

October 30, 2014

Jasper National Park Management
Parks Canada
Delivered via email: maligne@pc.gc.ca

Without Prejudice

Re: Draft Discussion Paper on the Maligne Valley Implementation Strategy

Dear Sir or Madam,

CPAWS Northern Alberta has reviewed Park's Canada's ***Discussion Paper: Maligne Valley Implementation Strategy (September 2014)*** (the "*Discussion Paper*") and appreciates being given the opportunity to submit comments to Parks Canada.

CPAWS Northern Alberta has organized our comments and recommendations in the following order to correspond with the *Discussion Paper*:

1. Visitor Experience;
2. Improving Ecological Integrity;
3. Strengthening Aboriginal Relationships; and
4. Managing Growth and Development.

1. VISITOR EXPERIENCE

CPAWS Northern Alberta would like to draw attention to the fact that, as stated in the ***Situation Analysis for the Maligne Valley – Draft October 2013*** (the "*Situation Analysis*") (pg. 10), 99% of visitors to the Maligne Valley agreed that "the visit had met or exceeded their expectations." Thus, visitor demand does not require a change in the mix of activities provided in the Valley or at Maligne Lake.

Comments: Maligne Road

CPAWS Northern Alberta is supportive of Parks Canada's proposal to update the basics along the Maligne Road, such as washrooms and garbage receptacles, and the installation of new interpretive panels to instruct visitors about the Maligne Valley. We also support the restoration of parking lots at trailheads that are used infrequently.

We have some concerns about the expansion of parking lots along the Maligne Road, if such expansion would have the effect of removing habitat or altering wildlife corridors through the narrow Maligne Valley. We have similar concerns about the development of new, short walks or hikes, as brushing and cutting to develop such hikes would negatively impact what cover is already provided for wildlife in the Maligne Valley.

We are also concerned about increased brushing along the roads if the effect of brushing would be to open up the roadsides for non-native species growth as well as encourage more frequent human-wildlife conflicts along the road. CPAWS Northern Alberta supports a traffic study being completed by Parks Canada, and would suggest that the feasibility of mass transit options be considered along the Maligne Road as a means of reducing the amount of traffic on the road.

CPAWS Northern Alberta supports the increased interpretive services proposed such as promoting Aboriginal culture or educating visitors on how to view wildlife safely and respectfully. However, we have concerns over the proposed Dark Sky viewing programs if they will have the effect of bringing more visitors to the Maligne Valley at night, which is when grizzly bears and other animals use the valley for feeding and movement. We are also concerned about the potential for irresponsible use of the park through self-guided products such as geo-caching. Geo-caching encourages people to stray off marked trails and into forested areas, which could potentially harm the natural environment and may lead to human-wildlife conflict.

Recommendations

- a) Expansion of parking lots should only be allowed where it is shown that expansion will not reduce available habitat within the valley;
- b) Brushing along the road should only be allowed where it is needed for safety reasons or where it will not increase human-wildlife conflict along the roads;
- c) Dark sky experiences should be limited to the bottom of the Maligne Road to minimize disturbance to wildlife using the Valley at night; and
- d) Self-guided products must be designed so as to minimize “off-roading” within the park.

Comments: Wilderness Areas

The *Discussion Paper* states that Parks Canada would like to update facilities and services to make “an outing in the Maligne wilderness more appealing to younger Canadians and families, new Canadians and visitors who are new to exploring wilderness” (pg. 7-8). CPAWS Northern Alberta would like to reiterate a comment made previously by our Chapter in a letter sent to Parks Canada dated November 22, 2013, in relation to the *Situation Analysis*: an information gap remains about new visitors to the park and the types of activities they enjoy participating in. There is a need for more evidence based on empirical data drawn from social science research conducted within the Park.

CPAWS Northern Alberta welcomed the news that trails and pathways in the Maligne Valley would be closed by Parks Canada for a period of time over the winter to support caribou recovery. We would propose a closure of the Maligne Road for the same period of time to support caribou recovery, as well.

At the Jasper National Park Forum held in Edmonton on October 16th, 2014, the question was presented as to whether more campsites should be placed in existing campgrounds on Maligne Lake, or whether another new boat-accessible campground should be added to the lake. If more space is required for camping on Maligne Lake, CPAWS Northern Alberta would support the addition of individual sites to existing campgrounds rather than the addition of an entirely new campground. This would lessen the impact of additional camping facilities by placing them in areas that are already disturbed by human usage.

Recommendations: Wilderness Areas

- a) CPAWS Northern Alberta once again encourages the federal government to reinstate funding for Parks Canada to be able to conduct both natural and social science within parks;
- b) Trails, pathways and roads in the Maligne Valley should be subject to delayed opening/track setting/ploughing over the winter months to allow for caribou recovery; and
- c) If more space is required for camping on Maligne Lake, additional sites should be added to pre-existing campgrounds rather than another boat-accessible campground being added to the Lake.

2. IMPROVING ECOLOGICAL INTEGRITY

According to the *Canada National Parks Act* (s.8(2)), the first priority when considering all aspects of management of parks shall be the maintenance or restoration of ecological integrity through the protection of natural resources and natural processes.

Comments: Caribou

Woodland caribou are listed as “threatened” under the federal *Species at Risk Act*, and it was recently recommended by the Committee on the Status of Endangered Wildlife in Canada (“COSEWIC”) that Southern Mountain Caribou be listed as “endangered.”

Parks Canada has identified five threats to caribou which are the focus of management actions (pg. 10 of the *Discussion Paper*). Two of these threats are stated as:

1. Direct human disturbance of caribou (e.g. road mortality, aircraft overflights); and
2. Loss of caribou habitat, which could result, for example, if a wildfire occurs.

CPAWS Northern Alberta would like to stress that increased built infrastructure and commercial development in the Maligne Valley and at Maligne Lake would also contribute to both direct human disturbance and loss of habitat for the caribou.

As stated in the *Discussion Paper*, “Parks Canada now has a legal obligation to implement critical habitat protection measures” following the release of the final federal *Recovery Strategy for the Woodland Caribou, Southern Mountain Population (Rangifer tarandus caribou) in Canada*. This obligation, together with the consideration of ecological integrity as the number one management priority, should ensure that no further built infrastructure or commercial development is allowed in the Maligne Valley, or at Maligne Lake.

CPAWS Northern Alberta supports Parks Canada’s proposed action to manage winter recreational access to critical caribou habitat in the Maligne Valley, and to consider augmentation of the Maligne herd. However, augmentation may only be successful when the current threats to the herd have been removed.

Recommendations: Caribou

- a) Recognition must be given to the impact of built infrastructure and commercial development on direct human disturbance of caribou and loss of caribou habitat; and
- b) Augmentation of the Maligne herd should only be considered when current threats to the herd have been removed or reduced to a level where the herd could potentially be self-sustaining.

Comments: Grizzly bears

COSEWIC has recommended that grizzly bears be listed as a “species of special concern” under the federal *Species at Risk Act*.

CPAWS Northern Alberta supports Parks Canada’s proposals to adjust trails and wilderness campgrounds to reduce the risk of bear-human conflict, to post bear warnings, and to remove obsolete facilities from pinch points. We would also suggest that no new facilities should be built in areas that have been previously identified as pinch points for grizzly bears, such as the north end of Maligne Lake.

Recommendations: Grizzly Bears

- a) No new facilities or development should be placed in areas that are already identified as pinch points for grizzly bear movement in the Maligne Valley or around Maligne Lake.

Comments: Wildlife Viewing

We encourage Parks Canada’s proposals to educate visitors to the Maligne Valley on wildlife and wildlife viewing etiquette. However, we are concerned that the use of shortwave radio or other broadcasting devices to alert visitors to wildlife on the road will, in addition to warning visitors of a traffic jam, potentially encourage visitors to rush towards the jam. This could pose a risk to wildlife along the Maligne road and could lead to larger or more problematic jams.

3. STRENGTHENING ABORIGINAL RELATIONSHIPS

CPAWS Northern Alberta strongly supports Parks Canada’s initiatives to increase the participation of Aboriginal peoples and groups in the park’s activities and interpretive programs. We agree that there are numerous opportunities for the park to celebrate historic ties and work with Aboriginal groups in managing and stewarding the Maligne Valley.

4. MANAGING GROWTH AND DEVELOPMENT

CPAWS Northern Alberta supports Parks Canada’s environmental stewardship activities in the Maligne Valley, such as encouraging recycling and reducing the reliance on fossil fuels to provide electricity at Maligne Lake. We also support the restoration of the wetland at Beaver Lake, improving waste management in the Maligne Valley, and encouraging commercial operators to adopt environmentally-sound practices.

Comments: Redevelopment of Maligne Tours Ltd. Facilities and Operations

Parks Canada states, at page 16 of the *Discussion Paper*, that it will:

[w]ork with Maligne Tours to update their visitor facilities and operations at Maligne Lake, *while ensuring all facilities, activities and services are consistent with Parks Canada’s legislative and policy framework, meet objectives or criteria set out in the management plan*, complement the valley’s wilderness setting and contribute to learning and experiential outcomes. (emphasis added)

Parks Canada's acceptance of tent cabins at Maligne Lake constitutes a decision to allow overnight commercial accommodations at Maligne Lake, which decision *does not* meet Parks Canada's own legislative and policy framework. Nor does this decision meet the objectives or criteria set out in the park's management plan, which explicitly prohibits the development of overnight commercial accommodations outside the town site of Jasper. Overnight commercial accommodations should not be allowed or considered at Maligne Lake.

We also have concerns surrounding the acceptance of the thatch-walled "wildlife-themed children's maze," which we understand is to be placed on the shores of the north end of Maligne Lake, just south of the boathouse. This area is used by moose for grazing and the placement of barriers to movement in the area could either pose a significant danger for both the moose and people using the maze, or could result in the loss of this area to the moose as a grazing ground. The building of the maze would also require the release of more land from the Park to Maligne Tours Ltd., and would result in increased infrastructure being built along the lake. Thus, we do not support the development of a thatch-walled maze at Maligne Lake.

Recommendations: Redevelopment of Maligne Tours Ltd. Facilities and Operations

- a) No new overnight commercial accommodations should be considered or allowed at Maligne Lake as being contrary to park policy and the park's management plan; and
- b) No thatch-walled wildlife-themed maze should be constructed at the north end of Maligne Lake due to conflicts with wildlife in the area.

CONCLUSIONS

Again, we appreciate being given the opportunity to comment on the *Discussion Paper* and participate at events such as the Jasper National Park Annual Forum. We hope the above comments will be useful to Parks Canada in making its decisions with respect to the Maligne Valley, and we are happy to discuss any of our comments or recommendations further.

Sincerely,



Alison Ronson
Executive Director, CPAWS Northern Alberta