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Tel: 604.873.6096

December 12, 2013

FMCBC

Greg Fenton Field Unit Superintendent Jasper National Park Jasper.Superintendent@pc.gc.ca

Re: Maligne Tours Ltd Proposal

Thank you for bringing the Maligne Tours Limited redevelopment of their leasehold and operations at Maligne Lake to our attention. Some aspects of the proposal are of high concern to our members and while the Federation of Mountain Clubs of BC (FMCBC) is a British Columbia organization we do wish to comment on the proposal.

The FMCBC is composed of about 30 mountain and outdoor recreation clubs. Its membership of approximately 4500 includes hikers, climbers, mountaineers, backcountry skiers and snowshoers. As Jasper National Park (JNP) is in the Rockies and on the BC border, members of many of our clubs regularly recreate in the park including in the Maligne Lake area.

The primary purposes of the FMCBC are:

- To represent clubs and the public interested in non-motorized backcountry recreation in BC, and to advise and take action on their behalf in matters that may impact their recreation experiences.
- To make recommendations to government and non-government organizations regarding the protection of and access to BC's backcountry and trails.
- To encourage self-propelled backcountry recreation, and to promote low impact and safe practices in the backcountry.
- To promote the development and maintenance of a trail network in BC.
- To promote the sound management and preservation of BC's backcountry recreation resources.

Comments:

1) In our view the first question is whether roofed accommodation should be permitted at Maligne Lake. The proposal would see the establishment of 15 tent cabins plus 66 suites in the redeveloped lodge. If fully booked that could mean about 150 visitors plus staff on site. We find this large number concerning.

We see nothing in the project proposal that assesses the ecological impacts of having so many additional people on site, potentially for 24 hours a day, at least through the snow-free season. Of particular concern are impacts on caribou and grizzly bear but also a variety of other species. This has to be a major concern for JNP since a prime mandate of the mountain parks is to protect ecological values. We are aware that JNP has particular concerns regarding caribou as their





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numbers have declined. The Park has implemented restrictions on recreational activities to protect the caribou including in the Maligne Lake area. Night-time disturbances to wildlife are in special need of assessment.

The FMCBC has a roofed accommodation policy for provincial parks and a key component of it is minimizing ecological impacts of any proposed accommodation. A copy of this policy is attached for your reference. We recognize that in some circumstances establishing a facility may reduce an existing problem.

- 2) We are disturbed that the proposed development is targeted towards the wealthy, or as Maligne Tours says, the "higher-yield" visitor. Given that our National Parks are supposed to be managed for everyone to enjoy, if any portion of this proposal is allowed to proceed we feel that the target client should be the average person. In short, the redeveloped lodge and tent cabins should be affordable to most, not just the well-off.
- 3) As JNP is on the BC border, many people from FMCBC clubs and all walks of life across BC are interested in any development plans in the park. We would argue that there should be open houses in BC, particularly in Prince George, but perhaps in other communities farther afield such as Kamloops and Vancouver.
- 4) We were surprised that in the section on building trust, Maligne Tours omitted Mt Robson Provincial Park, Valemount, and McBride. Some people working in Jasper even have homes in Valemount.
- 5) The proposal is short on details of many activities proposed by Maligne Tours. Before a final assessment of the entire proposal more details should be requested on the following items along with potential impacts, especially ecological impacts:
 - Thematic renewal of the Spirit Island Boat Cruise;
 - The reviving of "The Fisherman's Special";
 - Introduction of a low impact wildlife themed maze;
 - Introduction of a new Voyageur canoe excursion;
 - Introduction of Earth-caching;
 - Introduction of "Maligne at the Box Office";
 - Introduction of Mary Schaffer Photographs;
 - Introduction of The History of Wardens exhibit;
 - Introduction of free twice-daily "Wildlife in the Valley" storytelling experiences;
 - Introduction of Aboriginal-themed storytelling experiences which can be freestanding as "Aboriginal" in nature or which can be inter-woven into various themed experiences such as the Voyageur canoe excursion, earth-caching, etc.;
 - Introduction of a more true Maligne-thematic retail experience:
 - Introduction of a more true Maligne-thematic food and beverage experience.

Federation of Mountain Clubs of BC

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In summary, we recommend that the proposal be rejected.

- The proposal does not appear to be within the spirit of the JNP master plan that discusses limiting expansion to protect the natural ecosystems of the park.
- The proposal is incomplete as it lacks a broad range of assessments, the most important being a comprehensive ecological assessment.
- There is a lack of detailed assessment of several activities proposed.
- Lastly, there is a need for more open house opportunities, especially in BC.

Thank you for the opportunity to comment.

Sincerely,

Scott Webster President

Backgrounder

Maligne Tours' Concept Proposal for Redevelopment at Maligne Lake Jasper National Park

Recognised internationally, Maligne Lake and the entire Maligne Valley are iconic symbols of the Canadian Rockies, must-see attractions of Jasper National Park, and an integral part of the Rocky Mountain Parks World Heritage Site.

In November 2013, Parks Canada began a two-phase public engagement process to support the development of the *Maligne Valley Implementation Strategy*, which will contain a suite of actions to advance management plan direction for the Maligne Valley area over the next five to ten years.

Concurrent to Parks Canada's process, Maligne Tours' introduced their concept proposals for redevelopment at Maligne Lake. Maligne Tours' process is separate and independent from Parks Canada's *Maligne Valley Implementation Strategy* planning process, however, the timing for Parks Canada to consider ideas from Maligne Tours about renewal of their visitor offer is complementary and appropriate.

Maligne Tours is a commercial leaseholder that operates a day lodge (built in 1975) and supporting facilities at the north end of Maligne Lake in Jasper National Park. Their current visitor offer includes boat cruises to Spirit Island, boat rentals, food, beverage and retail services, and interpretive guiding. The Maligne Tours redevelopment proposal included the following key elements:

- Heritage themed roofed accommodations
- Tent cabins
- New specialty boat tours (e.g. photographer's tour, family tour)
- "Fisherman's Special" water taxi service to Spirit Island
- A new Voyageur canoe excursion
- Earth-caching
- Themed exhibits, including: "Maligne at the Box Office; Mary Schaffer Photographs; and History of Maligne Wardens
- Enhanced storytelling, including the possible introduction of Aboriginal-themed and Wildlife in the Valley storytelling experiences
- Updated and "Maligne-themed" retail and food and beverage experiences
- A thatch-walled, wildlife-themed exploratory maze

Parks Canada considered Maligne Tours' Conceptual proposals to redevelop their offer at Maligne Lake, in principle, on the basis of a preliminary policy review and the proposals' potential contribution to enhancing visitors' experiences and connections with the iconic Maligne Lake landscape, and to improve communication and interpretation about the Maligne Valley, a key objective identified in the Jasper National Park Management Plan (2010).

Public and Aboriginal engagement to support Parks Canada in its decision making was substantial and all feedback received was carefully reviewed and considered. An open and transparent public dialogue about Maligne Tours' development aspirations at Maligne Lake was followed by a rigorous public consultation process. Information and consultation events were hosted by Maligne Tours and included outreach to local environmental and tourism organisations, meetings with stakeholders, and public open houses in Jasper and Edmonton. The detailed concept proposal was available for review and comment by members of the public and interested Aboriginal communities for a four week period. In all public consultation, Parks Canada relies on internationally recognised standard practices and tools.

Parks Canada is a leader in park management and it is a Parks Canada priority to maintain or restore ecological integrity in our protected areas. In determining the decision on which elements of Maligne Tours' proposal could proceed to be considered for details review, Parks Canada considered this priority, extensive input from the public and Aboriginal groups, and the proposals' potential contributions to visitor experience, ecological integrity, public education, and the goals of Canada's National Conservation Plan.

Guided tourism to Maligne Lake began around 1908 and overnight accommodation was available at the lake's north end from the mid-1920s to the mid-1960s. For the past 40 years, Parks Canada has managed the north end of Maligne Lake as a day-use area.

Parks Canada administers many lease and license of occupation agreements and business licenses in Jasper National Park, whereby lessees, license holders and operators deliver services and programs to visitors as a key means of achieving Parks Canada's mandate of fostering public understanding, appreciation and enjoyment of our natural and cultural heritage. Visitors to national parks have the option to access services from business providers, and have been doing so for over 125 years. For more than a century, Parks Canada has been working with a range of partners to offer memorable visitor experiences in Jasper National Park while respecting the ecological and cultural integrity of the park and World Heritage Site in which it exists.

Further information on Maligne Tours' concept proposal is available at: www.malignelake.com/renewal.html.

News Release Communiqué

CP2014-00678 For Immediate Release

Parks Canada Announces Decision on Maligne Tours Concept Proposal for Redevelopment

Decision reflects consideration of ecological integrity, visitor experience and Canada's National Conservation Plan

July 25, 2014

Jasper National Park, Alberta

Parks Canada

Today Parks Canada has accepted 13 of the 14 elements of the Maligne Tours' concept for redevelopment for further considerations, including tent cabins and additional visitor experience offers. These elements offer the potential to support Parks Canada's commitment to the National Conservation Plan by connecting Canadians to nature, encouraging Canadians to experience their national parks and cultural places, and offering enhanced experiences with an iconic landscape. They also offer potential to improve communication and interpretation about the Maligne Valley, as identified as a key goal in the approved Jasper National Park Management Plan (2010).

Parks Canada has declined the proposed heritage themed roofed accommodation in Jasper National Park. This decision reflects extensive input from the public, stakeholders and Aboriginal groups, and consideration of the proposals' contributions to visitor experience, ecological integrity, public education, and the goals of Canada's National Conservation Plan.

Advancing the concept of tent cabins for more detailed review will coincide with a park management plan amendment to allow for release of necessary lands, and each element advanced would be subject to an environmental impact assessment and public and Aboriginal review prior to final determination.

Quick Facts

- Maligne Lake is the largest lake in Jasper National Park (22 km long) and the deepest (97 m). The area offers
 exceptional hiking and fishing opportunities.
- An estimated 380,000 visitors make the trip up the Maligne Road every year. The vast majority of these
 visitors approximately 360,000 come to the valley during the summer.
- Every year, almost two million Canadians and visitors from around the world visit Jasper National Park to sightsee, enjoy iconic Rocky Mountain scenery, and connect to nature.
- Jasper National Park, the largest of Canada's mountain national parks at more than 11,000 km², is part of one of the finest and most extensive systems of protected natural areas in the world.

Quote

"Parks Canada supports the National Conservation Plan by conserving and protecting Canada's special places and connecting Canadians to nature. Today's decision reflects our pledge to ensure our protected natural and cultural heritage remain unimpaired for future generations, while facilitating ways for people to meaningfully connect with and learn about nature."

Greg Fenton,

Field Unit Superintendent, Jasper National Park

Related Product

Backgrounder: Maligne Tours Concept Proposal

Associated Links

www.pc.gc.ca/jasper







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