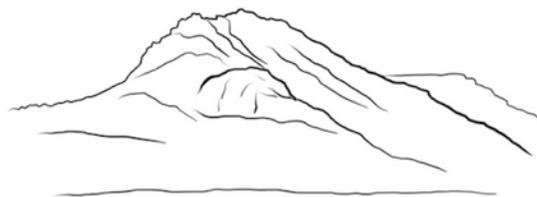


Save The Waterton Field

Meeting with Jonathan Wilkinson

31 August 2017



Save the Waterton Field

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A. Why should the new visitor centre be built outside the townsite and not on Block 39?

1. The 2000 Waterton Community Plan designates Block 39 as a Recreational Reserve.

Here are the Permitted Uses for Recreational Reserve Land (p. 59):

RECREATIONAL RESERVE DISTRICT (RR)

Purpose: The purpose of this district is to provide open space for recreational and cultural activities.

Permitted Uses:

- interpretive theatres
- outdoor recreational services
- playgrounds
- public parks
- public washrooms

Discretionary Uses:

- All development is prohibited except that necessary to support recreational and cultural uses.

Recreational Reserve land is primarily for OPEN SPACE (see above). This is emphasized throughout the Community Plan. Note the emphasis given to open space on page 8 of the Community Plan:

Waterton has significant areas of open space located on private leases and on public land. Generally these areas are used for recreation and by wildlife for forage and movement. The open space provides view lines and a feeling of openness that is a key element in defining the overall character of the community.

While urban in nature, the community is a place where lessees and visitors can experience a measure of solitude and view the beauty of its natural setting. Waterton sets a high standard for integrating community and natural values.

Here are the pictures of examples of Recreational Reserve land in the 2000 Community Plan (p. 29):



Does replacing this OPEN SPACE with a 10000 square foot visitor centre, administrative offices, and a 70+ stall parking lot meet the intended use of Recreational Reserve land?

Are administrative offices and parking lots REALLY “necessary to support recreational and cultural uses”?

2. Parks Canada has not followed the 2010 Waterton Management Plan

Page 27 of this plan mandates that Parks Canada explore the Compound Location for the new visitor centre:

- Investigate the feasibility of locating a new visitor centre at a site along the entrance road across from the Lake Linnet/Middle Waterton Lake day use area. This site will improve access for visitors, provide a positive welcome and sense of arrival, and mitigate impacts on the wildlife corridor in the area of the current visitor centre.

Access to Information requests prove that Parks Canada has ZERO evidence that the Compound Location is not a feasible location for the visitor centre:

We have completed processing your request, under the *Access to Information Act*, for:

"I am requesting all investigations that Parks Canada has done to show that construction of the new visitor centre "at a site along the entrance road across from the Lake Linnet/Middle Waterton Lake day use area" is NOT feasible. This investigation was mandated on page 27 of the 2010 Waterton Lakes National Park of Canada Management Plan. Given that Parks Canada has chosen an alternative location for the visitor centre other than what was mandated in the management plan, I expect that they have evidence that the compound location is not feasible (not the same as not preferable)."

Please be advised that a thorough review of our records was conducted and no documents were located in reply to your request.

Why has Parks Canada not investigated the Compound Location for the new visitor centre as mandated by the 2010 Management Plan?

If Parks Canada has suggested that the Compound Location is not an option, have they done any research or studies justifying their opinion? (Apparently not, according to the Access to Information request above)

The 2010 Management Plan lists as a "Key Action" the updating of the 2000 Community Plan to reflect the direction of the 2010 Management Plan (p.29):

- *The Waterton Community Plan 2000* will continue to guide the Waterton community within the context of this management plan and the Canada National Parks Act and Regulations. The community plan will be updated to reflect the direction of this park management plan.

Why has Parks Canada not updated the 2000 Community Plan as mandated by the 2010 Management Plan?

The 2015 Waterton Staff Housing Design Tender Amendment reveals Parks Canada's justification for not updating the Community Plan (p. 3 of 11):

Community Plan:

- This document is tabled in the House of Commons, so unlike community plans for other places like Calgary and Lethbridge, for example, it's very difficult to amend. It was completed in 2000, and there is no pressure or interest to reopen it.

We don't think the excuse "It's very difficult to amend" is a good enough reason not to keep the Community Plan updated as was required in the 2010 Management Plan. Also, what evidence are they basing the statement "there is no pressure or interest to reopen it" on?

Perhaps if Parks Canada had made the effort to update the 2000 Community Plan, the present Visitor Centre crisis could have been averted.

Furthermore, the National Parks Act mandates that the Management Plan must be updated every five years. From Parks Canada's own website:

The [*Canada National Parks Act*](#) requires that a management plan be prepared every five years. The management plan must respect broad legislative and policy requirements as outlined in Parks Canada's [*Guiding Principles and Operating Policies*](#) while addressing local issues and circumstances.

The first step of the planning process is the production of a *State of the Park Report*, which describes the state of health of the park in the context of the greater ecosystem and the progress made toward achieving the goals of the previous park management plan.

From an online search, it appears that the most recent Waterton Management Plan is the 2010 Plan and the most recent State of the Park Report dates back to 2008.

Why was an updated Management Plan not prepared in 2015? Why has it been almost ten years since a State of the Park Report was released to the public?

Who has responsibility for updating the Community Plans and Management Plans and what are the consequences for not keeping these plans updated as required?

3. Parks Canada's own managers in Waterton think building the visitor centre on Block 39 is a terrible idea.

Here are their comments on the feasibility of the Block 39 visitor centre location:

"With all the vehicle traffic, pedestrian traffic and tourist trikes everywhere...I can just see someone ploughing into them while they're confused and looking around for the VC"

-Joe Fontoura (Parks Canada Finance and Administration Manager)

"Fighting your way into town to find a bathroom, some basic information about ones intended activities, acquire the necessary [sic] permits should be simple and efficient and set you up for a positive experience, not a head shaking, fist pounding negative one."

-Anders Hawkins (Parks Canada Law Enforcement Officer/ Manager)

"I believe there is just too much congestion in the community. I do not believe it can be mitigated to make way for a visitor centre."

-Locke Marshall (Parks Canada Visitor Experience Manager)

Interestingly, Parks Canada initially redacted all internal discussion (including the comments above) that cast the townsite location in a negative light, while at the same time releasing only favourable discussion, giving the public the false impression that there were no internal concerns within Parks Canada about the Block 39 location.

How does Parks Canada justify redacting only half the conversation, creating a false impression to the public that there were no concerns around a Block 39 location, when in fact the public's concerns were shared by Parks Canada's OWN MANAGERS?

We understand that these managers now have no choice but to accept the visitor centre location decision since it was announced on 07 March 2016 (under threat of losing their jobs), but we do NOT believe that they truly believe that a townsite visitor centre location is the best location, based on their highly emphatic and well-reasoned arguments drawn on decades of visitor services experience.

Why were the wisdom and experience of these managers completely ignored?

Who could possibly know better than them what visitor centre location would work best in Waterton?

Not only was their input ignored, but they expressed grave concern about the *decision-making process*, and these process-related concerns were also ignored:

Heads up Locke, [REDACTED] Dennis briefed me on the VRC "fait accompli". I had been laboring under the misapprehension that the mgt team was going to see the consultants report, then discuss, then decide on the location. Disappointing result. Anders

(Anders Hawkins email to Locke Marshall, March 02, 2016 expressing disappointment about the visitor centre location decision-making process)

Here is another Parks Canada Manager in Waterton expressing grave concern about the decision-making *process* for the Waterton visitor centre:

From: Allen Nelson/NOTES/PC/CA
To: Ifan Thomas/NOTES/PC/CA@PC
Date: 02/03/2016 03:59 PM
Subject: VRC site selection study

Ifan,

I have reviewed the VRC selection study and am concerned with it's content. There are many questionable assumptions and misrepresentations throughout this document that must be addressed.

I echo the question that Dennis raised at the management meeting regarding what we as a management team understood regarding the process moving forward. I feel it would be irresponsible of us to move this project forward solely based on the findings of this study and without a final discussion and consensus as a management team.

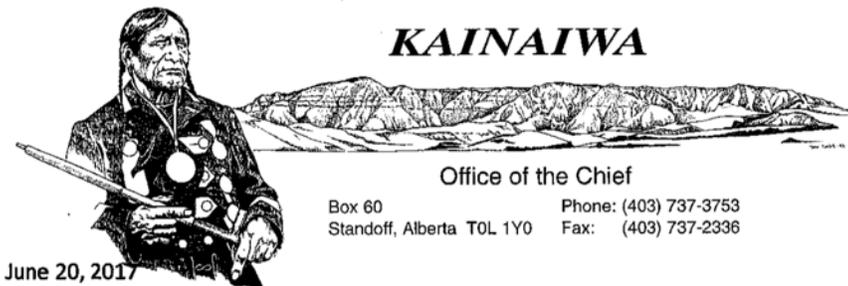
This project is far too important to push through without proper process. Once a site is selected there must be a defensible rationale for it's selection and I am afraid this document leaves us open to scrutiny.

Allen Nelson
A/Asset Manager
Waterton Lakes National Park
P.O. Box 200
Waterton AB, Canada T0K 2M0
Phone: 403-859-2721
Fax: 403-859-5106
Cell: [REDACTED]
allen.nelson@pc.gc.ca

Parks Canada has claimed that healthy discussion is part of good decision-making, but how does Parks Canada justify the obviously flawed visitor centre location decision-making *process*?

4. Parks Canada did not consult the local Indigenous Groups prior to announcing the Block 39 Visitor Centre location, or if they did consult them, then they ignored their input.

The local Indigenous Peoples have spoken out strongly on this issue. Here is a letter from the Blood Tribe Chief and Council indicating their opposition to a Block 39 Visitor Centre location and to any relocation of the Playground and Spray Park:



Grant Hunter, MLA
#940, 5224 – 48 Avenue
Taber, AB T1G 1S1

Dear Mr. Hunter:

Re: Waterton Lakes National Park Visitor Centre

The Kainai/Blood Tribe Chief and Council support the development of the new Waterton Lakes National Park Visitor Centre and would like to see the Visitor Centre in a location other than the playground area located in Block 39 of the Waterton Lake Townsite.

This playground and spray park area is heavily used by families for playing, relaxing and enjoying the views of wildlife, it is conveniently located near the shops and diners. This playground has been recently upgraded which increased its use and access. The Blood Tribe would like to see this area preserved for the children and youth to enjoy now and into the future.

If you have questions, please contact our office at 403.737.8102.

Sincerely,

Chief Roy Fox
BLOOD TRIBE CHIEF AND COUNCIL

"No relationship is more important to Canada than the relationship with Indigenous Peoples."

-Statement by the Prime Minister of Canada on National Aboriginal Day, June 21, 2017

How could Parks Canada's decision to completely ignore the input of the local Indigenous Peoples possibly be in line with the values of Canadians and the Liberal Government?

5. Parks Canada has done ZERO traffic or safety studies to suggest that a visitor centre on Block 39 is safe.

Superintendent Ifan Thomas has repeatedly stated that a townsite visitor centre will have no impact on traffic congestion because 98% of all visitors already visit the townsite. What he ignores in that statistic is actual, real traffic distribution patterns incorporating the park periphery and scenic roads and he makes the false assumption that that 98% is in the townsite simultaneously already. There is no evidence to support his claim that traffic patterns would not change due to a redirection of traffic from the existing visitor centre to a townsite visitor centre. An observation of the Cameron lake or Red rock parking lots will show licence plates from all over North America, some even from overseas. Any of those visitors who are first-time visitors to Waterton would likely have stopped at the existing VRC to ask for recommendations of where to go and then drove there immediately afterwards, completely bypassing the townsite. If a VRC is built in town, virtually all of the vehicles of first-time visitors from those parking lots will be forced to come into town first to ask where to go and what to see, increasing the existing traffic.

Access to Information requests show that Parks Canada Managers in Waterton understand this concept quite clearly:

-Dennis Madsen, Parks Canada Resource Conservation Manager, email Dec 09, 2015:

I have heard the argument that every visitor visits the townsite thrown up time and time again. It is really not helpful at all as it does not contain useful information. WHEN during their visit do they go to the townsite? WHY do they go to the townsite? WHERE in the townsite do they go?

-Locke Marshall, Visitor Experience Manager, email December 08, 2015:

- I do not agree with the argument that a community location will not add to the congestion because almost all visitors go to the town anyway. Here is why:

- a) Whenever you go into town on a very busy day, there are still 40-50 cars parked at the present VRC
- b) Some of those cars do not go directly downtown, but disperse to Cameron, Red Rock, trails, picnic sites outside town...
- c) Some go downtown right away, but often directly to a location suggested to them (with directions on how to get there) by the VRC staff
- d) As one car leaves the VRC it is replaced by another - so there are still 40-50 cars NOT downtown at any one time during the busiest parts of every day
- e) The constant capture and turnover delays some people from visiting the Townsite until later when some of the day traffic has gone
- f) If the VC were in the community those 40-50 cars would be forced to go downtown and be there at the same time as everyone else regardless of if they would have delayed their community visit until later if they had been intercepted by the VC before they went downtown
- g) Visitors, especially those needing immediate orientation information, will attempt to find parking close to the visitor centre whether or not it is a short distance from other parking opportunities, they will not park a bunch of screaming kids and grandma needing a washroom three blocks away
- h) Visitors continually get lost driving around the community. Better signs will help, but our collective VE experience shows that even very straightforward signs are ignored or missed on a regular basis. All community locations proposed would not be as visible or easy to find as one along the route into town.
- i) Repeat park visitors and locals who simply need a camping permit or some quick advice will not have to enter the community and add to or deal with the congestion if the centre is outside of town.

Unbelievably, Parks Canada took the position that traffic would improve following construction of a Block 39 Visitor Centre:

“The townsite already receives all visitors who come to the national park. There will be no increased traffic by relocating this facility in the community. In fact, traffic congestion, which is caused by the increase in visitation over the last 15 years will be relieved thanks to additional parking and new wayfinding in the townsite.”

-Backgrounder to March 07, 2016 New Waterton Visitor Reception Centre News Release

The Waterton Park Gate closure of August 06, 2017 proves that this position is absolutely absurd. This gross oversimplification of the traffic issues that would come with a townsite visitor centre shows a serious lack of thought and planning. Perhaps Parks Canada chose not to do a traffic study before choosing Block 39 for the visitor centre because they were afraid of what it would say. Even as late as June 2016, Superintendent Thomas was still publicly declaring that he did not think a safety study was necessary.

“I’m not convinced that we need a safety study but I’m certainly open to looking at it.”

-Superintendent Ifan Thomas, Parks Canada Public Consultation, June 18, 2016

Perhaps the strong public reaction to the Block 39 Visitor Centre location announcement is due in part to traffic, congestion and safety concerns of the public at the thought of cramming a 10000 square foot visitor centre, administrative offices and a 70+ stall parking lot in a small green space immediately adjacent to cottages and the Townsite Campground.

How could Parks Canada possibly have chosen a visitor centre location without having done a single traffic or safety study to assess the impact of a given location on traffic and public safety?

6. Parks Canada has not followed required procedures for Treasury Board Approval for Visitor Centre Funding.

In order to properly assess the risks of undertaking a Federal Infrastructure project over \$1 Million, a Project Complexity and Risk Assessment (PCRA) must be completed. A Tombstone Data Sheet cover letter specifying the exact location of the project must also be completed:

Ensure that the project tombstone data is accurate and complete as follows:

Date Prepared: _____

Prepared By/Contact:

List the lead and project team members who participated in the preparation of the PCRA. Provide full name & contact information

Project Name:

Project name as listed in PWGSC Investment Plan must include:

- Full address,
- Building/Complex Name

Project Description:

Provide a brief description of the project to provide context, and included the following where applicable:

- Project Type: Renewal, Tender Call, Options...
- Clients – major to minor
- Amount of space (total rentable)
- Length of term sought
- Reason for project
- Links to other leases/projects
- Investment Analysis Report status
- Lease Project Approval status
- In Service Date/Lease Start Date

Parks Canada admits that they NEVER completed a Tombstone Data sheet so how did they properly assess the risks of this project if there was no specified location? Here was their response to a request for the Tombstone Data Page:

We have completed processing your request, under the *Access to Information Act*, for:

"I am requesting the Tombstone Data Pages from the Project Complexity and Risk Assessment (PCRA) submitted to the Treasury Board for the \$7.6M new Visitor Centre Project in Waterton Lakes National Park. I am ONLY requesting the Tombstone Data Pages, not the rest of the PCRA."

Please be advised that a thorough review of our records was conducted and no documents were located in reply to your request.

Here are some examples of Parks Canada's answers to the PCRA questions (PCRA page 2, questions 16-18):

16	Does public perception influence the manner in which the project is conducted?	• The inherent complexity and risk of the project may increase if the project is influenced by public opinion.	<input type="radio"/> Reset Answer #16 <input checked="" type="radio"/> 1 : No <input type="radio"/> 5 : Yes	1
17	Do considerations relating to Aboriginal people (including land claims and Aboriginal consultation obligations) influence the manner in which the project is conducted?	• The inherent complexity and risk of the project may increase if Aboriginal people are to be involved throughout the delivery of the project.	<input type="radio"/> Reset Answer #17 <input checked="" type="radio"/> 1 : No <input type="radio"/> 5 : Yes	1
18	Do health and safety requirements add significant complexity to the requirements for this project?	• The inherent complexity and risk of the project may increase if there are health and safety factors to be considered and managed.	<input type="radio"/> Reset Answer #18 <input checked="" type="radio"/> 1 : No <input type="radio"/> 5 : Yes	1

So when they did their risk assessment, Parks Canada indicated that public perception does NOT influence the manner in which the Visitor Centre project was conducted, considerations relating to Aboriginal consultation do NOT influence the manner in which the Visitor Centre project was conducted, and health and safety requirements do NOT add significant complexity to the requirements for the project, all without even specifying a visitor centre location to base their answers on.

Almost every PCRA question was answered in a similar manner as the ones above, so as to ensure that Treasury Board Funding was approved without question. Parks Canada scored this project LOW RISK on the PCRA (Total Score 95, or 42% - a Level 1 Project - Low Risk)

Furthermore Parks Canada did this risk assessment without a specified location for the project, contrary to Treasury Board Requirements. Even more concerning is that the \$7.6M in funding was approved only for a Visitor Reception Centre but a large portion of this funding is being used to relocate townsite Administration offices (including the Superintendent's office) onto Block 39.

How was the funding for this project approved without a properly-completed Risk Assessment and without a specified location for the project?

Are Environment Minister Catherine McKenna and the Liberal Government okay with the above funding procurement practices?

We are requesting a full investigation into the funding application and Treasury Board Approval for this project.

7. Parks Canada has not properly considered the impact on emergency townsite evacuation due to increased congestion from to a townsite visitor centre

Parks Canada temporarily closed the Waterton Park Gate on Sunday August 6th, 2017 as it stated that the park had reached maximum capacity. Visitors attempting to enter the park during the closure were forced to wait 30-60 minutes in traffic on highways 5/6 only to be then be advised at the entrance road intersection that they could not enter the townsite.



This was the first time that Waterton has ever been closed due to concerns about overcrowding. No other national park in Canada has been closed this year for this reason. Even Parks with much higher numbers of visitors like Banff or Jasper do not face the unusual and potentially highly dangerous geographic constraint of a single road in and out of town.



This temporary closure has highlighted the issues of townsite overcrowding faced by Waterton. The public has repeatedly warned Parks Canada about the issues of capacity, congestion and public safety, which would only be worsened by the decision to build the new Visitor Centre on Block 39 in the centre of the townsite. Imagine if there was need for an emergency evacuation of the townsite. This is not unrealistic: In August 2015, the townsite was placed on evacuation alert due to a fire near Goat Haunt. The current fire hazard is rated as extreme and there is a fire ban and a backcountry closure. Adding to townsite congestion is a major safety issue. A visitor centre located outside the townsite would allow for crucial information to be provided to visitors BEFORE they reach the townsite, and reduce central townsite congestion to allow for easier evacuation if required.

It would make much more sense from an emergency preparedness standpoint to have a visitor centre accessible BEFORE the townsite.

The need to close the Waterton Park gate for capacity and safety reasons is proof that building the new Visitor Centre in the townsite is a very poor decision. It makes no sense to have long lineups of cars blocking the highway outside the park gate, while the information they require is in the visitor centre on the far side of the townsite.

Where is the forethought in building the visitor centre in the townsite? In 5-10 years, will gate closures be a weekly occurrence as the number of visitors to the park continues to increase? It is generally accepted that before long, Waterton will require a shuttle system to meet the demands of an increasing number of visitors. Where will these shuttle buses run from? (obviously SOMEWHERE before the townsite)

Why not choose a large open space before the townsite for a visitor centre and future future shuttle bus staging?

8. Litigation

An Application for Judicial Review was submitted last year regarding the new VRC on Block 39. The judge ruled that there was potential merit in the argument that Parks Canada had not followed land use requirements in locating the VRC on Block 39, however the Application was not granted as the Court declined to extend the 30-day time limit required for submission of an Application for Judicial Review. The 30-day time limit is set from the date of a decision announcement (in this case the date the VRC location was announced: March 07, 2016). Of note, Parks Canada did not respond to concerned members of the public regarding the VRC decision for well over 30 days from the date the decision was announced.

The court has not ruled on the merits or process adherence by PCA of the application, but only on the timing of the application. An Appeal has been filed to request that an extension be granted so the merits of the application may then be considered. This appeal will be heard in Edmonton this fall.

Furthermore, Parks Canada would need to obtain a Development Permit should they decide to proceed with building the new Visitor Reception Centre on Block 39. They have been advised that in addition to the current appeal, a legal challenge will be commenced against any such permit as soon as it is issued. We are confident that a 10000-square foot Visitor Centre along with administrative offices, a gift shop and a parking lot does not comply with Recreational Reserve land use designation requirements (which foremost call for "open space").

Parks Canada continues to claim, "the location is fully consistent with the zoning requirements in the Community Plan" (reference: Parks Canada website). We suspect that they know it is not and that they will either attempt to amend the Community and Management Plans (this would require public consultation and involvement of Parliament), or that they will change the name of the Visitor Reception Centre to an "Interpretive Centre". The \$7.6M in funding has only been approved for a Visitor Centre (not an Interpretive Centre nor administrative offices).

Regardless of the outcome of the current Federal Appeal, if the Visitor Centre project proceeds to the point of issuance of a Development Permit, separate legal proceedings will then be initiated.

9. Lack of Public Consultation

There was no legitimate public consultation prior to the Block 39 Visitor Centre Announcement on March 07, 2016. The Superintendent met with a preselected “Working Group” in December 2015 who were ignored when they recommended wider public consultation before any decisions were made. Access to Information documents prove that the location was already determined at this point and these meetings were held with no intention of incorporating any of the input.

Parks Canada has tried to justify this lack of Public Consultation by saying that Canadians were consulted for the Community and Management Plans and therefore there was no need for public consultation for the visitor centre. There is no legitimate reason why these Plans would justify ignoring the community and the wider Canadian Public on this matter. Furthermore, even the Waterton Community Plans and Management Plans are not being followed by Parks Canada on this issue as noted in Items 1 and 2.

This lack of Public Consultation is not in keeping with Section 8 of Parks Canada’s own Guiding Principles:

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.

We know from Access to Information requests that Parks Canada has deliberately tried to marginalize the overwhelming voice of the public on this issue by pretending that the voice of the public is only a small part of a “broader process” (Daniel Watson email to Pat Thomsen, May 02, 2016). What is hopefully now becoming apparent, is that public opinion on this issue continues to coalesce into an overwhelming, logic-driven consensus, opposed mainly by the Superintendent and the Parks Canada National Office.

The Parks Canada Public Consultations of June 18 and 19, 2016 were developed after-the-fact, with a pre-determined outcome. Access to Information responses prove that there never was any intention of changing the Visitor Centre Decision unless “anything substantive [had] been missed” (same Daniel Watson email as above), yet there was absolutely no transparency on what constituted “anything substantive”. The consensus of the Canadian public following these meetings was that they were a sham and that the Superintendent went into the meeting with zero intention of LISTENING to what people had to say, but only with the mistaken idea that he could overrule the concerns that the public have about a Block 39 Visitor Centre. As a result, the public has very little confidence in the leadership of Superintendent Thomas and his ability to manage Waterton Lakes National Park.

The Visitor Centre Design Consultation held in Spring 2017 received an overwhelmingly singular response from the public: “Do not build the visitor centre on Block 39 and do not touch the spray park or the playground.” Parks Canada was to have released a “What We Heard” report in June 2017 regarding the public’s input. We still have yet to see this report. Almost all comments from the public in the design process addressed the location issue; very few addressed the issue of the design itself. Could it be that Parks Canada is embarrassed to have had such a strong negative response from the public on this issue so they have either delayed the report or are not releasing it at all?

How does Parks Canada justify not following its own Guiding Principles in ignoring the Canadian public on this issue?

Why was no legitimate public consultation held on a project of this magnitude?

10. Parks Canada has breached their own *Values and Ethics Code*

As we have investigated this issue, we have uncovered a number of seriously concerning issues that are not in keeping with Parks Canada's own *Values and Ethics Code*.

Parks Canada previously claimed: "Visitation to Waterton Lakes National Park has increased by over 50% since 2000, from 300,000 to 477,000 visitors in 2015/16" (- Parks Canada Press Release announcing the New Visitor Centre, March 7th, 2016). According to page 27 of the 2008 State of the Park Report, released by Parks Canada, the number of visitors to Waterton in the year 2000 was 416,662. In other words, Parks Canada claimed visitor numbers grew over 50% between the year 2000 and 2015/16 (from 300,000 to 477,000) when in fact they only grew 14.5% (from 416,662 to 477,000). Parks Canada used this 300,000 visitor statistic to support the Visitor Centre site decision based on visitor increases (see Ifan Thomas Memorandum to Pat Thomsen, draft dated December 30, 2015, ATIP response A-2016-00016, pp. 263-266/1960). It seems highly unethical to use a false statistic to support the visitor centre project.

p. 27 2008 Waterton State of the Park Report:

Table 10: Visitor Numbers

	Visitors
1989	338,157
1990	353,908
1991	344,026
1992	345,662
1993	344,453
1994	389,510
1995	360,850
1996	346,573
1997	369,435
1998	415,636
1999	424,948
2000	416,662
2001	414,729
2002	395,390
2003	362,312
2004	367,454
2005	364,866
2006	363,119

Parks Canada has indicated they used a Visitor Centre Site Selection study prepared by Jenkins Architecture to decide between the final two possible locations for the Visitor Centre. From the Parks Canada March 07, 2016 Press Release Backgrounder: "An architectural firm was then retained to undertake a third-party review of the two locations to ensure a final assessment based on recognised architectural standards and principles." This study was supposedly an independent third-party study performed by Jenkins Architecture Ltd. to recommend a preferred VRC location out of the final two possible sites. Ifan Thomas claimed that this study would be "an impartial, defensible and professional recommendation" (p. 264 in ATIP request A-2016-00016), yet Parks Canada chose the criteria AND the weighting (despite this study supposedly having been done independently by Jenkins Architecture) AND Parks Canada manipulated the numbers to get the scores they want in order to favour the Block 39 location. Parks Canada also altered the descriptions for the site study to favour the townsite location, and deleted sentences that would favour the compound location.

Read again the words that Allen Nelson, Parks Canada Acting Asset Manager, wrote to Superintendent Ifan Thomas on 02 March 2016, expressing grave concerns about the content of the Jenkins Study:

I have reviewed the VRC selection study and am concerned with its content. There are many questionable assumptions and misrepresentations throughout this document that must be addressed.

If the Jenkins study was Parks Canada's legal basis for deciding between the final two possible sites (Ifan Thomas himself indicated this on p. 264), then what are the implications of their secret manipulation of this study?

ings, gravel parking areas, and other pieces of buildings housing pumps and lift stations. Much of developed open space with native vegetation. Site A would increase the percentage of developed tation on the property. Parks Canada has indicated ough the lower areas of the site. The presence of a e movement corridors and wildlife trails with .g. increased human use). SCORE: 2.5

2? . Dison

p.367/1960 ATIP request A-2016-00016 showing score manipulation.

Additionally, how does Parks Canada explain their justification for hiring Thomas Nesbitt under sole source to facilitate the Public Consultation sessions of June 18 and 19, 2016 with a budget of over \$56,000? Access to Information Documents confirm that Parks Canada's only justification for this decision was to claim that Tom Nesbitt was the "only person capable of performing the contract", yet he was also an admitted friend of Ifan Thomas. He was to have been impartial yet Access to Information documents confirm that he was feeding Parks Canada information throughout the process and actively coached Parks Canada on strategy. Please explain this breach in Parks Canada's *Values and Ethics Code* (even a "perceived" conflict of interest is not acceptable).

ATIP documents confirm a budget of over \$56,000:

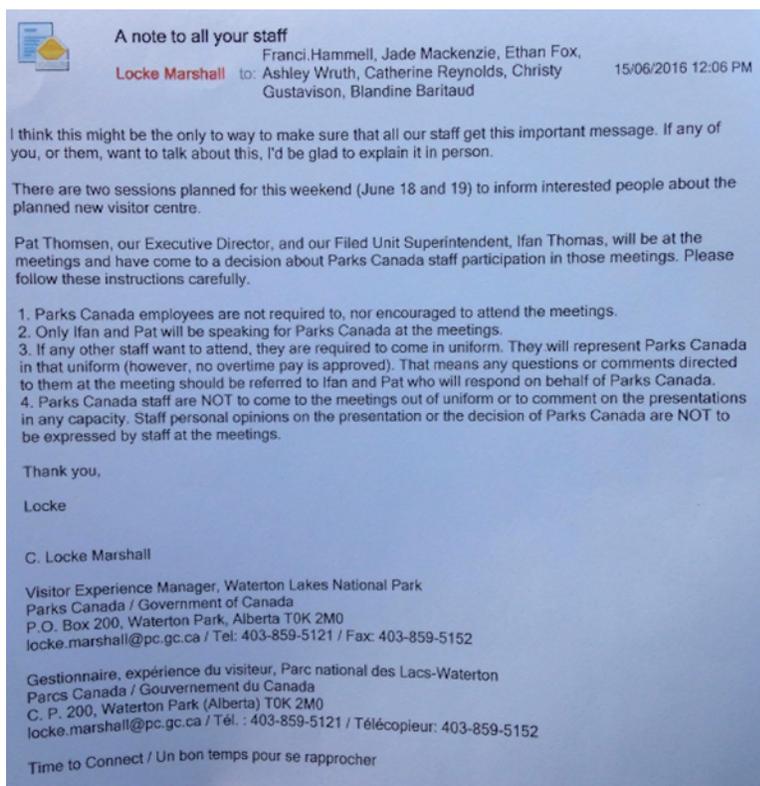
TOTAL ESTIMATE: \$46,659.00 professional fees + \$9,414.40 travel costs = \$56,073.40

From the Parks Canada website:

- Within the scope of their authority, all Parks Canada employees must ensure the proper, effective and efficient use of public money.

Is a sole source contract budgeted at over \$56,000 to an admitted friend showing “proper, effective and efficient use of public money”?

Superintendent Thomas and Pat Thomsen forbade Parks Canada employees from attending the Public Consultation of June 18 and 19, 2016, even on their own time, and they were also forbidden from expressing their own opinions or contributing to the public consultation process:



A note to all your staff
Locke Marshall to: Franci Hammell, Jade Mackenzie, Ethan Fox, Ashley Wruth, Catherine Reynolds, Christy Gustavison, Blandine Baritaud 15/06/2016 12:06 PM

I think this might be the only way to make sure that all our staff get this important message. If any of you, or them, want to talk about this, I'd be glad to explain it in person.

There are two sessions planned for this weekend (June 18 and 19) to inform interested people about the planned new visitor centre.

Pat Thomsen, our Executive Director, and our Field Unit Superintendent, Ifan Thomas, will be at the meetings and have come to a decision about Parks Canada staff participation in those meetings. Please follow these instructions carefully.

1. Parks Canada employees are not required to, nor encouraged to attend the meetings.
2. Only Ifan and Pat will be speaking for Parks Canada at the meetings.
3. If any other staff want to attend, they are required to come in uniform. They will represent Parks Canada in that uniform (however, no overtime pay is approved). That means any questions or comments directed to them at the meeting should be referred to Ifan and Pat who will respond on behalf of Parks Canada.
4. Parks Canada staff are NOT to come to the meetings out of uniform or to comment on the presentations in any capacity. Staff personal opinions on the presentation or the decision of Parks Canada are NOT to be expressed by staff at the meetings.

Thank you,
Locke

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Time to Connect / Un bon temps pour se rapprocher

Is this intimidation of staff *on their own time* really in keeping with the Parks Canada Values and Ethics code?:

The nature of the relationships among Parks Canada team members determines the quality of our workplace. To foster trustworthy and fruitful relationships, maintain and strengthen them, all members must:

- treat other Parks Canada team members with fairness as described in the *Human Resources Values and Operating Principles*;
- never harass other Parks Canada team members, stakeholders or partners;
- never retaliate against others;

At this same Parks Canada Public Consultation on June 18, 2016, Superintendent Ifan Thomas publicly promised:

“We had said all along that we’re not touching the spray park or the playground... We are not touching it. We said in the design documents that are public, that are... that are up for contract, we said quite clearly that the design had to complement that facility.”

If you have not already watched the video of Superintendent Thomas saying this, you can view it for yourself on our Facebook page where it has now had 11.2K views. It would be difficult to make a more clear and emphatic promise to the public. Imagine our surprise when we began hearing rumours this spring that Superintendent Thomas was having secret “discussions” with the local boards in an effort to relocate the playground off Block 39. Several local boards members denied that there were any discussions taking place, which was proven to be false once we obtained Access to Information requests proving that these discussions had indeed already taken place:



s.19(1)

Re: Reeves Phone Call
Brian Reeves to: Ifan.Thomas

18/04/2017 08:51 AM

History: This message has been forwarded.

Follow up to ours last week on moving the Playpark to the WCC . Talked with [redacted] and [redacted] and [redacted] and they are favorable to consider it , [redacted] said would be good if we could talk with your architect [redacted] about his thoughts on location, configurations, etc, and wanted to ask your permission for myself to contact [redacted]. Other matter is our broadband buildout and the line of reporting and authority within Parks as my staff would like clarifications , [redacted]

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> On Apr 18, 2017, at 8:41 AM, Ifan.Thomas@pc.gc.ca wrote:
>
>
> OK. Can you let me know what the discussion is in regards to ?
>
> Original Message
> From: Brian Reeves
> Sent: Tuesday, April 18, 2017 08:34
> To: Ifan.Thomas@pc.gc.ca
> Subject: Re: Reeves Phone Call
>
> Tomorrow morning is fine I am in YYC [redacted]
>
>
>> On Apr 18, 2017, at 8:31 AM, Ifan.Thomas@pc.gc.ca wrote:
>>
>>
>> I'm in meetings this am and then [redacted] for the rest of the day.
> I
>> can try to call you while on the road or we can schedule some time first
>> thing tomorrow am, say 08:30?
>>
>> Original Message
>> From: Brian Reeves
>> Sent: Tuesday, April 18, 2017 08:27
>> To: Ifan.Thomas@pc.gc.ca
>> Subject: Reeves Phone Call
>>
>> Whats a good time for a phone call for you today ?
>>
>> Barney
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Superintendent Thomas then pressured the local boards to offer their support to this deal, all without ever saying anything to the public. It was rumoured that if this deal was not supported, the playground would be ripped out by Parks Canada and the Waterton Community would be left without a playground. An announcement was subsequently made on Parks Canada's Facebook page indicating that a playground relocation deal was in the works, once again without any public consultation. We cannot imagine that this manner of doing business is in line with the Parks Canada *Values and Ethics Code*.

These are only a few examples that we have of serious breaches of Parks Canada's *Values and Ethics Code*. I suspect that in the correspondence Minister McKenna has received in this issue, there may be other additional examples.

I have three more incidents of deeply disturbing unethical behaviour that I would like to discuss with you when we meet.

11. Summary

The above concerns can be best summarized by saying that Parks Canada has not followed the proper and legally-required principles, processes and protocols on this project.

There is increasing evidence that public opposition to this project goes way beyond a small group of NIMBY leaseholders, contrary to what Parks Canada has been advising Environment Minister Catherine McKenna. The petition presented in parliament to Catherine McKenna in June 2016 has 1400 signatures. An online [change.org](https://www.change.org) petition now has 2772 signatures (and counting). The Save The Waterton Field Facebook page now has over 1400 likes/followers and the recent post about the gate closure reached almost 22000 people. Over the past 16 months, Parks Canada and the Environment Minister have received literally thousands of mailed letters, emails, phone calls, and tweets on this issue. There have now been many media stories and the general public is now widely familiar with this issue. Parks Canada's narrative on this issue, stating that this is just a small group of noisy leaseholders, has entirely fallen apart.

With the Federal Election approaching on or before October 21 2019, this issue is quickly becoming an election issue. Construction of the visitor centre is not scheduled to begin until 2018 and the project is not scheduled to be complete until 2020. With an ongoing federal appeal and a pending legal challenge of the development permit once it has been issued, this problem is set to remain squarely in the public eye for at least 2-3 more years unless a resolution is reached sooner. Canadians are now simply waiting to see whether their elected representatives will listen to them.

We are prepared to follow this issue through until the present problem has been corrected. As mentioned above, the Save The Waterton Field grassroots movement is growing stronger and an increasing number of people are asking "When will the Environment Minister intervene and listen to the voice of Canadians on this issue?" Looking towards the fall, we are presently working on a number of major announcements and initiatives, both on social media and in Ottawa, that we expect to receive wide local and national media coverage unless a resolution is found before then. We are hopeful that Minister McKenna will now listen to the public and work together with the public on a win-win solution.



B. Proposed Solution

1. Existing Project

We propose that Environment Minister Catherine McKenna put the existing Block 39 Visitor Centre project on hold until proper Public Consultation has been done and proper process has been followed on this project. Had the original visitor centre decision been made transparently, with legitimate public consultation and using approved processes, there would have been no reason to oppose it. All we are asking is that proper and legally-mandated processes now be followed. We are confident that much of the work regarding visitor centre design and planning could be easily transferred to another visitor centre location outside the townsite. We are not aware of any evidence proving that Parks Canada could not salvage this project even if the location were to be moved outside the townsite. There is no reason to rush forward on such a critical project: it is much more important that the right decisions are made and the right processes are followed. We encourage Minister McKenna to investigate the numerous concerns raised in this letter and to find answers for the Canadian public. We are looking to Minister McKenna to show leadership on this issue.

2. Potential Alternative Visitor Centre Sites

Many arguments for various visitor centre locations outside the townsite have been put forth. There is general agreement that the existing visitor centre is already inadequate and will not meet the needs of park visitors in the future. Admittedly, we are not able to conclusively say at this time which alternative visitor centre location will be best: this would be the purpose of further assessment and public consultation. What we do know, from Access to Information responses, is that Parks Canada never gave serious consideration to any other visitor centre location except Block 39.

One member of our group Garry Ursenbach, a retired engineer, has prepared a very well-researched and thoughtful discussion paper of the various alternative visitor centre sites. You should now have a copy of this presentation. Please consider the various options he has presented and the various benefits and drawbacks of each. We hope that when you are in Waterton this week, we are permitted to show you several possible visitor centre sites and discuss the various options.

3. Save The Waterton Field

We can guarantee that if this project is suspended and legitimate public consultation then takes place, the focus will immediately shift from one of opposition to one of collaboration. You can expect that once the decision is reversed, all the correspondence from the public to Minister McKenna will immediately shift to expressions of gratitude for listening to Canadians. I also expect that a reversal of this decision will carry a significant amount of political weight going into the next federal election in 2019. Once the decision is reversed, we would also expect Save The Waterton Field to quickly disappear from the public view, as there would be no further reason for our existence. After all, Save The Waterton Field exists only because we care about Waterton and want to ensure that it is preserved for the enjoyment of future visitors.

