



THE ASSOCIATION FOR MOUNTAIN PARKS PROTECTION & ENJOYMENT

protecting parks * protecting tourism

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The Association for Mountain Parks Protection & Enjoyment (AMPPE) has for 22 years been a voice of reason within Canada's Rocky Mountain Parks. AMPPE's mission is to advocate for the balance of ecological integrity, sustainable tourism and positive visitor experience. It is a delicate balance indeed – especially in this region. The mountain parks are a unique part of Canada, specifically Banff and Jasper as they are the only National Parks that contain town municipalities. Despite that fact, more than 95% of Banff National Park and more than 97% of Jasper National Park remain as protected wilderness. The recent report titled the "State of Canada's Natural and Cultural Heritage Places 2016" indicates that Banff and Jasper National Parks are both in a healthy state of ecological integrity, which is a testament to their being well managed and preserved.*

Banff and Jasper are famous the world over for their natural beauty and accessibility. They are also very well protected by the Parks Canada Agency that governs them. AMPPE does not believe that any fundamental change needs to be made to the CEAA 2012. The current act already provides the legislative strength to protect our wilderness with the needed flexibility of analysis on a project by project basis, which is especially paramount in the mountain parks. The importance of ecological integrity is key, however there remains a need for the inclusion of other factors when considering potential development or projects. For example, the town of Banff and Jasper are essential to providing the services that support the 4 million visitors that come to these two National Parks every year. The TransCanada highway is a critical transportation corridor connecting our country; the services along the roadways within the parks are necessary to support the visitor experience. The ski areas and attractions within the parks are a significant driver of the economy of Alberta and a major draw to Canadians and international visitors alike.

Visitation to Canada's National Parks is on the rise, especially with admission being free of charge in 2017 and Destination Canada receiving increased funding to market our country to the world. With more Canadians experiencing their National Parks and more visitors coming from around the world, sustainable tourism, culture, education and visitor experience must also be primary factors alongside ecological integrity in the environmental impact assessment process.

It is imperative that Parks Canada continue to have the authority to manage the National Parks and all of the ecological systems within – including a guiding role in the municipalities and attractions that uniquely exist in Banff, Jasper, Lake Louise, Yoho and Kootenay. These National Parks are very different to the rest of Canada and must be treated as such with allowed flexibility in order to both protect the environment and provide the required services to provide a world class visitor experience.

Some environmental organizations claim that the current environmental impact assessments undertaken by Parks Canada are being conducted without transparency, without independent science and with flawed public input. This is not true. In the cases of recent project approval within Banff and Jasper National Parks, extensive scientific review was undertaken with stringent regard for ecological impact before conditional approval was reached. The public was given many opportunities to provide input as is federally mandated; the forums were well advertised in regional and social media and always held over a period of several weeks to engage, educate and to garner feedback in advance of policy decisions.

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These same groups have been known to tend toward exaggeration with opinion being touted as fact in statements and presentations to policy makers. For an example of this, CPAWS continually refers to the approval of the long-term site guidelines at Lake Louise Ski Area as a 'massive expansion'. This claim is entirely false. After extensive assessment during the site guidelines proposal, Parks Canada required Lake Louise to decrease its leasehold by 30%, effectively turning over 600 hectares to a protected wilderness state. The notion that major development at Lake Louise is imminent is also not true, rather that potential future improvements would be examined on a case by case basis for approval. This ruling by Parks Canada is conservative, ecologically sound, region specific and pro-active in terms of Lake Louise and Banff National Park as a winter destination with numbers on the rise.

In summary, AMPPE supports Parks Canada as the most qualified Agency in managing and guiding the future of Canada's protected areas. Not only is the Parks Canada Agency effective in their role, but extremely thorough in their environmental impact assessments. Their management of Canadian ecological integrity is driven by expertise based on scientific studies conducted by world leading experts and specialists. The audit report issued by the Commissioner of the Environment and Sustainable Development last month attests to the fact that there is no better organization that Parks Canada to fulfill the critical role of environmental assessments.** The Parks Canada Agency has the tools, expertise and policy in CEEA 2012 to continue their important work as guardians of Canada's wilderness.

Thank you,



Casey Peirce
Executive Director
Association for Mountain Parks Protection & Enjoyment

* State of Canada's Natural and Cultural Heritage Places 2016:

http://www.pc.gc.ca/eng/docs/pc/rpts/elnhc-scnhp/~media/docs/pc/rpts/elnhc-scnhp/2016/pdf/elnhc-scnhp2016_e.ashx

** 2016 Fall Report by the Commissioner of the Environment and Sustainable Development (3.43, 3.48, 3.63, 3.69):

http://www.oag-bvg.gc.ca/internet/English/parl_cesd_201610_e_41641.html