CHARTER ADVOCATES CANADA

[redacted]

November 24, 2026

Honourable Premier Lorne Doerkson
Honourable Caroline Elliot, Attorney General
Honourable Á'a:líya Warbus, Minister of Environment
Honourable Donegal Wilson, Minister of Water, Land and Natural Resource Operations
PO BOX 9041 STN PROV GOVT
VICTORIA, BC V8W 9E1

[redacted]

Dear Premier Doerkson, Attorney General Elliot, Minister Warbus and Minister Wilson:

***Re: Closure of Joffre Lakes Provincial Park on the Basis of Ancestry***

Earlier this year I sent a letter to your predecessors expressing legal and constitutional concerns about the British Columbia government's decision to exclude the public from Joffre Lakes Park.

Our legal team prepared a legal challenge against this closure, awaiting client instructions to file. Political developments have led to a change of government in British Columbia and your ascension to roles of provincial responsibility.

We note your party's campaign promise to "[r]estore equal access to Crown land and provincial parks".[1]

Can you please confirm whether your government will close Joffre Lakes Park to the public on the basis of ancestry in 2027?

Your timely response to this request will be appreciated. Should your government implement closures of Joffre Lakes Park on the basis of ancestry in 2027, we have instructions to promptly file a legal challenge to protect the rights and interests of British Columbians in their Provincial Parks.

Sincerely yours,

[redacted]

Marty Moore, JD
Legal Director

Enclosure: June 15, 2026 letter to Premier Eby, Attorney General Sharma and Minister Davidson

[11] Conservative Party of British Columbia, *Ready to Deliver: Lorne Doerkson's Plan for a Stronger BC* (October 16, 2026) at page 46, available at https://conservativebc.ca/wp-content/uploads/2026/10/20261016_BCC_Platform2026_8-5x11-Draft-18_compressed.pdf.

MOORE JUSTICE LAW

June 15, 2026

The Honourable David Eby, K.C.
Premier of British Columbia
[redacted]

The Honourable Niki Sharma, K.C.,
Attorney General and Deputy Premier
[redacted]

The Honourable Tamara Davidson
Minister of Enrionment and Parks
[redacted]

Dear Premier Eby, Attorney General Sharma, and Minister Davidson:

***Re: Rescind the Excessive and Discriminatory Closures of Joffre Lakes Park***

Many British Columbians have expressed their concerns about your government's decision to exclude the public from Joffre Lakes Park, described recently as follows:

> As in previous years, Pipi7íyekw/Joffre Lakes Park will temporarily close to recreational visitors this season to continue the practice of providing time and space for members of the Lil'wat Nation and N'Quatqua to reconnect with the land in a meaningful way.
>
> The park will be closed to the public:
>
> - June 20 until 27, 2026, for National Indigenous Peoples Day and summer solstice celebrations
> - Sept. 8 until 30, 2026, for fall harvesting celebrations and National Day for Truth and Reconciliation[1]

Joffre Lakes Park however, exists "for the inspiration, use and enjoyment of the public."[2] Excluding the public from Joffre Lakes disregards this statutory obligation.

[1] BC Environment and Parks release, May 7, 2026.
[2] *Park Act*, R.S.B.C. 1996 c. 344, section 5(3).

The stated basis for the exclusion of the public is so 2,693 British Columbians[3]—less than .05% of the population—can have exclusive use of this Provincial treasure for 31 days because of their race and ethnic origin.

This exclusion of people from Joffre Lakes infringes the *Charter*'s protection of British Columbians' freedom of movement[4] and their right to equal protection and equal benefit of the law without discrimination based on race and ethnic origin.[5]

These *Charter* infringements are not justified.

There is no evidence that fair, race-neutral use allocations cannot achieve conservation goals while allowing for the inspiration, use and enjoyment of the public.

Further, there is no evidence that the accommodation of particular groups' indigenous practices requires the closure of any, let alone all, of Joffre Lakes Park for more than four weeks during peak season this year. The demands of particular groups do not dictate the rights of the public.

I urge you to respect the rights of all British Columbians and immediately rescind the excessive and race-based closures of Joffre Lakes Park.

Failure to do so may result in legal process without further notice.

Sincerely yours,

[redacted]

Marty Moore, JD

[3] This number is combined total populations of the Lil'wat Nation (2,299) and the N'Quatqua (394).
[4] See *Taylor v. Newfoundland and Labrador*, 2026 SCC 5 ("*Taylor*") at paras 26 and 29; see also *Evely v. Nova Scotia (Minister of Natural Resources)*, 2026 NSSC 118 at paras 40 and 56.
[5] *Canadian Charter of Rights and Freedoms, Part I of the Constitution Act, 1982, being Schedule B to the Canada Act 1982 (UK), 1982, c 11,* section 15(1).

**Moore Justice Law** Email: [redacted]