

Open letter to Canada's Minister of the Environment

April 9, 2014

Honourable Leona Aglukkaq
Minister of the Environment
House of Commons
Ottawa, ON K1A 0A6
By email: Minister@ec.gc.ca

Re: Maligne Tours proposal for overnight accommodation at Maligne Lake, Jasper National Park

Dear Minister:

As former senior national park staff, we are writing to strongly urge you to take a stand now that will safeguard Canada's national parks for years to come. Please reject the proposal by Maligne Tours for a hotel resort at Maligne Lake in Jasper National Park, part of the UNESCO Canadian Rocky Mountain Parks World Heritage Site.

Approving overnight accommodation at the Maligne Lake would contravene a Parks Canada policy designed specifically to limit development in the mountain national parks, and could open the floodgates to more commercial development, putting the ecological integrity of the mountain parks and quality of park visitor experiences at risk.

It is our view that the Canadian people, Jasper and other national park ecosystems and Parks Canada have nothing to gain and plenty to lose if this development is approved.

Currently only day use is allowed at Maligne Lake. Maligne Tours' proposed resort contravenes Parks Canada's 2007 policy that prohibits any new commercial accommodations outside park town sites and places clear negotiated limits on all existing "outlying commercial accommodations". This policy was developed after significant study by an expert panel and considerable public dialogue. It is a principled response to a widely-held view among a large majority of Canadians - as shown repeatedly in public opinion polling and management plan consultations - that nature protection and public enjoyment need to be protected against commercial development in our national parks. In our considered view, making an exception to this policy would undermine the entire policy foundation for controlling commercial development in our national parks. As such, it would be a betrayal of the public trust and a repudiation of what Canadians have consistently shown they expect of those entrusted with the care of their national treasures.

There is no doubt that other businesses and corporations would use the approval of this proposal as a precedent to try and secure new developments and expansions elsewhere, and that Parks Canada would be compromised in its ability to argue that these proposed developments contravene policy. The Maligne Tours' proposal is a very real "thin edge of the wedge" that could jeopardize the natural values of our national parks that Canadians have entrusted the federal government to protect on their behalf.

Further, the Maligne resort proposal is inconsistent with your legislative requirement under the Canada National Parks Act and the Parks Canada Agency Act to prioritize ecological integrity in park management decisions, as well as your responsibilities under the Species at Risk Act. The Maligne Valley is home to a Threatened Southern Mountain caribou herd that has declined precipitously in the past 15 years from more than 60 to just 5 animals. This endangered herd requires less disturbance, not more, if there is to be any chance for its survival and recovery.

Were it to proceed, the proposed Maligne Lake hotel development would extend the time of day that visitors and hotel staff use the area and its access road from daytime to 24 hour use. More staff and accommodation would be needed at the lake to service the hotel, leading to more wildlife disturbance. Losing just one caribou on the road because of increased traffic at dawn or dusk, or during the night, could be the final "nail in the coffin" for this herd. The northern end of Maligne Lake is also important habitat for grizzly bears and harlequin ducks, both sensitive species which could be harmed by the expanded activity that would result from overnight accommodation at the lake.

At a broader scale, the incremental commercial development that would result from allowing this precedent-setting contravention of park policy would threaten the ecological integrity of all of our Rocky Mountain national parks by enabling more development in sensitive ecosystems critical for the survival and movement of wildlife.

Any development proposal that could add risk to the well-being of vulnerable species in national parks is inconsistent with the requirement to maintain or restore ecological integrity as a first priority in park management decisions.

The Maligne resort proposal is being considered by Parks Canada on claims that it could improve visitor experience. A survey of Maligne Lake visitors showed 99% were satisfied with their visit, which raises the question whether the proposed development would in fact address the 1% that were not fully satisfied, and if so, if it is worth the risks noted above. Fundamentally, Parks Canada surveys show that Canadians are attracted to national parks for their wildlife and pristine natural beauty and not for built developments, regardless of whether they are tasteful, green or rustic.

In our view, the resort development at Maligne Lake and the anticipated subsequent incremental development would corrupt the natural beauty of Maligne Lake and of our parks. The question is whether you want to be known as the Minister who stood up for, and protected our national parks for Canadians, now and in the future?

Jasper is part of the Canadian Rocky Mountain Parks World Heritage Site which Parks Canada is entrusted to protect on behalf of Canadians and the global community. As you know, World Heritage is

a very special designation given by the United Nations to places on Earth that are of outstanding universal value to humanity and, as such, are to be protected by the responsible State Party for the global community to appreciate and enjoy, now and in the future. We have a global responsibility to ensure Jasper's natural values are not compromised.

As the local Jasper Fitzhugh newspaper noted in a recent editorial:

Policies exist for a reason. They are there to shape what is and is not acceptable. They are there to guide governments through tough decisions. And they are there to ensure fairness and due process...

...Parks' policies are in place to limit the growth of our town and park to ensure the protection of our wild spaces and wildlife. If the agency is planning to hold true to its mandate of protection and maintenance of ecological integrity, exceptions to longstanding policies on limited development are not an option.

We agree. National Parks are ultimately about natural heritage and future generations. We strongly urge you to stand up for the long term public interest and legacy by telling Maligne Tours that their operation is, and will always be, a day-use facility that serves the visiting public, not a private resort that excludes the public, contributes to the final loss of the Maligne caribou herd and fills a peaceful place with disturbance, noise and memory of broken promises.

We would be pleased to discuss this important matter with you, and look forward to your response.

Sincerely,



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Former Director General, National Parks, Parks
Canada
Former Chair, World Commission on
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Stephen Woodley, PhD
Former Chief Ecosystem Scientist, Parks Canada



Kevin Van Tighem
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