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Mr. Greg Fenton
Superintendent
Jasper National Park
Parks Canada Agency
P.O. Box 10
Jasper, AB TOE 1E0
Email: jasper.superintendent@pc.gc.ca

**RE: CPAWS Response to Environmental Assessment for Brewster Glacier
Discovery Walk in Jasper National Park, CEAA Registry Reference Number 11-
01-59982**

Dear Superintendent Fenton:

The Canadian Parks and Wilderness Society (CPAWS) would like to take this opportunity to reiterate our concerns regarding the Brewster Glacier Discovery Walk (GDW). On March 7, 2011 we sent a letter to Parks Canada outlining our concerns about this proposal. While we recognize that this particular consultation period is focused on the Environmental Assessment of the GDW, we offer this response on the Environmental Assessment (EA) in the context of our greater concerns regarding the erosion of Parks Canada's implementation of its mandate to make decisions that prioritize ecological integrity. Thus, in addition to responding to the EA, we also outline our other concerns in this submission.

Our comments are focused on the following areas:

- The long term impact on wildlife, including mountain goats and big horn sheep, cannot be predicted with confidence because there isn't enough conclusive data.
- The GDW could signal an opportunity to others for further commercial development in mountain national parks that could set a dangerous precedent and result in significant cumulative impacts on the park's ecological integrity.

- It is not consistent with the requirements and ethos of Parks Canada's own legislative and policy framework.
- There is no evidence that infrastructure-based activity meets the objective of connecting people with the elements of nature in the surrounding landscape.
- The evidence suggests that this type of infrastructure-focused development is not what Canadians want for their national parks. The survey the company conducted was not representative of the views of all Canadians, but focused primarily on tour operators' customers.
- There has been significant public concern expressed about this proposal locally, regionally and nationally.
- The public consultation process for this project has been problematic, with most of the consultation process being led by the commercial proponent and the Environmental Assessment public comment period being inadequate to allow thorough review and analysis of the documentation.

CPAWS has a longstanding history and involvement with National Park management and issues pertaining to Jasper National Park. Over the years we have been a key stakeholder representing wilderness values and conservation in the mountain parks. We work to ensure that ecological integrity is the number one priority in park management, and is a prerequisite to use, as required in the *Canada National Parks Act* and the *Parks Canada Agency Act*.

We support Parks Canada in their efforts to encourage visitor experiences that truly connect people to nature while maintaining and enhancing the ecological integrity of the parks as mandated under federal law. However, this project does not meet that test.

Given these concerns, and to protect the public interest in our national parks, we conclude that Parks Canada should reject the proposed Glacier Discovery Walk.

Setting a precedent

If this proposal were to go ahead, it could set a precedent for renewed commercial development in our mountain parks, allowing commercial interests to build more privatized infrastructure-focused tourist attractions in our national parks.

It appears from the documentation that the GDW proposal is being driven by Brewster's desire to make use of under-utilized infrastructure at the Icefields Centre. Thus, it is an example of prior infrastructure development driving further growth in a national park and demonstrates why any proposed new development that increases infrastructure must be very cautiously considered.

We are also concerned about the potential cumulative impacts of this proposal, particularly given the potential future developments that have been alluded to in recent policy discussions, including commercial activities such as zip lines that could add infrastructure and further commercial development in the park.

Impact on Wildlife

CPAWS has conducted a review of the science contained in the EA and offers the following comments:

Predictability of Outcomes for Wildlife

a. Camera Study and Field work

The study carried out was not adequate to predict with confidence what the short and long term impacts on wildlife will be as a result of the Glacier Discovery Walk (GDW). Limitations of the study include the size of the area studied, the length of time the study was carried out, and the limited amount of field work methods used. Peer reviewed science has demonstrated that wildlife regional movement patterns can be affected by local displacement and sensory disruption and that, to predict impact on wildlife with greater confidence, studies must be carried out over at least 1 -2 years over a larger geographic region.

b. Literature Review and Interviews

Related to ungulate traffic in the area, we note that the EA relies heavily on literature and interview material from Dr. Steve Côté and we concur with his view that *“the effects of GDW on goat populations will be difficult to predict”*.

CPAWS Recommendation

Given the shortcomings of the field work conducted by Golder and Associates, and given expert scientific opinion that impacts on goat populations will be difficult to predict, there would need to be more extensive scientific study of wildlife populations in the broader region as well as more study of wildlife (e.g. ungulate) behaviour in general in order to improve confidence in knowing what likely impacts may or may not be. Specifically, we suggest methodology that includes more “boots on the ground” over a longer time period looking for evidence on the landscape of different wildlife usage. We propose that, in decision-making regarding ecological integrity in the parks, the ‘precautionary principle’ applies and we note that Parks Canada and other federal departments have used this screening mechanism previously.

Parks Canada Legislation and Policy Framework

The proposed GDW is not consistent with the requirements and ethos of Parks Canada legislation and policies.

Legislation:

The Canada National Parks Act requires that *“Maintenance or restoration of ecological integrity, through the protection of natural resources and natural processes, shall be the first priority of the Minister when considering all aspects of the management of parks.”*

The Parks Canada Agency Act notes in its preamble that it is in the national interest to *“maintain ecological and commemorative integrity as a prerequisite to the use of national parks...”*

The EA report indicates that there will likely be some impact on wildlife populations but that the outcomes will be difficult to predict. Given the lack of predictability for wildlife outcomes, we believe that Parks Canada priorities of protecting ecological integrity would be contravened by the GDW. In the absence of adequate scientific information on the impacts of the project on wildlife and other aspects of the ecosystem, the proposed GDW should not be considered.

In addition to impacts on wildlife from the GDW, this particular area along the Icefields Parkway has wilderness character recognized in user surveys and by

UNESCO (regardless of zoning). The natural landscape and wilderness character would be significantly impaired by the GDW. From the highway to the south, people taking the scenic drive (as Parks Canada survey shows visitors prioritize) would be able to see the walkway jutting out of a natural landscape and people on the free public viewpoint will have their view of the natural canyon landscape impaired by the adjacent walkway. Coupled with the potential disruption to wildlife, we believe this type of development constitutes “impairment” to the wilderness character and ecological integrity of the Park, which runs counter to the legislative requirement to maintain our national parks unimpaired for future generations.

Policy:

According to Parks Canada’s Shared Responsibility guidelines, two things that sustainable tourism must be based upon are “*maintaining and enhancing ecological and commemorative integrity*” and “*respecting the intrinsic natural, cultural and scenic values of Canada’s protected heritage areas*”. Rather than focusing on the intrinsic natural values of the Icefields Parkway, the proposed GDW is focused on built infrastructure.

This type of development also contradicts the National Parks Policy which states that: “*Only outdoor activities which promote the appreciation of a park’s purpose and objectives, which respect the integrity of the ecosystem, and which call for a minimum of built facilities will be permitted*”(section 4.1.3).

Connecting Canadians to nature and the Park

CPAWS places a high value on connecting people to parks and wilderness and increasing their understanding of nature. While we agree with Parks Canada that people interact with nature in different ways, the Glacier Discovery Walk does not constitute an “interaction” with nature. The proposed large metal and glass structure will, in fact, physically separate people from nature. According to Brewsters’ and the design company’s descriptions, the GDW is intended to be an emotive experience generating a thrill of looking down from a great height. It is focused on the thrill of experiencing the infrastructure, not the connection with nature.

The proposal will also require users to pay expensive fees, a further barrier for many visitors, which we suggest is not in the Canadian public interest.

The Minister's letter in the Jasper Park Management Plan includes two goal statements related to connecting Canadians to nature:

"Our Government's goal is to ensure that Canadians form a lasting connection to this heritage and that our protected places are enjoyed in ways that leave them unimpaired for present and future generations."

"Our Government's vision is to build a culture of heritage conservation in Canada by offering Canadians exceptional opportunities to experience our natural and cultural heritage."

There is no social science evidence that this infrastructure-focused activity will effectively achieve either of these goals. The GDW proposal would change the current visitor experience at this site from being focused on appreciating a spectacular view of the Jasper landscape (which Parks Canada's survey shows that visitors want) to an artificial thrill experience dependent on built infrastructure. If the GDW were built, non-paying visitors' view from the free public viewpoint would be obstructed by a massive metal viewing platform, thus decreasing the quality of their visitor experience.

CPAWS Recommendation

Any consideration for redevelopment of areas in the park should focus on minimizing infrastructure, and maximizing visitor engagement with the intrinsic natural values of the park.

Lack of demonstrated need for the project

Brewsters has not shown how construction of this viewpoint is required to promote the park's purpose and objectives and why simply improving the current facilities at the Icefields Interpretive Centre would not meet the objectives. In essence, little has been done to justify the need to build the GDW when similar objectives could be achieved by improving existing facilities and programs while minimizing built facilities.

There is also little evidence that Canadians want this kind of development in their parks. The market survey that Brewsters conducted is not representative of the views of Canadians as it was focused on tour operator customers. According to Parks Canada's 2009 Icefields Parkway Intercept Camper Survey: *"the most important*

item for visitors is access to viewpoints. People come to the parkway for the spectacular vistas that are easily accessible by vehicle."

Public Concern

There has been significant public concern expressed about this project locally, regionally and nationally with over 1700 letters of opposition submitted to the environmental assessment process from across Canada. There is no evidence that Canadians want this kind of infrastructure-focused commercial development in their national parks. In fact the contrary is true: from the public concern expressed thus far, it seems that Canadians are uncomfortable with the idea that their national parks would be open to constructing privatized theme park-like tourist attractions.

CPAWS Recommendation

Parks Canada should respect the significant public opposition to this proposal by rejecting it.

Before proceeding with any new visitor activities or associated developments, Parks Canada should ensure that a solid social science-based understanding of how to effectively connect Canadians to nature is in place to guide decisions about what types of activities should be encouraged to achieve this goal.

Public participation and consultation

CPAWS has concerns about the process through which this commercial development proposal has been assessed to date, which we believe contradicts the direction in the Jasper management plan, and the intent of the CEAA policy framework for public participation.

The Jasper management plan states that: *"Jasper National Park will broaden participation in park management and approach problem-solving in ways that are innovative and more rewarding for participants. Better decisions will result from the sharing of information, critical analysis and creative thinking."*

The plan also includes a strategy of *"strengthening public involvement so Canadians feel confident they have an opportunity to participate in key decisions concerning their park"* and providing *"adequate notice and time for public review"*.

The Canadian Environmental Assessment Agency Ministerial guidelines for public participation in CEEA screenings state that:

A public participation process should provide the public with a fair and reasonable amount of time to evaluate the information presented and to respond to project proposals and to proposed decisions by proponents and responsible authorities.

The Brewster proposal is for a significant development in one of Canada's most cherished National Parks and World Heritage Sites. Our request for an extension to enable us to conduct a full review and analysis of the report and facilitate a discussion among our constituents was in line with the policy statements outlined above, and was, we believe, in the public interest. Parks Canada's rejection of our request for an extension to the three week EA public comment period runs counter to these policy statements

Another significant concern with process relates to the manner in which the consultations over the past year have been conducted. It is our strong view that Parks Canada should not delegate public consultation on the future of our national parks and World Heritage Sites to a party that has a vested commercial interest in the outcome of those consultations. Parks Canada is accountable to Canadians for protecting and presenting our national parks in ways that keep them unimpaired for future generations.

CPAWS Recommendation

As the responsible authority, Parks Canada should themselves be consulting with Canadians locally, regionally and nationally about the future of our national parks, and should be adhering to the principles for engaging Canadians in decision-making as outlined in the Park Management Plan.

Conclusion

In closing, we are deeply concerned that this proposed development represents a trend that could potentially open our treasured mountain parks to inappropriate commercial development that significantly impacts the ecological integrity of the park for current and future generations. Given the concerns outlined above, including the significant public concern that has been expressed from across

Canada, we believe that Parks Canada must reject this proposal in order to uphold its responsibility to protect and present our national parks on behalf of all Canadians and in a manner that protects the park's long term ecological integrity.

Sincerely,

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CPAWS National Executive Director

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