

**MINISTRY OF ENVIRONMENT
MEETING INFORMATION NOTE**

October 30, 2015
File: 280-20
CLIFF/tracking #: 292127

PREPARED FOR: Honourable Mary Polak, Minister of Environment

DATE AND TIME OF MEETING: November 3, 2:30-3:00pm

ATTENDEES:

MLA, Jackie Tegart, Fraser-Nicola
Wes Shoemaker, Deputy Minister, Environment
Jim Standen, Assistant Deputy Minister, BC Parks and Conservation Officer Service

ISSUE(S): MLA Jackie Tegart has requested a meeting with Minister Polak to discuss a number of issues in the Fraser-Nicola constituency.

BACKGROUND AND DISCUSSION:

MLA Jackie Tegart has requested a meeting to discuss the following issues:

- Designation of a day use area in Kentucky Alleyne Park
- Timing of a decision of a national park reserve in the South Okanagan
- Manning Park Resort Permittee's permit fees
- The existing Cache Creek landfill
- Cache Creek landfill extension

Kentucky Alleyne Park

Kentucky Alleyne Park (144 hectares) is located just off Highway 5A, about 38 km south of Merritt and 11 km south of the Coquihalla Connector/Highway 5A junction. The park's natural features and good access for coast and Southern Interior residents/travellers makes it a popular destination for fishing, camping, canoeing/boating, swimming and walking.

The park presently has 58 campsites and a group camping area. There is no dedicated day use area which has resulted in concerns being raised by the public regarding lack of parking for day use. Day users to the park either end up parking in a designated campsite or in non-designated areas.

While the layout and features of the park make identifying a dedicated day use parking area difficult, BC Parks is exploring options to address the day use parking issue in Kentucky Alleyne Park.

South Okanagan Intentions Paper

Following discussions with stakeholders, community interests and the Okanagan Nation, on August 13, 2015, the Province released an Intentions Paper, the *Protected Areas Framework for British Columbia's South Okanagan*, outlining how lands in the South Okanagan might be protected and to seek public comment on these proposals.

Comments, via a questionnaire on the BC Parks website, on the Intentions Paper were being sought until October 31, 2015.

s.13

To date, the Ministry of Environment has not consulted with Parks Canada on this proposal, but have advised Parks Canada that the ministry has prepared a proposed land management framework paper for public comment s.13

s.13

s.13,s.16

Manning Park Resort Permit Fees

On June 19, 2015, the new owner (Kevin Demers) and operator of Manning Park Resort (the Resort) met with Minister Polak, MLA Tegart, ADM Standen, and Regional Director Trehwitt to request an annual Resort park use permit fee waiver s.13,s.17,s.21

s.13,s.17

s.13,s.21

s.13,s.17,s.21

s.13,s.17,s.21

The newly approved BC Parks Ski Resort Policy includes an action for BC Parks to review ski resort permit fees with consideration of harmonization with fees charged for Crown land ski resorts. s.13,s.17
s.13,s.17

Existing Cache Creek Landfill

The landfill is authorized by the Thompson Nicola Regional District Solid Waste Management Plan and an Operational Certificate held jointly by Wastech and the Village of Cache Creek. The landfill is projected to close in 2016.

A post closure trust fund was established subsequent to an Environmental Appeal Board ruling in the late 1980s. The fund is an internal trust managed by the Province, presently valued at approximately s.17. The Ministry of Environment is responsible for disbursement of funds from the trust for post-closure care.

The Village of Cache Creek is the beneficiary of the trust, with the intent being that any proceeds from the trust available at the completion of post closure care of the site would be returned to the Village of Cache Creek.

s.13,s.16

s.13,s.16

On December 3, 2015, ministry staff will attend a technical meeting in Cache Creek with all stakeholders to get an update on landfill operation and closure activities.

New Site, Cache Creek Landfill Extension

The Cache Creek Landfill Extension neighbours the existing Cache Creek Landfill, but otherwise is a completely detached facility: liners, cells, drainage diversion, monitoring locations, leachate collection, landfill gas (LFG) extraction systems etc., are all separate. The existing Cache Creek Landfill will be closed and the Cache Creek Landfill Extension will be opened as an entirely separate and new operation.

s.13,s.17

SUGGESTED RESPONSE/NEXT STEPS:

Kentucky Alleyne Park

BC Parks is currently exploring options to resolve the day use parking issue in Kentucky Alleyne Park and will keep MLA Tegart advised of potential solutions.

South Okanagan Intentions Paper

s.13,s.16

Request for permit fee relief from Manning Park Resort
s.13,s.17

Now that the Ski Resort Policy is signed off and approved we are committed to completing a permit fee review in the very near future.

Cache Creek Landfill and Extension

Ministry of Environment staff will attend a technical meeting in Cache Creek in early December with all stakeholders to get an update on landfill operation and closure activities. s.13,s.17

s.13,s.17

Contact:	Alternate Contact:	Prepared by:
<i>Jim Standen, ADM</i>	<i>Bob Austad, Ex. Dir.</i>	<i>Ken Morrison, Mgr.</i>
<i>BC Parks and COS</i>	<i>Regional Operations</i>	<i>Planning & Land Admin.</i>
<i>250 387-1288</i>	<i>250 356-9241</i>	<i>250 356-5298</i>
<i>Mark Zacharias, ADM</i>	<i>A.J. Downie, Director</i>	<i>A.J. Downie, Director</i>
<i>Environmental Protection</i>	<i>Authorizations - South</i>	<i>Authorizations - South</i>
<i>250 356-0121</i>	<i>250 751-3176</i>	<i>250 751-3176</i>

Reviewed by	Initials	Date
DM	WSB for WS	Nov 2/15
DMO	BC	Nov 2/15
ADM, BCP&COS	JS	Nov 2/15
ADM, EP	MZ	Oct 30/15
Ex. Dir., RO		
Ex. Dir., CPAR	BB	Oct 30/15
Mgr., PLA	KEM	Oct 30/15
Author	KEM	Oct 30/15

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 28, 2015
File: 280-20
CLIFF/tracking #: 290926

PREPARED FOR: Honourable Mary Polak, Minister of Environment

ISSUE: Loyalty Card for BC Parks

BACKGROUND:

BC Parks' Executive met with Dale Saip, Vice President, Business Development, Vancouver Giants Hockey Club and Brad Pollock, Principal, Bradley Marketing Solutions International to discuss potential revenue opportunities for BC Parks, including a loyalty card program. In our discussions, three types of loyalty card programs were considered. The following summarizes the options:

Program	Description	Pros	Cons	Examples
Points-Based Loyalty Program	Purchaser entitled to either a discount on the current purchase or points to be used on future purchases.	s.13		<ul style="list-style-type: none">• More Rewards (Save-On-Foods)• AirMiles• Shoppers Optimum
Fee Cards with Instant Rewards	Consumers purchase a card for a fee and receive rewards as well as discounts at participating businesses.			<ul style="list-style-type: none">• Student Price Cards• Shriners Rewards
Extended Benefits & Rewards	A multiple business reward program.			<ul style="list-style-type: none">• BC Ferries Vacations

DISCUSSION:

s.13,s.17

s.13,s.17
s.22

s.22

SUMMARY:
s.13,s.17

Attachment 1: *Loyalty Rewards, Program Review- Bradley Marketing Solutions International*

Contact:

*Jim Standen,
ADM
BC Parks
250-387-1288*

Alternate Contact:

*Angus Carnie
Manager, Programs
BC Parks
250-387-4318*

Prepared by:

*Christine Rikley
Recreation Services Specialist
BC Parks
250-356-5287*

Reviewed by	Initials	Date
DM		
DMO	BC	Sept 29, 15
ADM	JS	Sept 29, 15
Dir./Mgr.	AC	Sept 28, 15
Author	CR	Sept 28, 15

Loyalty Rewards Program Review

PRESENTATION TO:

PARKS BC

SEPTEMBER 18, 2015

PREPARED BY:



BRADLEY
MARKETING
SOLUTIONS
INTERNATIONAL

Types of Rewards Program in Market today

- Points Based Loyalty Programs
- Fee Cards with Instant Rewards
- Extended Benefits & Rewards Programs

Points Based Programs



Pros

Cons

s.13



AirMiles Programs

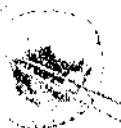
Earn Points/miles

Burn Points/miles

More Rewards



earn points



Tell us how **YOU** have turned your purchases into **really great rewards.**

[submit here.](#)



redeem points



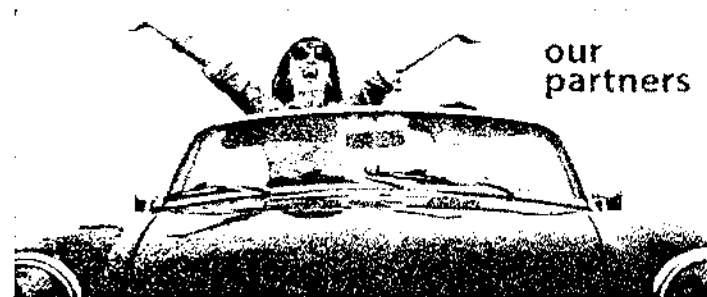
KitchenAid Deluxe 5 Qt Stand Mixer, Onyx Black
FREE with 100,000 points



6pc Mountain Laura Plate Set with Wood Base
FREE with 5,000 points



our partners



Earning points is now more convenient than ever. More Rewards has a variety of retail and online partners where you can earn points for your everyday spending. Start earning points now at any of our grocery, gas, entertainment, automotive, financial, and travel partners. The opportunities to earn reward points are endless, and easier than you think. With nearly 500 retail locations, our partners are local, which means more points for you, faster than ever before.



Multiple Points Issuing Partners

A large, dense, black and white photograph of a textured surface, possibly a book cover or a piece of fabric, showing a complex, repeating pattern. The texture is highly irregular and granular, with many small, dark, irregular shapes scattered across a lighter background, creating a mottled or marbled effect. The overall appearance is that of a high-contrast, close-up shot of a material with a complex internal structure.

Pros

Cons

s.13

Student Price Card



Register your card

REGISTER



SUBSCRIBE

Subscribe and get
the LOULOU SPC
VIP CARD!

ORDER NOW



GET MORE WITH SPC

10% off regular price
on all purchases
made with your SPC

Get the card



SHOP WITH SPC AND BMO

Presenting your BMO card with
your SPC card when making
a purchase with your SPC card
will earn you 10% off your purchase.

Check out the cards



FOREVER 21

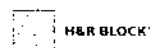
10% off regular price
on all purchases
made with your SPC

GUESS

10% off regular price
on all purchases
made with your SPC

Georgian

10% off regular price
on all purchases
made with your SPC



10% off regular price
on all purchases
made with your SPC

FRENCH CONNECTION

10% off regular price
on all purchases
made with your SPC

GUESS

10% off regular price
on all purchases
made with your SPC



10% off regular price
on all purchases
made with your SPC

heel boy

10% off regular price
on all purchases
made with your SPC



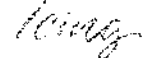
10% off regular price
on all purchases
made with your SPC

GUESS

10% off regular price
on all purchases
made with your SPC



10% off regular price
on all purchases
made with your SPC



10% off regular price
on all purchases
made with your SPC

GNC

10% off regular price
on all purchases
made with your SPC

GARAGE

10% off regular price
on all purchases
made with your SPC



10% off regular price
on all purchases
made with your SPC



15% off regular price
on all purchases
made with your SPC

Shriners Rewards



New ways to save,
more reasons to smile.

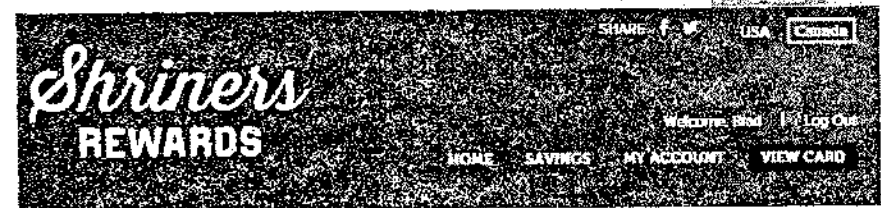
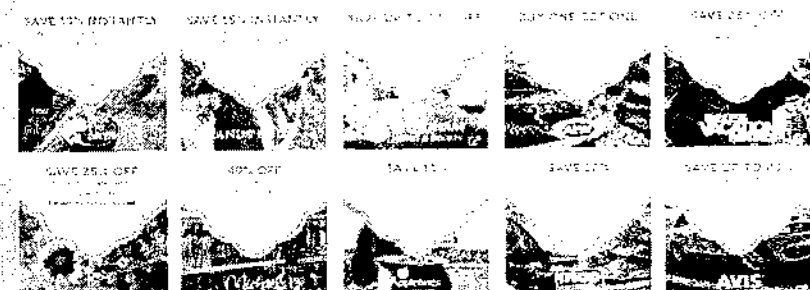
At Shriners Rewards, you'll find the best deals on everything you need for your business and family. From travel to home improvement, we've got you covered.



25% off and easy-goes toward supporting Shriners & charitable projects of your choice.

10 for 10 - Perfect savings

Click an offer to view more details.



How it works: 10 for 10

Search over 250,000 local deals

or use the filters to narrow your search

Home

Travel

Food & Drink

Auto

Home

Services

Events

Gifts

More

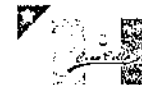
Clear Search

GO

Shriners Rewards Card

View Map

View the details for each deal on the map



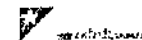
Green Room
855 Burrard Ave
Vancouver, V6C 1G5

VIEW DEAL



Cycle City Tours
1190 Columbia St W
Vancouver, Vancouver

VIEW DEAL



Ramada Inn & Suites Downtown Vancouver
1021 Granville St
Vancouver, V6C 1M6

VIEW DEAL



Ramada Inn & Suites Downtown Vancouver
1221 Granville St
Vancouver, V6C 1M6

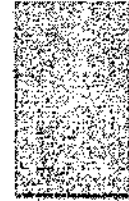
VIEW DEAL



Bayshore Bicycle Rentals
745 Denison St
Vancouver, V6B 2L6

VIEW DEAL

Extended Benefits & Rewards



Pros

Cons

s.13

BC Ferries

BC Ferries
Vacations

Home Packages Accommodation Destinations Activities Vacations Centre Media & Downloads Promotions



3rd Night Free Sunshine Coast Painted Boat Resorts

\$298



Packages

Discover the best of BC Ferries Vacations with our exclusive packages. Choose from a variety of options to suit your needs and budget. Book now to secure your spot.

Travelling within 4 Hours

Why BC Ferries Vacations?

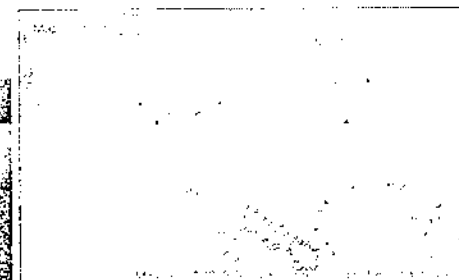
BC Ferries Vacations offers a unique and unforgettable experience. Enjoy the best of BC Ferries and the best of BC. Book now to secure your spot.

EXPERIENCE
CANADIAN COASTWAYS

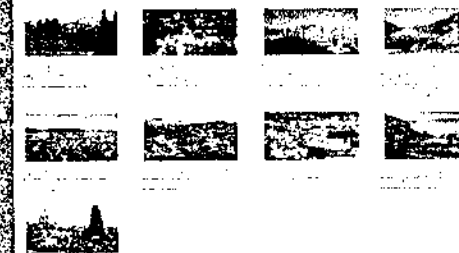
BC Ferries
vacations

Home Packages Accommodation Destinations Activities Vacations Centre

British Columbia Destinations



At a glance



All the best of BC

Discover the best of BC Ferries Vacations with our exclusive packages.

Packages

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Travelling within 4 Hours?

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

Discover the best of BC Ferries Vacations with our exclusive packages.

BC Ferries

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 22, 2015
File: 0280-20
CLIFF/tracking #: 290808

PREPARED FOR: Honourable Mary Polak, Minister of Environment

ISSUE: Campaign for BC Parks

BACKGROUND:

Ric Careless, BC Parks Elders Council, has met with the BC Parks Executive and the Premier's Office. In these meetings, he has presented a proposal entitled "Campaign for BC Parks." The proposal discusses a number of key issues facing the agency and makes recommendations for the future direction of BC Parks. The proposal contains four main components:

1. *A New Vision for BC's Parks* – emphasizes the importance of the social, environmental, economic and community benefits provided by parks, and outlines a strategy **s.13**
2. *Potential BC Parks Program Priorities* -- identifies new program priorities that will support the new vision, including **s.13**
s.13
3. *Possible BC Parks Revenue Sources* – explores potential options for expanding BC Parks' sources of revenue in order to achieve program priorities, including **s.13,s.17**
4. *Increasing Relevance: Categories of BC's Parks* **s.13**
s.13

DISCUSSION:

Ric Careless' proposal emphasizes the need for a new approach to park management to achieve long-term sustainability for the organization. The ideas presented in the proposal align closely with BC Parks' overall strategic vision of ensuring the provincial park system is thriving, celebrated and inspirational. **s.13**
s.13

SUMMARY:

s.13

Attachments: 1. *A New Vision for BC's Parks.*
2. *Potential BC Parks Program Priorities.*
3. *Possible BC Parks Revenue Sources.*
4. *Increasing Relevance: Categories of BC's Parks*

Contact:

Jim Standen, ADM
BC Parks
250-387-1288

Alternate Contact:

David Ranson
BC Parks
250-387-6852

Prepared by:

Reviewed by	Initials	Date
DM		
DMO	BC	Sept 25/15
ADM	JS	Sept 25/15
Dir./Mgr.	DR	Sept 25/15
Author		

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

September 14, 2015
File: 98900-40/PK 0002 RECREV
CLIFF/tracking #: 290198

PREPARED FOR: Honourable Mary Polak, Minister of Environment.

ISSUE: Mount Robson Park Operator Agreement Request for Proposal ("RFP") Posting on BC Bid.

BACKGROUND:

Mount Robson Provincial Park provides a unique tourism and outdoor recreation opportunity. It is the only wilderness park in the provincial protected area system that serves as a gateway to British Columbia on a high volume, national transportation corridor. Mount Robson is also part of the Canadian Rocky Mountain Parks World Heritage Site.

Recreation and tourism services in the park and transportation corridor are provided by a mixture of BC Parks own forces delivery, a Park Facility Operator Agreement, and partnerships between the Ministry of Environment ("BC Parks"), Destination BC and the Ministry of Transportation and Infrastructure. The partnership between BC Parks and Destination BC is outlined in a Memorandum of Understanding ("MOU") concerning the operation of the British Columbia Visitor Centre at Mt Robson located within Mount Robson Provincial Park.

BC Parks' existing Park Facility Operator Agreement and the MOU with Destination BC both expire on March 31, 2016. BC Parks is ready to post a new Park Operator Agreement RFP on BC Bid. The RFP includes the delivery of visitor information and park services at the Mount Robson Visitor Centre as a result of a strengthened partnership between Destination BC and BC Parks.

DISCUSSION:

The RFP has four key components:

1. Primary Services (including a merchandising program and Berg Lake Trail Registration at the Visitor Centre);
2. British Columbia Visitor Centre @ Mount Robson Services;
3. Maintenance of a Trucker's Rest Stop; and,
4. Operation and Maintenance of half the Berg Lake Trail.

s.13,s.17

s.13,s.17

Primary Services

The primary services component includes the delivery of all front country day use and campground services in Mount Robson, Rearguard Falls and Jackman Flats parks. It also includes the Berg Lake Trail registration and a merchandising program at the Visitor Centre.

s.13,s.17

BC Parks also conducted a facility services review along the transportation corridor to inform the RFP. BC Parks will be removing redundant, old and overbuilt facilities at key locations, many of which do not contribute to park experiences. s.13,s.17

s.13,s.17

British Columbia Visitor Centre @ Mount Robson Services

BC Parks used to pay Destination BC to provide Berg Lake Trail registration and park information services at the Visitor Centre. Under the new arrangement, Destination BC will pay BC Parks for providing visitor information counselling services under BC Parks' Park Operator Agreement. The RFP has been designed so the parks and tourism services at the Visitor Centre will be provided seamlessly and the Visitor Centre will still have the same look and feel as other British Columbia Visitor Centres. Visitors are not likely to see any difference in the service provided. s.13,s.17

s.13,s.17

Trucker's Rest Stop

s.13,s.17

Berg Lake Trail

The Berg Lake Trail is currently maintained by BC Parks "own forces". This RFP incorporates an option to contract out the maintenance of the lower half of the trail. Once

The development of this RFP involved a wide range of staff including BC Parks headquarters and regional staff, Destination BC staff, and regional TRAN staff. Local communities and stakeholders were also engaged on the British Columbia Visitor Centre @ Mount Robson services and the draft merchandising program in July. The RFP has received a Legal Services review and is ready to be posted on BC Bid.

NEXT STEPS:

BC Parks and Destination BC would like a joint press release ready for the day the RFP is posted to raise the awareness of this exceptional business opportunity in the Robson Valley and to promote good competition. A draft press release is provided in Appendix A.

BC Parks hopes to post the RFP on BC Bid no later than September 21, 2015. The RFP will be available for a period of 8 weeks.

BC Parks and Destination BC will hold a site meeting on September 29, 2015 at Mount Robson and jointly evaluate the proposals to ensure both agencies get high quality services at best value to tax payers.

Attachments: Appendix 1 – Draft Press Release

Contact: <i>Jim Standen</i> <i>BC Parks and</i> <i>Conservation Officer</i> <i>Service Division</i> <i>250-387-1288</i>	Alternate Contact: <i>Larry Boudreau</i> <i>BC Parks – Northern</i> <i>Region</i> <i>250-614-9910</i>	Prepared by: <i>Scott Back</i> <i>BC Parks – Northern Region</i> <i>250-614-9919</i>
---	--	--

Reviewed by	Initials	Date
DM		
DMO	BC	Sept 16/15
ADM	JS	Sept 15/15
EX Dir VEBD		
EX Dir RO	DC	Sept 14/15
A/R. Dir	DM	Sept 14/15
Author	SB	Sept 14/15

Page 23

Withheld pursuant to/removed as

s.13

MINISTRY OF ENVIRONMENT INFORMATION NOTE

Date: July 23, 2015
File: 280-20/Porteau Cove
CLIFF/tracking #: 288210

PREPARED FOR: Deputy Minister Wes Shoemaker, Ministry of Environment.

ISSUE: Overnight parking by cabin owners in the day use parking lot in Porteau Cove Park is restricting the ability of day users to access the park and impacting the Park Operator's ability to manage parking and collect fees for second vehicles and overflow camping.

BACKGROUND:

Porteau Cove Park is a 56-hectare park situated along the Sea to Sky Highway, only 40 kilometers from Vancouver. In 2013/14 there were approximately 528,000 visitors to Porteau Cove Park (493,000 day use visitors and 35,000 overnight campers). The park has a very popular day use area, and has also historically been a gateway for boaters and other marine users accessing Howe Sound. Unauthorized overnight parking has been occurring in the park for several years, and has been largely overlooked. This unauthorized parking is associated with a group of cabin owners and their guests who park their vehicles and boat trailers overnight in the day use area, utilizing the park boat launch to access their boat-access cabins located outside the park.

In 2012, BC Parks first attempted to resolve the Porteau Cove parking issue through implement overnight parking restrictions and closing the upper park access gate. s.13

s.13 . After BC Parks received several complaints, the Park Operator (PO) was asked to remove the posted "No Overnight Parking" signs. In 2013, BC Parks and the PO worked on a new parking plan to designate the three park parking lots: the upper lot for overnight users, the lower lot for day use and overflow camping, and the parking lot by the BC Parks Legacy Cabins for overnight campers' second vehicles. s.13

s.13

DISCUSSION:

As Porteau Cove Park has become more popular, the conflict between camping, day use and overnight parking has increased. The PO is finding it increasingly difficult to manage the day use parking areas because:

- Vehicles and trailers of the cabin owners and their guests are taking up limited parking spaces from other park visitors. These people are not paying for overnight use of the parking space.

- The day use parking lot is full on the weekends with overnight users, providing little opportunity for day users to access the park.
- The day use parking lot is also used legitimately in the evenings by campers with second vehicles who are required to pay a second vehicle charge (\$12/night). Conflict arises when campers have to pay for a second vehicle and they realize there are many vehicles parked overnight that did not require payment of a fee. As a result, the PO has had visitors refuse to pay the second vehicle charge.
- The parking lots are also intended to be used for overflow camping, which is an acceptable and approved use. Campers are being turned away because of limited spaces available due to the unauthorized overnight vehicles.

The cabin owners have several other boat launch options in the Howe Sound area. Sunset Marina in West Vancouver offers parking and boat launch services at \$29.00/day; Vanier boat launch offers parking at \$19.00/day; Sewell's Marina in Horseshoe Bay, the closest option, offer's launching for \$7.50/day and day parking for \$23.00/day; Lions Bay Marina charges \$14.00 per launch and \$20.00/day to park. There is currently no charge for either overnight parking or boat launching in Porteau Cove Park, which is the reason for the high levels of use that is creating this parking issue.

s.13,s.16,s.17

NEXT STEPS:

s.13,s.16,s.17

ATTACHMENT 1: s.13,s.16

Contact:*ADM: Jim Standen**Div: BC Parks and
Conservation Officer
Service**Phone: (250) 387-1288***Alternate Contact:***Name: Jennie Aikman,
Regional Director**Div/Region/Branch:
South Coast Region**Phone: (604) 924-2227***Prepared by:***Name: Zsana Tulcsik, Recreation
Services Officer**Branch/Region: South Coast Region**Phone: (604)898-3678, ext. 2233*

Approved	Initials	Date
DM	WS	July 31, 2015
ADM		
A/ED	JT	July 23, 2015
Dir./Mgr.	JA	July 20, 2015
Author	ZT	July 20, 2015

Page 27

Withheld pursuant to/removed as

s.16;s.13

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

Date: June 16, 2015

File: 280-30

CLIFF/tracking #: 284840

PREPARED FOR: Minister Mary Polak, Minister of Environment.

DATE AND TIME OF MEETING: June 18, 2015, 11:00 am.

ATTENDEES: Minister Polak, MLA Jackie Tegart, Jim Standen and Kevin Demers

ISSUE: Request for permit fee relief from Manning Park Resort Permittee.

BACKGROUND:

E.C. Manning Park is located between Hope and Princeton. The park contains one of three ski resorts which are located in provincial parks. The other ski resorts are within Mount Seymour Park and Cypress Park in North Vancouver.

In 1984, BC Parks sold the ski resort facilities and entered into a 50-year park use permit with Gibson Pass Resorts Ltd. (GPR) for the operation of the Manning Park Ski Hill Resort facilities (ski hill, lodge, cabins, restaurant, staff support services including housing, etc.). In 2003, BC Parks also entered into a 10-year Park Operator (PO) Agreement with GPR for operation of campground and day use facilities in the Manning Similkameen area (Manning Park to Keremeos).

The company operated successfully until mid-2000s. In November 2009, GPR defaulted on a mortgage agreement with HSBC and declared bankruptcy. The Court appointed The Bowra Group Ltd. as Receiver for GPR. The Receiver continued operations under the PO and Resort agreements with additional support funding from HSBC and marketed the company's assets and the operations until fall of 2012. Unable to sell and with costs exceeding revenues, HSBC finally withdrew financial support. **s.13,s.17**
s.13,s.17

At the same time, the resort was closing the Receiver had a purchase offer from Sunshine Valley Resorts and Cabins Inc. (now Sunshine Valley Recreation Inc.). **s.13,s.17**
s.13,s.17

s.13,s.17 The purchase concluded and Sunshine Valley took over operation in May 2013. Both agreements (Resort and PO) were transferred. Sunshine Valley is owned by Kevin Demers and parent company Holiday Trails RV Resorts (the Permittee).

The Permittee started to make some modest but positive changes to improve services and reinvest in a backlog of facility maintenance requirements. He also made some

improvement in the compliance with maintenance and service standards under the PO agreement. In August 2014, Sunshine Valley also successfully bid and was awarded the Manning PO agreement for an additional 10 years.

s.13,s.17,s.21

BC Parks did not agree to a fee waiver, but offered the following items in support of both the Permittee's Resort and PO operations conditional that he be in good standing:

- A commitment that upon completion of the Ski Resort Policy (in development) BC Parks will conduct a permit fee review that considers Crown land ski resort fees. s.13,s.17
s.13,s.17
- Extend the deadline for up to 10 years for requirements to remove old derelict buildings from the Resort permit area which is a permit condition assumed by the new owner.
- Commit to a review process involving the Permittee to adequately assess the Permittee's RV park development proposal either under the Resort or PO agreements.
- Accelerate planned capital project implementation within Manning Park that directly or indirectly supports the PO and Resort operations.

s.13,s.17

DISCUSSION:

s.13,s.17

s.13,s.17

SUGGESTED RESPONSE:
s.13,s.17

Contact
Jim Standen
Assistant Deputy Minister

(250)356-9545

Alternate Contact:
Bob Austad
Executive Director,
Regional Operations
(250)356-9241

Prepared by:
John Trewitt
A. Regional Director
Kootenay Okanagan Region
(250)490-8249

Reviewed by	Initials	Date
A/DM	MZ	June 16, 15
DMO	BC	June 16, 15
ADM	JS	June 16, 15
ED Reg. Ops.	BA	June 16, 15
Reg. Director	JT	June 15, 15

**MINISTRY OF ENVIRONMENT
INFORMATION NOTE**

03 June 2015

File:

CLIFF/tracking #: 284824

PREPARED FOR: Honourable Mary Polak, Minister of Environment

ISSUE: Establishment of a Parks Advisory Council to inform BC Parks Future strategy finalization and implementation

BACKGROUND:

BC Parks is one of North America's largest parks and protected area systems. There are opportunities to strengthen the financial position of BC Parks so that it can continue to offer and build upon the conservation work and recreation opportunities it delivers.

DISCUSSION:

In working towards that stronger position, BC Parks staff are developing a strategy that includes short-, medium-, and long-term activities under four headings (conservation, recreation, community, and First Nations). s.13

s.13

s.13

Bringing a Panel together could be an important early step in charting BC Parks' future. Not only does BC Parks gain valued insight, but it also benefits by bringing their influence on side. s.13,s.16
s.13,s.16

Achieving a careful balance in membership will be important because of the broad nature of the strategy being developed; different sets of our stakeholders will be attracted to particular aspects and we will want to ensure the panel has at least one representative that can speak to each part of the future vision (e.g., conservation, recreation, community, First Nations). We would recommend seeking the participation of the following 8

individuals as representative of local communities. First Nations, outdoor recreation, conservationists, and business and industry.

s.13,s.22

s.13

NEXT STEPS:

s.13

Contact:

*Jim Standen, ADM
BC Parks and COS
250-356-9545*

Alternate Contact:

*Jim Standen, ADM
BC Parks and COS
250-356-9545*

Prepared by:

*Ben Vander Steen
BC Parks and COS
250 387-3979*

Reviewed by	Initials	Date
DM	--	--
DMO	--	--
ADM	JS	6/12/15
Dir./Mgr.		
Author		

BC Parks – Parks Future External Advisory Panel
Candidate Membership

Community
s.13,s.22

First Nations
s.13,s.16,s.22

eNGOs
s.13,s.22

Business/Tourism:
s.13,s.22

BC Parks Campaign Concept Paper

Title: *"Super Natural British Columbians"*

Concept s.13
s.13

Critical Linkages and Dependencies:

Thoughtfully designed and properly timed, a public awareness campaign will:

- Highlight the BC government's accomplishments with respect to parks and protected areas
- Raise awareness and support for BC Parks
- Promote fundraising efforts by BC Parks under planned giving and corporate partnership programs

s.13,s.17

Candidate "Super Natural British Columbians" should be selected well in advance of the launch and should be chosen for their profile but also their broad appeal, contributions to worthy causes and credibility with respect to conservation and stewardship. A strong partnership with the selected candidates, ideally coupled with a corporate or personal contribution to Parks, would be the foundation for recognition. "Super Natural British Columbians" could be selected in association with particular Park related activities or programs in BC Parks (e.g. accessibility, biking, boating) and again, would ideally be coupled with a sponsorship agreement related to the specified activity.

Such a campaign could give a large boost to fundraising efforts.

Possible Candidate *Super Natural British Columbians*:

s.13,s.22

s.13,s.22

Page 37 to/à Page 57

Withheld pursuant to/removed as

s.12;s.13

**MINISTRY OF ENVIRONMENT
DECISION NOTE**

June 3, 2015
File: 280-20
CLIFF/tracking #: 284661

s.12,s.13

Page 59 to/à Page 61

Withheld pursuant to/removed as

s.12;s.13

MINISTRY OF ENVIRONMENT INFORMATION NOTE

May 21, 2015

PREPARED FOR: As background for MLAs who may be contacted with regard to BC Parks' Financial Sustainability Project

ISSUE: Introducing BC Parks' Financial Sustainability Project

BACKGROUND:

BC Parks protects special natural places within a protected areas system for world class conservation, outdoor recreation, education and scientific study. BC Parks operates much of the Province's protected area system in partnership with the private sector (Park Operators) to ensure park services are delivered in the most economical, effective and efficient manner.

The budget allocated to BC Parks has remained largely static since 2009. However, the cost of operating and maintaining the Province's parks rises each year due to rise in cost of a number of inputs including; labour, fuel, infrastructure amortization and maintenance. The gap between BC Parks budget and costs has forced BC Parks to shorten operating seasons, eliminate park ranger positions, reduce proactive maintenance activities and implement other program cuts. In late 2013, BC Parks was directed by the Core Review Committee to explore a more financially sustainable operating model for the organization.

DISCUSSION:

In response, BC Parks has developed a plan to progressively move towards long-term financial sustainability through a variety of initiatives that will:

- Increase revenues;
- Modernize our existing fee structure;
- Encourage investment from commercial operators;
- Enhance recreational opportunities and other visitor service in our parks;
- Leverage partnerships with other government agencies, businesses and First Nations; and
- Propose alternative management/business models for BC Parks.

The first phase of that plan was implemented in March 2015 when Caucus endorsed and the Minister of Environment approved a 2-\$5 increase to BC Parks' camping fees. The fee increase is expected to offset parks' operation costs by \$1.3million/year. The remaining phases will be to investigate and implement a number of projects with private and public partners that will lead to greater investment and tourism opportunities in the parks, and lead to a positive transformation of the BC Parks system

Key Messages

The Financial Sustainability Project will start BC Parks down a path towards self-sufficiency.

The Financial Sustainability Project will be guided by a set of overarching principles, including preservation of BC Parks unique ecological values, and enhancing the visitor experience.

The Financial Sustainability Project aims to expand the range of affordable recreation opportunities available to British Columbians through a differentiated fee scheme.

**MINISTRY OF ENVIRONMENT
MEETING INFORMATION NOTE**

May 20, 2015
File: 280-20
CLIFF #: 283452

PREPARED FOR: Honourable Mary Polak, Minister of Environment.

DATE AND TIME OF MEETING: 10:30am on May 25, 2015

ATTENDEES: Society of Park Operators

ISSUE: The Society of Park Operators (SPO) has requested a meeting with Minister Polak

BACKGROUND:

There are 57 Park Operators (POs) maintaining and operating 253 front country campgrounds and day-use areas under 73 service delivery agreements across the province. These 57 businesses range in size from small to large operations. Of the 57 operations, 16 are members of SPO.

BC Parks staff meet with the SPO Executive to discuss various issues, such as camping and recreation policies, contract amendments, the Discover Camping reservation program, park capital and maintenance, marketing, visitor services and experience and other issues.

The current recreation service delivery model, also known as the "Bundle Model," was implemented in 2003 to increase the efficiency and effectiveness of the previous service delivery model, known as the "Non-bundle Model". The Bundle Model brought about several changes in the delivery of services, namely longer term PO agreements, to a maximum length of 10 years and the grouping of individual park operation contracts into 42 bundles; however, 31 parks have remained as "non-bundle" operations due to geographic constraints and generally low value of contracts.

PO compensation is derived from 3 sources: Recreation User Fees (retained fees), Deficiency Payments and Service Plus (Additional Service) Fees. During the initial bid, the PO submits retained fees revenue and expense projections. Where POs determine their projected annual expenses exceed projected retained fees revenue, POs will identify a fixed annual Deficiency Payment they will require to complete all contract requirements over the contract term. In situations where POs determine their projected annual retained fees revenues will exceed projected annual expenses, POs will identify a fixed annual Return to Crown Amount they will pay to the province. All expenses associated with Service Plus are the responsibility of the PO and all revenue derived from Service Plus is retained by the PO.

DISCUSSION:

BC Parks has implemented the following projects/changes which are of interest to POs and therefore, may be raised during this meeting:

1. 2014 Competitive Tender Process for 38 New PO Agreements (PRISM)
 - In 2014, PO agreements for 75% of BC Parks campgrounds expired. This provided BC Parks with an opportunity to further improve the model for recreation service delivery in front country parks.
 - After extensive stakeholder and public consultation, BC Parks released 41 revitalized service delivery opportunities for competitive tender.
 - BC Parks evaluated 69 proposals received for the tenders. After review and negotiation, 39 new agreements were signed.
 - Due to the scale of the tender process, BC Parks staff were in constant contact with legal and procurement specialists in order to deliver a procurement based on the following principles of fair and open public sector procurement: competition; value for money; protection of privacy; public sector transparency; and accountability.
2. 2015 Recreation User Fee change
 - The competitive tender and award of 75% of the recreation service delivery opportunities resulted in a \$1.7 million increase in Deficiency Payments.
 - To generate the additional revenue needed to cover those costs, the Minister approved an increase to the camping fees to take effect March 15, 2015.
 - The fee increases were nominal to ensure camping remains affordable for families and visitors. Initial reservation numbers show the fee increase has not decreased camping demand.
 - As POs retain all Recreation User Fees, and the fee change will increase that revenue source, the Deficiency Payments to POs are scheduled to decrease by an amount equal to the projected increase in PO revenue. This means the fee change is projected to be revenue-neutral for POs and will reduce BC Parks Deficiency Payment budget by \$1.3
 - The SPO was representing a number of POs who disputed the amount by which Deficiency Payments are to be reduced. On March 20th, the SPO advised that their members would be abandoning this dispute. BC Parks has been working closely with Legal Services Branch to manage this issue. The terms of the new agreements are very clear as to how Deficiency Payments will be reduced in the event of a fee change. BC Parks intends to follow that contract language closely.
3. Service Plus Opportunities
 - PO Agreements allow POs to propose new commercial opportunities in BC Parks which enhance Park Visitor experiences and align with BC Parks' natural, recreational, historic and cultural values.
 - Where POs and BC Parks partner on a new commercial opportunity, there is potential for BC Parks to collect new revenue, potentially lowering the existing Deficiency Payment budget.
 - BC Parks staff intend to promote and explore new commercial opportunities with POs during the term of the new agreements as part of the BC Parks Financial Sustainability plan.

SUGGESTED RESPONSE:

- BC Parks values its partnership with the Society of Park Operators.
- s.13
- s.13
- s.13,s.14
- BC Parks is committed to maintaining a good working relationship with its PO contractors and has proposed a joint Fee and Revenue Committee so BC Parks can consult POs on future fee change proposals.
- s.13
- BC Parks is also keen to work with the PO Society in two proposed joint committees to examine facility standards and improving front country park accessibility.

Contact:

*Jim Standen
ADM
BC Parks and
Conservation Officer
Service Division
250-356-9545*

Alternate Contact:

*David Ranson
Executive Director
Visitor Experience and
Business Development
250-387-6852*

Prepared by:

*Christine Rikley
Visitor Programs
250-356-7693*

Reviewed by	Initials	Date
DM	WS	May 22/15
DMO	BC	May 21/15
ADM	JS	May 21/15
Exec. Dir.	DR	May 20/15
Mgr.	AC	May 8/15
Author	CR	May 8/15

The Society of Park Operators (SPO) submitted an agenda for its meeting with Honourable Mary Polak, Minister of Environment. The following is additional background and information for the Minister on the proposed agenda topics.

1. Introduction to Society of Park Operators

- Park Operators (POs) are contractors who manage provincial parks' facilities and deliver services on behalf of BC Parks
- 16 of the 57 POs BC Parks' contracts are members of the SPO. The 16 members primarily hold more complex, multi-bundle contracts with BC Parks, and represent the majority of the parks that are privately operated.
- Current president of the Society is Eddie Wood - owner of Sea to Sky Park Services and one of the primary contractors operating on the Lower Mainland

2. Working with BC Parks in partnership on

a) Service Delivery and Facility Standards

- The primary services provided by POs include fee collection, facility cleaning and maintenance, customer service, safety compliance and enforcement, and park operations
- The services POs are required to deliver are clearly defined in the PO contract and associated schedules (Facility Specifications) and manuals (Facility Standards)
- The Facility Specifications was created in 2014 to provide clarity on the specific facility maintenance activities expected of contractors. 75% of the PO contracts were publically tendered in 2014, and all new POs who were awarded contracts bid based on these new, clear, prescriptive maintenance requirements.
- The Facility Standards are in need up updating. Provided the Ministry has available budget, BC Parks intends to update the Facility Standards this fiscal. BC Parks is currently forming a joint committee of POs and BC Parks staff to discuss standards issues.

b) Marketing (Camping Coalition, National Camping Week, Go Camping Guide)

- BC Parks and the SPFO continue to be very active members of the Camping and RVing Coalition. The Coalition, which represents all major stakeholders in the Camping and RVing sector in BC, provides a unified marketing effort to promote camping and RVing in BC.
- Through the Coalition, BC Parks is supporting National Camping Week which was launched in BC on Tuesday May 19, 2015. At this time BC Parks is not offering fee discounts during National Camping Week but has been promoting this special week on the BC Parks website and Facebook.

- BC Parks continues to support the SPFO in the publishing of the Go Camping Guide by providing \$15,000 towards the costs of printing the Guide.

c) Parks Day

- BC Parks encourages Park operators to hold special events on Parks Day to celebrate our amazing park's system. BC Parks continues to offer the Kid's Art Contest to support Parks Day and has recently made available to Park Operators a Marketing Toolkit which will assist in event planning and promotional activities. This year Parks Day occurs on Saturday July 18th.

d) Quality Control Plan

- POs are responsible for establishing Quality Control Plans to ensure high quality Services are provided to Park Visitors in all Operating Areas. The plan must demonstrate how POs will conduct inspections, address deficiencies, and document the results
- Quality Control Plans are a new service delivery requirement for contracts signed in 2014, and transfer more responsibility for ensuring high-quality performance onto the POs. BC Parks staff will still conduct audits of POs' service delivery as part of a greater Quality Assurance Program.
- POs are responsible for designing their own Quality Control Plans. However, as a service to their members, the Society is working on developing a Quality Control Plan template for its members.

e) Working with BC Parks staff on improvements such as; facility standards and Service Plus

- BC Parks has proposed the formation of joint committees between the Society and BC Parks staff to collaborate on a number of service improvement opportunities.
- Committees' topics will include:
 - Recreation User Fees Review
 - Facility Standards and Design updating
 - Guaranteed Frontcountry Accessibility
- The Society has accepted BC Parks proposal and committees will begin meeting soon.

3. Fee Increase – Recent negotiations with Park Operators

- The competitive tender and award of 75% of the recreation service delivery opportunities in 2014 resulted in a \$1.7 million increase in Deficiency Payments (contract payments from the Province to POs).
- To generate the additional revenue needed to cover those costs, the Minister approved an increase to the camping fees to take effect March 15, 2015.
- The fee increases were nominal to ensure camping remains affordable for families and visitors. Initial reservation numbers show the fee increase has not decreased camping demand.

- As POs retain all Recreation User Fees, and the fee change will increase that revenue source, the Deficiency Payments to POs are scheduled to decrease by an amount equal to the projected increase in PO revenue. This means the fee change is projected to be revenue-neutral for POs and will reduce BC Parks Deficiency Payment budget by \$13.
 - The SPO, representing approximately 7 POs, disputed the amount by which Deficiency Payments are to be reduced. On March 20th, the SPO advised that their members would be abandoning this dispute. BC Parks has been working closely with Legal Services Branch to manage this issue. The terms of the new agreements are very clear as to how Deficiency Payments will be reduced in the event of a fee change. BC Parks intends to follow that contract language closely.
4. Park Policy to support revenue sharing with Park Operators through fee increases and new fees and reduce deficiency
- The authority to set fees is delegated to the Minister responsible for the Park Act.
 - BC Parks does not have a policy to share revenue generated from legislated recreation user fees (visitor fees) with private contractors. Revenue from fees are used to offset the costs incurred by BC Parks to contract park operation services to POs (decrease deficiency payments).
 - Historically, some additional revenue from fee increases has been used to increase contracted maintenance activities in parks. Because POs are the primary contractors for park maintenance, POs have historically benefitted from this practice of increasing contracted maintenance, and subsequently may have mistaken this past practice of increasing contracted services as 'revenue sharing'. However, the authority to apply additional revenue from fee increases still rests with the Province.
 - Under the current government policy of fiscal responsibility and restraint, current and future legislated fee increases will not be applied to increasing services in parks, and instead will be used to offset the basic service costs (deficiency payments to POs) which continue to increase. BC Parks does not have plans to share revenue generated from legislated fees with PO contractors.
 - BC Parks has allowed an opportunity for PO contractors to increase revenue they generate in parks through Service Plus activities. Service Plus refers to optional services a PO can provide to Park Visitors for an additional fee (fee is not legislated). The cost for providing the service is the responsibility of the PO. Service Plus provides POs an opportunity to deliver value-added, fee-based services that benefit both Park Visitors (through additional recreational opportunities) and POs (through additional business development and revenue opportunities).

**MINISTRY OF ENVIRONMENT
MEETING INFORMATION NOTE**

March 16, 2015
File: 280-20
CLJFF/tracking #: 276934

PREPARED FOR: Honourable Mary Polak, Minister of Environment.

DATE AND TIME OF MEETING: Wednesday March 18, 2015, 1pm.

ATTENDEES: Honourable Mary Polak, Minister of Environment
Wes Shoemaker, Deputy Minister, Ministry of Environment
Jim Standen, Assistant Deputy Minister, BC Parks
David Ranson Briefing
Yarko Petryshyn, Minister's Executive Assistant

ISSUE(S): BC Parks: Towards A Sustainable Future; a strategy for creating financial viability for BC Parks

BACKGROUND:

BC Parks is one of the largest protected area systems in North America at 1,029 Parks and Protected Areas. In 2013/14, BC Parks operated on a budget of \$47.9M, of which \$16.9M (35%) is attributed to revenue collected from recreation user fees (retained by POs). The vote allocation alone made up a BC Parks budget of \$31.0M. Expenditures against vote allocation and fee revenue are as follows:

Staffing \$15.5M
Goods & Services \$2.8M
Amortization - \$7.5M
Deficiency Payments - \$5.2M
Retained fee revenue (compensation to
POs) - \$16.9M

The current BC Parks operating model relies on private Park Operators who are contracted to deliver park services through procured agreements. Park Operators collect and retain user fees as compensation for their services and where those fee revenues exceed their projected operating costs, the operators bid a return to General Revenue. Where the fees are not sufficient to cover the cost of providing service, BC Parks pays a deficiency payment to the Operator from the BC Parks annual operating budget. A recent procurement of 75% of the park operating agreements resulted in increases in deficiency payments of approximately \$1.8M per year bringing the total deficiency payments to an estimated \$7.1M¹ annually ².

BC Parks carries a capital inventory valued at over \$700M. Maintaining this capital stock requires an annual investment of 2% per year or approximately \$14M. Amortization of the BC

¹ The above are the expenditures made against VOTE ALLOCATION, except for retained fee revenue which comes from Rec User Fees. PEF expenditures come out of a separate account which is not part of the BC Parks operating budget. Expenditures out of PEF were \$1.8M in 2013/14. There are also capital expenditures, \$13.0M in 2013/14, but these are not paid against the BC Parks' operating budget (though amortization will be).

² Before 2015 fee increase is taken into consideration. The fee increase will reduce this by between \$860k and \$1.3M depending on negotiation success of regional teams.

Parks capital stock also requires annual amortization payments from the operating budget ,which in 2015/16. will be \$8.1M and which are estimated to increase by approximately \$300K per year.

The current gap in funding represents a structural shortfall in that it is not a one-time budget issue, but rather, an ongoing and growing gap between vote allocation and costs. In order to maintain the high level of services that is the hallmark of the BC Parks brand, the organization needs to close this gap: work that includes looking at new and innovative revenue streams. The strategies that will be employed in reaching the goal of financial viability will be the subject of a high level strategy, supported by detailed internal work plans and focused work teams.

DISCUSSION:

In late 2013, BC Parks presented to the Core Review Committee seeking direction on the transformation of BC Parks to a more viable operating model. Coming out of this presentation, BC Parks was directed to explore a viable operating model for the organisation that meets visitor needs including, where appropriate, encouraging investment by increasing tourism opportunities and commercial activities. A review done subsequent to this direction ruled out any significant downsizing or rationalization of the parks system.

s.12,s.13

Page 71 to/à Page 82

Withheld pursuant to/removed as

s.12;s.13

**MINISTRY OF ENVIRONMENT
DECISION NOTE**

March 2, 2015
File: 28-20
CLIFF/tracking #: 276223

PREPARED FOR: Jim Standen, ADM, BC Parks and COS

ISSUE: Partnership with Offsetters in NatureBank

BACKGROUND:

In September 2014, Offsetters, the carbon broker that supported the 2014 Quadra Island acquisition, approached BC Parks to assess interest in partnering on their new project NatureBank.

Since then, Offsetters staff have been developing a prototype web portal and presented it to BC Parks in February, 2015.

DISCUSSION:

The concept of NatureBank is an engaging internet platform that uses social media and crowdfunding tools. It is being developed using highly experienced and renowned web and gaming developers in Vancouver including HootSuite. The purpose of the site is to draw and keep an audience coming back to learn about biodiversity and conservation in a fun way. The project fulfils a niche in park interpretation that BC Parks is not able to meet. It will also allow users to contribute financially to conservation projects in parks and protected areas. s.13

s.13

s.13,s.17

The potential benefits to BC Parks are:

- Attracts a new audience that may become park visitors & encourages existing park visitors to join NatureBank;
- Engages community, motivating existing and new funders with new funding avenues;
- Improves mechanisms to raise funds for conservation and over time, increases budget for conservation.

The potential benefits for park users are:

- An engaging, interactive and fun social experience;
- Allows users to support projects that matter most to them –and they know the impact of their contributions or investments;
- Actions are not only recognized, but rewarded.

BC Parks requirements would be:

- s.13,s.17
- Ongoing assistance with stories, information about conservation projects, which will require some staff time in collecting and coordinating.

OPTIONS:

s.13,s.17

RECOMMENDATION:

s.13,s.17

_____/_____
DECISION & SIGNATURE
Jim Standen
ADM

DATE SIGNED

Contact:

*Brian Bawtinheimer
Executive Director
Parks Planning & Mgmt
250 387-4355*

Alternate Contact:

*Jim Gilliland, Manager
Marketing Section
Visitor Services Branch
250 356-6831*

Prepared by:

*Eva Riccius, Manager
Conservation & Land Acquisition
Section
Parks Planning & Mgmt
250 387-8793*

Reviewed by	Initials	Date
ADM		
Exec. Dir.		
Mgr. CLA	ER	Mar 2/15
Author	ER	Mar 2/15

Page 86

Withheld pursuant to/removed as

s.12;s.13