



September 19, 2011

To Metro Vancouver Regional Parks Plan

By email to [RegionalParksPlan@metrovancover.org](mailto:RegionalParksPlan@metrovancover.org)

Please accept the attached comments from BC Nature. As a provincial federation of natural history clubs, we represent fifteen local clubs within the Metro Vancouver region, with many individuals who contribute extensively as volunteers to Regional Parks, including through several Park Associations.

We appreciate this opportunity to comment on the 2011 draft Regional Parks Plan.

Yours truly,

A handwritten signature in black ink, appearing to read 'John Neville'.

John Neville  
President, BC Nature

September 19, 2011

## **Comments on Metro Vancouver Regional Parks Plan September 2011**

The Regional Parks, Conservancies and Greenways managed by Metro Vancouver have immeasurable value as ecologically significant lands. The parks and greenways also provide tremendous benefit to the health of the Region's people by making outdoor recreation accessible, enjoyable and safe. It is inspiring on visiting the parks to see the number of people enjoying the beauty of our region's natural landscapes. The foresight to conserve these parklands and to manage them well is commendable.

The vision statement, "Healthy Parks – Healthy People", is forward looking and appropriate.

Following are comments on the four goals:

### **Goal 1: Promote Ecological Health**

Good recognition that "Metro Vancouver is steward to valuable inventory of natural landscapes". However when compared to the 2005 Regional Parks and Greenways Plan, the 2011 draft is lacking in specific details for action and is superficial in its descriptions. We prefer the stronger and more specific actions of the 2005 plan. For example, the 2005 plan committed "to protect and enhance regional landscapes, biodiversity and heritage features" and under this goal to (1) "secure and enhance regionally significant landscapes and critical habitat" and (2) "to manage conservation lands and habitat to protect their biodiversity, environmental and cultural integrity". In comparison, the draft 2011 plan commits to "manage regional parks to protect and improve ecological health" but does not mention biodiversity, critical habitat, environmental integrity or conservation lands as components of ecological health.

In Metro Vancouver's Ecological Health Plan adopted this summer, ecological health was largely defined with very human-centric terminology rather than a focus on protecting biodiversity and ecosystems. We recommend the Parks Plan include a full definition of "Ecological Health", including the need to conserve biological integrity and ensure resilient ecosystems and biodiversity. Certainly, the rationale for protecting the land in regional parks extends beyond ensuring ecosystem services for "the air we breathe, the water we drink and the food we eat" as described on page 12. Mention should also be made of the intent to protect species at risk, biodiversity and critical habitat. It would be helpful to list some indicators of ecological health such as intact ecosystems and biological integrity.

As a further comment on the omission of conserving biodiversity, the diagram on page 9 shows how this park plan is interconnected with a number of Metro Vancouver management plans. However this diagram fails to include the Strategic Directions for Biodiversity Conservation (2008) or the Sensitive Ecosystems Inventory which apparently is still a work in progress. These are key documents which should guide management decisions regarding the regional park system.

### **Goal 1 and Goal 2 Actions – Farming in Regional Parks**

Although the draft plan is presented in general language, Goal 1 includes the very specific direction to: "Develop sustainable farming principles to ensure that farming in regional parks contributes to ecological health." (Action 1.1.6) A related action is found under Goal 2, with statement "Provide opportunities to

experience working farm landscapes in appropriate park sites through establishment of an active farm program and academy for sustainable food production” (Action 2.1.5) The extent to which “farming in regional parks” will be encouraged is not clear from these two statements. Conservation of natural areas and provision for outdoor recreation are the primary functions of regional parks. Where “farming” can assist with increasing or maintaining biodiversity such as through occasional mowing of fields to prevent forest encroachment, such activities would be appropriate. As other examples, the heritage orchards fit the cultural function of some parks and community gardens encourage involvement of people and greater appreciation of food production. However, the Action statements in the draft plan could be interpreted as a major thrust to encourage farming, including commercial farming in regional parks. This would not be appropriate. Clarification of the scale and extent of what is being proposed for farming is needed. Given the prediction of an additional one million more residents over the next thirty years, we will need all the regional parkland for conservation and outdoor recreation purposes. Some farming activities can have negative impacts on wildlife and these would not be appropriate in regional parks. If Metro Vancouver wishes to promote food production, encouraging community and allotment-type gardens for Metro Vancouver residents to grow food would be a much more suitable activity in the park system. Colony Farm Regional Park, in particular, has several fields designated for agricultural use and is well situated close to public transit in a central area of Metro Vancouver. It would seem to be an ideal location to establish a number of community or allotment type gardens when people can get actively involved in the process of growing food. Certainly, the existing community garden at Colony Farm has a waiting list of hundreds of people – even without advertising that garden plots are available. There would appear to be a huge potential to have many more people growing food at Colony Farm. Note, the existing Community Garden Group has said that, in order to promote a sense of community and avoid volunteer overload of administrative responsibility, they do not want to enlarge their group.

If Metro Vancouver intends to promote public awareness and appreciation of farming, then we suggest that additional agricultural lands should be purchased explicitly for this purpose of “demonstration farming”. However, given the growing number of opportunities for people to visit working farms in the lower Fraser Valley, to experience agriculture and purchase farm products, it is not clear that Metro Vancouver should be directing limited taxpayer-funded resources into such programs. If there is felt to be an urgent need to develop such programs, Metro Vancouver should explore opportunities that would involve other partners such as post-secondary school agricultural programs, municipalities already involved in such programs and other groups such as Ducks Unlimited and Delta Farmland Wildlife Trust. The finite land resources available for parks and greenways, especially given the increasing population growth, should not be expected to serve a “farming” function, other than on a limited scale where farming contributes to biological diversity, where it showcases a historical role such as heritage orchards or where it increases community involvement in appropriate areas through community gardens.

### **Goal 2: Promote Outdoor Recreation for Human Health and Wellness**

This goal is commendable and the strategy to “Promote the physical and mental health benefits of parks and outdoor recreation” contributes well to the vision of “Healthy Parks-Healthy People”. As mentioned under Goal 1, we do not believe that strategy 2.1.5 to “experience working farm landscapes” belongs under this goal, and should be refined as to the scale and restrictions. Promoting human health and wellness can probably be better accomplished through the provision of community gardens where people are actively involved in food production rather than through viewing working farm landscapes.

### **Goal 3: Support Community Stewardship, Education and Partnerships**

This goal is commendable and Metro Vancouver shows leadership in achieving this goal.

### **Goal 4: Promote Philanthropy and Economic Opportunity**

This goal brings together strange bed fellows. We agree with promoting philanthropy. As for taking advantage of Economic Opportunities, each proposal should be carefully evaluated including timely and full public review, within the context of a particular park plan, which is what we believe the direction of the plan states. The public must be involved to assess the benefits to the public of such revenue generation. The strategy to

“Partner with businesses and organizations to provide enhanced services for visitors” should be better defined by giving examples of the types of economic opportunities that are and would be considered appropriate within regional parks. Some people might think that a golf course or a major restaurant would be an “enhanced” service to provide in regional parks. Is this what is intended? If not, then a more accurate description should be provided. If the intention of this strategy is to provide services such as canoe or bicycle rentals then “enhanced services” would be better defined as providing services which enhance the experience of the park and to promote closer contact with nature. Rather than state the goal as “promote economic opportunity” (which opens the door to almost any proposal), it would be better to state it as “work with other service-providers to provide activities which augment regional park experiences”.

### **Further Public Consultation**

Although the draft 2011 parks plan lacks the level of detail found in the 2005 plan and thus limits opportunities for more detailed public input, we note that an implementation plan will be prepared to provide additional information on land use policies and priorities for park projects, etc. (page 12). Given the importance of our regional park system and high level of use by the public, we request that a further public consultation be carried out regarding this implementation plan when it becomes available.

### **Timing of this Public Consultation Process**

We are disappointed with the extremely short public consultation process. In August, when providing comments on Metro Vancouver’s Ecological Health Plan, we were concerned because public consultation is poorly received in the middle of the summer. Now this important consultation on regional parks is exceedingly brief (Sept 7-19), with very short notice and only one public Open House scheduled in Burnaby. We think many people who take an interest in regional parks will not be aware of this consultation. In such a large metropolitan area, it is important to schedule meetings throughout the area. The limited meetings with Park Associations are good, but only partly serve to involve more people. Broader advertised public meetings would enhance partnerships and also might garner more philanthropic interest.