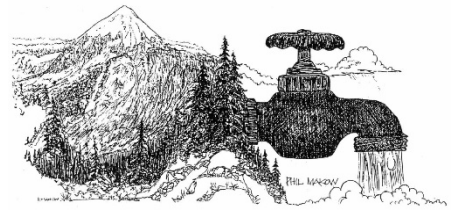


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September 15, 2016

Keith Baric,
Planning Section Head,
BC Parks and Conservation Officer Service Division

Re: Williamson Lake UREP Map Reserve

After our conversation yesterday morning regarding the still active UREP at Williamson Lake and our brief discussion about 'Map Reserves,' I realized that I need to make a formal request to you for the legislation and policy authorizing you to cancel the UREP Map Reserve.

My concerns relate to your stated imminent decision to rescind this UREP, created in early 1959, and BC Timber Sales' authority to issue forest harvesting permits within it.

From our understanding, a Section 16 Map Reserve protects Crown land forests from "disposition" under the *Land Act* (or any other *Act*), but BC Timber Sales is about to/or has already granted a timber sale within the UREP in question. You seemed to be disputing this point of law.

In our conversation, I made reference to a 1990 memo written by Derek Thompson, the former Director of Planning and Conservation with the Ministry of Parks. His January 29, 1990 memo to R.H. Roberts, Regional Director of the Lower Mainland Region with the Ministry of Crown Lands, states the following regarding the Crown Land Registry:

"Proposed reserves definitely depend on interim protection through Section 12 map reserves and we would appreciate the prompt renewal of the latter before expiry. We want to make certain that reserves and proposals are not subject to inadvertent violations or land dispositions."

Mr. Thompson's interpretation of Section 12 (now Section 16) Map Reserves is very clear. (I contacted Mr. Thompson after his retirement and discussed this letter with him.) What has changed since then?

UREPs are assigned a separate Land Ownership Code status by government: 61-N. Ministry of Forests' Timber Supply Analysis reports for the Boundary TSA in the West Kootenay cite many UREPs as 61-N, where N represents Crown lands "not available for long-term integrated resource management."

The March 1980 *Forests and Range Resource Analysis Technical Report* submitted to the BC Legislative Assembly by Forests Minister Tom Waterland, included a June 5, 1979 submission by T.E. Lee, the Assistant Deputy Minister of Parks & Outdoor Recreation Division. In his submission, is the following, under a section called *Additional Areas of Parks Branch Interest*:

“1. Reserves: Throughout the Province, numerous reserves of Crown land which are of recreational significance have been established by the Land Management Branch. The vast majority of these are very small sites, while about two dozen are greater than 1,000 hectares. Parks Branch considers that these reserves are important assets of the public; they ensure that, outside of established parks, there are key recreational sites available for public use and enjoyment. Except in special circumstances, all reserves should be excluded from forest inventory.”

Similarly, a reference to “withdrawals from the land base” was made in the September 28, 1984 *Forest and Range Analysis Report*, which was also submitted to the BC Legislative Assembly:

“An estimate of the anticipated withdrawals from the land base over the next 20 years for such purposes of farm lands, watershed reserves, wildlife preserves, ecological reserves and recreational reserves.”

Though these UREP Reserves were referenced in key Ministry of Forests’ documents, wherein these Reserves were to be protected, in our review of the *West-Kootenay Boundary Land Use Plan* published in late 1994, we found no references to UREP Reserves, of which there many at the time. This omission is both curious and troubling.

With regard to your impending decision about the Williamson Lake UREP Map Reserve, or any other similar Map Reserve, we request that you not rescind the Williamson Lake UREP Map Reserve in the interim.

Sincerely,
Will Koop,
Coordinator.

Cc: Margaret Steele