

Submission to Parks Canada Agency for It's Visitor Use Management Plan Consultation

The AMPPE logo consists of the letters 'AMPPE' in a white, bold, sans-serif font, set against a red rectangular background.The tagline 'ADVOCATES FOR WORLD-CLASS VISITOR EXPERIENCE IN CANADA'S MOUNTAIN NATIONAL PARKS' is written in a white, bold, sans-serif font. It is positioned to the right of the AMPPE logo and is partially overlaid by a dark grey, low-poly mountain range graphic that spans the width of the central banner.

Submitted:
July 27, 2024

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July 27, 2024

Francois Masse, Superintendent
Lake Louise Yoho Kootenay Field Unit
Parks Canada

Dear Francois,

On behalf of the Association of Mountain Parks Protection and Enjoyment (AMPPE), I thank you for accepting our submission for the Visitor Use Management Framework consultation. Your openness to our input underscores the importance of collaborative efforts in addressing the challenges and opportunities within the Lake Louise area.

As I write this, however, I am saddened by the terrible news of the Jasper fires. This horrific event and the busiest season for operators may impact the number of survey responses you receive. Additionally, these events will heavily impact visitation patterns.

AMPPE is committed to fostering a collaborative dialogue with Parks Canada and all stakeholders to ensure that the Lake Louise area remains accessible and enjoyable for visitors while preserving its natural beauty and ecological integrity. We urge Parks Canada to look at some of the plans already created, such as the Expert Panel Report and Banff Lake Louise Tourism's Lead Tourism for Good: 10-Year Vision, in addition to the responses gained in this consultation. We look forward to continued collaboration and dialogue as we address the issues and opportunities ahead. Together, we can ensure that our national parks remain exemplary models of sustainable tourism and environmental stewardship.

Again, Thank you for your commitment to engaging with AMPPE and other stakeholders in this critical consultation process. We are excited about the potential outcomes and are ready to contribute to successfully implementing the Visitor Use Management Framework.

Sincerely,

Debbie Harksen
Executive Director
Association of Mountain Parks Protection and Enjoyment (AMPPE)



Summary of Key Points

- Appropriately managed, visitation could have a net positive impact on conservation.
- Adequate infrastructure is the easiest way to manage visitor behaviours while protecting the environment.
- Lake Louise is not alone in looking to find solutions to manage visitors. Many jurisdictions are creating and employing Visitor Use Management (VUM) strategies. AMPPE recommends looking to places with successful strategies to look for best practices. All potential options for change should be considered.
- While visitation to the park has increased by 31%, there is a correlation to regional population growth
- When creating a vision/desired conditions, consider and integrate the long-term visions provided in the Expert Panel for Moving People Sustainably in the Banff Bow Valley.
- Parks Canada has done an admirable job inventorying high-value habitats and managing ecological integrity. If Parks Canada inventoried less valuable areas where new trails could be built, this could ease the pressure on these pinch points. We know that less than 3% of BNP has been 'developed'
- It would be interesting to see some data regarding some pilot projects undertaken. How many people see Moraine Lake now versus before the change? Have GHGs significantly reduced since the change? Has there been any impact or changes on wildlife since the change? Is there any data from Lake O'Hara? Any visitor satisfaction information? Data about human-wildlife encounters, costs of bathroom maintenance etc. should also be released so stakeholders can consider the full scope of the issues being discussed. For example, these documents cite changing visitor behaviour; we want to know what changes you see.
- Before implementing tactics in specific areas around the Parks, AMPPE recommends creating a larger framework that considers how changes in one area may affect another area rather than simply implementing tactics in isolation. The new framework should recommend measurable metrics and goals.
- Regarding tactics, all possible solutions should be considered and studied, including alternate forms of transportation.

- Banff Lake Louise Tourism has developed a 10-year vision for tourism titled Lead Tourism for Good. This Vision is comprised of responses from over 2000 people over two years. The vision offers guiding principles to consider when defining desired conditions for the Lake Louise Area Visitor Use Plan.

Background

Parks Canada is developing a new visitor use management (VUM) plan for the Lake Louise area. Over time, Parks Canada has implemented many strategies in the Parks. Tactics such as visitor education, paid parking, and shuttles are examples of some recent efforts aimed at moderating visitor behaviour and volumes. Since their inception, other tactics used in the parks are permits, business licenses, and trail closures. Parks Canada has also previously placed restrictions on personal vehicles, such as in Lake O'Hara's case, where walking or bussing are the only ways to access the area, and a lottery is used to manage the influx of guests seeking reservations.

While the scope of this framework will pertain to specific pinch points, AMPPE wants to acknowledge that there are forces beyond the specific geographic area that have an impact on how visitors use the Lake Louise area.

LLYK is initiating this consultation and strategy as visitation to Banff National Park has grown 31% over the last decade*, with 2023-24 being the busiest season on record. The Field Unit says this surge impacts visitor experience, safety, and ecological integrity. The strategies Parks Canada has implemented so far- specifically visitor shuttles, reservation services, and paid parking- have reduced volumes by 23% since 2019.

For context, it is worth noting that the world's, the country's, and, importantly, Calgary's populations have increased during this time. Calgary alone has grown by 16% over the last decade.

Understanding this context and how the population of the Calgary area and areas within a driveable distance directly impact the Mountain Parks is important as this group is most likely to use personal vehicles to access the Parks. New Canadians also have a free pass to access the parks, which could also have an impact.

Visitation and Conservation

Some conservationists are concerned that tourism and visitor numbers come at the expense of ecological integrity. AMPPE believes that while this could be true without proper management, tourism can drive improved conservation. The Mountain Parks themselves were created because of tourism.

The connection between visitation and nature is hard to overstate. Given the many ways tourism businesses depend on the natural world, it is undeniable that nature-positive tourism is not only a moral imperative but also a commercial one. When nature suffers, so does tourism. This mutual dependency has evolved into mutual support and care.

When managed sustainably, tourism can significantly benefit the environment. One primary way it can do so is by generating funds that support conservation efforts. Entrance fees, eco-tourism and adventure activities, and voluntary contributions from visitors can be channelled into conservation activities such as protecting endangered species and restoring habitats. For instance, in many African countries, the revenue from safari tourism helps fund anti-poaching units and wildlife conservation programs.

Moreover, tourism can raise environmental awareness among visitors and communities. By experiencing the natural world firsthand, tourists often gain a greater appreciation for the need to protect it. With more funding, the educational programs and interpretive centres in our national parks and other nearby tourist destinations could go even further in producing programs to inform visitors about local ecosystems, wildlife, and the importance of sustainable practices. For example, the Galápagos Islands have stringent visitor regulations and extensive educational programs that help tourists understand the delicate balance of the island's ecosystems and the need for their protection.

Sustainable tourism should promote the development and implementation of environmentally friendly infrastructure. Eco-lodges, renewable energy sources, and waste management systems are often established to accommodate eco-conscious travellers. These practices not only reduce tourism's environmental footprint but can also serve as models for local communities. The use of solar panels in eco-resorts in Costa Rica, for instance, has inspired broader adoption of renewable energy in nearby areas.

If Mountain Park businesses could obtain permits or be incentivized to invest in efficiency upgrades, the carbon caused by tourism would be offset. Furthermore, these upgrades would communicate the pride and care we take in our parks.

Overall, sustainable tourism, with its emphasis on conservation, education, and sustainable practices, can play a pivotal role in protecting and enhancing the environment. By generating funds for conservation, raising awareness, promoting eco-friendly infrastructure, and incentivizing



the preservation of natural landscapes, tourism can be a powerful tool for environmental stewardship.

The tourism sector's reliance on nature and expertise in creating inspiring and memorable experiences means it is ideally placed to be a guardian of nature.

Values and Key Attributes

The key attributes and values of the Lake Louise area as identified by Parks Canada:

- **A wide variety of recreational opportunities:** The Lake Louise area is a premier destination that provides many recreational experiences. Visitors stroll alongside glacial lakes, hike through golden larches, paddle through mountain lakes, and climb peaks in the backcountry. There are options for groups of all sizes and abilities.
- **Outstanding viewscapes:** World-renowned views of turquoise lakes, glaciers, mountain peaks and golden larches attract amateur and professional photographers from around the world.
- **Vital wildlife corridors:** The Fairview and Whitehorn wildlife corridors provide critical habitat for large carnivores to travel through the area to find mates and food. Grizzly bears, wolves, and lynx are a few of the species that use these corridors.
- **Alpine and subalpine ecosystems:** Ecosystems contain lakes, meadows, forest, and habitat for sensitive species. The area is home to a wide variety of plants and animals, including sensitive species such as grizzly bear, wolverine, whitebark pine, little brown myotis, barn swallow, and western toad.
- **Culturally significant area for Indigenous peoples:** The Lake Louise area lands and waters have been used for millennia by Indigenous peoples for sustenance, ceremony, trade, and travel.

AMPPE agrees that these are indeed key values and attributes of the Lake Louise Area but urges Parks Canada also to include the following:

- **Internationally renowned mountaineering objectives and unique mountain culture:** (From the Chateau Lake Louise website) In 1899, professional mountain guides were introduced to the Canadian Rockies and for more than 50 years, The Fairmont Chateau Lake Louise's Swiss guides taught thousands how to hike and climb. The legacy lives on with its certified Mountain Heritage Program.
- **World-class visitor services:** The Lake Louise area is home to numerous options for accommodations, including the historic Chateau Lake Louise, centres for activities such

as the Lake Louise ski resort and Summer Gondola, and some of the most well-trained mountain guides in the world. Indeed this is an attribute.

Key Issues

The key issues identified to support the need behind this Visitor Use Management (VUM) plan consultation centre on reduced visitor experience, problems with facilities and operations, ecological degradation and increased visitor safety issues. The root cause of these issues is a lack of adequate investment in our parks for both operations and infrastructure.

Congestion

The congestion issues around the Lake Louise area are well documented. The Expert Panel on Moving People Sustainably Within the Banff Bow Valley states,

“At Lake Louise, for example, there has been a 71% increase in traffic volume over the past decade. This has led to significant congestion issues. Parking lots at Moraine Lake and Lake Louise are often full by 7 am from June to September. Motorists will circle the parking lots and drive up and down Lake Louise Drive, hoping to secure a spot eventually. This has also led to the proliferation of parking along roadways leading to popular destinations, further negatively impacting the ecological areas along roadways and contributing to roadway traffic congestion. This causes great frustration for visitors, produces GHG emissions, and poor porosity for wildlife moving through the area.

The panel report recommends several actions that could be undertaken to improve the situation. So far, the Panel recommendations implemented by Parks have led to a 23% reduction in private vehicle use. Given adequate investment, Parks Canada has indicated a willingness to implement more recommendations from the report. Sadly, Parks has little control over its budget allocations.

Parks Canada has, though, undertaken many positive steps towards managing issues in the Lake Louise area, but, as the Expert Panel report also points out, the implementation of these measures was in isolation of a broader framework to address the transportation and mobility issues within the park which limited their effectiveness at resolving the underlying congestion issues.

Infrastructure and Investment are the solution

Having proper infrastructure is the easiest way to manage visitors' behaviour and is key to encouraging human-wildlife coexistence. The issues identified by Parks Canada, such as cleanliness of facilities line ups and difficulty with trip planning, would also be improved with investment.

Despite rising visitation, Parks Canada's operational budget has remained mostly static despite increased park usage. As Parks Canada points out, maintaining its operations and facilities is increasingly more expensive.

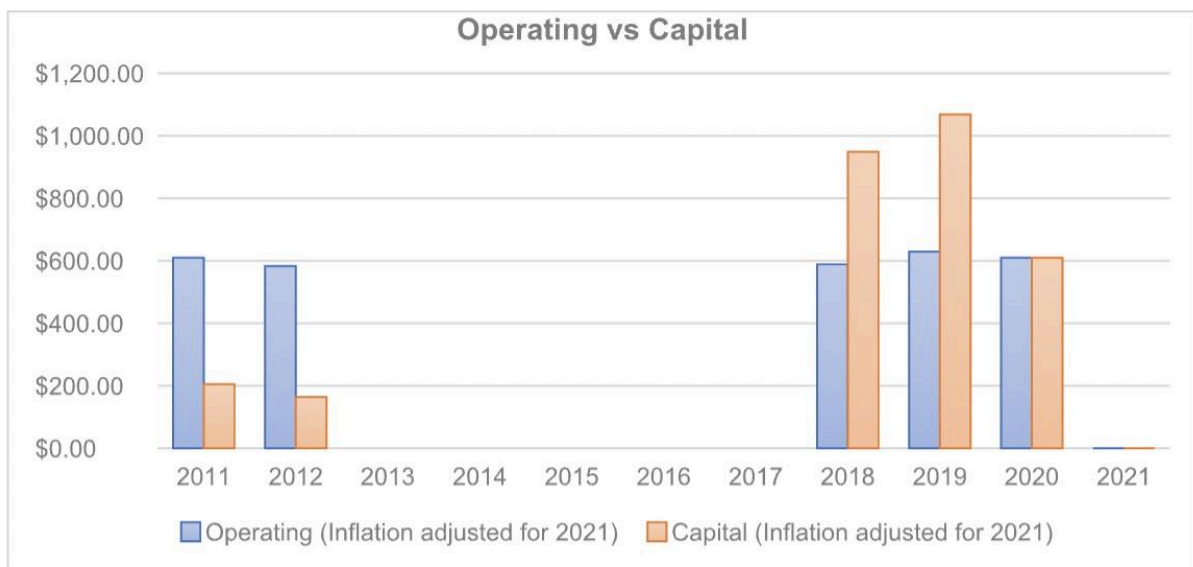


Figure 2

It is relevant to note that Moraine Lake has only two bathroom stalls. Many visitors have become interested in sunrise photography. Commercial operators have indicated that there are often 200-400 people at Lake Moraine for sunrise- many of them have travelled to the location after having their morning coffee- yet there are only two stalls. Commercial operators have indicated a willingness to contribute financially towards bathrooms as this is a source of numerous guest complaints. The two stalls require near-constant cleaning to keep up with their use.

Draft desired conditions

AMPPE participated in the 2023 consultation that resulted in these draft desired conditions. While Parks Canada has done a good job of summarizing most of the key points brought up at the session, it is worth noting that Banff Lake Louise Tourism (BLLT) has created a 10-year vision for tourism titled Lead Tourism for Good. Lead Tourism for Good incorporates the views of over 2000 local people and organizations and provides community-generated guiding principles to focus activities related to tourism in the Parks. This vision has a larger scope and should be considered in terms of desired conditions.

<https://www.banfflakelouise.com/lead-tourism-for-good>

“We must lead tourism for the good of people and park. This means developing and inspiring new and meaningful ways to enjoy this place and leave it even better than it is now. It means continuously changing and adapting tourism for good because, in a place which is proudly 97% wilderness, we must be wildly innovative within the limits of the remaining 3%. It means collaboratively creating a future where Indigenous Peoples and businesses are present and thriving within the park. It means championing an industry and community that is welcoming, safe and inclusive for those living, working and playing here. A future where this awe-inspiring place continues to be shared in transformative ways that bring out the best in each of us and inspires stewardship in all of us – and in generations to come.”

Visitor Experience

The desired conditions compiled for the visitor experience section of the draft are on the right track but could be clarified regarding what visitor experience means.

One definition of visitor experience is, “A visitor’s experience refers to an individual’s subjective evaluation of their **feelings** towards events related to their visitor activities, from planning, being at the destination, and recollecting the trip. Factors such as authenticity, social and emotional value, behavior of other tourists, comparison with standards, and social and physical encounters contribute to the perceived value of the experience”-*adapted from several sources*

The draft desired conditions do not contain statements that refer to a visitor’s feelings.

Suggested additions:

- Visiting the Lake Louise area fills both visitors and locals with a sense of pride and responsibility. They are moved to want to protect this special place.
- Visitors feel welcome in Lake Louise. They are moved to protect and preserve the park and its living, natural and cultural legacy through true-to-place experiences.
- The history of the Lake Louise area as a premier mountaineering destination is respected and revered. Stories and first-hand accounts of adventure and exploration fill visitors with a sense of adventure.
- Park stakeholders understand commercial operators' reliance on nature and take advantage of this expert knowledge when designing public experiences

*Note the term, *'Guided commercial operator' seems to have a negative connotation; Referencing guided or unguided visitors would be less leading.

Natural and Cultural Resources

Parks engagement documents provide instruction on interpreting the desired condition statements, saying they “ describe how the Lake Louise area will look, feel, sound, and function in an ideal future. They focus on what the area should be like rather than how to achieve the vision.”

The statements below, however, don't align with this directive. The statements below both offer suggestions on HOW the desired condition would be achieved.:

- "Wary carnivores like grizzly bears have areas to live and feed without being disturbed by humans. These secure habitats are maintained or improved by carefully managing visitor use." and "The health of the Fairview and Whitehorn wildlife corridors is not further compromised by human activity. Wildlife movement through both corridors is supported BY limiting human activity during sensitive periods, traffic mitigation efforts, and wildlife crossing structures.

- The statement, Trail sightlines and visitor use areas are maintained could be more aspirational. It could be written to clarify the purpose of trail sight lines. For example, trail sightlines reduce blind spots and improve wildlife cover.

Suggested addition:

- Science and data collected in the Lake Louise area are shared freely with visitors and stakeholders to increase their knowledge and to make informed decisions on Parks matters.

Park Infrastructure

As mentioned earlier in this document, appropriate, modern infrastructure would significantly improve most of the issues identified in the Lake Louise area.

Suggested additions:

- The facilities and operations in the Lake Louise area reflect pride of place and inspire and educate visitors to steward similar facilities in their home countries.
- Facilities and operations convey a commitment to efficiency and function and are in themselves a source of pride.
- Facilities surpass the latest resilience and climate change science standards using the latest technology and, where possible, alternative energy sources.
- Parks Canada permitting, reservation systems, and communications are seamless, transparent, accessible and efficient. These efficient processes enable operators to focus on delivering authentic, true-to-place experiences and services.
- Parks Canada's corporate culture embodies a welcoming mindset, with staff who are enthused, healthy, and excited about sharing these special places.
- Parks Canada is funded at a rate proportional to its visitation, so it has the tools and staff it requires for the work to be done.
- Parks Canada has clear indicators for each section in this framework and reports on the progress towards achieving these conditions annually.

- Parks Canada’s exceptional use of technology and high-quality infrastructure makes it easy for visitors and stakeholders to access information, plan trips, and make informed decisions about their behaviours and choices.

Visitor Safety

Suggested addition:

- Up-to-date information is always available to residents and travellers through various sources, including digital and traditional methods.

Proposed goals for Getting around the Lake Louise area

Parks Canada’s documentation notes that “Banff National Park saw 4.28 million visits in 2023/24, the busiest year on record.

It is worth noting that visitation has increased in the Park at a similar rate to population growth and immigration rates in Canada, particularly in Calgary. Calgary’s population alone has grown over 16% during the same period, and visitation in Lake Louise by 31%.

Lake Louise is not alone in looking to find solutions to manage visitors. Many jurisdictions are creating and employing Visitor Use Management (VUM) strategies. Zion National Park, which attracts about 5 million annual visitors in an area one-sixth the size of Banff National Park, is investing fees and revenues collected from the area into improved visitor facilities. This is a page that publicly lists some of the improvements that have been made with park revenues. (<https://www.nps.gov/zion/learn/management/yourdollarsatwork.htm>). We understand that fees collected are used in the park, but this type of transparency goes far in explaining the system and building trust between constituencies.

According to Zion’s website, “Millions of visitors enjoy Zion every year. As visitation grows, the National Park Service is working to upgrade infrastructure, protect natural resources, expand accessibility, and elevate your experience at Zion. Your fee dollars are an important part of accomplishing those goals. About 80% of the fees we collect are invested directly into projects across Zion. The other 20% are shared with national parks across the United States that do not collect fees.”

Alternate Transportation

Some US parks are finding new ways to move visitors around that are less impactful on the environment. While AMPPE remains a champion for active travel where possible here are some examples of alternate travel being used elsewhere:



- Yellowstone National Park uses electric driverless shuttles to move visitors around the park.
- Gondolas are used in areas across Europe. Gondolas are highly versatile mass transit solutions that provide fast, reliable, safe, fully accessible and cost-effective transportation into even the most geographically challenging areas. Depending on the design, Gondolas can accommodate between 4,000 to 6,000 passengers per hour per direction. One gondola system can transport the same number of people per hour as 2,000 cars or 100 buses.

Infrastructure funding allocation

In contrast to Zion National Park, infrastructure dollars in the mountain parks are allocated differently. For example, of the most recent infrastructure fund, all seven Mountain National Parks received only 12.5% of the \$557 million fund.

In January 2023, the federal government announced funding for upgrades to Lake Louise Road in Banff National Park. The enhancements were initially announced to accommodate improvements for transit infrastructure, private vehicles and cyclists. Unfortunately, the funds allocated for this project were only half of what is needed to complete the desired project scope.

Parks Canada cited engineering challenges that would cause the project cost to nearly double. So, after 25 years of trying to get a short piece of road repaved in one of Canada's busiest parks we will get a repair, but the opportunity to add lanes for active travel and emergency vehicles has passed.

The Rocky Mountain National Parks welcome 60% of all of Parks Canada's visitors annually and generate 50% of Parks Canada's revenues. However, they have received less than 20% of Parks Canada's project funding over the last decade. As noted in the most recent funding allocation for infrastructure, that amount has dropped to 12.5%.

Distributing visitors over time and space has been used in other areas. Parks Canada has done an admirable job inventorying high-value habitats and managing ecological integrity. Looking at and inventorying less valuable areas where new trails would have less impact could be developed to ease the pressure on these pinch points. We know that less than 3% of BNP has been 'developed'

It should be noted that though the scope of this plan focuses on specific areas, traffic flows and behaviours begin before visitors arrive and are also affected by what happens in other areas of the parks, the region and perhaps even the world. While the world's population, the country, and, most importantly, the country- Calgary- increases, visitors are concentrated in fewer areas of the

small part of the park that is not deemed a wilderness area. I am not suggesting changing that ratio necessarily, but pose the question about less 'valuable' habitat.

The Expert Panel on Moving People Sustainably in the Banff Bow Valley has offered several potential solutions for the congestion in the Lake Louise area. The ones that the LLKY Field unit has employed so far have greatly reduced traffic flows.

From the People moving strategy:

- Key strategy 1 -Reduce private vehicle arrivals
- Key strategy 2 - Create mobility hubs
- Key strategy 3 - Improve & diversify public transportation options
- Key strategy 4 - Develop & encourage active transportation
- Key strategy 5 - Create a comprehensive and unified transportation service
- Key strategy 6 - Develop partnerships with stakeholders & Indigenous Peoples
- Key strategy 7 - Use pricing as a tool to influence behaviour
- Key strategy 8 - Better understand visitor experience & transportation use