

***LTA The Land
Of British***



***Trust Alliance
Columbia***

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November 6th, 2003

Agricultural Land Commission
1334-4940 Canada Way
Burnaby, BC
V5G 4K6

ATTN: Kirk Miller

Thank you for delaying adoption of the Guidelines for Conservation Covenants until further distribution and discussion among our member Land Trusts. We have had further consultation with those members who have had experience in the past working with the staff of the Commission on approving Covenants and would like to provide the following responses.

As you are aware, we are not in agreement with the requirements of Section 22. However, we commend the Commission on the improvements made to the Guidelines, specifically the examples in Appendix 2, which offer samples of protection beyond listed species, such as riparian buffers, water quality and foreshore aesthetics. It would be wonderful if the Guiding Principles themselves included a reference to the acceptance of covenants for more than environmental values. Thus, a regional panel or staff will easily recognize the Commission's potential approval of values such as heritage buildings or heritage trails.

As you have also heard, difficulties in the past have had to do with the long process of land trust staff consulting with Commission staff on the covenant, before final drafting. Our members report that this has resulted in increased time and costs, and sometimes an early rejection, with resultant frustration by the landowners. We hope that these Guidelines will assist in reducing or eliminating this time consuming process for all.

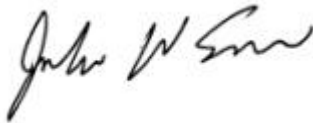
We also hope that the level of scientific validation will not be a problem. Our members have limited time and resources to place covenants on lands which have important environmental or cultural values, thus it is their responsibility and best interest to obtain scientific references on a property which has threatened or endangered species. Other environmental values, such as protection of riparian zones or groundwater would not require scientific validation, and we hope that this will also be clearly understood by the various Panel Chairs and staff.

We are planning to monitor the process of obtaining covenants on ALR lands over the next few years, asking our members to inform us of the process, timing, and resultant approval or rejection of covenants on Agricultural Reserve Lands.

Again, thank you very much for the changes to the Guidelines so far, and for this opportunity to present our members' experiences and needs to satisfy the farmers and ranchers who wish to protect natural and cultural values on the lands they currently are stewarding for the benefit of all people and natural systems in the province of B.C.

Please let us know if we can assist you in any way on this or other mutual interests in cooperatively merging the interests of farmers, ranchers, and land trusts who work to protect our natural and cultural heritage.

Yours truly,

A handwritten signature in black ink, appearing to read "John Scull". The signature is written in a cursive, flowing style.

John Scull
Chairman

Helping to steward, protect and restore B.C.'s natural and cultural diversity