

June 1, 2013

Manitoba Conservation and Water Stewardship
Box 50
200 Saulteaux Crescent
Winnipeg, Manitoba R3J 3W3

Submitted by email to: buildingtheparksprovince@gov.mb.ca

Dear Parks Planners:

Re: Manitoba Parks Strategy

Green Action Centre is pleased to respond to the proposed new parks strategy for Manitoba - Building the Parks Province. We believe that land-use and transportation policies are absolutely central to achieving a more sustainable society and comment from that perspective.¹

1. Green Action Centre supports the central purposes of parks to protect nature and connect people to nature.

Protecting nature and connecting people to nature are important goals for a sustainable Manitoba. Ethically, protection recognizes that we share the planet with other living things having their own intrinsic worth and deserving of respect. Practically, protection of and connection to nature foster recognition that we are part of living systems and dependent on their many material and psycho-spiritual services. Nature is a domain not only for the supply of resources but also for understanding, recreation, aesthetic enjoyment and spiritual transcendence. Since these experiences can be shared, they create important social bonds and cultural foundations as well. Moreover, these experiences are highly motivating. They can induce love and care for the natural world leading to more sustainable living. Without experience, understanding and visceral attachments, will people care enough to act?

2. Green Action Centre also supports (with caveats to follow) the parks strategy's objectives to develop sustainable and fair parks funding, enhance park experience, promote additional forms of active engagement, and strengthen environmental stewardship.

3. Furthermore we recommend the adoption of ecological standards and monitoring modelled initially on Parks Canada's principle of ecological integrity and accompanying indicators.

Building the Parks Province proposes that "the fundamental principle of Manitoba parks is maintaining ecosystem health" (p. 6). But what is meant by ecosystem health and how can it guide parks management?

Parks Canada has addressed this issue under the rubric of "ecological integrity" at least since the National Parks of Canada Act, 2000 established that "maintenance or restoration of ecological integrity, through the protection of natural resources and processes, shall be the first priority of the Minister when considering all aspects of the management of parks." This mandate is further defined and

¹ See <http://greenactioncentre.ca/content/provincial-land-use-policy-review/>.

interpreted at <http://www.pc.gc.ca/eng/progs/np-pn/ie-ei.aspx>. Moreover a variety of indicators has been synthesised to monitor and measure how well the ecological integrity of Canada's national parks is being maintained (<http://www.ec.gc.ca/indicateurs-indicators/default.asp?lang=en&n=CDE1612B-1> and <http://www.ec.gc.ca/indicateurs-indicators/default.asp?lang=En&n=7CB5BB69-1&offset=1&toc=show>)

Manitoba requires a comparable clarification and monitoring of the fundamental principle guiding parks management. Parks Canada's standard and indicators of ecological integrity, adapted to Manitoba landscapes, if necessary, can guide Manitoba parks management and reporting unless and until a better provincial system is created.

- 4. We recommend better integration of parks policies with the TomorrowNow goal for Manitoba "to be one of the most sustainable places to live on earth." Recommendations 5. and 6. specify how.**
- 5. Green Action Centre recommends reconsideration of the policy to create new cottage lots in provincial parks for privately developed cottages.**

Looking first at settlement impacts on ecological integrity, we believe that, in particular, policy #6 under *Enhancing the Parks Experience* should be re-examined:

6. NEW COTTAGE LOTS – To allow more Manitobans the opportunity to enjoy cottaging in provincial parks, new opportunities for cottage lot development will be explored in parks with existing cottage subdivisions.

Cottages, with their accompanying fire smart vegetation removal, shoreline development, access roads, and sewage generation and disposal, have, in aggregate, a significant ecological footprint. Much of the physical footprint remains year around for seasonally occupied cottages. Adding new such impacts to existing ones would appear to detract from the ecological integrity of parks. None of this, of course, "enhances the parks experience" for other park users or wildlife. It is a private benefit at the expense of the public. Should the province be in the business of subsidizing the acquisition of second homes by privatizing public goods like park lands²? Moreover new homes typically drive increased consumption (thus increasing one's global ecological footprint). At the very least an impact analysis should be conducted and alternative means to enable park-like living experience should be examined. The cottage lot policy does not seem to have received a "need for and alternatives to" analysis subject to sustainability principles.

What are alternative means to enable extended stays by families in natural settings ("cottaging")? Here are several.

- Alternatives for cottage ownership
 - Redirect cottage lot availability to crown lands outside of parks. There are unclaimed lots from cottage lot draws (http://www.manitoba.ca/conservation/fcfs_cottaging/index.html).
 - Redirect cottage lot availability to First Nations lands with benefits to First Nation landowners (<http://news.gov.mb.ca/news/index.html?archive=&item=1839>).
 - Leave the acquisition of cottages to the private real estate market.
- Alternatives to cottage ownership

² A further issue is that privatized benefits from public lands are subsidized by the taxpayer. Manitoba now recognizes that cottage fees and land rentals need upward adjustment over 5 or 10 years. Is it enough, and soon enough? (<http://www.gov.mb.ca/conservation/parksstrategy/fees.html>)

- Cottage rentals, leases and timeshare (private, social enterprise, provincial or First Nation sponsored). Note that there are no Vacation Rental By Owner (VRBO) listings in the Whiteshell or Nopiming provincial parks. (See <http://www.vrbo.com/vacation-rentals/canada/manitoba>.) Is this because parks rules restrict using cottages for businesses? If so, modifying the restriction could open cottages to use by others than the owner.
- Cabin rentals, leases and timeshare (private, social enterprise, provincial or First Nation sponsored).
- Limit any new development and sold cottages in parks to rental properties through regulation or incentives or lease expiration. Include such properties in the campsite booking system. Note that limiting any new developments to rental properties can multiply the cottaging experience for many more families over time with fewer developed properties by optimizing building use. Single family owners may have seasons or years of intensive use and other seasons and years of vacancy.

6. We also recommend the development of a sustainable transportation strategy for travel to/from/within Manitoba's Provincial Parks.

Transportation is the largest source of GHGs in Manitoba (37%).³ A smaller transportation footprint is necessary to meet, belatedly, legislated greenhouse gas reduction goals in The Climate Change and Emissions Reduction Act and further reductions beyond. Since most parks are not where people live, without changes in transportation modalities, a policy to increase parks visitations will increase transportation demand and drive up emissions. The problem is compounded when campers carry their houses with them in the form of large RVs or campers.

The solution is to promote a sustainable transportation shift as a key and well-marketed component of the new parks strategy. Building the Parks Province takes two steps in this direction, but many more need to be taken.

Policy #11 under *Stronger Environmental Stewardship* is to "include enhancing the role that parks play in how we mitigate for climate change, including initiatives focused on achieving energy conservation and the reduction of greenhouse gas emissions in provincial parks. This includes a new pilot project implementing the use of electric vehicles for patrolling in some provincial parks." But of course whatever emissions are saved by a few government EVs within the parks will be overwhelmed by increased travel to and from parks, if the campaign to increase parks usage succeeds.

Policy #12 under *New Enticements for Active Families*, which promises to look for sponsors to introduce transportation to Birds Hill Provincial Park on Canada Day weekend with enhanced access for Winnipeggers by 2015. We believe that this policy is a step in the right direction. But it has the potential to go much further by including sponsored trips to more remote locations and shifting transportation share from cars and RVs to buses and other forms of transport. The Winnipeg Free Press provides an example with winter trips to Assinipi park by bus and a summer excursion to Churchill by train.

We propose a strong initiative to promote car-free and car-lite camping as a widely-available option through a prominent well-planned, facilitated and marketed theme within the parks experience. Travelling lighter is possible if camping facilities, boats and supplies are available at the destination and more efficient forms of transportation are used..

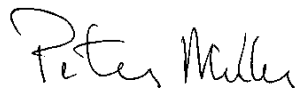
³ http://www.gov.mb.ca/conservation/climate/mb_doing.html

Here (thanks to Anders Swanson) are other specific suggestions to consider.

- **Develop park-specific pedestrian and bicycle infrastructure plans in every provincial park to include first-class connectivity, maintenance standards, signage and mapping.**
- **Implement a Complete-Streets policy for roads within parks.**
- **Explore, develop and promote the concept of car-free camping generally based on world-leading examples.**
- **Strengthen the relationship and physical walking/biking connection between the Town of St. Malo's business community and St. Malo Provincial Park.**
- **Look for other examples where transportation issues impede the development of eco-cultural-tourism and other benefits to communities that exist near provincial parks.**
- **Establish a target of zero GHG emissions from all Parks vehicles, based on the example of the Forks National Historic Site.**
- **Develop a connectivity plan for trails along the Grand Beach provincial park, Bird's Hill provincial park, St. Malo provincial park and The Red River Corridor, building on the momentum of Rivers West's Vision 2030 Master Plan and the ongoing development of the Trans Canada-Trail.**
- **Take action to increase seniors' access to major parks by scheduled bus.**
- **Ensure that the Borders to Beaches trail is completed to the highest-degree of quality and that it gets the attention it deserves.**
- **Finish the missing connection within Birds Hill Park between the Folk Festival gate entrance and downtown Winnipeg via a world-class segregated bicycle facility.**
- **Request the identification, formalization and preservation of short, but important pieces of existing province-wide bicycle touring network, such as the Paint Lake - Thompson bicycle corridor, old Number one Highway and the Beausejour to Whiteshell provincial park corridor, River Road and Duff Roblin park, and more.**
- **Formally request that Manitoba Infrastructure and Transportation begin the development of a pan-Manitoba trail network, similar to Quebec's Route Verte, that would provide sustainable access to all of Manitoba's parks and become a world-renowned and locally loved attraction.**
- **Develop a strategy to increase use of sustainable winter modes such as cross-country skiing, snowshoeing and nordic walking.**

Building the Parks Province is an imaginative set of proposals to strengthen the parks system and its value to Manitobans. Thank you for consideration of Green Action Centre's proposals to further integrate it with the goal for Manitoba "to be one of the most sustainable places to live on earth."

Sincerely,



Peter Miller, Chair
Green Action Centre Policy Committee