

LASQUETI COMMUNITY ASSOCIATION
Ferry Committee
Route 55 (Lasqueti Island)
An Analysis of Options for the Committee's Consideration
Unsolicited submission by David B., private citizen | May 2026
Revised May 27, 2026

Governance Disclaimer

David B. provides this submission in the capacity of a private citizen and non-member of the committee. The committee chair is my spouse. I disclose this relationship in the interest of full transparency.

All data and conclusions are derived from independent research of publicly available documents and records. No consultation has occurred with the chair or any committee member regarding the contents of this submission.

I request that this input be evaluated solely on its technical merits and processed through the committee's standard procedures for unsolicited public submissions to honour the formal separation between personal associations and committee governance.

Purpose of This Submission

This document has one purpose: to assemble, in a structured form, the factual and analytical groundwork that the committee would need to conduct a balanced evaluation of the options available to it regarding the regulatory status of Route 55. All three principal options, conversion to regulated status, continuation under an improved unregulated contract, and maintenance of the current arrangement without intervention, are assessed on equal terms.

This submission does not advocate for any of the three options. All decisions rest with the committee and, where appropriate, with the LCA membership and board. If any section is found to be inaccurate, the committee is encouraged to note and correct it.

All figures and contractual obligations cited have been verified against the primary sources identified in the Sources section at the end of this document. The primary source of contract-specific information is the publicly released WPM operator contract, reference TRA-2024-41105, which comprises the original agreement dated April 1, 2020, and the Amending Agreement dated March 27, 2024.¹ Regulatory framework information is drawn from the *Coastal Ferry Act*, the Coastal Ferry Services Contract between BC Ferries and the Province of British

¹WPM Operator Contract (TRA-2024-41105): Route 55 "Lasqueti Island" Passenger and Freight Marine Transportation Services. Original agreement dated April 1, 2020; Amending Agreement dated March 27, 2024. Obtained via FOIPPA request to BC Ferries. Available at: https://lasqueti.ca/files/lasqueti_ferry_contract.pdf

Columbia, the 2018 Redlin Report, and the 2025 BC Ferries “Charting the Course” Vision Report.²³⁴⁵

1. THE CRITICAL TIMING CONSTRAINT

Under Article 9.03 of the Coastal Ferry Services Contract between BC Ferries and the Province of British Columbia,⁶ BC Ferries must give the Province notice six months before the end of an operator contract. At that point, the Province and BC Ferries jointly determine whether to continue the unregulated arrangement or convert the route to regulated status.

WPM’s contract was extended by the 2024 Amending Agreement to March 31, 2028.⁷ Six months before that date falls on September 30, 2027. Any community position regarding conversion must reach the Ministry of Transportation and Transit (MOTT) before that date to have any prospect of influencing the determination.

The community is not a formal party to the Article 9.03 determination. That determination is made exclusively between the Province and BC Ferries. The only channel through which community input can reach that process is through MOTT. This applies equally to the conversion option and the contract improvement option: the earlier the committee engages with MOTT and BC Ferries, the greater the opportunity to influence the 2028 renewal terms.

If the committee does not form and communicate a position before September 30, 2027, the renewal determination will proceed without community input. This applies whether the committee ultimately pursues conversion, contract improvement, or neither.

2. VERIFIED FACTS: THE CURRENT WPM CONTRACT (TRA-2024-41105)

The following is drawn directly from the WPM operator contract. All figures and obligations are confirmed from that document.

2a. Parties and Vessel

- **Operator:** Western Pacific Marine Ltd. (Graham Clarke, President), 501 Denman Street, Vancouver, BC V6G 2W9.
- **BC Ferries signatory (2024 Amending Agreement):** Jason Boyd, Acting Vice President, Marine Operations.

²Coastal Ferry Act, SBC 2003, c. 14. Available at: <https://www.bclaws.gov.bc.ca/civix/document/id/hstats/hstats/1039790163>

³Coastal Ferry Services Contract between the Province of British Columbia and BC Ferry Services Inc., effective April 1, 2003, as amended. Available at: https://www.bcferries.com/web_image/h9f/h87/8816524951582.pdf

⁴B. Redlin, “Connecting Coastal Communities: Review of Coastal Ferry Services” (June 2018). Available at: <https://www2.gov.bc.ca/assets/gov/driving-and-transportation/reports-and-reference/reports-and-studies/ferries-marine/20180630-review-coastal-ferry-services.pdf>

⁵BC Ferries, “Charting the Course: A Vision for Coastal Ferries” (August 2025). Available at: https://www.bcferries.com/web_image/hd5/hda/9053468819486.pdf. The 25-route figure is independently consistent with BC Ferries, *Investor Overview* (February 2026), which confirms BC Ferries operates 25 designated routes across 47 terminals.

⁷WPM Operator Contract (TRA-2024-41105), Amending Agreement, section 3.

- **Vessel:** M.V. Centurion VII, registered 1985, Port of Vancouver, Official No. 804881. At the time of writing, it is approximately 40 years old. The Transport Canada vessel registry records the registered owner as **Harbour Cruises Ltd.**, at 501 Denman Street, Vancouver, BC V6G 2W9 — the same address as WPM, the contract operator. These are legally distinct corporate entities. The contract (TRA-2024-41105) names WPM as the operator but does not address vessel ownership. The ownership implications for a conversion scenario should be confirmed before any MOTT submission; it is not established that conversion would require dealing solely with WPM on vessel transition.⁸
- **Contract term:** April 1, 2020, to March 31, 2028. The original four-year term (to March 31, 2024) was extended by four years by the Amending Agreement dated March 27, 2024 (Amending Agreement, section 3).

2b. Service Specifications (Schedule A, as amended)

- **Route:** French Creek, Vancouver Island, to False Bay, Lasqueti Island.
- **Passenger capacity:** The contract (Schedule A) specifies up to 60 passengers and 100 pounds of personal hand baggage per passenger. It has been reported in the community that Transport Canada subsequently required a third crew member, reducing the vessel's approved passenger capacity to 59. This figure has not been independently confirmed against the Certificate of Inspection; an ATIP request to Transport Canada would be required to verify it. The committee should treat 59 as the likely operational figure pending that confirmation.
- **Annual frequency:** 763 round trips per year (intended frequency; Schedule B specifies make-up procedures for weather cancellations).
- **Peak season:** The ten-week period from the last Wednesday of June to Labour Day inclusive; 17 round trips per week.
- **Non-peak season:** 14 round trips per week, plus 5 additional sailings at 6:45 p.m. on Mondays of long weekends between Easter and Thanksgiving. No sailings are required on Christmas Day or New Year's Day.
- **Terminal facilities:** WPM is responsible, at its own expense, for establishing and maintaining access to the facilities at both French Creek and False Bay (Schedule C). This infrastructure responsibility would change materially under conversion.

2c. Fares and Escalation

The 2024 Amending Agreement replaced Schedule D in its entirety. Base fares as of April 2024 (before taxes) include the following: adult peak, \$11.43; adult non-peak, \$10.24; child (ages 6 to 12) peak, \$5.57; and senior (65 and older) non-peak, \$5.10. Children under 6 travel free. The maximum authorized fare escalation rate was increased from 2.3% per annum (2020 contract) to 3.2% per

⁸Transport Canada Vessel Registry, M.V. Centurion VII, Official No. 804881. Available at: <https://www.wapps.tc.gc.ca/Saf-Sec-Sur/4/vrqs-srib/eng/vessel-registrations>. Confirms registered owner as Harbour Cruises Ltd., 501 Denman Street, Vancouver, BC V6G 2W9; certificate expires 2029-09-30. Passenger capacity is not included in this public registry record; the Certificate of Inspection would require an ATIP request to Transport Canada to obtain.

annum compounding (2024 amendment, Schedule D, note 4). These figures are authorized maximums; WPM may increase fares by less.

At 3.2% per annum compounding applied annually from the April 2024 base, the maximum authorized adult peak fare would reach approximately \$12.97 by March 2028, an increase of approximately 13.5% from the 2024 base of \$11.43.⁹ This is an arithmetic projection; actual fares may be lower. Whether 3.2% per annum compounding is an appropriate escalation rate for a provincially subsidized essential service is a question the committee may wish to raise at the 2028 renewal.

2d. Performance Standards and Default Provisions

- **Missed sailings threshold:** More than five scheduled sailings missed in any 12-month period constitutes a default ground (section 10.2(c)), except where missed sailings result from force majeure, emergency response, bad weather, vessel sinking or grounding, or fire.
- **Non-performance fee:** The 2024 Amending Agreement introduced a financial penalty for missed sailings (Schedule E, section 2). The specific amount is redacted from the publicly released contract under FOIPPA sections 17 and 21.
- **Service standard:** Section 10.1 states that service is the essence of the agreement. BC Ferries holds sole discretion to determine whether there has been a significant or continued lack of service.
- **Termination for convenience:** BC Ferries may terminate the agreement with 90 days' written notice and without giving reasons (section 2.1).

2e. The 2024 Performance Review Period

Schedule H of the 2024 Amending Agreement established a Performance Review Period from April 1, 2024, to March 31, 2026, during which BC Ferries was entitled to terminate the agreement on 180 days' notice with payment of a termination fee (amount redacted). This period ended on March 31, 2026.

WPM completed the Performance Review Period without termination. This indicates that BC Ferries assessed WPM's performance as satisfactory under heightened scrutiny. It is a relevant data point in evaluating all three options.

2f. Accountability Provisions Added by the 2024 Amending Agreement (Schedule G)

The 2024 Amending Agreement replaced the original Schedule G with the following obligations:

1. An AED (automated external defibrillator) is on the vessel during scheduled service, with a trained crew member.

⁹Projected fare figures are arithmetic calculations from the 3.2% per annum compounding escalation rate stated in Schedule D of the 2024 Amending Agreement and represent authorized maximums only. Actual fares charged by WPM may be lower.

2. Narcan kit on the vessel.
3. All correspondence with Transport Canada related to the service must be provided to BC Ferries within three business days.
4. Semi-annual open public meetings on Lasqueti Island (increased from the annual requirement in the 2020 contract).
5. By October 1, 2024: develop and make public a written community engagement plan; at the end of each year of the term, publish a summary of feedback received and actions taken in response.
6. Make public the policies and protocols for changes in sailing times, sailing cancellations, ticket issuance, and conditions of carriage.
7. Review and consider prepaid passes and return-day fares with the local community.

A note on item 7: the language “review and consider” imposes no enforceable obligation to implement prepaid passes or return-day fares. Whether this should be converted to a firmer commitment at the 2028 renewal is a matter for the committee.

A note on advisory committees: BC Ferries terminated all Ferry Advisory Committees province-wide. Route 55 did not have an FAC even when that program existed. The contract references community engagement but does not establish any standing advisory body. This absence is relevant to Option B: there is no formal community mechanism, short of this committee’s advocacy, through which proposed contract improvements can be pressed with BC Ferries.

The accountability provisions added by the 2024 Amending Agreement correspond closely to concerns formally documented in the period immediately preceding the renewal. Between September and November 2023, the LCA Ferry Committee submitted three letters to BC Ferries and the Ministry of Transportation and Infrastructure, raising specific concerns about crew levels, passenger capacity, communication failures, and the absence of the annual public meetings required under the 2020 contract.¹⁰ A community town hall facilitated by MLA Adam Walker (Parksville–Qualicum) on January 27, 2024, attended by 80 residents, produced a published What We Heard Report recommending specific contract improvements; this report was submitted to BC Ferries, the Ministry, and WPM before the Amending Agreement was executed on March 27, 2024.¹¹ Whether the 2024 provisions were directly shaped by this advocacy is not established in the publicly available record.

2g. Transparency Limitation

¹⁰LCA Ferry Committee letters to BC Ferries and the Ministry of Transportation and Infrastructure, dated September 1, October 12, and November 21, 2023. Submitted by Shelley Garside, Chair, LCA Ferry Committee. Available at: <https://lasqueti.ca/node/7388>. Note: the Ministry was subsequently renamed the Ministry of Transportation and Transit.

¹¹“Lasqueti Town Hall: What We Heard Report” (January 2024). Organized by MLA Adam Walker’s office (Parksville–Qualicum) with island trustees and LCA Ferry Committee chair Shelley Garside. Attendance: 80 residents (50 in person, 30 virtually). Submitted to BC Ferries, the Ministry of Transportation and Infrastructure, and WPM before the Amending Agreement was executed on March 27, 2024. Available at: https://lasqueti.ca/files/lasqueti_ferry_what_we_heard_report.pdf

Section 12.1 of the contract states that service operational data (number of trips, passengers, freight volumes, and fares collected) is public information. However, information relating to WPM's finances and expenses is explicitly excluded from this provision. The community and the committee cannot independently assess the economics of WPM's operations or the appropriateness of the provincial service fee, as those figures are redacted from the publicly available contract.

3. VERIFIED FACTS: THE REGULATORY FRAMEWORK

The following is drawn from the *Coastal Ferry Act*, the Coastal Ferry Services Contract between BC Ferries and the Province of British Columbia, the 2018 Redlin Report, and the 2025 BC Ferries "Charting the Course" Vision Report.

3a. The Regulated and Unregulated Route Framework

- BC Ferries operates 25 designated (regulated) routes and, under contract, administers 8 additional unregulated routes, for a total of 33 routes.¹² Route 55 is one of the 8 unregulated routes. The 25-route figure is independently confirmed by the BC Ferries *Investor Overview* (February 2026). The 8-unregulated-route and 33-route totals are drawn from the "Charting the Course" Vision Report (August 2025), which states: "Outside of the 25 regulated routes that BC Ferries delivers, the company also administers contracted ferry services on 8 unregulated routes that provide crucial links between communities and the larger transportation network."
- Unregulated routes are operated by independent contractors under contracts administered by BC Ferries with provincial funding. They are not subject to economic regulation by the BC Ferry Commissioner, though they are subject to Transport Canada safety regulations.¹³
- The Coastal Ferry Services Contract provides the mechanism by which an unregulated route may become regulated. Article 9.03 provides that, within six months before the end of an operator contract, the Province and BC Ferries may determine whether the route will convert to a designated route. This provision has existed since 2003 and has never been used.¹⁴
- The eight unregulated routes primarily serve remote communities and First Nations territories ranging from the Broughton Strait to central, northwestern, and north coast Vancouver Island and Prince Rupert.¹⁵ The specific communities served by other unregulated routes are substantially different in character from those on Lasqueti Island, and whether any have sought conversion is not documented in publicly available sources.

3b. What Regulation Provides

- The BC Ferry Commissioner is an independent regulator established under the *Coastal Ferry Act*, appointed by the Province but acting independently of both the Province and BC

¹³Coastal Ferry Services Contract, Article 9.01; Redlin, "Connecting Coastal Communities" (2018).

¹⁴Coastal Ferry Services Contract, Article 9.03; Redlin, "Connecting Coastal Communities" (2018).

¹⁵BC Ferries, "Charting the Course" (August 2025).

Ferries. The Commissioner's core responsibility is to regulate average fare increases by setting a system-wide price cap.¹⁶

- The Commissioner also monitors adherence to the Coastal Ferry Services Contract, approves or denies major capital expenditures, requires capital plans, mandates quarterly and annual reporting with audited financial statements relating to ferry operations, and oversees operators' customer complaint processes.¹⁷
- The Commissioner may appoint a person to inspect operator operations if, among other circumstances, the Commissioner believes core ferry services may not be, or may not have been, provided (*Coastal Ferry Act*, s. 46).¹⁸
- The Commissioner does not have authority over BC Ferries' day-to-day operations, customer service policies, safety procedures, or specific individual fares on specific routes. The price cap operates at the system-wide average level.¹⁹
- Ferry operators are required by law to fund the BC Ferry Commissioner under a formula set out in the *Coastal Ferry Act* (s. 57).²⁰ On a small foot-passenger route such as Route 55, the practical cost implication is not publicly documented and would need to be investigated.

3c. Implications of Conversion for Route 55

- If Route 55 were converted to a designated route, it would become part of the "BC Ferry System," defined in the Coastal Ferry Services Contract as the system "operated by or on behalf of BC Ferries using the Designated Ferry Routes" using "vessels owned or leased by BC Ferries."²¹ See Sections 6 and 7 (Option A) for the full implications of the vessel ownership requirement, which represents the most significant practical constraint on this option.
- The M.V. Centurion VII is registered to Harbour Cruises Ltd., a company sharing an address with WPM but legally distinct from it. The contract names WPM as the operator. Conversion would require BC Ferries to operate the route using a vessel it owns or leases; however, the precise vessel transition implications depend on the ownership structure between Harbour Cruises Ltd. and WPM, which has not been publicly documented. No public information is available on what vessel BC Ferries would provide, at what cost, or on what timeline.
- Route 13 (Langdale to Keats and Gambier Islands) is the only precedent for a regulated route operated by a contractor rather than BC Ferries directly. That arrangement predated the *Coastal Ferry Act*.²²

4. CONTRACT COMPLIANCE: ITEMS VERIFIABLE NOW

¹⁶*Coastal Ferry Act*, s. 38; BC Ferries, "Charting the Course" (August 2025).

¹⁷*Coastal Ferry Act*, ss. 45.2, 46, 46.1, 48, 64.1, 65, 66.

¹⁸*Coastal Ferry Act*, s. 46.

¹⁹BC Ferry Commissioner website. Available at: <https://www.bcferrycommission.ca/>

²⁰*Coastal Ferry Act*, s. 57.

²¹Coastal Ferry Services Contract, Article 1.01.

²²Redlin, "Connecting Coastal Communities" (2018).

Several obligations introduced by the 2024 Amending Agreement are verifiable from public sources. The committee does not need to wait for the 2028 renewal cycle to assess whether these commitments are being met. The findings are relevant to all three options.

Obligation (Schedule G, 2024 amendment)	Deadline	How to Verify	Status
Written community engagement plan made public	October 1, 2024	WPM's public communications; enquiry to BC Ferries Marine Superintendent	<i>Not verified by this submission</i>
Annual feedback summary for Year 1 (feedback received and actions taken)	End of contract Year 1 (March 2025)	WPM's public communications	<i>Not verified by this submission</i>
Policies on sailing cancellations, schedule changes, ticketing, and conditions of carriage were made public	Ongoing obligation	WPM's public-facing materials	<i>Not verified by this submission</i>
Semi-annual open public meetings held on Lasqueti Island	Ongoing: twice per year since April 2024	Community records; meeting minutes	<i>Not verified by this submission</i>

Non-compliance with any of the above obligations constitutes a contractual breach that is within BC Ferries' authority to enforce. Documented non-compliance is directly relevant to the committee's evaluation: it bears on whether the existing contract framework is delivering the accountability it is designed to provide, which affects the relative merits of Options B and C.

5. STRUCTURAL VULNERABILITY: SERVICE CONTINUITY RISK

This section addresses a risk that is independent of which option the committee chooses, though the three options respond to it in different ways.

The dependency and notice position.

Lasqueti Island's only surface transportation link is Route 55. That service depends on a single private operator under a contract terminable by BC Ferries on 90 days' notice without cause (section 2.1 of the contract). There is no independent body monitoring WPM's financial condition, no

regulated continuity obligation, and no formal requirement for WPM to maintain a succession or contingency plan. If WPM were to encounter serious difficulty, the community would have at most 90 days' notice before service disruption, depending on when BC Ferries exercises its termination right.

The absence of independent financial oversight.

Under the current unregulated framework, BC Ferries monitors WPM's operational performance against contract terms but is not required to assess or report on WPM's broader financial condition. The provincial service fee paid to WPM is redacted from the public record, and WPM's financial statements are not subject to any public reporting requirement under this contract. No independent body has the authority to examine whether WPM is operating the route on a financially sound basis as a recipient of public subsidy.

By contrast, the *Coastal Ferry Act* (s. 46)²³ grants the BC Ferry Commissioner authority to appoint a person to inspect a designated operator's operations if the Commissioner has reason to believe that a report provided by the operator is incomplete or incorrect or that the operator may not be providing core ferry services. Section 66 requires designated operators to submit audited financial statements annually as they relate to ferry operations. These authorities would apply to Route 55 if it were a designated route.

Note on WPM's current legal proceedings.

The following is provided as a matter of public record and is included because it is relevant to the structural vulnerability described above. **The committee should verify the current status of these proceedings before referencing them in any external submission.**

WPM is currently named in two BC Supreme Court civil actions and subject to a BCGEU unfair labour practice complaint filed at the Labour Relations Board. These proceedings arise from WPM's role as project manager for the Kootenay Lake ferry construction project, a contract entirely separate from Route 55. The total amounts claimed in the civil actions have been reported as exceeding \$6.9 million.

These are unresolved proceedings. No finding of wrongdoing has been made. They are noted here not as an assessment of WPM's conduct but as an illustration of the type of financial and legal exposure to which any operator may be subject and which the current unregulated framework has no mechanism to monitor on the community's behalf.

Verification note: The figures and proceedings cited above have not been independently verified against BC Supreme Court civil registry records or Labour Relations Board filings by this submission. The committee should confirm them before any external use.

The structural point stands regardless of how those proceedings resolve: a single-operator, terminable-on-notice, unregulated service arrangement for an island's only transportation link carries inherent continuity risk that is not addressed by the current contract framework. Option A addresses this through independent regulatory oversight; Option B can address it partially through contract provisions (vessel capital planning and contingency requirements); Option C does not address it.

²³*Coastal Ferry Act*, SBC 2003, c. 14.

6. INFORMATION GAPS

The following gaps are material to evaluating the three options. The committee should treat them as open questions until addressed through the inquiry steps noted.

Gap	Why It Matters	Suggested Inquiry
Why has the Article 9.03 conversion mechanism never been used in 23 years?	If there is a structural, financial, or political reason this has not occurred, it is likely the most important single fact bearing on Option A. Proceeding without this answer risks committing effort to a path that is not achievable.	Direct inquiry to MOTT. Contact community associations or local governments in communities served by other unregulated routes along the central and north coasts (Broughton Strait area, North Coast of Vancouver Island) to determine whether conversion has ever been attempted and, if so, what the outcome was.
What is MOTT's current position on conversion for small unregulated routes?	The Province must agree to conversion under Article 9.03. Without preliminary political support, Option A is not feasible regardless of the committee's advocacy effort.	An informal, non-committal inquiry to MOTT should be made as early as possible. It costs little and may significantly affect the analysis.
What would happen to the terminal dock facilities at French Creek and False Bay if conversion occurred?	Schedule C places terminal access costs on WPM at its own expense. Under a BC Ferries-operated regulated route, this responsibility would shift. The nature, cost, and timeline of that shift are not publicly documented.	Inquiry to BC Ferries Marine Superintendent regarding terminal ownership and access arrangements under different operational scenarios.
What vessel would BC Ferries provide if conversion occurred, and at what cost and timeline?	The M.V. Centurion VII is WPM's asset. Conversion requires a BC Ferries vessel. No information is available on procurement or transition arrangements. Service continuity during transition is a legitimate community concern.	Inquiry to BC Ferries' fleet operations or planning staff. Review any publicly available BC Ferries fleet planning documents.

Gap	Why It Matters	Suggested Inquiry
What would the BC Ferry Commissioner funding obligation cost on Route 55?	<i>Coastal Ferry Act</i> , s. 57 requires operators to fund the Commissioner. On a small route, this cost could affect fares, provincial subsidy levels, or both. No estimate is publicly available.	Inquiry to the BC Ferry Commissioner's office. Review the Commissioner's annual report for the funding formula.
Does regulated status demonstrably improve service outcomes on comparable small foot-passenger routes?	The assumption that regulation improves service has not been tested against evidence for small routes. The Commissioner does not control day-to-day operations or specific individual fares.	Review BC Ferry Commissioner performance monitoring reports, which are publicly available. Where possible, seek direct input from communities on comparable regulated small-island routes.

7. OPTION ANALYSIS

Each option is assessed on four dimensions: what it provides, what it does not provide, a preliminary feasibility assessment, and the principal risk. All three options should be treated as legitimate candidates until the information gaps in Section 6 have been addressed.

Option A: Advocate for Conversion of Route 55 to Regulated Status

Dimension	Assessment
What it provides	Independent oversight by the BC Ferry Commissioner, separate from both BC Ferries and the Province. A system-wide price cap mechanism, which removes the current 3.2% per annum compounding fare escalation from WPM's sole discretion. Mandatory quarterly and annual reporting with audited financial statements relating to ferry operations. Commissioner authority to inspect operations and review financial records if there is reason to believe core services may not be provided (s. 46). A Commissioner-approved formal complaint process. Commissioner authority to approve or deny major capital expenditures. Route becomes part of the BC Ferry System with an explicit provincial commitment to service continuity.
What it does not provide	Control over day-to-day operations, customer service policies, or specific individual fares. Continuity of WPM as operator; conversion would require BC Ferries to operate the route using its own vessel. Any guarantee of service improvement, regulated small routes have

Dimension	Assessment
	not been systematically compared with unregulated ones for community outcomes. Certainty on terminal responsibilities, vessel provision, commissioner funding costs, or transition timelines, all of which require further investigation.
Feasibility	The conversion mechanism has existed since 2003 and has never been exercised. The community has no formal standing in the Article 9.03 process; influence depends entirely on MOTT support. Feasibility cannot be assessed without a preliminary approach to MOTT. If MOTT is receptive, this option is achievable before the September 30, 2027, notice window; if not, it is not achievable on this timeline.
Principal risk	Conversion triggers a transition in which WPM loses its contract, and BC Ferries must procure a vessel and assume or restructure terminal responsibilities. The quality and continuity of service during and after that transition are unknown. On a small, historically uneconomic route, service standards under direct BC Ferries administration are not guaranteed to be superior to the current arrangement.

Option B: Advocate for a Strengthened Unregulated Contract at the 2028 Renewal

Dimension	Assessment
What it provides	Targeted improvements to specific accountability and service gaps, negotiated through BC Ferries at the 2028 contract renewal. Provisions the committee could propose include quarterly reporting requirements (functionally equivalent to s. 65 of the <i>Coastal Ferry Act</i> for regulated routes); a formal complaint process with defined timelines and BC Ferries oversight; a vessel replacement and capital planning requirement (the Centurion VII will be 43 years old at contract expiry); conversion of the pre-paid passes provision from a “review and consider” obligation to a specific commitment with a timeline; a review of the fare escalation rate; and a contingency requirement addressing WPM’s obligation to notify BC Ferries of material changes in its legal or financial condition. Continuity of WPM operations preserves the existing community relationship and eliminates transition risk.
What it does not provide	Independent oversight: BC Ferries is both the contract administrator and the enforcement body. Transparency into WPM’s finances and the provincial service fee. A complaint mechanism with an independent enforcement authority.

Dimension	Assessment
Feasibility	The pattern from the 2020 contract to the 2024 Amending Agreement is instructive: BC Ferries added substantial provisions in 2024, including semi-annual community meetings, a community engagement plan, non-performance fees, a crew education fund, and a technology development fund. This demonstrates BC Ferries' willingness to strengthen the contract when presented with reasoned submissions. This option does not require MOTT's agreement and can be pursued through direct engagement with BC Ferries.
Principal risk	Contract improvements depend on BC Ferries' agreement and WPM's acceptance. The committee has no formal standing in the negotiation; it can advocate but not compel. There is no guarantee that specific requested provisions will be included in the renewed contract.

Option C: Maintain the Current Arrangement without Intervention

Dimension	Assessment
What it provides	No expenditure of committee resources on advocacy or negotiation. The 2024 Amending Agreement added substantial accountability provisions that have not yet been fully tested across the extended contract term. WPM completed the Performance Review Period without termination. The contract runs to March 31, 2028, providing time to observe WPM's compliance with the 2024 obligations before any decision is made.
What it does not provide	Any proactive influence over the 2028 renewal terms. A response to the vessel aging issue: the Centurion VII will be 43 years old at contract expiry, and no capital planning obligation currently exists. Any mechanism to address the fare escalation trajectory. Independent oversight or financial monitoring. The committee cannot re-enter the 2028 renewal process after September 30, 2027.
Feasibility	Straightforward to execute. It is appropriate if the committee concludes that the 2024 amendment has adequately addressed community concerns and that no further action is warranted. It should be recorded as a deliberate decision with stated reasoning, not the default outcome of inaction.
Principal risk	This option closes the Article 9.03 window by default. If the committee later determines that conversion or contract improvement was desirable, the next opportunity may not arise until the 2028 renewal

Dimension	Assessment
	<p>window or later. The structural vulnerability described in Section 5, including the vessel aging issue and the absence of independent financial oversight, is not addressed under Option C. The 2023–2024 renewal cycle is directly relevant: in October 2023, the LCA Ferry Committee formally requested a competitive tender or a one-year maximum renewal extension to allow for competitive procurement; the outcome was a four-year renewal with WPM.²⁴ The committee had been actively engaged with BC Ferries and the Ministry throughout the preceding months.</p>

8. SUMMARY COMPARISON

Factor	Option A: Convert to Regulated	Option B: Strengthen Contract	Option C: No Action
Independent oversight	Yes (BC Ferry Commissioner)	No, BC Ferries administers and enforces	No
Fare control	The Commissioner's price cap removes 3.2% p.a. escalation from WPM's sole discretion	Subject to negotiation at the 2028 renewal	3.2% p.a. compounding escalation continues
Financial monitoring	Yes, the Commissioner can inspect operations and review financial records (s. 46)	Not independent; BC Ferries only	None
WPM continuity	No, WPM likely loses the contract	Yes	Yes
Requires MOTT agreement	Yes	No	No
Requires BC Ferries agreement	Yes	Yes, at renewal	No
Precedent	None since 2003	Pattern of improvement evident (2024 amendment)	Status quo maintained
Committee effort	High	Moderate	Minimal

Factor	Option A: Convert to Regulated	Option B: Strengthen Contract	Option C: No Action
Vessel aging addressed	BC Ferries is responsible; timeline unknown	Can require a capital plan at renewal	Not addressed
Terminal costs	Responsibility transfers from WPM; implications unclear	Remain with WPM	Remain with WPM
Structural vulnerability	Addressed through independent oversight	Partially addressable through contract provisions	Not addressed
September 30, 2027, deadline	Binding; advocacy must be substantially complete	Does not require Article 9.03 mechanism	The window closes by default

9. CONSIDERATIONS COMMON TO ALL OPTIONS

Vessel condition and end-of-life planning.

The M.V. Centurion VII was registered in 1985 and is approximately 40 years old. The Transport Canada vessel registry confirms the current certificate expires September 30, 2029, meaning recertification will fall due within whatever contractual arrangement follows the March 2028 expiry, regardless of which option the committee chooses. The community-reported reduction in approved passenger capacity from 60 to 59, attributed to a Transport Canada crewing requirement, is an early illustration of the type of regulatory constraint that an aging vessel may increasingly attract. Vessel succession is a genuine risk regardless of regulatory status. None of the three options eliminates this risk; Options A and B create mechanisms to address it, but neither guarantees action on any particular timeline. The committee may wish to consider whether vessel planning should be treated as a parallel priority, separate from the regulatory evaluation.

The community has no formal standing in the regulatory or renewal processes.

Under all three options, the committee's influence is exercised through advocacy rather than legal right. For Option A, the relevant party is MOTT. For Option B, the relevant party is BC Ferries. Neither is obligated to accept community positions, though both have demonstrated responsiveness to reasoned, evidence-based submissions.

Option C should be an active decision.

Option C is a legitimate outcome of this evaluation if the committee concludes the 2024 amendment has adequately addressed community concerns. It should not be the outcome of the committee simply running out of time to consider the question. The September 30, 2027, deadline is fixed.

Community division is a realistic possibility under Option A.

Conversion would likely end WPM's contract with Route 55. The Lasqueti community has an established relationship with WPM. Any public consultation process should be structured to surface differences of opinion on this question rather than paper over them.

10. A SUGGESTED EVALUATION FRAMEWORK

The following sequence of decisions is offered for the committee's consideration. It is structured to ensure that high-cost or irreversible actions are not taken before the information required to support them has been gathered.

8. **Establish a mandate.** Does the committee have LCA board support and the capacity to conduct this evaluation before September 2027? If not, Option C is the de facto outcome and should be recorded as such.
9. **Verify WPM compliance with existing 2024 obligations.** The engagement plan, feedback summary, published policies, and semi-annual meeting obligations are all overdue or ongoing. The committee should establish whether WPM is meeting them before forming a view on the adequacy of the current framework.
10. **Make an early, informal approach to MOTT.** Before forming a public position on any option, a quiet inquiry to MOTT about the feasibility of conversion should be made. This does not commit the committee to any position; it avoids the cost of preparing an advocacy case that is not politically viable.
11. **Fill the identified information gaps.** The gaps in Section 6, particularly those relating to why conversion has never been used, terminal infrastructure, vessel provision, and commissioner funding costs, are material to evaluating Option A.
12. **Consult the community.** Present all three options to the LCA membership with their actual trade-offs, including the WPM continuity question and the structural vulnerability observations in Section 5. Record and document the input.
13. **Form and communicate a position.** Submit a formal position to MOTT and/or BC Ferries before September 30, 2027, if the committee is pursuing Option A or B. If Option C, document the reasoning and communicate it to the membership.

11. SUGGESTED WORK PLAN

The following is offered for the committee's consideration and adaptation. Named individuals should be assigned to each task by the committee. "Chair" denotes the committee chair; "Committee" denotes the ferry committee acting collectively.

Hard deadline: the committee must have a clear position and have initiated any MOTT or BC Ferries engagement before September 30, 2027. Working back from that date, all four phases should be complete by February 2027.

Phase / Task	Owner	Target	Notes
PHASE 1: Foundation (June to August 2026)			
Secure LCA board approval for the evaluation mandate and confirm committee capacity and timeline.	Chair	June 2026	Without board support and committed committee capacity, the evaluation cannot proceed, and Option C is the practical outcome.
Verify WPM compliance with 2024 Schedule G obligations: engagement plan (due October 2024), Year 1 feedback summary (due March 2025), published policies on cancellations and ticketing, and semi-annual meeting records.	Committee	June 2026	Verifiable from public sources. Any non-compliance should be documented and, if the committee considers it appropriate, raised with BC Ferries.
Make an informal, non-committal approach to MOTT to gauge the political feasibility of conversion.	Chair	July 2026	Highest-priority external action in Phase 1. Frame it as an information-gathering exercise. The response will significantly affect the relative merits of Option A.
Research why the Article 9.03 mechanism has never been used; contact local governments or community organizations in communities served by other unregulated routes to determine whether conversion has ever been attempted and with what result.	Committee	July 2026	The other seven unregulated routes primarily serve remote communities along the central and north coasts. Community governance structures differ; adjust the inquiry approach accordingly.
Independently verify the current status of the BC Supreme Court civil actions and BCGEU complaint referenced in Section 5 of this submission, using the BC Court Services online registry and the Labour Relations Board.	Committee	July 2026	Required before any external reference to those proceedings. Do not rely on secondary sources.
Inquire with BC Ferries regarding terminal dock arrangements at French Creek and False Bay under a conversion scenario.	Chair	August 2026	Required to understand the full operational and cost implications of Option A.
PHASE 2: Analysis (September to October 2026)			

Phase / Task	Owner	Target	Notes
Analyze MOTT's response and all information gathered on conversion feasibility. Determine whether Option A is politically viable before proceeding.	Committee	September 2026	If MOTT has indicated that conversion is not under consideration, the committee should weigh this heavily before committing further resources to Option A.
Identify specific contract provisions to request under Option B, with draft language: quarterly reporting, formal complaint process, vessel capital planning, fare escalation review, prepaid pass obligation, and contingency notification requirement.	Committee	September 2026	Draft provisions should be specific and enforceable. The 2024 amendment is the baseline.
Inquire with the BC Ferry Commissioner's office regarding the Commissioner's funding obligation and its cost implications for a small foot-passenger route.	Committee	September 2026	Required to assess the full cost implications of Option A.
Review BC Ferry Commissioner performance monitoring reports and, where possible, seek direct input from communities on comparable regulated small-island routes to assess whether regulated status delivers measurably better outcomes.	Committee	October 2026	Commissioner reports are publicly available. This is the central factual question for Option A.
Prepare an options paper presenting all three options in balanced terms, incorporating Phase 1 and Phase 2 findings, for community consultation.	Chair	October 2026	The options paper should present each option with its actual trade-offs. It should not advocate for any outcome.
PHASE 3: Community Consultation (November 2026)			
Present the options paper to LCA membership; facilitate a structured discussion of priorities, risk tolerance, and community values, including the WPM relationship, vessel aging, and the structural vulnerability described in Section 5.	Chair	November 2026	All three options should be presented on equal terms.

Phase / Task	Owner	Target	Notes
Document and summarize community input in writing for committee records and any future external submissions.	Committee	November 2026	A written record of community input is a prerequisite for any credible submission to MOTT or BC Ferries. Differences of opinion should be noted, not resolved artificially.
PHASE 4: Decision and Submission (December 2026 to February 2027)			
Committee deliberation: Reach a formal position on Option A, B, or C, with documented rationale, for LCA board approval.	Committee	December 2026	Rationale should be documented regardless of which option is chosen.
Secure LCA board approval of the committee's position.	Chair	January 2027	Board endorsement is required before any formal external advocacy.
If Option A: Submit a formal written position to MOTT and request a meeting with senior staff before September 30, 2027. Include the community input summary, the options analysis, and specific questions regarding the Article 9.03 process.	Chair	February 2027	MOTT contacts (confirmed from gov.bc.ca): Minister of Transportation and Transit (Hon. Mike Farnworth), PO Box 9055, Prov Stn Govt, Victoria, BC V8W 9E2. Deputy Minister (Heather Wood), PO Box 9850, Stn Prov Govt, Victoria, BC V8W 9T5. Tel: 250-387-3198. The committee should identify the specific branch responsible for coastal ferry services before submitting; minister and deputy minister contacts are provided as confirmed entry points.
If Option B: Submit proposed contract provisions to BC Ferries Marine Superintendent with a request to engage in pre-renewal discussions.	Chair	February 2027	BC Ferries Marine Superintendent, 1300 Ellenor Road, Comox, BC V9M 4B3 (confirmed from contract section 13.1 and BC Ferries terminals directory). Pre-renewal engagement should precede BC Ferries' internal renewal planning. Section 2.1 of the contract requires 90 days' notice of renewal, so BC Ferries will initiate renewal planning well before December 2027.
If Option C: Prepare a brief written summary of the committee's decision and reasoning for	Chair	February 2027	Option C should be communicated transparently to the membership as

Phase / Task	Owner	Target	Notes
distribution to LCA membership and schedule a review before the 2028 renewal.			a deliberate decision with stated reasoning.

SOURCES

All sources cited in this submission are primary or authoritative documents in the public domain, except where noted.

1. WPM Operator Contract (TRA-2024-41105): Route 55 “Lasqueti Island” Passenger and Freight Marine Transportation Services. Original agreement dated April 1, 2020; Amending Agreement dated March 27, 2024. Obtained via FOIPPA request to BC Ferries. Monetary figures redacted under FOIPPA ss. 17 and 21 are noted where referenced.

Available at: https://lasqueti.ca/files/lasqueti_ferry_contract.pdf

2. Coastal Ferry Act (SBC 2003, c. 14).

Available at: <https://www.bclaws.gov.bc.ca/civix/document/id/hstats/hstats/1039790163>

3. Coastal Ferry Services Contract between the Province of British Columbia and BC Ferry Services Inc., effective April 1, 2003, as amended.

Available at: https://www.bcferries.com/web_image/h9f/h87/8816524951582.pdf

4. “Connecting Coastal Communities: Review of Coastal Ferry Services” (B. Redlin, June 2018).

Available at:

<https://www2.gov.bc.ca/assets/gov/driving-and-transportation/reports-and-reference/reports-and-studies/ferries-marine/20180630-review-coastal-ferry-services.pdf>

5. “Charting the Course: A Vision for Coastal Ferries” (BC Ferries, August 2025).

Available at: https://www.bcferries.com/web_image/hd5/hda/9053468819486.pdf

Alternative portal: <https://www.bcferriesprojects.ca/bc-ferries-charting-the-course>

6. BC Ferry Commissioner website: <https://www.bcferrycommission.ca/>

8. Transport Canada Vessel Registry, M.V. Centurion VII, Official No. 804881. Confirms registered owner, certificate expiry, and physical specifications. Passenger capacity is not included in the public registry record.

Available at: <https://www.wapps.tc.gc.ca/Saf-Sec-Sur/4/vrqs-srib/eng/vessel-registrations>

9. BC Supreme Court civil registry (for independent verification of proceedings referenced in Section 5): <https://www.bccourts.ca/>

10. BC Labour Relations Board (for independent verification of the unfair labour practice complaint referenced in Section 5): <https://www.lrb.bc.ca/>

11. LCA Ferry Committee letters to BC Ferries and the Ministry of Transportation and Infrastructure, dated September 1, October 12, and November 21, 2023. Submitted by Shelley Garside, Chair, LCA Ferry Committee. Note: the Ministry was subsequently renamed the Ministry of Transportation and Transit.

Available at: <https://lasqueti.ca/node/7388>

12. “Lasqueti Town Hall: What We Heard Report” (January 2024). Organized by MLA Adam Walker’s office (Parksville–Qualicum) with island trustees and LCA Ferry Committee chair Shelley Garside. 80 residents attended. Submitted to BC Ferries, the Ministry of Transportation and Infrastructure, and WPM.

Available at: https://lasqueti.ca/files/lasqueti_ferry_what_we_heard_report.pdf

This submission is offered in good faith to assist the committee’s deliberations. The author welcomes the correction of any factual errors.

David B.

Lasqueti Island, BC

May 2026