

Salt Spring Island Agricultural Alliance

106 Old Scott Road, Salt Spring Island, BC V8K 2L6

Tel: 250-537-5511 Fax: 866-257-2046

November 16, 2009

Sharon Erickson
Section Head, Planning
Environmental Stewardship & Parks and Protected Areas Divisions
Vancouver Island Region
Ministry of Environment
2080 - A Labieux Road
Nanaimo, BC V9T 6J9

Dear Sharon Erickson:

Re: Burgoyne Bay Provincial Park Management Plan, draft October 2009

The Salt Spring Island Agricultural Alliance is a not-for-profit organization established to oversee the implementation of the 'Plan To Farm' Salt Spring Island Area Farm Plan (AFP) and to represent Salt Spring agricultural interests on and off-island. Membership is restricted to organizations and includes all Salt Spring groups with an interest in local agriculture.

The Alliance fully endorses and supports the letters recently submitted by the Salt Spring Island Farmers Institute, Island Natural Growers, and the Salt Spring Island Local Trust Committee. This letter repeats the concerns and ideas already expressed and is our submission to the public comment process ending November 20. This letter is also a letter of proposal for an Ecological Farm Management Plan, first proposed at a meeting with Scott Benton and Brian Bawtinheimer over a year ago.

The Alliance is deeply concerned that the October draft management plan for the Burgoyne Bay Provincial Park, while recognizing the historic role of agriculture in Burgoyne Bay, does not reflect previous submissions and comments from the Salt Spring community in support of continued agriculture in the park and precludes appropriate agro-ecological management of the fields. Specifically, the table on page 27 states:

To continue historic agriculture land use management

- Continuation of the existing haying operation under a Park Use Permit;
- Develop a haying strategy for the valley bottom that will reduce impacts on grassland-nesting birds, allow the hedgerows to expand naturally and incorporates the wetland restoration plan;
- Commercial farming is not permitted under the Park Act and an interpretive experience relating to the island's agricultural heritage is available nearby at Ruckle Provincial Park. Therefore agricultural use in Burgoyne Bay Provincial Park will be limited to continuation of the existing haying operation;

With no provision for nutrient management, the fields and soils will become increasingly degraded through time. Moreover, the encroachment of the hedgerows will reduce the habitat available for some prey species, and the amount of arable land. This is not good ecological management, nor is it a reflection of historic agricultural activities. Our proposed solution is the following:

Proposed Ecological Farm Management Plan Process

1. Salt Spring farm organizations, represented by the Salt Spring Island Agricultural Alliance and supported by local government, are willing to fund and organize an Ecological Farm Management Plan, to be integrated with the overall Park Management Plan.
2. The Salt Spring Island Farmland Trust is a not-for-profit society established as part of the Area Farm Plan to hold and manage farmland on behalf of the community. This society, in consultation with BC Parks, and working together with local government, the Agricultural Alliance and the local conservation community, may be the appropriate organization to undertake an agro-ecological planning process, conducted by qualified professionals.
3. The objective is to create a plan for long-term soil fertility and crop rotation that meets conservation needs and other requirements of the Management Plan for Burgoyne Bay Provincial Park. No commercial farming is advocated or desired. Any sales will be on a cost recovery basis, and any resulting surplus will be used to further the implementation of the management plan.
4. The first step will be to identify, in consultation with BC Parks, suitable fields not designated for other uses. An agriculturally and ecologically sound forage crop program will be developed for these fields.
5. The plan will probably consist of a long-term rotation, such as several years in hay, followed by one year of green manure or livestock grazing, reseeding to hay. Requirements for regular soil testing, organic certification, and wildlife considerations will be included. Visitor signage and messaging will be drafted.
6. The cost of this plan will be borne by the Salt Spring Island community, not BC Parks.
7. Upon approval of the Ecological Farm Management Plan by BC Parks, a Parks Use Permit will be issued to the Salt Spring Farmland Trust (or other appropriate organization) to implement the plan. Implementation will be on a cost-recovery basis, with any additional funds necessary raised by the Salt Spring community.

We therefore request that the wording on page 27 of the Burgoyne Bay Park Management Plan be revised to enable an Ecological Farm Management Plan to be developed.

We also request acknowledgement of our proposal and approval to proceed with preparation of an Ecological Farm Management Plan, on the understanding that a Parks Use Permit or other mechanism to enable implementation of the Plan may be granted when a Plan satisfactory to BC Parks is produced.

Yours sincerely,

Anne Macey, chair, Salt Spring Island Agricultural Alliance

Cc Scott Benton, Executive Director, Parks and Protected Areas Division
Brian Bawtinheimer, Director, Parks Planning & Management Branch
Peggy Burfield, Planning Officer
Joe Benning, Area Supervisor
Harry Parsons

Recipients list:

Sharon Erickson
Section Head, Planning
Environmental Stewardship & Parks and Protected Areas Divisions
Vancouver Island Region
Ministry of Environment
2080 - A Labieux Road
Nanaimo, BC V9T 6J9

Scott Benton, Executive Director, Parks and Protected Areas Division
Ministry of Environment
PO Box 9339 Stn Prov Gov
Victoria BC
V8W 9M9

Brian Bawtinheimer, Director, Parks Planning & Management Branch
Ministry of Environment
PO Box 9398 Stn Prov Gov
Victoria BC
V8W 9M9

Peggy Burfield, Planning Officer
Environmental Stewardship & Parks and Protected Areas Divisions
Vancouver Island Region
Ministry of Environment
2080 - A Labieux Road
Nanaimo, BC V9T 6J9

Joe Benning, Area Supervisor
Saanich/Southern Gulf Islands
Environmental Stewardship, Protected Area Section
Vancouver Island Region
Ministry of
Environment
2930 Trans Canada Highway
Victoria, BC V9B 6H6

Harry Parsons
1596 Grady Road
Gibsons, BC V0N 1V6