

Former Senior Parks Canada Officials Speak Out Against Lake Louise Ski Area Expansion

If you blinked you missed it. The “it” here would be what Parks Canada likes to call its “public engagement” process regarding guidelines for the development and use of the Lake Louise Ski Area. Three weeks...that’s how much time Canadians had to comment on the guidelines, guidelines developed, in private, by Parks Canada and Ski Lake Louise. Later in this issue you’ll read

Sean Nichols assessment of these guidelines. Below you can see what former senior officials from Parks Canada felt about these guidelines in an open letter they wrote to the federal environment minister...it’s far from flattering.

- Ian Urquhart

Open letter to Canada’s Minister of the Environment

June 19, 2015

Honourable Leona Aglukkaq
Minister of the Environment
House of Commons
Ottawa, ON K1A 0A6

Re: Lake Louise Ski Area Guidelines for Development and Use

Dear Minister:

As former senior national park staff, we are writing to ask you to stand up for the ecological integrity of Banff National Park and reconsider the proposed massive expansion of the Lake Louise Ski Area. The scale and scope of the proposal are unprecedented in a national park and at odds with the park’s purpose.

The current ski hill proposal doubles the already large, on-hill skier capacity and increases the developed area by over 30%. It doubles parking, doubles the number of ski lifts, builds new lodges, and constructs water reservoirs for snow making. It supports the cutting down of white-bark pine, a species at risk. Despite this, Parks Canada is calling this proposal a “significant environmental gain”, an astonishing assertion contradicted by evidence. While there will be a reduction in the overall lease areas, these areas could not have been developed anyway merely because they were within the lease boundary. There is no real ecological gain and may be real ecological losses if fully implemented.

The current proposal is acknowledged by Parks Canada to be in violation of the Canada National Parks Act, because it would expand the already-large ski area into legally-designated wilderness areas outside the current lease. The proposal is to amend the Act to allow more development in a designated wilderness area inside Canada’s premier national park. Banff is one of the oldest national parks in the world and a World Heritage Site, which Canada has pledged to the world to protect for its outstanding universal value. We wonder why the Parks Canada Agency charged with upholding and implementing the National Parks Act is championing a proposal to disregard it.

The rationale given in the national Ski Area Guidelines for considering a lease reduction to be something that can be considered a “net environmental gain” is that the lands released will be protected as designated Wilderness and protected from the risk of future development. The fact that these site guidelines propose to take land already protected as Wilderness, that were never part of the ski area lease, and allow a lift, warming hut and glading to take place puts the lie to that assurance. As such, approving these site guidelines would create a shocking precedent that undermines the logic behind the Ski Area Guidelines and essentially makes all Wilderness vulnerable in future. We consider this to be extremely bad policy and a betrayal of assurances given to the Canadian people when the Canada National Parks Act was amended to provide for designated Wilderness and, again, when the national Ski Area Guidelines were approved.

The science used in the Strategic Environmental Assessment of the Lake Louise proposal is outdated and incomplete. Because of a reduction in the Park’s science capacity, much of the information is old and the environmental assessment is not based on the collection of new site-specific information. We do already know that the existing ski hill development has significantly reduced the area’s mountain goat population; this was documented in the 1983 final report of the park’s Biophysical (Ecological) Land Classification. We do not know if the small remaining goat population can survive any new impact, and the site guidelines offer no thresholds or targets against which success or failure at restoring or maintain goat populations can be measured. We do know that the planting of the existing ski runs has created unique vegetation types that attract grizzly bears. We do not know what the impact of attracting bears to highly visited Lake Louise is on bear habituation and interactions with other areas in the park. Are Lake Louise bears the ones getting killed on the railway or becoming

involved in human-wildlife conflicts? We know that grizzly bears are normally active in daylight hours but, at the Lake Louise ski resort, choose to move into open areas only after summer use ends each day. Yet the site guidelines propose to extend summer operating hours further into the evening hours and establish no targets or thresholds for displacement of wary wildlife. There are many other issues not addressed in the strategic environmental assessment. For example, there is no mention in the assessment of the World Heritage values that need to be protected, nor of cumulative impacts of existing ski area developments.

The proposal supports large-scale development outside the existing lease, under licenses of occupation. Specifically the areas of the West Bowl and Hidden Bowl are Wilderness areas outside the ski area's lease. They are important wildlife areas, and as legally required, should not be developed for commercial skiing.

There are some excellent ideas in the ski hill proposal that can help manage some of the existing ecological problems in the Lake Louise area. The movement of the summer lodge higher up the mountain to avoid conflict between humans and bears is important for bears, although it might also reduce habitat quality for mountain goats. Similarly, ideas to strengthen the Whitehorn wildlife corridor are welcome. These are the ideas that a ski operation should strive for in a national park best practices that should already be required, not part of a "significant environmental gain." In any case, they are good ideas in an overall plan that is ecologically negative.

This proposal was developed in private between Ski Lake Louise and Parks Canada. We completely understand that it is in the commercial interest of Ski Lake Louise to ask for as much development as possible. We do not understand why Parks Canada would choose to become a proponent of this project without involving other stakeholders in the planning process - especially when some of the expansion proposals such as new development in Hidden Bowl will certainly reduce the quality of experience for existing users who travel from all around the world to experience undeveloped wilderness in the Skoki corridor. The scenic, noise, wildlife displacement and other impacts on quality visitor experiences would likely not have been discounted and placed secondary to the commercial interests of the leaseholder if representatives of other interest sectors had been involved in discussions earlier. The current process allows for a 3 week public comment period to comment on two major documents, the 86 page Lake Louise Ski Hill development Guidelines and the 170 page Strategic Environmental Assessment. These documents must be considered against the Banff Management Plan, the National Ski Areas Guidelines and Canada National Parks Act — both the letter of these laws and policies but also very much against their spirit and what they purport to offer all Canadians, not just ski resort patrons. Such a short comment period is not consistent with a desire for real public engagement, nor is it consistent with Parks Canada's once-acclaimed reputation for meaningful consultation. More significantly the planning approach used here consists of "decide, announce and defend" and is not in keeping with meaningful engagement on the globally significant public values of Banff.

So we ask that you set aside any further consideration of expansion of the ski resort beyond its current boundaries and suspend the seemingly inexorable approval of these ski hill guidelines. This suspension would allow for the opportunity for meaningful workshops with stakeholders and the public on what a good plan for the area would include. The current plan is simply an enormous ask from a private development interest, an assault on policy and legal protections that the people of Canada should be able to count on, and lacks perspective and balance.

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

Sincerely,

Stephen Woodley, PhD Former Chief Ecosystem Scientist, Parks Canada

Kevin Van Tighem, Former Superintendent, Banff National Park, Parks Canada

Nikita Lopoukhine, Former Director General, National Parks, Parks Canada Former Chair,
World Commission on Protected Areas, IUCN

Bruce Amos, Former Director General, National Parks, Parks Canada

Theirry Bouin, Former Field Unit Superintendent at Fundy and La Mauricie National Parks

Tom Kovacs, Former National Director, Natural Resources Conservation, Parks Canada

Raymond Alègre, Ex-Directeur, Gestion du Portefeuille des Investissements, Parc Canada

George Mercer, Former Jasper National Park Wildlife Specialist

Murray McComb, Former Chief of Planning Studies, Parks Canada

Gary Sealey, Former National Director Visitor Activities, Parks Canada

Bert Crossman, Former Chief Park Interpreter, Kouchibouguac National Park