



# Yuutu?it?ath

March 17, 2026

District of Ucluelet  
200 Main Street  
PO Box 999  
Ucluelet, BC V0R 3A0

VIA EMAIL TO: [tjbrown@ucluelet.ca](mailto:tjbrown@ucluelet.ca)

Dear Tyler Brown,

**RE: 560 Marine Drive – Application for Zoning Bylaw Amendment**

Thank you for referring the Zoning Bylaw Amendment application for 560 Marine Drive (Lot 1, Plan VIP76214, DL 281) to Yuutu?it?ath Government (“YG”). YG appreciates the District of Ucluelet’s continued engagement and the opportunity to review this proposal.

As a Modern Treaty Nation, YG exercises governance responsibilities within its ḥahuuḥi and maintains ongoing interests in lands, waters, and resources throughout its Traditional Territory. Early engagement on development proposals within this area supports constructive government-to-government collaboration and helps ensure that cultural heritage, environmental stewardship, and YG members’ rights and interests are appropriately considered in municipal decision-making processes.

**Treaty Rights and Harvesting Considerations**

YG wishes to highlight that the Big Beach access area adjacent to the proposed development is occasionally used by YG citizens for harvesting activities. These activities form part of YG citizens’ exercise of Treaty-protected harvesting rights within YG’s Traditional Territory under the Maa-nulth Final Agreement.

YG is concerned that the proposed rezoning would significantly increase the density and intensity of use on the property, changing the current zoning which allows six residential units and one neighborhood pub to a development that could permit up to twenty-five residential and tourist accommodation units in addition to a pub. Given the site’s proximity to Big Beach and existing public access points, this level of intensification would likely result in a substantial increase in tourism activity, visitor presence, and recreational use in the surrounding area, raising concerns regarding potential cumulative impacts to YG citizens’ ability to meaningfully access and exercise Treaty-protected harvesting rights, including increased recreational pressure and changes to the character and use of nearby coastal areas.

At present, the referral materials do not provide sufficient information to understand how these

broader impacts have been considered. YG respectfully requests that the District consider these Treaty interests as part of its decision-making process and ensure that any future consideration of this proposal includes a clearer assessment of how increased development density and associated visitor activity may affect YG citizens' continued ability to access and use nearby areas for harvesting.

### **Cultural Heritage and Archaeological Considerations**

YG's Language and Culture Department has advised that there is a known registered archaeological site associated with this property (see Figure 1). While the currently recorded site boundary may only extend slightly into the parcel (see Figure 2), the 50-metre buffer associated with areas of high archaeological potential extends across the entirety of the property.

YG acknowledges that an Archaeological Impact Assessment was completed for the property in October 2016. However, based on YG's review, there are notable discrepancies between the findings in the 2016 assessment and observations documented in earlier archaeological inventory work (1997 Ucluelet Site Inventory Study). In addition, YG notes that the western portion of the property – where the registered archaeological site is located – was not subject to subsurface testing as part of the 2016 study.

Given these limitations, YG maintains that archaeological potential within the property has not been fully assessed. As such, should the proposed development proceed, YG requires that the proponent implement an approved Chance Find Procedure and work directly with YG's Language and Culture Department to ensure that a YG cultural monitor is present during all ground-altering activities.

In addition to the registered archaeological site, YG has identified unconfirmed ethnographic information associated with this general area, which further reinforces the need for careful heritage values within the property.

YG expects that these requirements be incorporated into any conditions of approval associated with this application.

### **Environmental and Land Stewardship Considerations**

YG exercises stewardship responsibilities throughout its hahuuti and maintains an ongoing interest in ensuring that development within its Traditional Territory is carried out in a manner that protects ecological integrity and respects the interconnectedness of land, water, and marine environments.

The proposed increase in density and intensity of use on the property, in close proximity to Big Beach and surrounding coastal ecosystems, raises concerns regarding potential impacts to local environmental values. Increased residential and tourism-related use may result in greater

pressure on nearby terrestrial and marine areas, including impacts to vegetation, wildlife habitat, and shoreline conditions.

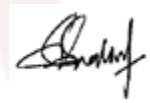
YG notes that the referral materials do not provide sufficient information to adequately assess potential environmental impacts associated with the proposed rezoning, including considerations related to stormwater management, wastewater servicing, and the cumulative effects of increased use in the area. Given the sensitivity of the surrounding environment, YG emphasizes the importance of ensuring that these factors are carefully evaluated prior to any decision on the proposed amendment.

YG respectfully requests that the District ensure that these considerations are addressed prior to any further advancement of the application, and that appropriate mitigation and monitoring measures are identified in collaboration with YG.

### **Conclusion**

YG appreciates the opportunity to review this proposal and looks forward to continued engagement with the District of Ucluelet. YG remains available to work collaboratively with the District to ensure that cultural, environmental, and Treaty interests are meaningfully addressed as this application is further considered.

Sincerely,



Sunny Dhaliwal  
Chief Administrative Officer  
Yuułuʔiłʔatḥ Government - Ucluelet First Nation

cc: Charles McCarthy, President - Yuułuʔiłʔatḥ Government - Ucluelet First Nation

Ashley Van Acken  
Director of nism̓aakukqinʔaala (always our land) - Lands and Resources  
Yuułuʔiłʔatḥ Government - Ucluelet First Nation

Carey Cunneyworth, Director of ḥaahuupačakukqinʔaala (always our teachings) -  
Yuułuʔiłʔatḥ Government - Ucluelet First Nation