



Comox Valley Regional District
Regional Parks Background Study
March, 2022

PROPOSED REGIONAL PARKS SERVICE

INTRODUCTION

The Comox Valley Regional District (CVRD) and its member jurisdictions are exploring the establishment of a Regional Parks Service. A Working Group comprised of parks managers from the Comox Valley local governments has undertaken, with the assistance of a local government consultant, a *Regional Parks Background Study* to help guide discussions on the purpose and shape of a new service. Based on the information in the *Background Study* and on the outcomes of subsequent discussions with the local government Chief Administrative Officers, the Working Group has developed a proposed service structure. This paper presents the proposed structure for the consideration of decision-makers.

PROPOSED STRUCTURE

The proposed structure of a new CVRD Regional Parks Service consists of five major elements, all of which are identified and explained as follows:

Service Definition: The proposed Regional Parks Service would be established to protect regionally-significant natural areas, and to provide a network of regional greenways.

- ⑩ *Protection of Natural Areas* — The protection, in perpetuity, of regionally-significant natural areas throughout the Comox Valley would be the service's primary purpose. Such areas include sensitive ecosystems, aquatic and upland habitat corridors, estuaries and foreshores, and other areas that would be identified through a science-based approach for their high conservation value.

The CVRD would work in close partnership with its member jurisdictions, community partners, K'ómoks First Nation, governments and private companies to acquire and protect high-priority lands through the service. As a general rule, lands identified for protection would be relatively large in size; however, small areas could also be targeted to address specific conservation needs, opportunities or threats.



Where compatible with conservation goals, trails and other low-impact works would be developed in the regional parks to provide opportunities for people to access, connect with and enjoy nature. Connection and enjoyment would help to build awareness of the natural environment, and would generate support for efforts aimed at limiting the loss of sensitive ecosystems, protecting biodiversity, and restoring natural systems.

- ⑩ *Provision of Regional Greenways* — The provision of regional greenways would be an additional purpose of the Regional Parks Service. Regional greenways would be developed as off-road linear parks with multi-use trails. As a general rule, they would provide the principal linkages between communities throughout the Comox Valley; however, they could also enable residents of the region to access significant parklands and natural areas, significant natural features (e.g., beaches, lakes) and other significant points of interest.

The regional greenways would connect to the local greenway and active transportation corridors of the CVRD's member jurisdictions. The identification and acquisition of routes would be undertaken through the service, as would the development of the necessary greenway infrastructure.

Service Participation: The proposed service would protect natural areas and develop new greenways throughout the whole of the Comox Valley for the benefit and value of the entire regional community. All jurisdictions of the Regional District, and all parts of each jurisdiction, would be encouraged to participate in and support the service. Full participation recognizes the broad public benefit of regional parks, and is a feature of all regional parks services in high-growth parts of British Columbia.

Service Governance: The governance model for the proposed service would feature a Regional Parks Service Committee of the Comox Valley Regional District Board.¹ The Committee would be responsible for providing recommendations to the Board on all service matters. Membership would consist of nine (9) individuals, all of whom would be local elected officials (e.g., Directors and Councillors). Each participating jurisdiction would receive one (1) committee member for every 10,000 population or portion thereof.

¹ Several regional districts in British Columbia have established regional parks committees to assist in governing regional parks services. The scope, membership and voting rules of these committees may be customized to address the specific needs of participants.



The total make-up of members, therefore, would be as follows:

- | | |
|------------------|--------------|
| > Courtenay (3) | > Area A (1) |
| > Comox (2) | > Area B (1) |
| > Cumberland (1) | > Area C (1) |

Each Committee member would receive one (1) vote on every matter for a total of nine (9) votes. A two-thirds' "super-majority" of six (6) votes would be required on all proposed Committee recommendations, including recommendations related to the approval of the service's *Land Acquisition Strategy*, the acquisition of lands, and the approval of the service's operating and capital budgets. The membership structure coupled with the requirement for super-majority support on recommendations would ensure broad support among participating jurisdictions on all matters, including questions of spending and land acquisition.

It must be emphasized that the requirement for a two-thirds' super-majority would apply only at the Committee level, and only on recommendations to the Board. The Board, as the service's ultimate decision-making body, could choose to reject a recommendation of the Committee and determine, using the *Act's* default corporate weighted voting rules, a different course of action. The service structure, with its customized governance model, would therefore require good faith on the part of the Board in order to function as intended. The Board would need to know and accept that recommendations coming from the Committee, particularly on land acquisition and spending matters, had met a high bar of support from participants.

The Committee's *Terms of Reference*, which would be embedded in a Committee bylaw, would explain the importance of the membership and voting rules, as well as the shared expectation of participating jurisdictions that the Board acknowledge and respect the broad support that exists for all recommendations from the Committee.

**Service
Funding:**

The funding structure for the proposed service addresses total service cost, cost recovery and cost allocation.

Total Cost

The total cost of the service would take into account needs related to land acquisition, parkland development and service operation.

- ⑩ *Land Acquisition* — Through the proposed service the CVRD would make use of a broad variety of acquisition tools, in addition to direct purchasing, to acquire and protect regionally-significant natural



areas, and to secure regional greenway corridors. Where direct purchasing were the only — or the preferred — way to acquire targeted properties, opportunities to leverage regional funds and build funding coalitions would be pursued. Local tax revenues would be needed as part of the solution, however, in most if not all cases.

- ⑩ *Parkland Development* — Within the context of natural area protection, the service would provide opportunities for residents of the region to access, connect with and enjoy nature. As the number of regional parks grew, it would be important to provide sufficient funds to develop the trails, parking areas and other low-impact works required to provide these opportunities. The amount to be provided would be dependent on the number and timing of regional parks and greenways acquired, and on the scale of development preferred.
- ⑩ *Service Operations* — Maintenance and administration of the Regional Parks Service would add to the total cost.

The annual land acquisition, parkland development and service operation expenses would comprise the total cost of the service each year. Land acquisition would be the most important component since it would drive all other costs. Acquisition costs could not be determined, however, until the parties to the service had undertaken strategic planning and endorsed a *Land Acquisition Strategy*.

In the service's first year of operation (2023), the total cost would be relatively minor, set at a maximum of \$275,000.00 — an amount that would translate to an average of about \$6.00 per household.² This level of funding would be sufficient to:

- ⑩ undertake and complete a *Regional Parks Strategic Plan* (\$75,000.00)
- ⑩ develop a *Regional Park Acquisition Strategy* (\$60,000.00) — work that would follow and be informed by the strategic planning process
- ⑩ pay necessary start-up staffing costs (\$75,000.00)
- ⑩ pay the Comox Valley Regional District support service allocation cost (\$25,000.00)

² This average household cost impact assumes full regional participation in the proposed service. The amount also assumes that service costs would be allocated among participants on the basis of converted assessment, and would be recovered using a property value tax (see later).



- ⑩ replenish the Comox Valley Regional District Feasibility Service for a portion of start-up expenses incurred prior to formal service establishment (\$40,000.00)³

The annual cost would be increased incrementally each year to meet the needs of the expanding service. The exact amount of increase would be informed by the *Regional Parks Strategic Plan* and *Land Acquisition Strategy*, and determined based on a recommendation of the Regional Parks Committee. Reliance on the Committee's recommendation would provide a high degree of cost control over the service.

Cost Recovery

Regional parks are true public goods that benefit the entire regional community. In local government, property taxation is considered the most equitable tool for recovering the costs of a service that provides public goods. Accordingly, the full cost of the proposed Regional Parks Service would be recovered by property taxes.

Property taxes can be levied on an *ad valorem* basis (i.e., on the assessed value of the property), or on a parcel basis through a property parcel tax. In general, parcel taxes for public good services are considered regressive, especially when a uniform amount is charged to every parcel, irrespective of property use or assessed value. At present in British Columbia, property parcel taxes are used to recover a portion of costs — specifically, land acquisition costs — in only one regional district. And, in that regional district, the property parcel tax is being phased-out. For the proposed Comox Valley Regional Parks Service, all costs would be recovered using a property value tax.

The CVRD could choose to recover land acquisition costs separately from parkland development and operations costs, using a separate acquisition service and tax requisition. This approach is used in some other regional districts to ensure that funds raised for the purchase of lands can be used only for the purchase of lands. Alternatively, a single regional parks service bylaw and tax rate could be used in combination with a statutory reserves to provide the same assurance. This approach is used in several of the regional districts examined for the *Background Study*, and is proposed for the Comox Valley service.

³ Total costs to be repaid to the Feasibility Service are expected to be approximately \$70,000.00. \$40,000.00 would be repaid in 2023; the remainder would be repaid in 2024.



Cost Allocation

The proposed service's property value tax burden (i.e., the total amount of property tax to be raised) would need to be allocated across participating jurisdictions. In public goods services, regional districts typically allocate costs on the basis of converted assessment — the default method under the *Local Government Act*. Costs for most regional parks services in British Columbia are allocated in this fashion.

In the proposed Regional Parks Service, costs would be allocated on basis of converted assessment.

Service Delivery:

The proposed service would be delivered by the Comox Valley Regional District Parks Department. Wherever practicable, the Parks Department would collaborate in the delivery of specific activities — e.g., interpretive programs, nature education, natural resource management, cultural resource preservation — with environmental and conservation groups, and the K'ómoks First Nation.

K'ÓMOKS FIRST NATION

The local governments of the Comox Valley are committed to consulting and — where possible — collaborating with the K'ómoks First Nation on the acquisition of lands, operation of regional parks and trails, and protection of important ecosystems. Participation by the K'ómoks First Nation in Committee discussions would be an additional topic for discussion.