in use on these lakes is erroneous, mainly as boat owners, in selling one boat are usually purchasing a new boat that is 2, or often 4 feet, longer (the 2 foot

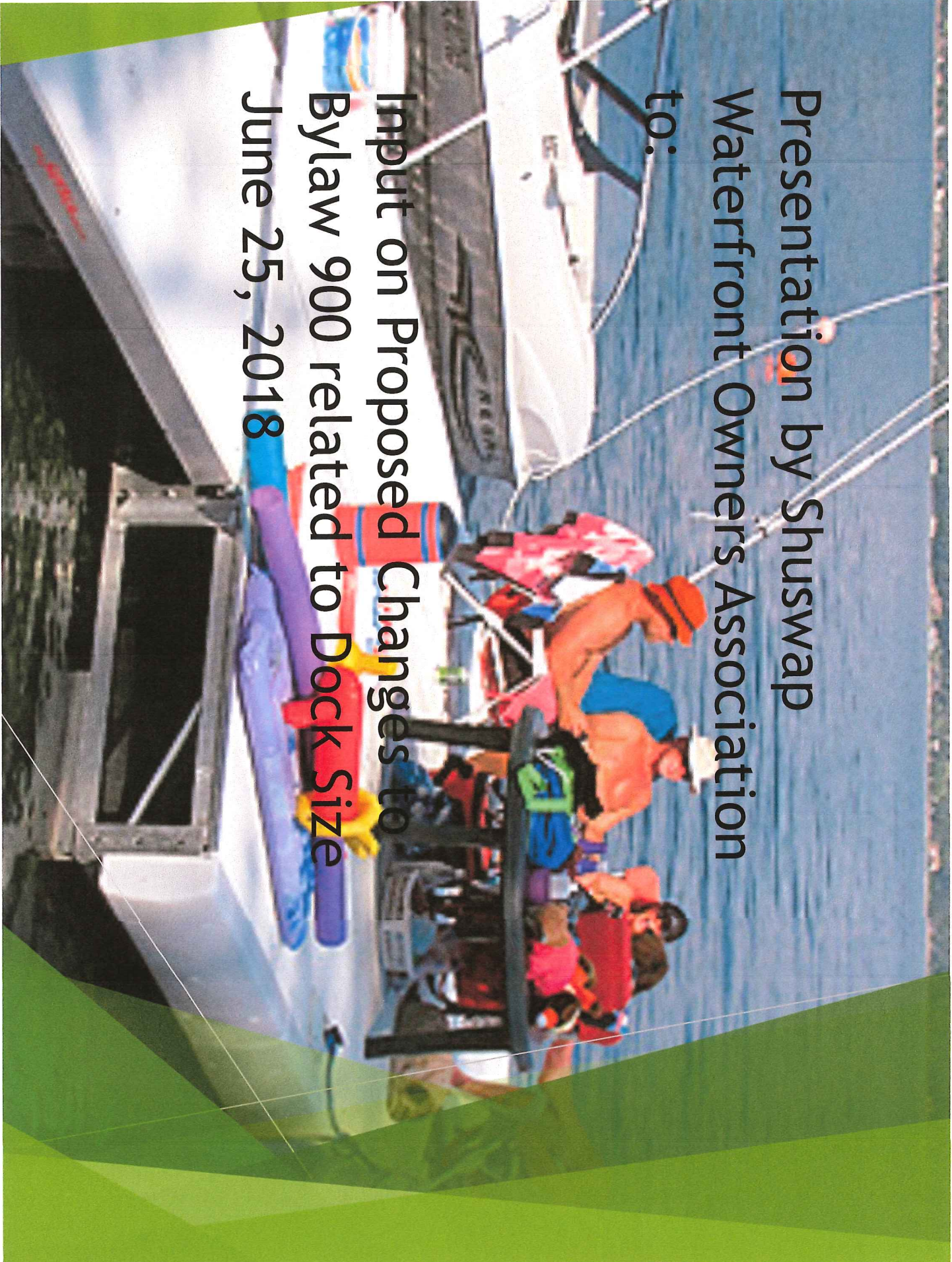
syndrome). Thus, it is our observation that boats are generally getting longer than would be suggested by the staff analysis.

Our recommendation for safe loading and unloading of persons, especially older or physically challenged persons, combined with our experience with sudden weather changes on our lakes suggest that docks need to be at least 10 feet longer than the length of the boat that will regularly be using the dock for moorage. These two observations have led us to the conclusion that, should the CSRD wish to retain a prescriptive approach to the regulation of dock size, that a maximum top area of just more than 37 m<sup>2</sup> be adopted in the revised Bylaw. This would also ensure that there is minimal likelihood of disturbance of the lake bottom where the approach to the dock is shallow.

Finally, although we have not done an extensive survey of the current docks on the Shuswap lakes, clearly the majority are bigger than the CSRD's proposed size and have been built to be practical and reasonably safe for the conditions on the Shuswap. It does not make sense to enact a bylaw that goes against the current practical wisdom and will only create more problems in the future.

Thank you

SWOA

A photograph of a group of people on a boat deck. In the foreground, a man in a blue shirt and orange hat is leaning over a table, possibly serving drinks. Other people are seated around the table. The boat has a white hull with a dark stripe and a white sail. The background shows a blue body of water and a distant shoreline. The image is framed by a green geometric graphic at the bottom.

**Presentation by Shuswap  
Waterfront Owners Association  
to:**

**Input on Proposed Changes to  
Bylaw 900 related to Dock Size  
June 25, 2018**

# What Considerations Determine the Required

## Size of a Safe Dock On Shuswap Lake?

1. Size of boat to be docked
2. Bathymetry of the foreshore
3. Neighbourhood
4. Usage
5. Location / Environment

## Size of the Boat to be Docked

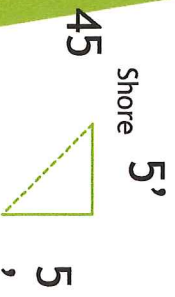
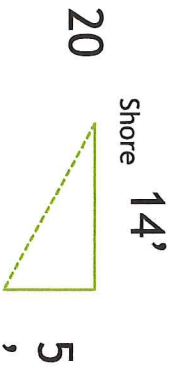
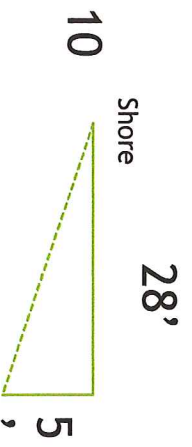
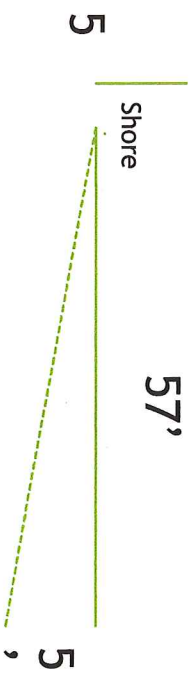
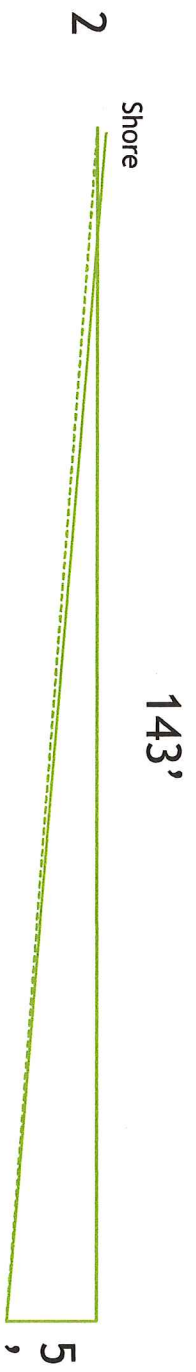
- Safety of all persons involved in mooring a boat requires a dock at least 10 feet longer than the boat
- If the dock is in an exposed position, a longer dock will be required for safety reasons.
- If mooring aides such as “boat whips” are required because of an exposed docking position, then a longer dock is required.
- If the dock is in a congested area (lots of buoys etc.), then a longer dock may be needed to safely land a boat because of the oblique angle of approach.

# Bathymetry of the foreshore

- The minimum safe water depth under a recreational boat on Shuswap Lake is 5 feet.
- More water under the hull is required in exposed locations on the lake because of the large vertical throw caused by abnormally large waves and wakes.
- The slope of the lake bed determines the distance from shore to the point where safe water depth under the hull is reached. Current Bylaw 900 regs may require a lengthy ramp to access a minimal dock resulting in unsafe access.
- The large annual range in the lake level (>10') makes movable/ floating docks and ramps a requirement. Small, narrow floating docks are very unstable in rough weather.
- Many areas around Shuswap Lake have very shallow lakebeds. See the attached diagram demonstrating the effect that variation in the angle of the lakebed has on the distance from shore to a five foot water depth.

Degrees

Distance from Shore to 5' Water Depth





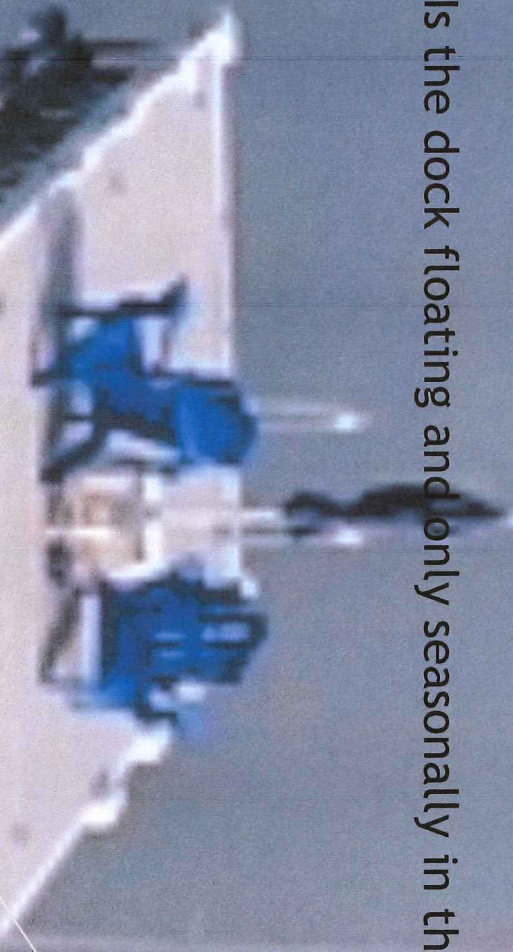


## Neighbourhood

- Is the dock in a crowded public area? If so a restriction on boat and dock size may be required. Otherwise, why impose mandatory size limits?
- What do the adjacent properties have for docks? If the neighbours have large docks why restrict a new dock?
- Is the dock in a shallow water area? If so consideration of safe water depth must be considered.
- Is the dock very exposed? If so it may need to be bigger and more robust than usual to withstand heavy weather.

# Usage

- Is the dock strictly used for boat access?
- Perhaps commercial docks should be kept to a higher standard than docks that are used for seasonal personal use only.
- Are there accessibility issues for the owners? Are there handicapped or older people involved that require special mobility aids?
- Is the dock floating and only seasonally in the lake?



## Location / Environment

- Is the dock in some sort of sensitive environmental area? Have there been repeatable scientific studies to indicate negative impacts from small docks on fish habitat?
- Many dock are in locales with very low angle beach fronts. Examples would be Blind Bay, Sorrento , Indigo Bay, Magna Bay , Sicamous Narrows etc.
- Why treat everyone as if they had the same situation to deal with?

**D.S.Cunliffe, P.Eng.**  
**Consulting Services**

8 – 5260 SQUILAX ANGLEMONT ROAD, CELISTA, B.C. V0E 1M6

**Consulting Engineering**

CELL (250) 851-6852 FAX (800) 831-5791  
EMAIL: [DaveCunliffe@AirspeedWireless.ca](mailto:DaveCunliffe@AirspeedWireless.ca)

---

May 27, 2019

Christine LeFloch, Planner  
Columbia Shuswap Regional District  
555 Harbourfront Drive NE  
PO Box 978  
Salmon Arm, BC V1E 4P1

Dear Sir:

Subject: Lakes Zoning Amendment - Bylaw No. 900-25

---

I am writing to express my concern about the proposed amendments to Bylaw 900.

1. Dock Size

I believe the CSRD should adopt the provincial guidelines for dock size. The focus needs to be on boater's needs and safety, not some arbitrary number that has no basis in fish science or aesthetics. The province has expertise in both matters and I believe the CSRD should recognize this and not try to create another source of conflict on the lake. Furthermore, having Bylaw 900 consistent with provincial rules will make the next change a seamless process. The province has already changed their approach on dock size twice during the life of Bylaw 900 and will undoubtedly do it again.

The proposed increase from 24 m<sup>2</sup> to 30 m<sup>2</sup> is a waste of time and shows a lack of boating experience on the part of whoever proposed this change. This minor change would allow a 10' wide dock to increase in length from 25.8' to 32.3'. A six-foot change in length will not begin to address the safety concerns of docking larger vessels in rough weather.

2. Dock Width

The change from 3.0 m to 3.05 m while correcting to a 10' width may sound good, doesn't address the physical reality of construction materials.

The minimum dock width using standard materials for an aluminum dock with flow through decking is 5-2' deck panels, 2" per side for the aluminum frame, and another 2" per side for plastic edging for a total width of 10'-8" or 3.25 m.

The minimum dock width using standard materials for a wood decked dock is 10' long boards, 1 5/8" per side for fender planks, and 2" per side for plastic dock edge for a total width of 10'-7 1/4" or 3.23 m.

The proposed change to 3.05 m seems to address the fact that dock materials come in Imperial measure but does not reflect real conditions.

The same problem will affect the proposed change in walkway width from 1.5 m to 1.52 m. There seems to be no understanding of the materials used in construction.

### 3. Unobstructed Foreshore

In principle, I support the right of the public to be able to walk unimpeded by docks on the foreshore. I believe however that this topic can't be addressed by changes to the OCP's that might lead to new DP rules or Bylaw provisions. The problem is that any dock that blocks public access is already prohibited by the province and by Riparian Common Law. Older docks will be grandfathered as existing non-conforming in new CSRD Bylaws and unless the province is willing to enforce their rules, the obstructions will still remain.

I think the CSRD's efforts would be better spent working with the province to remove obstructions rather than create new rules that will have no material effect.

In summary, I feel the proposed bylaw amendments do nothing to address boating safety or the needs of waterfront owners. I strongly encourage the Board to reject Bylaw 900-25 and go back to the drawing board, but this time with a bit more common sense.

Please call if you have any questions.

Yours truly,



D.S. Cunliffe, P.Eng.

Cc Director Simpson, Area F  
Director Demenok, Area C

**From:** [info@csrd.bc.ca](mailto:info@csrd.bc.ca) on behalf of [Columbia Shuswap Regional District](#)  
**To:** [Planning Public Email address](#)  
**Subject:** Form submission from: Comment Form - Lakes Zoning Amendment (CSRD) Bylaw No. 900-25  
**Date:** Saturday, May 18, 2019 9:14:41 AM

---

Submitted on Saturday, May 18, 2019 - 09:14

Submitted by anonymous user: [REDACTED]

Submitted values are:

1. I live or own property in: Electoral Area F (North Shuswap including Scotch Creek, Lee Creek, Magna Bay, Anglemont, Celistia)

\*Other (please explain): :

2. I am a: Waterfront owner

\*Other (please explain): Own waterfront and semi water front.

3. I currently: Own a dock and a boat

\*Other (please explain):

This proposed dock size is: Too small

What size would you recommend? 12'x36'

5. Other comments you would like to share?

The Shuswap is the largest natural free flow body

Of water in BC. Where and what is the logic behind the current size and proposed size and Why the size restriction on this huge lake?

6. If staff have questions regarding your comments, may we contact you? : Yes

Email address: : [REDACTED]

