

The Honourable Leona Aglukkaq
Minister of Environment, Government of Canada

June 4 2015

Dear Minister Aglukkaq,

We the undersigned, former senior Parks Canada Managers, are writing to you to lodge our opposition to the proposed building of the **Never Forgotten National Memorial** in Cape Breton Highlands National Park.

As you know, the National Parks Act requires you as the Minister responsible for Parks Canada to assure that all decisions affecting a national park consider the Park's ecological integrity as the first priority. Furthermore, any proposed developments in a national park must be for the purpose of enhancing ecological integrity of the Park and not for the sake of development. It is clear that the proposed "Mother Canada" statue for Cape Breton Highlands National Park will not enhance ecological integrity and the proposed associated facilities that include parking lots and an interpretive facility will only further impact the Park. We are very much opposed to the proposed location of this large memorial statue with associated parking, restaurant and interpretive centre. It is not only inappropriate in a national park it is in violation of the site's Wilderness Zone designation as detailed in the Management Plan for the Park. To be sure, if developers can obtain stakeholder and public support to put up this memorial in other locations they can do so without our objection. In Nova Scotia, there is no shortage of sites that can accommodate such a project. Green Cove is not one of them.

We are also concerned about the shortcomings of the process being used to assess this project. Parks Canada is renowned worldwide for its open consultation processes. Remarkably, in this instance there does not appear to have been any significant public consultation prior to the announcement. This one project seems to be on a fast-track despite the lack of broad based public support. It certainly gives the appearance that decisions are being imposed on Parks Canada in opposition to its governing legislation and policies.

Specifically, the National Parks Act provides you direction on consultation. Accordingly, the Minister shall, where applicable, provide opportunities for public participation at the national, regional and local levels, including participation by aboriginal organizations, bodies established under land claims agreements and representatives of park communities, in the development of parks policy and regulations, the establishment of parks, the formulation of management plans, land use planning and development in relation to park communities and any other matters that the Minister considers relevant.

Given that this proposed memorial is for fallen soldiers from all across Canada and that National Parks are dedicated to all Canadians, we recommend strongly that consultation be undertaken at multiple scales, including local, provincial, and federal.

The current Detailed Impact Analysis process fails to achieve this and is too limited in scope.

The following have signed on to this note of opposition:

Tom Lee (former CEO Parks Canada), Nikita Lopoukhine (former Director General, National Parks and Chair Emeritus World Commission on Protected Areas), Bruce Amos (former Director General, National Parks), Michael Porter (former Director General, National Parks), Mike Fay (former FAO, Parks Canada), Carol Whitfield (former Field Unit Superintendent Cape Breton), Tim Reynolds (former CBH Park Superintendent), Ken East (former Field Unit Superintendent, Central Ontario), Tom Kovacs (former Director, Natural Resources Conservation Branch), Tim Sookocheff (former Director, Park Establishment Branch), Steve Langdon (former Field Unit Superintendent Vancouver Island), Pierre Lessard (former Superintendent LaMauricie NP), Dave Warner (former Superintendent, St. Lawrence Islands National Park), Norm Ruttan (former Superintendent Thousand Islands National Park), Clément Bédard (Ancien directeur de la Réserve de parc national de l'Archipel de Mingan et de la Réserve du parc national d'Ayuittuq), Raymond Alegre (Ancien Directeur, Gestion du Portefeuille des Investissements), George Ingram (former Director, Policy, National Historic Sites), Neil Munro (former Science Advisor, Atlantic Region), Gary Sealey (former Director Visitor Activities), Claude Mondor (former Chief - Area Identification, Parks System Planning Branch), David Welch (former Head, Environmental Quality), Arthur Hoole (former Head, National Park Planning, Prairie Region), Ron Hamilton (former Chief Park Warden), George Mercer (former Assistant Chief Park Warden for CBHNP), Ross Dobson (former CBHNP Interpreter), Gary Lindfield (Former Chief, Cooperative Activities), Doug Hodgins (former Project Manager, Policy and Legislation Branch), Bert Crossman (former, Natural Resources Officer and former President of PIPS)

cc: CPAWS Nova Scotia, Alan Latourelle, Mark Keyling, Rodger Cuzner, Chronicle Herald