

Minster Barry Penner
British Columbia Ministry of Environment

Valhalla Wilderness Society (VWS)
New Denver British Columbia

Re: Commentary on the MacMillan Provincial Park Safety Enhancement Project

To Minister Penner:

25 November 2005

On Friday, 10 November 2005, your Ministry posted scientific reports and other information about the proposed parking lot at Cathedral Grove (MacMillan Provincial Park). It invited the public to 1) "comment on the park values that are important to them"; and 2) "review the various studies, maps and options that have been developed to address the parking situation." The deadline for submissions is December 9, only one month away.

VWS welcomes this opportunity, but a month is not enough time for our members and the public-at-large to learn about it, read all the materials provided, and send in a submission. In view of the very short time frame, we are rushing this letter to you as part one of the VWS input. It will:

- 1) Summarize VWS's review of the information;
- 2) Request additional options and reports to be made available for public review immediately;
- 3) Request that your Ministry immediately stop preparations for a parking lot and initiate a Master Plan process.

Part two of this submission, which will be sent a little later, will review the reports in detail.

This dispute has involved protesters occupying the park for many months to stop the Ministry from logging a significant area of forest from a tiny park that was created specifically to protect rare coastal temperate rainforest, including some of the rarest and most magnificent big trees in the world. The Ministry of Water, Land and Air Protection sought to have the protesters removed by filing a lawsuit against them and applying to the BC Supreme Court for an injunction. The court turned down the application.

The matter in contention has been not so much where to build a parking lot, but whether to build one at all. Many visitors and those who view the park in photographs online are not only reacting to the majesty and astounding stature of the trees; they are stunned and angry at the scenes of wanton excess and butchery on the surrounding clearcuts; many express pain and shock at how small a remnant has been left for them, for wildlife, for the trees themselves. As evidence of this, see the Swedish website, www.cathedralgrove.se.

The impacts of the logging upon the park have been huge. They include serious hydrological impacts and windthrow. The Roosevelt Elk, a blue-listed species in BC dependent upon diverse forest cover including old-growth forest, has dwindled down to a small remnant herd. Little wonder many park supporters have expressed zero tolerance of further impacts in the name of human convenience, human safety, or human profit.

VWS is located in a village of 500 people on a highway transportation route for logging trucks and chip trucks. All this traffic has to slow down approaching the town and stop at a stop light. We see

no reason why a slower speed limit and a stop sign could not be put up at Cathedral Grove. This should be offered as an option for review.

None of the reports your Ministry has posted on the internet is an actual ecological impact assessment. They involve comparing the impacts of one parking lot site versus another, or else they evaluate the potential impacts of windthrow, flooding, etc upon visitor safety and the facilities your Ministry has proposed to build; or else they consider the impacts upon the big trees without consideration of the overall ecosystem upon which the big trees depend.

Surprisingly, there is no assessment from a professional biologist on the impacts to the Roosevelt Elk population. Your Ministry actually has an excellent report on Roosevelt Elk, ("Status of Roosevelt Elk in British Columbia," Quayle and Brunt, MWLAP, Wildlife Bulletin No. B-106 Mar. 2003.) We found it at www.bibpurl.oclc/web/6792.

This report portrays the Roosevelt Elk as a subspecies which is globally unique. There are only about 3,600 left in BC. Scientists say clearcut logging is one of the major causes for its decline. Much of their habitat in the area of Cathedral Grove has already been logged. Yet it appears the Ministry has not commissioned an assessment of the status of this particular herd, its usage of the park, and how the parking lot might contribute to the destruction of its habitat.

It has been thirteen years since this park had a master planning process. Master plans are supposed to be renewed every five years. A master plan process would consider the total ecological context of the park, and start with using real public process to create a vision for the park. It would air all of these powerful issues and provide the public ample time to consider the evidence and form an opinion.

Your invitation to the public to comment upon park values is greatly appreciated. This conflict will continue to spread from park to park if the government does not address the problem at Cathedral Grove at its root level. The problem is rooted in provincial policy, and changes in policy have opened up a wide gulf between the public and the government on the issue of park values.

In November, 2003 the Park Act was changed to clearly allow "resort" and "lodge" development in BC parks.

In 2004 the government developed the BC Parks Lodge Strategy to open provincial parks to numerous, potentially large, luxury lodges to be built by private investors. The government will aggressively promote lodge sites to development corporations at home and abroad.

In July of 2004, the Provincial Park Boundary Adjustment Policy was approved. This document says that the Ministry of Water, Land and Air Protection will consider removing portions of parks to accommodate developments that would violate the Park Act. So far as VWS is aware, there was no public input on this policy.

According to one of the leaked documents related to the Park Lodge Strategy, there are plans to rewrite the Park Act by 2007, apparently to bring it in line with the concept of huge commercial tourism development in our park system.

There has been widespread public protest of these policies. There has been a blockade at Cathedral Grove, a court case that the government lost at Grohman Narrows; the intervention of the Ktunaxa Nation at Columbia Lake; and great controversy surrounding preparations to offer Valhalla Park to international development corporations as a site for one or more lodges.

This part one of the VWS input is being written on November 11 - Remembrance Day. There is a great intensity of appreciation of democracy on this day. There is a remembrance of the profound danger to the world posed by governments that exceed their rightful balance of power by evading, then outright breaking, and finally rewriting the laws that protect the public interest.

Democracy is alive and well in BC in some ways today. But for many people who have paid taxes, worked, and perhaps even struggled for years to protect British Columbia's parks, our park system has been submerged in Night and Fog. As always, when the public is no longer able to scrutinize or participate adequately in the management of public affairs, we may be sure that the public interest will suffer grave injury. Along with this submission, we wish you every success in restoring the light of democracy which, in its past illumination, built our provincial park system.

Sincerely,
Anne Sherrod
Chair, Valhalla Wilderness Society