

CPAWS Comments on Parks Canada's National Urban Parks Policy Consultation

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The Canadian Parks and Wilderness Society (CPAWS) is pleased to participate in Parks Canada's "Toward a National Urban Parks Policy Consultation" and to share our recommendations to help Parks Canada in developing a National Urban Parks Policy to guide the designation and management of national urban parks.

We would like to congratulate Parks Canada on the successful launch of the National Urban Parks Program in 2021 and the extensive amount of interest it has generated across the country. We are also pleased to see the new Discussion paper and Backgrounder, released as part of the National Urban Parks Policy Consultation, which reflects many of the recommendations provided by [CPAWS to Parks Canada's National Urban Parks Program in March 2022](#). CPAWS strongly believes that national urban parks, both terrestrial and marine, could play an important role in helping Canada achieve its 30% by 2030 commitments by protecting rare habitats, biodiversity-rich areas and species at risk, supporting climate change adaptation and ecological connectivity, and as a means to get more Canadians behind these ambitious and vital conservation commitments.

The recently approved Kunming-Montreal Global Biodiversity Framework presents an important opportunity for Parks Canada over the coming years. The Agency is well-placed to play a leadership role in implementing the Framework by contributing to well-designed and effectively managed networks of protected areas on land and in the ocean, in partnership with Indigenous peoples. The Agency is also well-placed to play a leadership role in encouraging and incenting conservation action on the broader land and seascape and across jurisdictional boundaries.

We offer the attached recommendations with this context in mind. Please feel free to contact us if you have any questions, or to discuss our recommendations. We look forward to seeing the draft National Urban Parks Policy and will continue to support the implementation of the National Urban Park Program across the country.

Sincerely,



Anna Pidgorna, PhD
National Senior Conservation Coordinator
apidgorna@cpaws.org

CPAWS Recommendations on the National Urban Parks Policy:

Our recommendations on the National Urban Parks Policy are intended to support Parks Canada in effectively implementing the National Urban Parks (NUP) program while actively contributing to helping Canada achieve its 30% by 2030 conservation commitments.

We have organized our recommendations under the following five priority themes:

- I. Guiding principles and overarching recommendations.
- II. Core objective: Conserving Nature.
- III. Core objective: Connecting People with Nature.
- IV. Core objective: Advancing reconciliation with Indigenous Peoples.
- V. Operations and Management.

Below we provide more detailed recommendations on each of these themes.

I. Guiding principles and overarching recommendations.

1. Overall, we are pleased with the Discussion paper and the Backgrounder and support both the intent behind these documents and the spirit of the proposed National Urban Parks Policy (hereafter, the Policy).
2. Parks Canada must ensure that the language in the Policy is absolutely clear in its intent and requirements to uphold nature conservation as a core objective and preclude any potential misinterpretation.
3. The upcoming Policy is presented as the key instrument of designating, operating and managing NUPs. While that can be an acceptable approach in the short term, in the long term, we believe federal framework legislation will be necessary to ensure an effective NUP network, which has clear positive conservation outcomes.
4. Although not all NUPs will be managed by Parks Canada, they are being established first and foremost as important conservation tools. Maintaining or restoring ecological integrity must be clearly articulated as the first priority in managing NUPs. This should be embedded as an overriding principle within the policy and framework legislation.
5. We support using standards as qualifiers for maintaining a NUP designation. However, we strongly recommend the establishment of External Advisory Bodies to ensure *ongoing* transparency, monitoring, and evaluation of activities and management effectiveness of NUPs. The currently proposed interventions *after* major disruptions or challenges occur will be more difficult to implement and could result in compromising the successful operation of the NUP.
6. Regardless of the governance model, all new national urban parks must meet a criterion of “additionality” in delivering conservation outcomes and build upon existing efforts to protect and restore these sites. In other words, involvement in each NUP must lead to clear and meaningful conservation outcomes, such as upgraded legal protection, land acquisitions, commitments and capacity for ecological restoration and monitoring etc.
7. A National Urban Parks Policy must include opportunities for marine urban parks. Most coastal cities have been developed in bays and along deltas and estuaries because of productive coastal ecosystems. As a result of development and urban sprawl, ecosystems have been destroyed or degraded and are now in critical need of restoration and protection, as we are only just beginning to fully appreciate the host of ecosystem services that these ecosystems provide – from flood defense to carbon storage to fish habitat. Marine urban parks are an opportunity to leverage ongoing restoration projects, rewild urbanized shorelines, increase resilience to climate change, and connect citizens to marine protected areas.

II. Core objective: Conserving Nature.

1. We fully support the mandatory designation of the NUPs as a “protected area” or an “other effective area-based conservation measure” (OECM).
2. All NUPs, regardless of governance model, must have a primary/overriding objective of conserving nature and associated cultural values and ecosystem services (maintaining and/or restoring ecological integrity through protecting natural ecosystems and processes) to support maintaining and restoring the natural and cultural values of the area.
3. We fully support the need for administrators of the NUP to “commit to implement substantial and effective activities to mitigate pressures and threats to biodiversity, protect sensitive ecosystems and culturally significant landscapes, restore degraded ecosystems, conserve habitat for species at risk, contribute to climate resilience and implement nature-based climate solutions”. We need to ensure there is appropriate language in the Policy that frames these commitments as clear and actionable designation requirements. Further, sensitive ecosystems and culturally significant seascapes must also be considered alongside landscapes.
4. We welcome the minimum standards to ‘maintain designation’ for core objective: Conserving Nature. We are keen to ensure there are adequate tools for municipalities to offer a legally binding protection status for areas within a NUP and at the various zonal levels.
5. It is likely that the various parcels comprising the NUP will not be immediately adjacent to each other. Therefore, ecological connectivity goals, criteria and principles should be set at the onset. It is also important to integrate Parks Canada’s NUP program with the Agency’s Ecological Corridors program, as both are linked, and to make sure any other relevant federal government projects are aligned to and contribute to meeting their objectives.
6. Although we are pleased to see “exploring buffer opportunities” listed among the requirements for NUP designation, we believe this requirement falls short of what is needed for a successful NUP. We recommend that all NUP have a buffer zone delineated and managed as a critical component of the NUP, especially where ecological, cultural and/or other landscape features are present and/or intended to be restored. Protected areas on their own are insufficient to protect most ecosystems and prevent biodiversity loss. Active measures must be taken to maintain, enhance and restore the “surrounding matrix” - the areas around these core conservation sites as well as improving the connectivity between them. We recommend doing so either by actively managing the surrounding landscape and seascape around the NUPs and/or by designating a buffer zone.

III. Core objective: Connecting People with Nature.¹

We broadly support the key considerations within the Connecting People with Nature Objective, including no entry fees, availability of public transportation, accessibility and equity, diversity, inclusion, and languages.

We agree that NUPs should be welcoming, accessible and inclusive spaces for all people living in urban areas to improve community socialization and access to nature. Furthermore, acknowledging the important role urban natural areas play in providing shelter for homeless populations, a sensitive, pro-active approach to addressing the needs of houseless people is essential for NUPs, working with all levels of government and other partners and experts.

1. NUPs should serve as a launch pad for urban populations to develop an appreciation for nature and find opportunities to engage in conservation and stewardship within the NUP and beyond.

¹ In addition to several key points listed here, we have framed our thinking around this core objective in the [CPAWS 2022 NUP Policy Recommendations](#).

2. NUPs should offer a variety of low-impact recreational activities (i.e., hiking, picnicking, swimming, running, biking, canoeing, kayaking, camping, etc.) for urban populations to explore and enjoy nature. Active transportation routes should be included that can provide opportunities to include ecological corridors into their design, repair and maintenance.
3. NUPs should provide educational programming for urban populations to learn about outdoor activities, biodiversity conservation, Indigenous Peoples and history, and protected areas across Canada (i.e., national parks, provincial parks, Indigenous-led conservation areas, national marine conservation areas, etc.)
4. Visitor infrastructure and all activities should be designed, managed, and operated to support the primary objective of maintenance/restoration of ecological integrity within the NUP. Park managers should also ensure infrastructure demonstrates cutting edge practices for ecopassages, green infrastructure and/or building retrofits.

IV. Core objective: Advancing reconciliation with Indigenous Peoples.

We strongly support the objective to advance reconciliation with Indigenous Peoples, including ensuring the NUP governance and management is aligned with Indigenous ways of stewarding lands, water, and ice. We would also like to stress that it is paramount to ensure *resources are provided* to support the inclusive participation of all the Indigenous Treaty partners of the area in NUP establishment, governance and management processes.

1. Fully support that “Indigenous systems of law, governance, and knowledge are part of and prioritized in decision-making”.
2. NUPs should be established with the free, prior, and informed consent of the Indigenous Nations whose traditional territories the NUPs reside on.
3. NUPS could be nominated by Indigenous Nations and, in some instances, also be designated as Indigenous Protected and Conserved Areas.
4. NUPs should include Indigenous Nations, individuals or communities/groups in co-management and stewardship, where possible. This should include supporting Indigenous Guardians programs within the park and being inclusive of Indigenous People’s knowledge and aspirations in designing management plans.
5. NUPs should include a land acknowledgement and information on the Indigenous Peoples and history of the area, as desired by regional Indigenous organizations.
6. Signage in NUPs should not only be in French and English, but also language of the local Indigenous Peoples
7. Indigenous groups should be identified, encouraged, and *enabled*² to be involved in governance. They should also be consulted on allowable activities, infrastructure, addressing the impacts of urbanization, and guidance on plans for transitional sites.
8. The establishment and management of NUPS should foster ethical space where Indigenous knowledge systems and Western Science can interact on equal footing.

V. Operations and Management.

1. In addition to developing a strong, clear Policy on NUPs, we recommend creating new federal framework/enabling legislation that clearly articulates the goals, objectives, and criteria for a NUP, including options for governance/management. This would best ensure the ecological, social and cultural goals of NUPs are met over the long term and provide the strongest public accountability.

² Including by providing adequate financial means.

2. We support the requirement for enforceable establishment and on-going funding/management agreements with all governing authorities that include requirements to meet NUP criteria/standards, as well as implications if the governing authority(ies) do not meet these standards.
3. As recognized in the [Pathway to Canada Target 1 Decision Support Tool](#) for protected areas and OECMs, it is essential that governing authorities have mechanisms and the authority to ensure that activities that are incompatible with biodiversity conservation do not occur, and that compatible activities are effectively managed. This will be particularly important in the complex urban environment.
4. Management plans should be developed through transparent, public processes, with a legal requirement for a *5-year review and update*, recognizing the intense and fast-changing pressures of an urban environment, and the need for adaptive management. Management planning should also include the development of Visitor Use management strategies to avoid NUPs “being loved to death”.
5. We agree that the effectiveness and contribution of NUPs to conservation, social, and other goals should be measured through clear and transparent monitoring indicators, which should be developed as part of the NUP management planning process. Given the collaborative nature of the NUPs, additional provisions might be added to the management planning process for even broader consultations and engagement during management planning. We strongly believe that External Advisory bodies (both national and park-specific) will help with monitoring and evaluation of activities, while ensuring transparency and management effectiveness. Additional monitoring and evaluation processes applicable to NUPs include the biannual Minister’s Roundtable on Parks Canada, which would allow the general public and stakeholders to provide feedback to the Minister on his work with regards to the NUPs.
6. While we broadly agree that “the national urban park continues to only include land and water uses, infrastructure, or development activities that are consistent with the objectives of the park or are vital to the function of the urban area”, we strongly suggest that the latter portion of this recommendation be clarified and not left to the interpretation of governing authorities.
7. We support the proposal to use zoning to identify various areas within the park that will have different types of visitor activities and different levels of protection. Zoning is essential for optimal design and management of NUPs due to the often patchy and disconnected nature of the ecosystems the NUP is being created to protect. As with National Parks, any change to a NUP’s zoning constitutes a major amendment to the NUP management plan and may only be made following an environmental assessment, public notice and public participation in the decision.

Additional recommendations

In addition to these key recommendations, we also noticed a few instances where further clarification is needed, for example:

1. We have seen statements that NUPs will be “large, predominantly natural areas within or near a major city” as well as “PCA has not proposed a minimum size nor thresholds related to ‘naturalness’ and that “both small and large conserved areas can have significant conservation benefit”.
2. We would like to see further clarification on NUPs committing to “strengthen the quality and effectiveness of conservation measures to ensure that ecological health is maintained and improved” - an element of the Conserving Nature objective.
3. We would also like further clarification on the proposed NUP Network that will provide a “forum to share information and experiences, facilitating opportunities for learning” and where PC “will collaborate with national urban park managers to develop guidance and tools”. Although we support an idea of a Network and the kind of information sharing described here, we believe External Advisory Bodies are needed to ensure ongoing transparency, monitoring, and evaluation of activities and management effectiveness of NUPs.