



Garden City Conservation Society

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Mayor and Councillors, especially Parks Committee,

We commend your determined efforts on behalf of the Richmond community to resolve the Massey Crossing, and we work with you on that, especially via Fraser Voices. On behalf of the community, we also aim to work with you on the Garden City Lands situation.

The Garden City Lands project began with a well-done project chart in September 2012. After that, the project went off track with its focus on skirting the ALR (example in Endnote 10). That is in contrast to celebrating the ALR status and Richmond's agri-eco legacies, although the somewhat improved collaboration with Kwantlen after we wrote to the Agricultural Land Commission is a step in the right direction.

As well, whims and guesswork appear to pre-empt knowledge-based decisions. Unfortunately, council's step of approving (in June 2014) the proposed plan in a limited way—as a “guide”—seems to have been taken as a *carte blanche*.

Now the project is supposedly on the brink of starting the main infrastructure, the dike-road trail system, in August. The project is woefully unready for that desirable step.

The dike-road trails have three crucial roles: (1) for water management, (2) as arterial roads/trails, and (3) for open-land park recreation, all ALR purposes. They are like a good quarterback in football—essential for success and worth the cost of quality.

We contend that the arterial dike-road trail system is worth building with excellent accessibility, excellent capacity and excellent low-maintenance durability. By deleting less-needed features like the kilometre of wooden viaducts, the project could afford quality, leading to very popular use for a very long time.

At this point, it is still possible for the project (with improved planning) to make the dike-road trails follow the best routes for all the agri-eco-rec ALR uses of the Lands—and build them with little adverse impact. However, in 2013, drastically underfunded consultants could do only cursory mapping and analysis of soil and vegetation.

In the past year, our calls to fill the gaps were heeded when **Kwantlen did soil analysis on a grid of 55 half-hectare squares on the west side of the Lands. The City still needs to do the east side.** Working from knowledge can only help, even for tending the bog vegetation, and Coun. Harold Steves has said the whole Lands might be farmed in future (not our wish).

Concurrently, the soil grid of the whole Lands needs to be filled out with a vegetation inventory featuring the sphagnum species (at least four), native bog plants, and invasive plants. That would enable informed placement of dike-road trails and the transplanting of sphagnum and bog plants from outside the bog restoration area (including the trail routes) to the bog restoration area.



It's clear that the southern half of central dike-road trail in the **April 2016 project map** (at left) is **misplaced**. It should not wander left.

The problem can be deduced from the pattern of wetness (darkness) in the **Consultants' 2013 Vegetation Map** and in the **Satellite View of the Lands** (below). The non-bog vegetation and the dryness are both unsuitable.

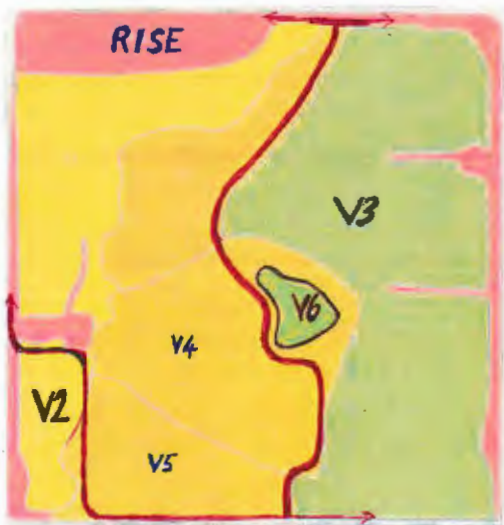
The consultants' map is consistent with 2011 Garden City Lands Coalition findings, which we have kept on sharing and recently confirmed.



Consultants' 2013 Vegetation Map



Satellite View of the Lands

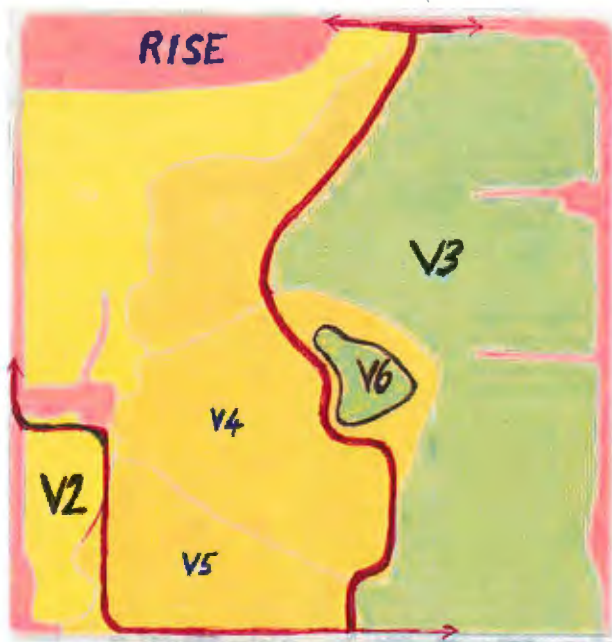


Revised Central Route (rough)

An *approximate* suitable route for the southern half of the **central dike-road trail** is shown in our rough **Revised Central Route** graphic (at left).

Note: The small V6 area near the centre is a natural saucer that retains precipitation water. The saucer contains the most extensive patch of sphagnum moss. The particular sphagnum species there doesn't occur elsewhere on the Lands.

Of course, *refining the route* with the needed inventory findings continues to be essential.



The central dike-road trail route in the graphic would keep acidic bog water in the bog area (V3 & V6)—not mixing with the alkaline water in a succession area to the west, where birches and other non-bog plants would consume it.

After transplanting of bog plants from V5 to V3, **the correction could free up V5 land for agriculture.** (Duplicating the later-stage ecology of the Richmond Nature Park is likely less valuable.) Also, **the area of the reservoir pond could be increased by a hectare or more in the low-lying and barely fertile area on the south edge of the Rise.**

That could still result in a large net increase in eco-friendly farmland, along with a more adequate irrigation supply.

On a related topic, we gather from the project team that the contrived “fen” near the southwest corner is one of the senior parks manager’s ideas. The Lands have enough fens. One is V2, which could be augmented with a jog in the perimeter trail, as shown in the Revised Central Route graphic at top left. (But that conservation area could be configured even better to suit the observed ways that native bees and nesting birds make use of it.)



We should add, since we’ve touched on the perimeter dike-road trail, that there are problems with the perimeter route too, and **the dike-road system map should be problem-free before any trail building begins.** We hope KPU can start farming without it.

Currently the problems may seem unsolvable because **even the best of consultants are limited by the terms of reference and funding from the City.** Solutions are possible anyway.

The main need at this point is to increase and apply the necessary knowledge to make the route of the dike-road trail system optimal, with initial care to get the central trail right.

Endnotes:

1. The Garden City Lands project's [current maps](#) begin with the Landscape Zones map (shown in a small size in this letter). After that, there's a version with numbered areas and a legend. That is very revealing. Notice, for example, that **there is very little agricultural land** other than the KPU land (north of the middle, Lansdowne Road).

Note: Garden City Conservation advocates ALR uses that are simultaneously agriculture, ecological conservation and open-land park recreation uses, but we realize there's usually one primary use. The Richmond Food Security Society (under a previous name) was the advocate for agriculture use first, the default priority on ALR land. It seems appropriate to maintain balance unless informed food security stakeholders, including the RFSS and permaculture leaders, say it doesn't matter.

2. The **non-KPU agricultural land**, including community gardens, may be as little as **3.5 hectares**. But at least **1.5 hectares of that is in the natural fen** along Garden City Road between the southwest corner and the multifunction area. That fen area is suited to conservation (featuring nesting birds and native bees), but it is very poor land for farming. Apart from that, there is **only about 2 hectares for non-KPU agriculture**, which is very little. (Note: Since some areas are not labeled, perhaps there's a bit more.) Many of the farming uses that would suit the ALR parkland would be of interest for open-land park recreation participants to observe and engage in. The body of this letter has shown how it is possible to increase the agricultural land while simultaneously helping the sphagnum bog restoration.
3. By nature, the Garden City Lands supports a *range of ALR uses* for agriculture, ecological conservation and open-land park recreation. The planning does not seem to envision them so that decisions about dike-road trails and land use would enable them. That is particularly true for open-land park recreation, which is what should make the Garden City Lands one of the world's great parks.
4. A high-profile example is the non-ALR use of an event field taking up valuable ALR space for events such as concerts and sports tournaments when it would just be duplicating the roles of locations like Minoru Park. Furthermore, the idea that a field can be trampled by thousands of people at a concert (a non-ALR use unless there is specific ALC permission for an event) and then switch back to wildlife habitat or even to food growing seems unrealistic.

A real ALR use for it at this stage would be for soil enrichment through cover crops and grazing and also for wildlife. A longer-term use would almost certainly be community gardens and community farms. The needs will grow, and the amount of available land in the City Centre cannot grow as quickly. The project's vision needs a far-off time horizon.

5. Surely the dike-road trail ought to be efficient to build and maintain. Instead, we still see a wastefully winding perimeter trail and also designs that run water onto the trail surface instead of off it. In this, we can learn from the closely-spaced storm drains down the Garden City Road side of the Lands. The drains are typically so clogged that the project team didn't know they exist (judging from the recent survey, which said they don't exist). Since Richmond apparently can't afford much park maintenance, we must assume the need for trails that are self-maintaining to the extent possible.
6. The project shows two large areas of pollinator fields, which could be okay if there are plans for botanical gardens and their maintenance. However, the obvious starting point is the pollinator field in the southwest corner that just needs to be left alone to function.
7. There seem to be plans for trees all around the Lands, and having quite a lot of trees is fine in principle. Since this letter is mainly about dike-road trails, especially the central one, we should at least caution that a large part of the community (including many in a large ethnic group) would have security concerns if there are woods close to the trails. That includes (for instance) the wide "hedgerow" (along the central trail), which might also be taxing on the scarce water resources.
8. Bicycle paths and possible bicycle use of the multipurpose main path of the dike-road trails need to be addressed in the context of beginning construction of the dike-road trails. The bike use is marginally an ALR use (e.g., as a means for sightseeing). Bike paths separated from the main path of the dike road trails have the additional value of enabling safer and pleasant ALR use for the more-clearly ALR uses. Related aspects:
 - Since there are bike paths bordering the Lands on the south and west sides, perhaps they could be separated from Westminster Highway and Garden City Road by a physical barrier (attractive and safe).
 - On the north side, where there is a need for an area of mixed urban forest, a bike path between the dike-road trail and the forest would require no incremental space because it would serve as security space.
 - On the east side, where there logically should be visitor parking and only minimal trees except toward the north end, the bike park could be between the parking and the dike-road trail.
 - That would result in a continuous bike path around the Lands, bordering the road on the south and west and providing a security buffer along the outer side of the dike-road trail on the north and east sides.

9. While the 20-acres arrangement with Kwantlen Sustainable Agriculture is a good step, the City cooperation with KPU is not convincing (e.g., with KPU practically forced off the Rise, though tending orchard trees for picnickers). Ideally the City will enable KPU to meet its needs well and set clear expectations for KPU's community outreach in return.
10. The lack of effective progress in the enhancement of the Garden City Lands appears to result partly from systemic problems, including the mindset of trying to get around the obstacle of the ALR status. The ongoing contra-ALR effort has been the Sports Council one championed by Coun. Bill McNulty. It overtly includes a soccer complex of at least 26 acres. At two meetings on February 28, 2011 (General Purposes Meeting and Council Meeting), Sports Council representatives clarified further, They brought out their desire to replace the Riverport swimming and arena facilities with better ones on the Lands. (This has been checked at the Richmond Archives—using audio of the meetings.)

It is a huge challenge for the City to make the radical change from the perspective of getting around the ALR as an obstacle to the perspective of celebrating the ALR and Richmond's agri-eco legacies (the approach with the potential to foster one of the world's great parks).

11. With the systemic problem (down to the level of senior manager of parks and roughly parallel manager positions in planning, communications, etc.), the best efforts of the dedicated hands-on staff and consultants are frustrated. The consequence is that the project makes the least of capable consultants who are hobbled by their terms of reference and sometimes inadequate funding (e.g., when contra-ALR uses receive funding priority). Our 2015-19-15 message to General Manager Dave Semple (see appendix) brings this out.

In the same way, the tremendous value provided by the community is wasted, including by fake consultation, exemplified by the 2013 survey that Garden City Conservation carefully showed to be not at all valid. Despite that best effort with community expertise, the survey "results" were still used as a pretend foundation.

We cannot be sure of the motivation for making the least of all forms of valuable expertise. In contrast, we can have a pretty good idea of the results, and we have done our best to share the knowledge.

12. Of course, all this has ramifications for the Musqueam lawsuit.

Sincerely,



Jim Wright,

in consultation with the directors, Garden City Conservation Society

APPENDIX: Message to Dave Semple, 2015-10-15, re biophysical inventory and consulting

I commented about the “Garden City Lands Biophysical Inventory and Analysis” yesterday. Since I hadn’t looked at the inventory for a long time, I went back to it in order to be more sure and precise about what I was saying.

I looked at the “Inventory and Analysis” related to sphagnum mosses, the keystone species of any sphagnum bog ecosystem (the ecosystem Harold Steves has advocated restoring for many years). On page 27 (PDF 31), the introductory paragraph about sphagnum says that only two sphagnum species were identified, whereas Michael Wolfe had identified four and also confirmed that there are still four after seeing the conflicting observation. It would be easier to miss a distinction or miss an occurrence of a species than to mistakenly identify an additional one, and the likelihood is that Michael’s information from at least eleven years of observation of the Lands (and the rest of the Lulu Island Bog) is more credible.

A further factor is that the “Inventory and Analysis” is internally inconsistent. For instance, page 27 conveys that sphagnum was identified only in Zones V-2, V-3 and V-4. However, in the Vegetation Analysis on page 35 (PDF 39), sphagnum is indicated only in V-6 and V-7. That analysis correctly identifies that there are large patches in V-6 but probably does not identify the species there correctly, and it completely misses the numerous sphagnum patches spread over V-3. If I recall correctly, there are also some in the eastern part of V-5, which certainly includes vegetation worthy of sphagnum bog ecosystem conservation.

The consultants, Diamond Head, are reputable, but I had the initial sense (when the document suddenly appeared after apparently being a long way in the future) that it had been rushed into publication without sufficient observation or careful analysis, let alone validation for quality assurance. The blatant inconsistencies in the observations/analysis of the most important species, the mosses of the genus sphagnum, confirm the symptoms.

My quick critique of the treatment of sphagnum also confirms that the terms of reference — the City’s expectations about Diamond Head deliverables — must have been inadequate. Since Harold Steves had long promoted sphagnum bog ecosystem restoration and enhancement on roughly 60% of the Lands, and since Garden City Conservation had knowledgeably supported that, one certain need was for Diamond Head to provide organized observations and analysis that would be a first step toward making science-based decisions about whether, where and how to go about that ecosystem restoration and enhancement. Since Diamond Head is a capable company, they would have met the clear expectation if it had been established. Furthermore, the fact that the City accepted the report indicates that Diamond Head had met whatever expectations may have existed,

Yesterday, I commented about the inadequacy of the Wildlife/Habitat inventory/analysis, which is another main part of a biophysical inventory, and I see that the first sentences on that topic confirm it: “A detailed wildlife survey was not conducted for this inventory and analysis. However, potential wildlife presence was determined based on assessment of existing habitat quality (in addition to any incidental observations while on site).”

Enough said?

Note: The red highlighting has been added for the purposes of this appendix.