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The Hierarchy of Government and Public Agencies in Park Development

In October 1961, there will take place in Montreal a national conference on "Resources for Tomorrow", jointly sponsored by the federal Department of Northern Affairs and National Resources and the various resources departments of the provinces. The conference will be concerned with resource management problems of agriculture, water, regional development, forestry, wildlife, recreation, and fisheries.

The Bureau staff were invited to prepare a study of parks administration for the Recreation section of the Conference. It was published early this month among the background papers for the Conference, and is here reproduced with the permission of the Conference Secretariat.

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THE BUREAU OF MUNICIPAL RESEARCH

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The Hierarchy of Government and Public Agencies in Park Development

SUMMARY

In Canada, parks and recreation are administered at all three levels of government — federal, provincial and municipal. Great difficulties of administration arise from the fact that there is no clear-cut distribution of parks and recreation functions among the three.

The national parks system finds itself carrying out provincial and regional park functions in some provinces, and in others doing very little at all. The internal administrative difficulties of the national parks are made much worse by the irregularity of their functions.

Municipal parks are generally administered either by regular municipal departments, responsible to the elected Council, or by relatively independent boards such as the Boards of Parks Management erected in some Ontario municipalities. Municipalities face grave financial problems with respect to park land acquisition, but more basic is the question of the attitude municipalities take toward their recreation responsibilities. Also, municipalities are subject to provincial control and must learn to live with whatever administrative and financial conditions provinces impose upon them.

Regional parks, requiring as they do the participation of the province and one or more municipalities, pose the most complex administrative problems and also are probably the greatest area of unmet need in the parks field. Saskatchewan and Ontario have recent legislation governing regional parks, both requiring municipal initiative. One fairly successful and economical type is the regional park that can be developed in a water conservation area. While admirable, such parks are limited as to use and cannot be looked to as the final solution of the regional parks problem.

Provincial parks tend to be administered through departmental branches (Ontario's system is described at length), but British Columbia recently created a Department of Recreation and Conservation. The provincial parks systems, however administered, must be given clearer definitions of their functions, especially since they face both ways in their inter-governmental relationships: to the federal government and to the municipalities.

The enthusiasm and generosity of private agencies have been of vital importance to parks development. Inevitably, it becomes necessary to try to fit private efforts in with public programs. Also, there is plenty of scope for commercial recreational operations. If big public parks monopolize some recreational functions, they also open up other possibilities to enterprising individuals.

The parks and recreation function is only one aspect of government in which institutions have lagged behind the movement of society. Certain recommendations are advanced that relate to government in general and to parks and recreation in particular.

- (1) Functions appropriate to each level of government must be defined with clarity and consistency.
- (2) Administrative co-ordination among government recreation agencies must be a conscious goal.
- (3) To spare the public purse, functional co-ordination of recreation with other allied programs (e.g. conservation) should be exploited to the full.
- (4) More and better use of the art and technique of planning should be applied to the provision of recreation facilities.
- (5) Parks and recreation programs should be made the clear responsibility of the elected representatives of the people through the customary departmental system of organization of government.
- (6) If institutional amendments are needed — e.g., lengthening the terms in office of municipal councillors — to bring about better handling of public business, they should be made.
- (7) All regional functions, not only parks and recreation, stand in need of more effective administration; the answer is the setting up of a second-tier regional municipality, with elected representatives governing matters of regional concern.



The Hierarchy of Government and Public Agencies in Park Development

Canadians are brought up to believe that Canada is a country of "vast untapped natural resources". It may come as a shock to some of us that our natural resources are not uniformly vast and, in particular, that we are in danger of running short of *space* of all things; but in terms of land adaptable for recreational purposes, the fact is that our supply of space is not unlimited, and in certain places the dwindling supply is inadequate to meet the burgeoning demand.

The people of New York State recently approved by referendum a bond issue of \$75 million largely for acquisition of land for recreational purposes. Much of the money is to be devoted to the restoration to wilderness state of some areas partially developed by private parties as hunting and fishing club preserves, etc. The American people take just pride in their laborious 300-year struggle to conquer the wilderness; in 1961 we see them willingly spending vast sums to get the wilderness back. There are lessons to be learned from this, among them the realization that the wilderness of Wyoming or Colorado is of limited use to the average resident of Brooklyn or Syracuse.

Hence the necessity for aggressive, forward-looking policies and for careful administration, assuming that the Canadian community *wants* recreation park facilities and is prepared to pay the price. It has to be assumed that a reasonable attitude toward recreation needs exists at the various governmental levels. Our discussion of *administration* assumes the existence of some substantive *policy*.

The first questions to be settled are: what are the various types of recreational parks required by an urbanized nation? Can these be assigned with any show of reason among each of the three levels of government? Is it possible to say which functions should be undertaken respectively by municipal, provincial and federal authorities? These are basically questions pertaining to the need for administrative co-ordination and its relationship to functional co-ordination.

The stumbling-block most feared by promoters of public recreation parks is the frightening expense of land acquisition. Admitting that land not acquired today will be lost forever or will be more expensive tomorrow, it cannot be denied that the cost of land is frequently high enough to give pause even to the enthusiast. This being the case, the public interest demands imperatively that every opportunity be seized to co-ordinate the conservation and development of forest, water and soil resources with the satisfaction of recreational needs. The basic problem is how to achieve the necessary administrative co-ordination within and between all levels of government. In this paper we consider federal, provincial, regional (including conservation authority) and local municipal parks. There exist also county parks and other joint inter-municipal parks. It is easy to say that the overall system should be such that services provided are complementary to the

greatest possible extent; the question remains one of administrative organization and practice (assuming consistent policies).

While the objective of this paper is to consider these questions as they pertain to the whole country, most of the information is illustrative rather than comprehensive and relates to Ontario and other provinces where the problems and experience appear most relevant. Since it has been deemed advisable to devote most attention to areas of administration where the more complex difficulties exist, the federal parks system is given only a very brief treatment.

I. Parks and Recreation Administration in Canada.

(i) National Parks.

Since 1885 when the first National Park was established to protect the mineral hot springs around what we know as Banff, 18 areas totalling more than 29,000 square miles have been taken into the federal system. The latest such park is *Terra Nova* in Newfoundland. Of the 29,000 square miles, 17,300 are in one area, *Wood Buffalo Park* in Northern Alberta and the North West Territories.

The first National Parks were created from lands belonging to the federal government, chiefly in the west. More recently national parks have tended to be developed in suitable areas made available by the provinces. The impression is freely given that the federal government is unlikely to develop a national park without a provincial invitation. The Province of Quebec, which has extraordinarily large park reserves, has no national park, and the Province of Ontario, which itself entered the field early with Algonquin Park in 1893, has only three, all relatively small. The upshot of this haphazard development is that at the present time national parks are being called on to perform functions for which they were not intended.

Under the National Parks Act, administration is carried out under authority of the Minister of Northern Affairs and National Resources by the National Parks Service. The Service gets advice from the Forestry Branch of the Department and from the Canadian Wildlife Service, and has engineering work done usually by the Department's Engineering Services Division, sometimes by the Department of Public Works. The key functionary in the administration of the park system proper is the Resident Superintendent, who with his staff is responsible for virtually the entire operation of his park, its animal population and vegetation, its human residents and visitors.

There is need for clarification of the role of the National Parks Service in the hierarchy of responsibility for public park development. The problems of the National Parks Service are really problems of administration and government organization as much as prob-

lems of technique. The irregular distribution of national parks among the provinces suggests that there is no clear division of responsibility for parks between the federal and provincial levels. Without such a clear division of responsibility, there cannot be smooth co-ordination of national parks with essential supporting services provided by provinces, nor can the public be assured of effective consideration of the other areas of public interest that are associated with parks: conservation, transportation, regional development.

Basic questions come to the fore. Should certain types of large-area park be administered solely by the federal authorities? If so, what kind of park functions ought to be left to the provinces? Is it a good thing for the federal parks program to be geared to the necessity to fill gaps, where made welcome to do so? Is one level of government abrogating its responsibility? Should the federal function be, perhaps, more a matter of leadership and service rather than of actual operation? It will be found that questions akin to these arise with respect to parks operations at all government levels — questions of apportionment of responsibilities, and questions of intergovernmental co-operation to ensure that maximum use is made of parks and to eliminate costly conflicts between parks and related programs. Answers are suggested to only a few of these questions in this paper; most are left open as matter for discussion.

(ii) Municipal Parks.

Any attempt to summarize municipal parks administration in Canada in a factual manner would lose itself in a maze of details. In the circumstances, perhaps the best approach is a series of questions:

To what extent do municipalities recognize a need for planned parks development? Where does recreation stand in the scale of priorities of municipalities?

Granted a positive attitude towards the provision of parks, do our municipalities concede any need for specialized administration of parks?

Does the fact that municipalities rely heavily on property taxation for their revenues (Quebec's, Newfoundland's, and, to a degree, New Brunswick's rather less so than the other Provinces) impose a limitation on the extent to which they can properly spend money on recreation? Is this the real deterrent, or is it just their over-all difficulties of revenue-raising?

The advice of experts, intended for both municipalities and provinces, frequently is to grab as much park-type land as possible as soon as possible, because no matter how expensive it is now, it is going to be more expensive later. Presuming the validity of this argument, how many municipalities can afford this kind of saving?

Certain problems that arise in municipal parks administration in Ontario may provide a focus for discussion.

A municipal council in Ontario may choose to set up a Board of Parks Management to operate its parks, or may choose to accept the responsibility for parks itself. The Boards of Parks Management, which have a fair degree of independence vis-a-vis their municipal councils, are governed by the Public Parks Act.

This Act provides machinery for municipalities which prefer to keep parks administration at arms' length from the control of Council, "to take parks out of politics," as it is sometimes put. Land acquired by a non-elective Board might be considered immune from the elected council's presumed propensity to surrender long-range benefits for immediate advantages. This viewpoint presupposes that the council will name to a parks board people who are more inclined than councillors themselves to acquire land in the proper amounts and locations for continuing park purposes. May it not be that this "buffer" idea of the appointed parks board represents an approach not sufficiently positive to stand up to today's growing requirements?

The Public Parks Act, it should be noted, imposes severe limitations on Boards of Parks Management. First, they must run their parks system each year on expenditures (including principal and interest payments on debentures) that represent not more than one mill on the dollar of local assessment; second, they are subject to a total acreage limitation — e.g. 2,000 acres for a city not less than 100,000 population; 500 acres for a township. To express urban park acreage needs in terms of a direct numerical relation with population is a futile exercise; estimation of space required depends on analysis of many other factors besides population. Purely for illustrative purposes, however, reference can be made to one "rule of thumb" which says that an urban area ought to have seven acres of parks for every 1,000 inhabitants; by this standard, no city of over 300,000 population can possibly be adequately provided for under the Public Parks Act.

In fact, not many of Ontario's cities choose to operate under the Public Parks Act, preferring to place parks administration more directly under the control of the elected council.

It must never be forgotten that the municipalities are subject to whatever controls the provinces choose to exercise, administrative as well as financial. If the province places responsibility for different aspects of parks and recreation in the hands of different departments and agencies, the municipalities have no recourse but to deal with all such departments and agencies. For parks and recreation purposes, an Ontario municipality will or may come into contact with:

the Department of Municipal Affairs;

the Department of Planning and Development;

the Horticultural Societies Branch of the Department of Agriculture, if it hopes to erect a community centre as part of a park and to receive a statutory grant therefor;

the Community Programs Branch of the Department of Education, if it wants assistance with a community recreation program;

the Ontario Parks Integration Board (a special body made up of the Chairman or Vice-Chairman of the Ontario-St. Lawrence Development Commission, the Chairman of the Niagara Parks Commission, and three Cabinet Ministers), if the municipality is interested in a parks project outside its own boundaries;

the Ontario Municipal Board, for debenture approvals, for parks as for all other purposes.

(iii) Regional Parks.

The part of the parks system in which the problems of administration are most acute is the part that falls between the strictly local parks, which by their nature are accommodated within municipal limits, and the large provincial or federal parks in vicinities free from immediate heavy urban pressures. It may be contended that present needs are greatest and most pressing, while the range of possibilities for action is most limited and is most rapidly diminishing, in parks programs designed to serve the outdoors recreation demands of urban regions. The financial problem in this category of parks has two prongs: the government of a province is reluctant to commit itself too heavily for the advantage of only a part of its people; the municipality is characteristically short of money, limited (by the province) in its borrowing, and cautious about expenditures on areas outside its borders.

The most striking thing about the evolution of our parks system in Canada is the relatively recent dates of the important provincial legislation on the provision of parks in urbanized regions, e.g., in B.C., 1957; in Saskatchewan, 1960; in Ontario, 1954, 1957 and 1960.

This alone would suggest that active awareness of recreation needs of this type has had comparatively late growth in Canada. Further evidence is readily forthcoming: in the heavily urban southern regions of Ontario, designated by the province's Department of Lands and Forests as the Southeastern and Southwestern Regions, the number of provincial parks in active operation in 1954 was only three. Today there are twenty-eight. In Saskatchewan, a province few Canadians would think of as being pressed for space, provincial parks development dates, for all practical purposes, from the appointment in 1957 of Mr. Wm. M. Baker to study parks needs and facilities in Saskatchewan.

One immediately obvious direction in which the province might move to help meet the outdoor recreation park needs of a given urban area is to assist the affected municipalities in the creation and development of such a park somewhere in their vicinity. This is now possible in Saskatchewan under the Regional Parks Act (1960) and in Ontario under the Parks Assistance Act (1960). In both cases, the province will assist a municipality or group of municipalities with generous contributions toward capital outlays required at the outset. Of

course, a municipality that is hard put to satisfy its needs including local parks, acquisition for which is most expensive, may be unwilling to contribute very heavily to a regional park.

In Ontario's case, the Parks Assistance Act declares that to be approved for assistance a park must complement the Provincial Parks system. The regulations specify that the parks must have picnic and camping facilities, must exact admission and service charges not less than those of provincial parks and must be fully maintained by the municipality. Perhaps it would be parochial for a municipality to argue that the Parks Assistance Act is a scheme whereby the municipalities can be made to help the Provincial Parks, rather than the reverse. Parochial or not, this view is common enough. The province's defence is that the parks confer a local benefit, chiefly, and ought therefore to be paid for in large part locally.

Most of the applications received in this first year of the Parks Assistance Act's life have reportedly come from rural and small urban communities. Commonly the applications envisage the conversion of an existing camp-site or trailer camp into a park that meets the requirements of the Act and its regulations.

This Act is administered by the Department of Planning and Development; but the Department is obliged to submit an application of which it approves to the Ontario Parks Integration Board.

The regulations promulgated under the Saskatchewan Regional Parks Act are a little more permissive as to park uses than those under the Ontario Parks Assistance Act. The Saskatchewan parks may include sports grounds, specifically including golf courses. Also, the Regional Park Authority is not compelled to charge fees, although it may do so, having applied to the Minister of Natural Resources for approval. Possible competition with Provincial or National Parks is ruled out by the fact that the Minister is unlikely to approve the placing of a Regional Park in a location where it would so compete. The object of the Act is defined with a directness refreshing in a Public Statute: ideally, everyone in Saskatchewan is to be "within a reasonable driving distance from a provincial or regional park" (Sec. 4(c)).

As far as can be determined, there is no significant history of the administration of joint provincial-municipal regional parks. Discussion of this sort of parks administration must therefore be conducted on a more or less theoretical level. If it can be agreed that one range of parks functions is properly the concern of the municipality exclusively, and another range the concern of the province exclusively, then it becomes possible to discuss whether or not there is an intermediate range of parks needs to be filled, and if so how. What type of parks fall into this category? To what extent should the municipalities share in their establishment, control, maintenance? To what extent should the province share? What aid should the province provide other than financial, if any? A more searching question is raised: Falling as it does in the administrative no-man's-

land between municipal and provincial jurisdictions, is the regional park one of a number of functional needs calling for the creation, utilization or strengthening of second-tier municipalities embracing broad trading areas or similarly defined territories?

Both the Saskatchewan and Ontario regional parks statutes place the initiative for establishment of a park on the municipalities. Only time will tell whether the municipalities will accept the responsibility fully enough and soon enough. Meanwhile, the question stands: how much of the initiative for regional parks ought properly to be left with municipalities?

(iv) Conservation Areas as Regional Parks.

One partial solution to the regional park problem, a solution with a built-in economic justification, is provided by recreational use of land in river valley conservation areas. In river valleys, lands in the flood plains are adaptable to very few uses indeed; in other parts of river valleys, the stream banks must be protected against erosion and accordingly there must be restrictions on the uses to which the land is put; in yet other places, reforestation for purposes of water conservation limits land use. It frequently happens that recreational uses can be permitted in such areas without any conflict with conservation objectives.

In Ontario, a Conservation Authority can be set up by the Provincial Government to supervise the safeguarding of a watershed or a number of adjoining watersheds, on the initiative of some at least of the affected municipalities (the plural is of the essence). Elaborate provisions assure the representation of all participating municipalities in the running of the authority and the fair apportionment of costs of each project among the municipalities benefiting from it (Conservation Authorities Act, 1946 and amendments). The Province is also permitted representation on an Authority to which a Provincial grant is made. *Advisory Boards*, which despite their name share in the making of executive decisions, may be created to assure consideration of all the related aspects of watershed conservation: reforestation, flood and pollution control, land use, recreation and possible educational activities. In these ways, obviously, numerous local citizens become actively involved. The relationship with representative institutions and the electoral process is not always clear.

The Province assists in three principal ways:

- (1) it pays 75 per cent of the costs of the preliminary engineering studies required for a conservation scheme;
- (2) it pays 50 per cent of the initial capital costs of a scheme;
- (3) it may assist with personnel: two technicians of the Ontario Department of Planning and Development are seconded to the Metro Toronto Conservation Authority.

The development of land for parks use can never be more than a by-product of the primary functions of a

watershed conservation authority, but experience proves that it can be an advanced, valuable by-product and, indeed, that the park developments may be carried much further along than the dictates of conservation demand. The submission made to the 1961 "Resources for Tomorrow" Conference by the Metropolitan Toronto and Region Conservation Authority urges the development of the recreation sector in these terms:

"Lands acquired by Conservation Authorities must, in the first instance, be capable of performing a job relative to conservation: For example, flood plain land, valley slopes, source areas, reforestation land, etc., are suitable. If these lands can, in the second instance, be used for recreation without seriously interfering with their primary task, then they should be so used. It is recognized from this basic interpretation of the legislation that not all forms of recreation are possible on conservation lands, and secondly that there is a limit on the number of people which an area of conservation land can support for recreation purposes. While there is little factual information available on this second point, it appears that the number is considerably less than on conventional park land."

The co-ordination of parks development in urban areas with conservation programs need not, however, depend on the initiative of the local municipalities, as it does under the Ontario Conservation Authorities Act. The province may also move into this field. Ontario did so in establishing the Ontario-St. Lawrence Development Commission, Saskatchewan is doing so in its development of the South Saskatchewan River.

One of the most promising facets of the river valley conservation approach to the provision of recreational land is the tendency of population centres to emerge by or near waterways: that is to say, this solution can often be applied where the need is actually or potentially great. Enthusiasm for this attack on the problem of overcoming park land scarcity must not blind us to the fact that it is a left-handed way of promoting recreation. In the nature of things, recreation must remain at best the secondary concern of conservation authorities. It cannot be hoped that this approach will provide basic solutions to any of the major problems in the field of parks and recreation.

(v) Provincial Parks.

The administration of provincial parks as such has not the complexity at the base that a Conservation Authority or a jointly sponsored regional park program has. Referring again to Ontario as an example, not necessarily as a model, the Department of Lands and Forests Parks Branch administration is described here-with.

The Department divides the province into seven districts, each of which is organized with much the same range of divisional offices as the Toronto head office. Two of the districts cover the populous southern part of Ontario; the remainder are in the north. An im-

portant distinction must be made immediately: Provincial Crown lands are quite plentiful in the north but are extremely scarce in the thickly settled south.

Recommendations for park locations are made to the central office of the Parks Branch by the parks supervisor of each district, with supporting data concerning access, water supply, vegetation, etc. Such a recommendation might, of course, originate with a private person or group. If the central Parks Branch sees merit in the suggestion, it will be circulated among the various branches of the Department—including Fish and Wildlife, Forest Protection, Surveys, Operations, Timber, Research—to see how the recommended site would conform with their programs. If the location is agreeable to all of the departmental branches, the recommendation is forwarded to the Ontario Parks Integration Board. The recommendation will be, basically, a request to reserve a portion of the Crown lands or to acquire a stretch of privately-owned land. Clearly, it is easier and less expensive to reserve Crown land than to buy private land; hence the relative difficulty of obtaining sites in southern Ontario where, of course, the need for parks is greatest.

The Ontario Parks Integration Board, as the name implies, is a provincial agency that endeavours to co-ordinate the efforts of the various public parks authorities active in the province, notably the Department of Lands and Forests, the Conservation Authorities, the Ontario-St. Lawrence Development Commission, and the Niagara Parks Commission. It was established in 1956. The members of the Board are the Provincial Treasurer, the Ministers of Planning and Development and of Lands and Forests, the Chairman of the Niagara Parks Commission (himself at present a Minister) and the Chairman or a vice-chairman of the Ontario-St. Lawrence Development Commission. The Board is the final co-ordinating authority for the regional and provincial parks system. Through the presence of the Provincial Treasurer, the parks system, which requires a fairly heavy capital outlay each year, is correlated with the other needs of the province. The Board has itself no staff other than clerical; this, it may be argued, is a point in its favor, for the constituent members have staffs of their own to help them reach their decisions without further referral to the administrative level.

The evolution of the provincial parks administration in British Columbia is interesting, as it reflects the growth in importance of the recreation function of government.

The first B.C. Provincial Park, Strathcona Park on Vancouver Island, was established in 1911. The period of most rapid development came during the depressed 1930's; by 1940 the system included nearly 6.5 million acres. Today, there are 8.5 million acres in 155 different areas in B.C.'s provincial parks.

In 1940, when the system had reached something approaching its present dimensions, administrative responsibility was housed in the Parks Section of the B.C. Forest Service, employing the professional services of two foresters. In 1945, the agency's terms of reference

were broadened and its name was changed to Parks and Recreation Division, B.C. Forest Service. Then in 1957, the legislature created by statute the Department of Recreation and Conservation. "The result is", reported the new Department in 1957, with a note of pardonable exultation, "that British Columbia can claim the first Provincial Minister of the Crown in Canada of a department organized to blend together the major elements of outdoor recreation." The parks function in particular is handled by the Parks Branch; in 1958-59, the current expenditure of the Provincial Parks Branch was \$900,000 out of a total departmental expenditure of \$2.3 million.

Ontario provides an example of a parks system organized through a branch of a resources department, and British Columbia an example of a department which administers recreation as a prime concern. Whether a province will choose to administer recreation through a department or a branch of a department depends on how important, relatively, it considers recreation to be. From the viewpoint of administration, however, the choice can and almost inevitably will make a great deal of difference. A branch, one of many in a department, is unable to take on commitments independently. Dealing with representatives of other levels of government, provincial branch officials are obliged to await confirmation of their proposals from higher up; such confirmation will not normally come until various other branches have been consulted. The complications multiply when the responsibility for the recreation function is dispersed among departments and other Crown agencies.

Furthermore, the province being the middle level of government, its administrative machinery is obliged to work together with both municipal and federal governments. The two relationships are obviously quite different, a consideration which does nothing to ease the task of intergovernmental co-ordination.

Finally, the absence of a clear division of responsibilities between federal, provincial and municipal levels of government naturally obstructs co-ordination between them, and would do so even if the administrative machinery itself were the simplest imaginable.

The last point, here as in every other portion of this paper, rises to the top. What should the provinces be called on to do in the recreation field? When that question is answered, the administrative problems will at least be more clearly defined.

(vi) Private Agencies.

Private activity in the parks field takes three forms of importance to parks administration:

- (1) provision of facilities by public-spirited bodies such as service clubs,
- (2) operation of private parks by commercial entrepreneurs,
- (3) support of parks programs by private recreation associations.

No one of the three forms of activity is of one kind in all cases. Nothing short of a list would convey the full scope of private initiative. A brief note of certain aspects of each will be more useful than a summary that is bound to be inadequate.

1. Commonly, service clubs are generous with donations of equipment and even of large-scale structures, mostly for local parks but often for outdoor camps, etc., as well. In Edmonton, the Kinsmen have erected facilities costing a quarter of a million dollars in a park along the Saskatchewan River. Where a reasonably strong park authority exists, charitable efforts of this kind can readily be fitted into a recreation program. Often enough, however, donations fill a virtual vacuum. The problem in such cases is to make sure that the money is well spent, for the sake of both donor and beneficiary. At the same time, the chilly hand of bureaucracy should not be allowed to freeze a generous impulse. A professional recreation director might not have been prepared to say that the Town of Rocky Mountain House, Alberta, needed more than anything else a rodeo ground; but if that is what a service club was bent on building for the town—and it was—there may be no justification for interfering. The limiting factor is the commitment for maintenance that can fall on the municipality; if great, the maintenance burden would justify a municipality in declining such an offer.

2. Leaving aside private "rod and gun" or other outdoors type clubs whose members are willing to pay for one degree or another of luxury and/or privacy, and considering only commercial operators of facilities open to the public, it is difficult to see how an outdoor park operator can compete with provincial or regional parks in the facilities they provide. On the other hand, the very nature of the public outdoor park effectively eliminates it as a competitor in several fields of recreation. An official of the Metro Toronto Conservation Authority expressed to us the unexpected complaint that there were *not enough* amusement entrepreneurs in the neighborhood of the Metro conservation areas. Plenty of scope exists in such places for privately-operated swimming pools, hotels, golf courses of the conventional and the par-3 variety, and so on. Naturally, no use of land could be permitted which by proximity would injure the fundamental concept of the public park, but only the pessimist would insist that this condition leaves no room at all for private enterprise.

3. Support of parks programs by organizations made up of interested persons, such as the Dominion-chartered Parks Association of Greater Toronto, assists parks administrators in a promotional way. It is not easy to determine where assistance to the administrators ends and pressure on politicians begins. Certainly a great deal can be achieved by people who organize on behalf of recreation as a cause. (Lest the reference to "pressure on politicians" be taken amiss, the authors wish it to be understood that they regard some types of pressure on politicians as a positive good.)

II. Parks and Recreation in Relation to Government Organization.

(i) Parks and Planning.

Planning—meaning the work of the professional planner, not planning in the general sense of deliberate forethought—is a fairly new governmental instrument. It bears immediate relevance to parks and recreation. Recreation is a land use—in fact, a range of land uses. The planner's craft is to apply precise data to a problem in accordance with principles that have a proven scientific validity. The planner can assist the parks authority, be it municipal, provincial or regional, in every aspect of its program other than day-to-day operation: location, size, nature of service required, auxiliary facilities (e.g., parking), maximum exploitation of access, staging of development, anticipation of usage.

The provinces, generally speaking, exercise supervision over municipal planning. In administering their own functions, do provincial governments themselves make the best use of planning techniques? There is room for doubt. Attention is apparently given to the need to consider projects from many viewpoints—but this is not planning.

It has been noted that the thorniest problems in the parks field lie in the realm of regional parks. This is symptomatic of a larger difficulty, the lack of a true regional unit of government, which shows itself equally clearly in the near-total absence of authorities for regional planning.

Planning within municipalities has won very wide acceptance now in Canada. The general rule is that the province allows the municipality to choose whether or not to institute the planning process; but once the choice to do so is made, the municipality is subject to quite close regulation in the planning it does.

Another characteristic of local planning in Canada is the separation of the planning function from the direct authority of the council. In Ontario, for instance, planning in a municipality is the responsibility of an appointed planning board on which by statute elected representatives cannot be more than a minority. The independence so bestowed on the planning board has in practice a double effect: it becomes easier for planners to draft their plans, but more difficult for the plans to gain council approval.

The wise use of land for recreation is an important objective of planning. This might be put even more strongly: it is entirely likely that parks and recreation will be one of the first governmental functions to suffer from the absence of effective municipal planning.

An essential precondition, then, of the best possible use of local land resources for parks use is the installation of workable planning procedures in municipal governments. If planning is not being done, it should be; if it is being carried out under conditions that prevent its effectiveness, the conditions should be changed.

(ii) *Theories of Organization of Government.*

A marked feature of twentieth century government, no less in Canada than elsewhere, has been the rise in importance of separated boards or commissions, appointed bodies carrying out functions of government while being more or less independent of the elected representatives. Examples in the parks field in Ontario at the provincial level are the aforementioned Niagara Parks Commission and the Ontario-St. Lawrence Development Commission; at the local level, there is the Board of Parks Management, and, as we have seen, there is a direct relationship between the parks function and the planning board.

There has been voluminous discussion of the merits and demerits of such separated bodies. A recent example is the report of the Gordon Commission on the Organization of Government in Ontario, 1959.

Such bodies have one great merit: they do achieve results relatively quickly. The independent commission is an apt device with which to overcome initial inertia. Where public support of the policy concerned is strong and clear, such dynamism is praiseworthy; but the student of government who approaches the matter with leanings in favor of representative institutions must adopt a skeptical attitude toward the continued existence of each individual separated body performing a governmental function.

(iii) *A Point of View.*

To focus further discussion it may help if the writers state their point of view on this subject. Moreover, this point of view naturally underlies any judgments expressed in this paper, and in fairness it ought to be made explicit.

1. We believe that at all levels parks and recreation ought to be administered by regular departments of government responsible in the normal way to the elected representatives of the people. We believe this both out of loyalty to the ideals of representative government and — this we underline — out of concern for efficient management. At the local level in particular, the fragmentation of government responsibility among boards and commissions robs elective office of its challenge to superior talent, impedes co-ordination of effort, and also deprives the fragmented functions of the services of the most outstanding public leaders. We see this problem as a vicious circle: amputate from the elected council many of its responsibilities and powers, and you make elective office the prize of smaller men; fill your

councils with smaller men, and it becomes necessary to reduce further their responsibilities and powers. We would declare that both to assure public control of a public issue, and to assure continuous top-quality administration in the long run, parks and recreation policies should be placed firmly in the hands of the people's elected representatives.

2. Again referring to the local field, parks and recreation is only one public function whose character has altered with the passage of time. Generally speaking, the city and town have changed so much in the last five decades or so that all local government functions have changed too. We must not shirk the question of whether municipal institutions have changed in keeping with the changes in the jobs they must do. For instance, in objection to our contention that parks policy ought to be directly the responsibility of the council, it might be argued that a councillor cannot possibly learn enough in a one- or two-year term to shape recreation policy. If this be true, which of two things ought we to do? Should we take parks and recreation out of the hands of councils and put them into the hands of persons, even devoted persons, who need never justify themselves to the voters? Or should we lengthen the councillor's term of office? Frankly, we prefer the latter. But the point is that the administration of parks and recreation, to be understood, must be seen in its context as but one problem in the organization of government.

3. Similar considerations apply to the question of regional parks. We have suggested that regional parks pose the most difficult administrative problem in the recreation field. But once again, the parks function is far from the only regional requirement that has proven to be an administrative stumbling-block. The basic fact is that concentration of population, facility of movement, and increase in leisure time, among other irreversible modern phenomena, have given a new economic and social reality to regions embracing areas far larger than our cities and towns, generating special problems that cry out for solution on a regional basis. The only answer is the establishment of regional institutions — not regional single-purpose bodies (e.g., for water supply or sewage disposal) but regional institutions with comprehensive responsibility for dealing with regional problems. What is needed, in short, is a second-tier municipality that places policy responsibility for regional functions in the hands of elected persons. The metropolitan areas of Toronto and Winnipeg have responded to the challenge in their own ways. No doubt other regions will seek different answers. Our basic point is that the most fruitful long-term approach to regional parks administration is the development of new regional government institutions.

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