



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

The Hon. Peter Kent,
Minister of the Environment
House of Commons
Parliament Buildings
Ottawa, Ontario
K1A 0A6
Email: Minister@ec.gc.ca

December 14, 2011

Dear Minister Kent

Re: Environmental Assessment for proposed Brewster "discovery walk"

As stated in our November 23 letter to Greg Fenton, Superintendent, Jasper National Park, Alberta Wilderness Association (AWA) does not feel that the short period of time given by Parks Canada to review Brewster's Environmental Assessment for the above proposal was in any way adequate, and so our ability to respond to the EA has been severely compromised. Our comments on the EA must therefore necessarily be somewhat curtailed, and should not be viewed as precluding any future concerns which may come to light.

AWA made clear its opposition to Brewster's "discovery walk" proposal in a February 18 letter to you. AWA believes that Parks Canada should never have entertained the egregious "discovery walk" proposal to the extent that it already has done; concerns with the proposed development are fundamental, and go far beyond any possible "mitigation" of effects. While we recognize that the EA review is not necessarily the best opportunity to register our opposition to the entire project, in the absence of any better process by Parks Canada to solicit opinions on the proposed development, we must underline our concerns.

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- AWA believes that development of such a major engineering project would be entirely inappropriate in Jasper, one of Canada's highest profile and most ecologically important national parks. AWA is entirely opposed to what the Edmonton Journal so accurately refers to as the "crass commercialization" of a national park. If such an offensive development is allowed to proceed, it would be difficult to imagine any future development in the park ever being turned down.
- AWA also believes that construction of the "discovery walk" would contravene Parks Canada's mandate. According to the 2001 Canada National Parks Act, "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."
- It is not the mandate of Parks Canada to ensure the long-term economic viability of a commercial company operating in one of Canada's primary national parks.
- AWA was closely involved in the public review of the Draft Management Plan for Jasper National Park in 2009 and 2010, and at no stage was there any intimation that such a major and inappropriate development was being considered, nor that there was any public demand for it.
- AWA opposes the privatization of this section of the National Park. We believe the area should remain in public use and not leased to an Arizona-based entertainment company.
- No evidence has been offered by Brewster or Parks Canada that there is a demand for contrived "visitor experiences" such as this development, other than from the company which stands to make a profit from them.

Inadequate public consultation

- The Canadian public, who have a stake in National Park management, have not been consulted in the proposed development. Parks Canada's November 23 *Information* notice on the EA consultation notes that "Public feedback is an important part of the environmental assessment and decision-making process," which is undoubtedly true. It then continues "Notices of the report's release have been sent to stakeholders, to local and regional newspapers and to Aboriginal groups with historical connections to the park." No mention is made of consultation with the broader Canadian public, who have an interest in such issues.
- At public information sessions in Jasper and Edmonton, participants were informed by Parks Canada staff that opposition to the proposal had been limited and "mostly local." This appears to be entirely at odds with AWA's experience. Many AWA supporters across the province have spoken out plainly against the development. Numerous letters of opposition to the proposal have appeared in a number of newspapers, including the Edmonton Journal and the Jasper Fitzhugh, and these have by no means been restricted to local residents. Parks Canada's consultation on the proposal has been highly selective. All Canadians have an interest in National Parks, and have a right to be consulted on major developments affecting their parks. This has not yet happened with the Brewster project.
- Brewster's "market survey" of the views of its own supporters, cited in the EA, should in no way be construed as any sort of gauge of public opinion. If major developments are proposed for Jasper National Park, then opinion polls should be conducted into the opinions of all park users, not just a selection of sympathetic individuals.
- In the 2009 *Icefields Parkway Intercept Camper Survey*, "access to viewpoints" was rated as the most important item for visitors. The survey notes: "Many past IP (Icefields Parkway) campers said it is the beauty, scenery, wildness, quiet and peacefulness of the area that attracts them to

the IP... It is the grandeur and beauty of the Icefields Parkway that attracts people. The services and facilities are important but the beauty is the biggest draw.”

- A better test of public opinion might be the Jasper Fitzhugh’s online poll (December 9-12, 2011) in which 69 percent of respondents responded “no” to the straightforward question “Should Parks Canada approve the Glacier Discovery Walk?” (Of course, this begs the question why Parks Canada has never asked this simple question of Canadian park users).



Public safety

- Part of the justification for the project (Section 3.1 *Purpose and Justification*) is the need to improve traffic safety. If traffic safety needs to be improved in this area, then it should be improved, irrespective of whether Brewster builds a major development in the area. Improving traffic safety should certainly not be used as a “justification” for this proposal.

Construction traffic

- Many implications of the considerable volume of construction traffic are not considered in the EA. Although the EA refers at times to the construction traffic which would affect the site, it does not consider the broader effects of the considerable construction traffic on the Icefields Parkway as a whole.
- Cranes, drilling rigs, dump trucks, tandem trucks are all mentioned at different times in the EA. All of these will have to access the Icefields Parkway from the north or the south; all will have an impact on wildlife mortality on the highway, as well as on park visitors using the highway. Why does the EA not detail the amount of additional construction traffic using the highway?
- When will this traffic use the highway? In the daytime when park users will be most inconvenienced, or at night when wildlife mortality can be expected to be higher? What monitoring will be carried out into wildlife mortality from construction traffic, and what level or wildlife mortality would lead to a suspension of construction traffic?

AWA repeats our opposition to the Brewster “discovery walk” proposal and requests that Parks Canada refuse the proposal.

Yours truly

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'ND', is positioned to the right of the text 'ALBERTA WILDERNESS ASSOCIATION'.

Nigel Douglas,
Conservation Specialist

cc: Alan Latourelle, Chief Executive Officer, Parks Canada Agency
Email: Alan.Latourelle@pc.gc.ca

cc: Greg Fenton, Superintendent, Jasper National Park
Email: Greg.Fenton@pc.gc.ca

cc: Linda Duncan, NDP Environment Critic
Email: Duncan.L@parl.gc.ca

cc: Ms. Elizabeth May, Leader of the Green Party of Canada
Email: Inc@greenparty.ca

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