

TO: Daniel Watson; CEO Parks Canada Agency
(cc: Minister, Politicians and Media)

FROM: Waterton Lakes Leaseholders Association (with support of many others)

SUBJECT: Waterton Lakes National Park Visitor Reception Centre

REFERENCE DOCUMENTS:

Waterton Community Plan 2010 (CP)

Waterton Management Plan 2015 (MP)

Parks Canada Values and Code of Ethics (VCE)

Parks Canada Guiding Principles – Section 8 – Public Input (GP8PI)

Parks Canada recently announced a decision for the location of proposed Visitor Reception Centre (VRC) at Waterton Lakes National Park. A significant number of Leaseholders, both private and commercial, as well as large numbers of Park employees and regular visitors from Southern Alberta are opposed to the location of the VRC on Block 39. The opposition stems from the following:

- The location is in the middle of the townsite where it will be difficult to find and creates further traffic congestion, parking and safety hazards.
- Other better locations, outside the townsite, were not given valid consideration.
- The location of the VRC inside the townsite is a contradiction with the Community Plan
- Stakeholders were not consulted (leaseholders and the general public).

This land is zoned Environmental and /or Recreational Reserve. It has been used for generations as a playfield for children, youth and adults. The added congestion, traffic and parking will be a serious safety hazard for children.

Superior locations for the VRC outside the townsite including, the Parks Compound, were dismissed without justification or consideration of the Community Plan and accepted urban planning principles.

The Community Plan (CP) on page 28 states that:

- Parks Canada will move most of administrative functions to the Compound (outside of the village).
- Only the Municipal Administrative functions (i.e. Townsite Manager and the Municipal Officer) would remain in the townsite on a seasonal basis in the historic administrative building.

The proposed VRC will additionally house all the senior administration and the “Falls Theatre” full time. The proposed Block 39 location therefore does not conform to the Community Plan in many aspects.

In the press release, Parks Canada states that the location was reviewed by a third party consultant. However this consisted of the Park presenting only two options, and a list of 13 criteria weighted by senior PC staff to ensure Block 39 would be recommended. Sound quantitative urban planning and traffic considerations appear to be missing.

The VRC, and other questionable staff housing projects, were announced as “decisions” during off-season time when leaseholders and public visitors were mostly absent. No consultation with the general public took place. An early attempt in 2015 by the Waterton Leaseholders’ Association (WLLA) to provide feedback was ignored. The WLLA undertook a survey of leaseholders and 94% were against the location in the townsite. Many Park employees are also against the Block 39 location but can’t publicly comment.

We are well aware, and have documentation, of the “legalese” buried in the reference documents that lets Parks Canada do “whatever they damn well please” (to quote a local Parks Canada management individual). This is a raw, gross exercise of bureaucratic authority! We respectfully request that you take your legal responsibility pursuant the VCE (CEO Responsibility Section 5, page 20) and GP8PI to put the VRC projects ON HOLD until independently supervised valid public consultation can take place and other alternatives be considered. Time is of the essence in that a “Request for Proposals” for architectural design of the VRC is in progress. There is time to do it right! Construction of the VRC is scheduled for completion in 2018.

We look forward to your early response

Yours very truly,

The Waterton Leaseholders’ Association

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For the benefit of other Public Servants and the Media; following are a few excerpts from the VCE and GP8PI. The referenced Parks Canada documents are in the public domain and are available from Parks Canada websites or from us.

[Some additional bolding added for emphasis]

Parks Canada Guiding Principles – Section 8 – Public Involvement

<http://www.pc.gc.ca/eng/docs/pc/poli/princip/sec1/part1d.aspx>

8. Public Involvement

Public involvement is a cornerstone of policy, planning and management practices to help ensure sound decision-making, build public understanding, and provide opportunities for Canadians to contribute their knowledge, expertise and suggestions.

Canadians are provided with the opportunity to state their views on such major issues as national policies, the establishment of new national parks, the acquisition of national historic

sites, and the preparation and review of management plans, before final decisions are made. Special opportunities for public participation are provided to individuals and groups at the local and regional levels, including Aboriginal peoples, who may be more directly affected by Parks Canada initiatives and operations.

For public participation to be effective, certain fundamental practices will be adhered to. These are:

- the provision of clear, timely, relevant, objective and accurate information;
 - an indication of the areas requiring decisions and relevant policies, legislation and agreements;
 - adequate notice and time for public review;
 - the careful consideration of public input;
 - feedback on the nature of comments received and on Parks Canada response to participants; and
 - respect for all **interested publics**.
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Parks Canada Values and Ethics Code (Excerpts)

<http://www.pc.gc.ca/eng/docs/pc/guide/code.aspx>

Expected Behaviours –

I create and maintain the connections needed for a mutually beneficial relationship with Parks Canada team members, **stakeholders and partners**. (page 7)

I act at all times with integrity and in a manner that will bear the closest public scrutiny.

I take responsible action when I detect any behaviour which does not cohere to Parks Canada Values and Ethics.

(page 8)

Duties of Vigilance

Values and ethics are necessary for maintaining trustworthy and fruitful relationships between **Parks Canada team members, stakeholders, partners and Canadians**. These relationships are essential for our long-term success and we are all responsible for them.

An incident can quickly undermine relations and have serious consequences for the organization. (page 9)

- never harass other Parks Canada team members, **stakeholders or partners**;
- never retaliate against others; (page 13)

Responsibilities

Responsibilities of all Parks Canada team members regarding values and ethics:

All Parks Canada team members have an important role to play in fostering and maintaining trustworthy and fruitful relationships and developing trust within the team, **as well as with stakeholders, partners and the Canadian public.**

(page 16)

5. Specific responsibilities of the Chief Executive Officer regarding values and ethics

The Chief Executive Officer plays a lead role with respect to values and ethics. He/she has a **legal obligation** to establish the *Parks Canada Values and Ethics Code* and to ensure its application and implementation.

The Chief Executive Officer listens to the Parks Canada team members, seeks their input and provides his/her vision of the Values and behaviours required for the organization's success. (page 20)