



August 15, 2011

ecologicalhealth@metrovancover.org

To Whom It May Concern:

Re: Metro Vancouver's Draft Ecological Health Plan

While we are pleased to see Metro Vancouver develop a plan to help the regional district take some positive steps towards improving ecological well-being, we have a number of serious concerns about this draft ecological plan.

First, it is extremely inappropriate to undertake public consultation over the summer months. Most of our members who would be very interested in commenting on the plan are on vacation or are pre-occupied with other matters. Given that many of our members in the lower mainland are actively engaged in stewardship projects and have a detailed understanding of the region's ecology, we feel the plan would be much improved if they had an opportunity to review the plan and make recommendations. We request the Metro Vancouver Board defer approval until this plan can be reviewed under an appropriate public consultation process including regional meetings that all Metro Vancouver residents can easily attend. In addition, we feel it would be valuable to convene workshops with stewardship groups before the proposed projects are approved. The rush to adopt this plan appears unseemly and we are concerned, if the plan is adopted as presently written, it will reflect poorly on Metro Vancouver.

Secondly, some our members have participated in the development of related documents such as the Strategic Directions for Biodiversity Conservation in the Metro Vancouver Region (2008) and the Forum Proceedings (2010) which followed this. One of the recommendations to come out of this process was that an Ecological Health Plan must deal specifically with biodiversity. To our minds, this means Metro Vancouver must first complete the Sensitive Ecosystem Inventory (now underway) so that the findings of this Inventory can provide a framework for developing an Ecological Health Plan. Given the wealth of knowledge about the ecology of the lower mainland, it is difficult to imagine that it would take much more time to complete the Sensitive Ecosystem Inventory. The absence of any focus on species at risk or the outstanding ecological features of the lower mainland in the draft Ecological Health Plan is most surprising.

The draft plan contains a number of errors or misstatements. As examples, hummingbirds is misspelled and Coquitlam Lake is not called a Reservoir. The authors of the report appear to believe the only anadromous fish we have in the region are salmon.

In general, the draft plan takes a disappointingly superficial approach towards ecological health on rather familiar themes. The focus on "Making Connections" sounds eerily like the Regional Greenways Plan to which many of our members provided input several years ago. "Supporting salmon in the city" is something many stewardship groups in the lower mainland have been intensively involved with for years. Providing pollinator habitat was also one of the goals of the Naturescape Program developed over 15 years ago. While these all remain worthy objectives, are they sufficient enough for this new Ecological Health Plan to be one that really engages, inspires and educates the public?

Our members do not have the time, at present, to fully review and comment on this plan and the associated proposed projects. We urge you to defer approval of the Ecological Health Plan until the Sensitive Ecosystem Inventory is completed and an adequate timeframe for public consultation can be developed.

Sincerely

John Neville,

President, BC Nature