

**BRIEF BY THE OTTAWA VALLEY CHAPTER OF THE CANADIAN PARKS AND WILDERNESS SOCIETY
ON THE
JULY 2020 DRAFT GATINEAU PARK MASTER PLAN
SEPTEMBER 20, 2020**

The Ottawa Valley Chapter of the Canadian Parks and Wilderness Society (CPAWS-OV) welcomes the opportunity to provide comments on the July 2020 draft Gatineau Park Master Plan. The mission of CPAWS-OV is to protect the exceptional biodiversity of the Ottawa River Watershed in eastern Ontario and western Quebec through the promotion of the establishment of new parks and protected areas, the sound management of existing parks, the promotion of connectivity and connecting Canadians to nature through education, stewardship and outreach programs. As protecting Gatineau Park was the inspiration for the formation the chapter in 1969, the Gatineau Park Master Plan is of great interest to CPAWS-OV as the guiding document for managing the park. We continue to call on the NCC to present a bold, progressive vision for the future in the plan. The following submission outlines the CPAWS-OV recommendations in response to the draft Gatineau Park Master Plan.

The CPAWS-OV response to the Draft Master Plan is presented in 5 sections, summarized below and expanded upon later in the text:

1) Conservation / Ecological Integrity / Biodiversity

The National Capital Commission (NCC) professes to hold conservation and ecological integrity as the primary guiding principle for managing the park. The Gatineau Park Master Plan should emphasize this, rather than seemingly strike an apologetic balance between conservation and recreational use. It is our recommendation that ecological integrity be listed first in all discussion of priorities by park management, and that the specifics around ecological monitoring be expanded.

2) Legislation

CPAWS-OV is pleased to see mention of some key issues included in this plan which were excluded from previous plans. Specifically, outlining the need for legislative protection is a welcome addition. However, we feel that the need for legislation is of such importance to the park that the plan should expand greatly on how legislation would provide the park similar protections as our national and provincially protected areas enjoy across the country. The

Gatineau Park Master Plan references the benefit of increased legislation, but it is the recommendation of CPAWS-OV that the specifics of governing legislation be highlighted and explored in further depth such that the Canadian public be made aware of the benefits.

3) Visitation

The current draft of the Master Plan seemingly prioritizes the recreational use of the park, and ecological integrity does not emerge as the obvious management priority to the reader. Further, there are numerous concerns with the vision of visitation within this current draft of the plan. CPAWS-OV calls on the NCC to strengthen the vision for park visitation and avoid compromise when it comes to recreational activities at the expense of the park’s ecological health and sustainability.

4) Private Property

While private property occupies a relatively low percentage of the overall park landmass, its impact on the ecological integrity of the park is significant. Emphasis should be placed on the reducing effects of private developments, for example in regard to lakeshores where private infrastructure can easily undermine the work done by the NCC to protect the park. An uninformed reader must be made aware of the many jurisdictions within the park that are responsible for regulating private development and again of how protective legislation could provide the NCC with authorities to properly ensure the park’s health. CPAWS-OV believes that the private property (and management of, effects on ecological integrity, infrastructure, connectivity etc.) should be addressed in much further detail.

5) Other Considerations / Specifics

This section of our response will highlight other considerations for the plan, as well as identify specific sections where we recommend changes / edits.

1) Conservation / Ecological Integrity / Biodiversity

The draft Master Plan focuses heavily on recreational management for people (access, transportation and parking) and is extremely light on biodiversity outcomes. ‘Wildlife’ conservation is dealt with at the end of the report as a seemingly peripheral issue. Yet in the 1999 Plan for Canada’s Capital, Gatineau Park the NCC committed to managing the park to the standards of a International Union for the Conservation of Nature (IUCN) Category II natural heritage area in which the protection and management was intended to preserve ecosystems first, and to provide recreational activities second.

Biodiversity conservation needs to be discussed at the beginning of the draft plan and recreation and other human issues second.

The state of ecosystems based on observing infrastructure density is not a sufficient indicator, monitoring must be a focus. CPAWS-OV recommends a science-based ecological monitoring program.

Indicators have been developed in Gatineau Park (e.g., water quality, loons, frogs) yet there is nothing included in the draft management plan about the current state of forest cover and/or the desired dynamic state.

- What is the state of monitoring of forest ecosystem resources?
- What is the intactness of forest? How is it changing? Is it becoming dominated by shade tolerant tree species?
- What about natural disturbance processes? In the absence of disturbance (e.g., fire suppression), the forest may be changing in composition (and with widespread diseases - see below).
- Many forests in eastern North America are subject to ‘mesophication’ - an increase in shade tolerant species such as maple (*Acer*) and beech (*Fagus*) and a decline in shade intolerant or mid-tolerant species such as oaks and white pine.
- How does the NCC propose to address this if this is happening in the park (and fire is suppressed - historically small surface fires created conditions for oaks/white pine)? And how does forest successional change impact the distribution and abundance of species at risk and other species in the park?
- How does the NCC propose to address issues such as widespread pathogens and diseases affecting tree species (invasive alien species)? These include emerald ash borer, beech bark disease, hemlock woolly algid, butternut canker.

Although the draft Master Plan mentions encouraging research this should be expanded on and include applied ecological research perhaps investigating the effects of trail use on distribution and abundance of species at risk (or invasive species such as garlic mustard). In addition previous work has used satellite imagery to map forest composition and structure in Gatineau Park (and suggested this could be used to prioritize areas or identify areas of concern (e.g., Czerwinski et al. 2014) - but this is not mentioned. What about specifics of restoration in some areas (e.g., removing invasive or planted species)? There is no mention of management for Monarch butterflies and other projects of management interest in the park. CPAWS-OV feels there is substantial potential for stewardship and restoration initiatives and recommends the NCC work with academic institutions, conservation organization and the general public to implement such management programs.

The Master Plan does acknowledge that the "the overall ecological impact of infrastructure and recreational areas cannot be increased in the future". This would imply, hopefully, that the expansion of infrastructure must cease or at least be severely curtailed in the future. CPAWS-OV has expressed past concern as to the development of Camp Fortune, O’Brien House and the Wakefield Mill. Both NCC developed and managed assets as well as commercial leases must not be permitted to expand. Instead, the NCC should encourage the development of various new recreational attractions and accommodations in the communities surrounding the park. We welcome the fact that the draft plan does set out some parameters.

The draft plan professes to be very concerned with habitat fragmentation. However, there is no prohibition of new roads, except for “...new roads that cause habitat fragmentation will not be permitted” (p. 39). Given all roads cause fragmentation, there needs to be a firm commitment that no new roads will be constructed inside the boundaries of the park. This should include the expansion of existing roads, including those under the jurisdiction of municipalities or the province of Québec.

In addition, there needs to be a buffer zone established around the park (and parts of the 13 corridors should be included in this zone). CPAWS-OV recommends the implementation of a clearly defined and mapped buffer zone around the park and that sufficient resources be invested to engage the province of Québec, MRCs, municipalities, property owners and local communities from the beginning of the process.

Thus far urban development is encroaching on the south-eastern edge (Aylmer sector of the City of Gatineau, Chelsea) as well as the eastern edge (Highway 5 and associated developments, and Wakefield expansion) and now some on the western edge (Luskville Falls). How is the NCC going to control further development with the park surrounded by urban use? This will compromise the ecological integrity of the park and impact wide-ranging species that require large home ranges.

In the sections on ecological corridors there is no mention of the importance of connectivity within the park - including the importance of maintaining interconnectedness of wetlands for species at risk such as Blanding’s Turtle which uses multiple wetlands and has extensive overland movements to nesting sites. Also, ecopassages and culverts for wildlife are not mentioned (turtle hatchlings, deer etc.) yet these are critical as the park is surrounded by infrastructure (including Highway 5 expansion). CPAWS-OV recommends mitigation measures to reduce wildlife mortality on all roads within the park and that the NCC work collaboratively with other agencies, including the Ministère des Transports du Québec to ensure that wildlife safety and mobility is considered when highway 5 is expanded or upgraded.

The elements of modern spatial conservation planning, including zoning, are completely lacking and the approximate (and pre-existing) zones suggested do not address the spatial distribution of biodiversity in the park. The draft plan suggests that the most remote areas are left alone - while the southern parts of the park should be where recreation is concentrated. This is the “easy / business as usual” option and a microcosm of what Canada (and other countries) have done with their protected area networks (protected areas are in areas of scenic beauty such as mountainous regions - usually far away from biodiversity hotspots that conflict with human use and interests). Calling the northwestern part of the park around Lac la Pêche a ‘Wildlife conservation area’ implies that this is the only part of the park reserved for wildlife and biodiversity conservation which is counter to the 1999 Plan for Canada’s Capital.

The plan makes frequent reference to biodiversity conservation and management but never really articulates what is meant by this, nor what the NCC proposes to do to make sure that this is achieved. This is virtually never expanded in terms of concrete conservation action. There is no formal assessment of ‘management effectiveness’ anywhere in the report.

As for most management plans, specific goals and targets need to be set for species and plant communities (management plans for individual species such as species at risk are not mentioned). For

example, these could be to increase the numbers of a species at risk to a certain level or desired cover and state of vegetation types. Climate change is likely to impact the park in unforeseen ways (tree species composition, water levels in wetlands) but there is little mention of this threat.

The plan ignores the fact that there are gradients of biodiversity in the park in terms of vegetation/wildlife communities (e.g., more shade tolerant hardwood forests in the south and forests with more boreal characteristics in the north). Frequent mention is made of species at risk on the Eardley escarpment, as if these are the only species at risk communities in the Park. But there are species at risk and unique communities in many other areas of the Park, including around Meech Lake. There needs to be full representation of wildlife and plant communities within the park too, which requires high levels of protection for much of the southern and eastern areas in the park. Incidentally this will also include critical habitat for some species at risk, which the NCC *has a mandate to protect* - regardless of potential conflicts with human recreational interests.

2) Legislation

The issue of legislative protection is not dealt with until section 5.1 (Establishing legal protection and Federal legislative and planning framework). This should be #1 not #5 and *is the paramount concern for the park* - including defining boundaries and preventing further development of private properties within, or at the edge of, the park.

The draft Master Plan suggests that everything is under legislation and implies that the park is fully protected; however, this is not true. The entire status of the park needs to change for full protection and effectual management.

The mention of protective legislation is welcome but should be given prominence in the beginning of the draft Plan. There is a need to identify specific actions such as commitments to a timeline, establishing a focus or working group and perhaps involving the NCC Board.

The last sections of the draft plan present the advantages and requirements for modernizing the Park’s legal framework. Sadly, Gatineau Park’s boundaries are currently not legislated, and as such park lands may be sold, exchanged or developed without Parliamentary approval or public input.

Private residences are still being constructed on the remaining private land not acquired by the NCC. Legislation would reinforce the park’s conservation mission and its protection, control private property development, modernize pricing of activities, establish regulations, and assign powers of protection and enforcement.

To be sure, the idea of governing legislation for Gatineau Park is not new. Over the past several decades, individuals and conservation organizations, including prominently CPAWS-OV, have petitioned Parliament, and met with Ministers, Senators and Members of Parliament. Social media campaigns to “make it a real park” are ongoing. To date, Senators and MP’s and even Ministers have sponsored eight pieces of legislation. However, each died on the Order Paper for a variety of reasons.

This underlines the absence of real Parliamentary and Government commitment and the lack of a clear assignment of responsibility in a ministerial mandate letter. We call upon the Government of Canada to

introduce legislation that would enshrine the boundaries of Gatineau Park and grant powers to Park administration equivalent to that conferred on the management of the National Parks of Canada.

Without legislative protection and regardless of the current draft Park Master Plan's intentions, Gatineau Park will continue to be threatened by boundary modifications, policy shifts, uncontrolled private development and most importantly the loss of ecological integrity.

Useful precedents for legislation are readily available. Following are 3 options which could be considered by the National Capital Commission and the Government of Canada:

- Amend the National Capital Act under which the NCC operates. The Act only mentions Gatineau Park in relation to providing for payments in lieu of taxes to adjoining municipalities. Amending the National Capital Act perhaps may be the simplest approach, but would nevertheless need to specify park boundaries, authorities, and powers that would parallel the content of a stand-alone Act.
- A stand-alone Act, such as the Act establishing the Greater Toronto Area's Rouge National Urban Park, managed by Parks Canada is another option. A further consideration is to have Gatineau Park managed in a cooperative venture with Parks Canada as part of a string of “Urban Parks” across Canada. Having access to protected areas in proximity to urban areas was highlighted this summer by the COVID-19 pandemic. In times of crisis, people seek solace in nature. Gatineau Park visitation this summer broke all records.
- A third legislation option is to have Gatineau Park listed under the National Parks Act. As such Gatineau Park would have the highest level of protection equal to iconic landscapes like Nahanni, Banff, Jasper and all the other globally recognized Canadian National Parks and benefit from the expertise of a world class agency. It would fulfill the original vision of having Gatineau as the first national park east of the Rocky Mountains, mirroring the western parks of the Rocky Mountains. Indeed, Gatineau Park is already larger in area than many National Parks.

Gatineau Park, on the doorstep of the National Capital, containing the Prime Minister’s summer residence, the House of Commons Speaker’s residence and the historic Mackenzie King’s Estate deserves the attention of our legislators. With climate change impacts already visible, expanding urban developments, and growing recreation demands, it is critical that Gatineau Park’s biodiversity be given the highest level of protection which only proper legislation can confer.

Reference should be given to the lack of governing legislation in the Federal Legislative and Planning Framework.

3) Visitation

The high concentration of visitors in certain places and at certain times is extremely problematic This has been accentuated by the pressures of the first summer of the Covid-19 pandemic which have required the NCC to adopt new policies regarding visitor activities.

Managing visitor numbers in Gatineau Park - in fact in any large or even small conservation park - is always challenging. Gatineau Park is unique in that access to the prime recreation areas, such as the Meech Lake sector, are also heavily occupied by housing, private boat houses and wharves, the latter in some cases purported to be illegal, automatically limiting access to the trails and waterways of the sector to the tax paying public. The residents control almost all the potentially accessible shoreline. The Master Plan is disappointing in that this issue is not mentioned let alone addressed. In this regard the statement that "private landowners and commercial tenants will contribute to the protective effort to protect the park" sounds hollow if not contradictory.

Many of the recreational suggestions and objectives are conflicting in themselves, and also conflict directly with biodiversity conservation objectives (which are not fully articulated). For example, attracting more people but at the same time protecting the values of the park. In fact, recreation in the park seems to be quite out of control with multiple user groups (over)using parts of the park as a playground.

Gatineau Park is a multi-use park with many vested interest groups. Such complex systems require models to achieve a balance between conflicting interests, given that biodiversity conservation must be the priority (according to legislation). But there is no mention of the use of modern optimization models to resolve these conflicts. Conspicuous by their absence are spatial overlays in Geographical Information Systems of human recreational pressure on maps of biodiversity hotspots (note that locations of many species at risk are confidential due to illegal harvesting, e.g., American ginseng).

While acknowledging the work of the Friends of Gatineau Park, more outreach and education are required in order to encourage visitors to adopt behaviours that are supportive of conservation. In addition to the corps of volunteer patrollers, this could include signage, volunteer and/or student ambassadors to ensure a presence on the landscape and to help make visitors aware of park rules and regulations. Should education and outreach not be sufficient, Conservation Officers must then be readily available to enforce the regulations. CPAWS-OV recommends that the NCC invest in education, outreach and enforcement to effectively manage visitor use and to curtail abuses.

The Plan states “Finally, resource exploitation (minerals, forestry) as well as hunting and gathering are prohibited, as are any other activities prohibited under existing NCC regulations” (page 64). Anecdotal evidence and observations by CPAWS-OV members and supporters suggest that park rules are being ignored, sometimes overtly, including the harvesting of plants, the collection mushrooms/fungi and endangered plants illegally and dogs are often present on trails where domestic animals are prohibited.

Sustainable Transportation

While several ideas are mentioned, there are few if any firm commitments. One example: “gradually reduce reliance on motor vehicles...”(p. 31). Bold actions are required to address the number of vehicles in the park. Parking is related to sustainable transportation. The plan needs specific and progressive direction. For example: “Look to implement all transportation options before adding parking” (p. 57) could be strengthened with: “No additional parking for motor vehicles will be added in the park.” CPAWS-OV recommends the NCC develop a new Sustainable Transportation Plan for the park

which encourages public and active transportation. CPAWS-OV does not support the expansion of existing parking facilities or the establishment of new parking facilities.

4. Private Property

The presence of private property in Gatineau Park requires a full and comprehensive assessment in the Master Plan. The omission of this serious problem is a fundamental weakness.

The public consultation process as summarized in the draft Master Plan revealed an expectation that urban development both within and around the park should be limited and that improved control over residential use is required. The document does not provide specifics. In its vision for the park, the draft plan states that its stewardship "will continue to be a to be a shared responsibility through the collaboration and active participation of residents, community groups, and visitors" and specifically that "Private landowners and commercial tenants will contribute to the collective effort to protect the park." Unfortunately, no clear information on how this is to implemented can be found in the draft Master Plan.

In the draft Master Plan preamble, the NCC appears to acknowledge that there could be an issue with private property development by stating that those "whose use and development do not take into account the site's environmental context could have a significant negative impact on the park's integrity." Further on it notes that "The protection and management of Gatineau Park are carried out under the powers conferred by the National Capital Act" while nevertheless adding that to have "more appropriate legal tools to manage the park as a conservation park" is desirable.

Claiming that Gatineau Park is small compared to neighbouring parks is disingenuous. In fact, at least a dozen federal parks in the country are smaller than Gatineau Park and the nearest provincial park (*Parc national de Plaisance*) is much smaller. Nor do any of these parks have significant resident populations and most none at all. Nevertheless, that the Plan calls for connectivity to the natural regions outside the park is to be applauded as is its recognition of the necessity to reduce the fragmentation of ecosystems and habitats in and around Gatineau Park. Within the park the protection of natural links and the ecological integrity in part are to be achieved by reducing the impact of infrastructure. The draft plan only specifies the danger of fragmentation by road and recreational infrastructure, completely and inexplicably omitting private property infrastructure.

The draft Master Plan states that the NCC must work with the municipalities and property owners to, as it claims, "ensure that the development of these properties respects the natural environment in which they are located." Observers on the ground have seen no evidence that respecting the natural environment is fundamental in the continuing construction of private residences nor has the NCC made criteria available. The Plan does call on the NCC to "encourage" good stewardship on the part of property owners and municipal authorities. That this matter is treated so superficially is a major flaw in the Master Plan. The NCC's long term aim of acquiring residences and properties only as they become available and as resources are at hand is really a plan for sustaining habitat loss and degradation and increasing resident -user conflict.

That the NCC may be aware of the lack of control over private property is possibly evident as seen where the plan notes that "additional legal tools may assist in the park's management." and that there is

value in "renewing the NCC'S legal framework" in order to be able to better protect a conservation park as mentioned earlier. Now is the time for strong and effective federal legislation to give the people of Canada control over their Capital Conservation Park thus ensuring its ecological integrity for generations to come.

5) Other considerations in the text:

1.1 Overview

- Reference Indigenous culture when discussing the cultural heritage of Gatineau Park

1.2 General Description and Location of the Park

- No reference to the province of Québec owning land within the boundaries of the park.
- “Gatineau Park is surrounded by rural areas, 80% of which are mainly agricultural.” (page 10). What is the actual physical area that this was calculated from - i.e. what area around the park? (there is no need to say ‘mainly’ if 80% is stated).

1.4 Federal Legislative and Planning Framework

- The plan states "As stewards of federal lands, the NCC must protect the habitats of legally protected species, and a conservation park must provide quality habitat to conserve its biodiversity." How does NCC provide “quality habitat to conserve its biodiversity”? What management is being actively carried out in the park apart from trail maintenance and installing culverts (sometimes without prior knowledge of, and negative impacts on, species at risk)? This should be described.

1.5 A Precious Legacy

- A source of hunting, fishing, and berry gathering resources. Surely there were more profound uses (cultural and spiritual, shelter, canoe and other construction materials, travel routes, firewood...)

1.6 The Park Today

- Trends and Evolution – no reference to climate change other than weather events. Biodiversity impacts need to be noted.
- National Capital Act is not mentioned among authorities and policies
- Not sure what is meant by this statement “Landscapes of significant cultural importance may be vulnerable to interventions in Gatineau Park.”

1.7 Planning Process and Public Stakeholder Consultations

- The plan mentions increased accessibility but the NCC plans to control access by cars and limit the numbers of cars allowed in the park (In ‘What we’ve heard ”Improve accessibility to reduce vehicle traffic within the park”, page 19). When increased ‘accessibility’ is mentioned does it mean increased inclusivity (people from all backgrounds, and people with disabilities)? Care needs to be exercised in distinguishing what is meant by ‘accessibility’ and ‘inclusivity’.

- The Park is open to many entry points and this is not addressed as a current problem.

2.0 Vision Statement

- The focus on “enjoy” may be the wrong sentiment. Perhaps “continue with the protection of nature”.
- Background statement should provide perspectives on implications of climate change, population growth, human health derived from exposure to nature and future pandemics which causes local demand for access to nature is heightened.
- Description of the vision statement “It is home to a variety of rare and at-risk species as well as several natural *habitats*”, page 21. The word ‘habitat’ is species-specific and is misused throughout the report. ‘Habitats’ should be replaced by ‘vegetation types.’

3.0 Premises

- If conservation is the first priority, it should be listed first in this section. Adherence to park policies and personal responsibility is key to ensuring the protection of ecological integrity. Legislation wording should include the fact that specific legislation is as of yet not in place.

3.1 Conserving Nature and Culture

- A missing element is recognizing the importance of education in this element. All the policies and laws in place will not be effective unless there is a good understanding of these and their value in regard to protection.

3.3 Promote Equitable and Sustainable Access

- The goal of bringing more people to experience nature in Gatineau Park needs a caveat – where possible in the context of protecting nature.

3.4 Foster Engagement and Collaboration

- Recommend reference to collaborating with school boards.

5.1.1 Ecosystem Conservation

- The plan states that the NCC will “Use native and diverse species in planting programs to increase the resilience of the natural environments.” How will this be done and where?

5.1.2 Managing the Ecological Impact of Recreational Infrastructure

- E. This paragraph includes the wording “if this loss or fragmentation can be compensated”. Compensated should be replaced with “offset”.

5.1.4 Nighttime Periods

- How does night period policy apply to private lands inside the park?

5.2.1 Environmentally Friendly Activities

- Should Speology in Lusk Cave be allowed if there are bats present? (White-nose syndrome - what measures are being taken to prevent spread?).
- Fishing at Lac La Peche - does it include spear fishing?

5.2.5 Boating

- C. In collaboration with municipalities and Transport Canada, implement measures to limit shoreline erosion. Does this also apply to homeowners?

5.2.9 New Activities and Events

- Current activities should be subject to and assessed with the same criteria as new activities.

5.5.2 Private Property in the Park

- As the private residential construction in the park is continuing it would appear that "private" infrastructure" is to be excluded from this policy, which is certainly a critical gap.
- This section speaks to encouragement. Specific actions are needed – establish best practice guidelines.
- Part D. Use expropriation as a last resort, to prevent a major irreversible environmental impact (e.g. subdivisions).

The text states:

E. **Encourage** the owners of properties that remain private to adopt best environmental practices regarding the development and use of their land and the management of their sanitation systems.

F. For private properties, **encourage** the municipalities to implement design guidelines adapted to the riparian environment and the natural habitats.

G. **Encourage** municipalities to adapt their bylaws to limit the subdivision of large private properties in the park. The focus might be better to do more than encourage. Launch or initiate best practices.

5.5.5 PRIVATE PROPERTIES OF INTEREST LOCATED OUTSIDE THE PARK

- This section misses mention of encouraging environmental organizations such as Action Chelsea for Respect of the Environment (ACRE), Nature Conservancy of Canada, *Conseil régional de l'environnement et du développement durable de l'Outaouais*, to help assembling lands.

FOR FURTHER INFORMATION:

For further information regarding the recommendations contained in this brief, please contact:

John McDonnell,

Executive Director

819-778-3355

jmcdonnell@cpaws.org