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Off Limits: How Radical Environmentalists are Stealing Canada’s National Parks

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Contents

Executive Summary 3
Introduction 5
Ideology: Trends in Wilderness Conservation 10
Policy 22
Process 34
Politics 39
Alternatives 47
Conclusion 51
Appendix A 53
Bibliography 54
About the Authors 58



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Executive Summary

Banff in the Balance: Radical Environmentalism in Parks Canada Policy

Over the past decade, Banff has become the centre of the debate over the future of Canada's national parks policy. Environmentalists have consistently clashed with community planners and commercial interests asserting that the multiple-use philosophy that inspired the establishment of Canada's first national park is now imperiling it. As restrictions on access to, and activities within, Banff National Park continue to add up, this *Public Policy Source* seeks to investigate the growing influence of radical environmentalism on Parks Canada policy. We will document how:

- Policy debate continues to focus on the commercial and recreational activities such as downhill skiing, golf, and tourist activities in the Banff townsite despite the fact that less than four percent of the park has ever been open to them. This crisis rhetoric does not reflect the positive increase in Canada's protected areas network over the past decade (38 million hectares); rather, it reflects the "moving targets" of environmentalist campaigns.
- The environmentalist agenda has expanded its attention from saving species to saving spaces through "rewilding schemes" such as the Wildlands Project, Y2Y (Yellowstone to Yukon), and A2A (Algonquin to Adirondacks). As Banff is considered part of the "critical link" of the Y2Y initiative, environmentalists have devoted significant resources to phasing development out of Banff. The social and economic consequences of such radical schemes are severe, but policy-makers are responding favourably to such projects. The Ecological Integrity Panel cited Y2Y as part of "the new paradigm of protected areas."
- The "ecosystem approach" adopted by Parks Canada is an extremely problematic management philosophy because of the fact that ecosystems are not, in fact, concrete systems, but mental constructs ("geographic free-for-alls"). For instance, the Greater Yellowstone ecosystem has been estimated to cover anywhere from 5 to 19 million acres, depending on who's defining it.
- The "top-down theory" that asserts that large carnivores serve a special role in regulating ecosystems lacks widespread support within the scientific community. Nonetheless, environmentalists have made the grizzly bear the rallying symbol in their public advocacy campaigns. Their cause is advanced by the research and policy-making efforts of "independent" projects such as the Eastern Slopes Grizzly Bear Project (ESGBP), whose Parks Canada representative "ultimately became the main author of the park management plan." Such "mission-oriented" science projects are guided by the unique blend of science, ideology, and activism characteristic of contemporary environmentalism.
- By providing grants and establishing community funding (or "animation") programs to support the lobbying and research efforts of environmental groups, government is tilting the playing field in the debate over park policy towards the agendas of special interests.
- The Banff-Bow Valley Study (BBVS) released in 1996 painted a dark future for the park by warning that "Commercial interests will ease out spiritual values, to the detriment and creativity of the nation." However, the reliability of the predictive models is question-

able, and the paucity of social science evidence casts doubt on the study's conclusions. For example, despite relying on estimated rates of visitation ranging from 3 to 6 percent, the actual rates of visitation since have resulted in close to a cumulative 1 percent drop (this drop amounts to over 13 percent if one discounts the anomalous surge in attendance in 1994-95).

- The Panel on Outlying Commercial Accommodation (OCA) was established in 1998 to review guidelines for OCAs and ski areas in the mountain parks. Again adopting the round table process, the constructive efforts of Parks Canada to draft new ski area guidelines in conjunction with ski area operators were rejected by environmentalists in their entirety. Instead, the Panel heard suggestions that "When a ski area's lease runs out, shut the things down, yank the equipment, raze the buildings and reclaim the access road."
- The Ecological Integrity (EI) Panel review (which released its final report last March) was billed as a participatory process, although a review of the organization affiliations of the individuals invited to participate in the Panel's workshops (as well as the composition of the Panel and secretariat themselves) reveal that environmentalists, park professionals, and scientists clearly outnumber other interested stake holders. The relative influence of environmentalists is reflected in the final report of the Panel, which concluded that Parks Canada had "no dual mandate" to oversee both protection and use.

- Parks Canada has commissioned policy review studies that have debated such questionable projects as the extermination of all non-native species of wildlife and vegetation; raising or burying the Trans-Canada Highway; returning golf courses to "pristine montane conditions"; and having downhill skiing declared and "inappropriate activity," or at the very least, having it classified as a "non-conforming use." Several of these projects are already under way.
- Environmental groups are now poised to gain added clout as a result of the expanded human resource potential of the new Parks Canada Agency, whose very creation reflects the use of organizational redesign as a policy instrument. Lamenting a "green ceiling" within the organization, the EI Panel recommended transforming the parks agency into an advocacy organization.

A centralized approach to policy-making, including environmental policy, provides an inviting target for small, highly focused and aggrieved groups. In order to be able to afford sustaining a national park system guided by sound science (estimated by the EI Panel to require \$28 million per year in additional funding) and management, new revenue generation mechanisms are going to be needed. User fees, environmental entrepreneurship, and private stewardship all allow market mechanisms naturally to protect the scarcity of Canada's parks and wilderness.

Introduction

Banff: A Place for Wilderness and Tourism

The image that Alberta presents to the world is tied closely to the Rocky Mountain parks. The province is home to the four major mountain parks of Canada. This fact has given Albertans a unique opportunity to enjoy them, because they are nearby, as well as a special responsibility to promote policies to ensure that the parks will be there for future generations to experience. This double purpose, or dual mandate, the responsible protection of current and future use and enjoyment, is in fact the responsibility of all Canadians. Indeed, it is expressed explicitly in section 4 of the National Parks Act (1930), the chief legal document that defines the purpose of the parks: "Parks are hereby dedicated to the people of Canada for their benefit, education and enjoyment, subject to the provisions of this Act and Regulations, and such Parks shall be maintained and made use of so as to leave them unimpaired for the enjoyment of future generations."¹ A sound public policy regarding the nation's national parks, and especially regarding Banff National Park, contemplates a balance between preservation of the natural assets of the park "unimpaired for the enjoyment of future generations" and use of the parks for the "benefit, education and enjoyment" of Canadians today. Such a balance has never been achieved easily.

Banff's dual mandate: protection and enjoyment

The contradictions in this dual mandate are obvious enough. Tourists come to climb, to ski, to

camp, or perhaps just to gaze at the peaks, the wilderness, and the wildlife. If too many visitors clog the highways or if too many hotels are built on mountain tops, or in valleys, or if too much transportation infrastructure is built, then the natural value of the parks will be compromised. It is a delicate matter to determine how much is too much. Yet, the observation of Rodney Touche made a decade ago still rings true:

The mandate of the authorities governing the national parks is to preserve them for the enjoyment of future generations. Strict preservation is an easy mandate to discharge, requiring only a negative response: no mining, no lumber cutting, no hunting, no construction. Enjoyment poses a harder problem. The area cannot be enjoyed by many people if, because of its size, it is mainly inaccessible and if there is nowhere to stay or eat or refuel one's car. And so some development has always been allowed.²

In recent years, as we shall see, wilderness conservation has been replaced by what may be called "restoration" to a condition that proponents believe is emphatically natural. This is an ambitious project, and a "negative reaction" to economic activity is merely a first step.

The current success of the exclusively preservationist (or, indeed, the "restorationist") agenda is indicated by the widespread acceptance of the opinion that the two elements of the mandate of Parks Canada are incompatible. According to the preservationists, the alternatives are stark: either protection or enjoyment, but not both. One of the

1 *An Act Respecting National Parks*, RSC 1930, c. 33.

2 Rodney Touche, *Brown Cows, Sacred Cows: A True Story of Lake Louise* (Hanna, Gorman, 1990), 101.

purposes of this *Public Policy Source* is to examine the origin and significance of this view.

Whatever its origin, the dichotomy of protection and enjoyment has been widely accepted. A recent Angus Reid poll, for example, reported that “Albertans pick wilderness over tourism.”³ A closer look at the questions asked in this poll, however, reveals that respondents were called upon to choose between two mutually exclusive propositions: “that National Parks are about tourism and recreation,” or “that National Parks are about protection.”⁴ Now, any pollster worth his salt can design a questionnaire so that the results, to a greater or lesser degree, can be anticipated. Faced with such a choice, it is perhaps not surprising that 65 percent of respondents chose protection, 22 percent chose tourism and recreation, while only 13 percent saw a place for both “competing goals.” It is not self-evident that preservation and enjoyment are mutually exclusive, as the Angus Reid question assumed. The notion that the parks should be preserved in order to be enjoyed was evidently too subtle for Angus Reid to consider.

Generally speaking, when complex public policy issues are framed as simplistic black or white alternatives, the resulting discussions are neither balanced nor prudent. On the contrary, they are polarized from the start, and even more polarizing in their effects. As a consequence, the very terms of the discussion are contested, resulting in confusion, not clarity.

Ecological integrity: A mandate to destroy?

Much of the confusion over current parks policy stems from the language adopted over the course of a cumulative policy review process initiated by the federal government with the appointment of the Banff-Bow Valley Task Force in 1994. Reflecting recent trends in the wilderness conservation movement, ostensibly scientific discourse has been turned into highly charged political rhetoric in order to redefine the basic assumptions and pa-

rameters of parks policy. Specifically, the overriding consideration is to evaluate the impact of activities in the parks on what is called their “ecological integrity.” No one would in principle argue against a common sense understanding of ecological integrity, or EI as it is called by Parks Canada officials and environmentalist groups. Obviously, preservation of the integrity—the wholeness and soundness—of the ecology—the natural environment—must be an important priority in

park management. In fact, however, the effective meaning of EI is far from clear. As a technical term, a term of art, as the lawyers say, it has been used to promote everything from the common sense meaning of environmental stewardship, to a most unusual and basic restructuring of the mountain parks, especially Banff National Park.

In the name of ecological integrity, it has, for instance, been proposed that Moraine Lake, the image of which used to grace the back of the \$20 bill,

In the name of ecological integrity, it has been proposed that Moraine Lake, the image of which used to grace the back of the \$20 bill, be either bombed or poisoned so as to eradicate all non-native fish species, described as “biological pollutants” by one prominent ecologist.

3 Joe Woodard, “Albertans Pick Wilderness Over Tourism,” *Calgary Herald* (19 August 2000), p. B1.

4 Angus Reid, “Albertans Views on Development in National Parks,” Media Release (18 August 2000).

be either bombed or poisoned so as to eradicate all non-native fish species, described as “biological pollutants” by one prominent ecologist.⁵ Science projects already under way at the less well known Bighorn Lake are just as astonishing. There are trout in Bighorn Lake today, but according to EI advocates, once upon a time there were none.⁶ Ecological integrity today apparently requires that the existing fish be exterminated and the lake returned to pristine sterility. Bighorn Lake, a few miles from the Banff townsite, is a popular destination for hikers with fishing poles. It seems a curious policy of wildlife management that requires the extinction of wildlife.

Likewise, parks policy reviews have recommended that the lawns and ornamental gardens

in front of Chateau Lake Louise, as well as “foreign” grasses at more remote outlying commercial accommodations (OCAs), be dug up and replaced with “native vegetation.”⁷ Bird feeders in the town of Banff have been outlawed.⁸ A recent transportation workshop put on by Parks Canada in Banff heard suggestions that the Trans-Canada Highway and the main line of the CPR be buried, or raised onto concrete stilts, because they are said to interfere with the movement of wildlife, including birds.⁹ It has repeatedly been argued by environmentalists that downhill or alpine skiing be declared an “inappropriate activity,” and prohibited.¹⁰ Likewise, it has been deemed that “golf is an activity that is unwarranted in national parks on both ethical and ecological grounds.”¹¹

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- 5 David Schindler, “Biological and Chemical Pollutants in Aquatic Ecosystems of Banff National Park,” lecture given at the University of Calgary, 8 February 2000. See also Jill Mahoney, “Critics Blast Plan to Kill off Banff Fish,” *Globe and Mail* (29 July 2000), p. A1; Barry Cooper, “Banff May See a Lake Bombed Yet,” *National Post* (7 Jan. 2000), p. A18. Subsequently bombing was ruled out by Parks Canada.
- 6 Brian R. Parker and David W. Schindler, “Square Hooks For Exotic Brooks: Experimental Gillnet Removal of Brook Trout From Bighorn Lake, Banff National Park,” *Research Links* 8, no. 2 (Summer/Autumn 2000), p. 1. In this article, Parker and Schindler describe the experimental gillnet removal of brook trout that began in July 1997. Applying electric shocks to the shoreline waters in an attempt to kill juvenile fish was attempted, but was discontinued because it proved ineffective. Looking ahead to future projects, they conclude that “If the restoration of larger lakes is proposed, alternate methods of fish removal including, but not limited to, electroshocking, trapnetting, destroying spawning grounds, lake drawdown and/or the application of piscicides should be given consideration to, or in replacement of, gillnets.” Parker and Schindler, p. 7. In his Calgary lecture Prof. Schindler allowed that it is sometimes necessary to keep science out of the public eye to do it effectively. See also Parks Canada, *Banff National Park Management Plan* (Ottawa, ON: Minister of Public Works and Government Services Canada, 1997), pp. 17-20.
- 7 Parks Canada Agency, *Unimpaired For Future Generations? Conserving Ecological Integrity With Canada’s National Parks*, vol. II, “Setting a New Direction For Canada’s National Parks,” Report of the Panel on Ecological Integrity (Jacques Gu erin *et al.*) (Ottawa, ON: Parks Canada, 2000), pp. 12-10.
- 8 Shelley Knapp, “Banff in a Flap Over Bird Law,” *Calgary Herald* (28 May 2000), p. A4.
- 9 Candace Savage, “A Highway Runs Through It,” *Canadian Geographic* (July/August 2000), pp. 35-42. See also, Parks Canada, *Banff National Park Wildlife Transportation Workshop*, Report of the Workshop, Banff, AB, 8-9 Feb. 2000. For a study of the effect on birds, see Colleen Cassidy St. Clair and Wayne McDonald, “Experimental Approaches to the Study of Transportation Barriers in BNP: A Research Perspective From Small Mammals and Birds,” in Parks Canada, *Banff National Park Wildlife Transportation Workshop*.
- 10 Round Table Submission to OCA Panel Review of *Draft Guidelines for the Development and Operation of Ski Areas in Banff and Jasper National Parks* (16-18 Dec. 1998). Parks Canada’s official policy on downhill skiing is ambiguous. There can be no redevelopment or expansion of existing operations but skiing nevertheless has a place in the parks—for now. This policy is highly uncertain because the Ecological Integrity Panel (see below) discussed having downhill skiing managed as a “non-conforming use.” They added that “if non-conforming facilities become economically non-viable, no longer popular, or are determined to have undue impacts on ecological integrity, Parks Canada should take steps to permanently remove them from the parks.” See Parks Canada Agency, *Unimpaired...* vol. II, pp. 11-9.

Many of these proposals come not from the independent advocacy of small, quirky environmental fringe groups, but from government-sponsored external research efforts, encouraged as part of the federal government's resolve to impose what they call an "ecosystem approach" on park management. For many of the scientists and activists advocating this new approach, the goal of ecological integrity denotes more than environmental protection: it requires a restoration or "rewilding" of "natural ecosystems," including the phasing out of development and the end of all "anomalous activities." One result has been a large number of trail closures and other restrictions on human access to the parks. These administrative actions by Parks Canada officials are routinely justified in terms of ecological integrity, preserving ecosystems, and the need to maintain wildlife corridors. The \$2.4 million Banff-Bow Valley Study (BBVS), completed in 1996, has likewise been cited as justification for many of these administrative and regulatory measures.

Parks policy restricts enjoyment of park

Parks policy has tended towards ever-greater restriction on enjoyment in order to promote ever-greater preservation. With the completion of reports of the Parks Canada Panels on Outlying Commercial Accommodations (OCAs) in 1999, and on Ecological Integrity (EI) in 2000, this policy trend has been emphatically affirmed. Bolstered by the scientific discourse that established benchmarks in the BBVS, and aided by the legal advice of the Sierra Legal Defence Fund, the EI

Panel has reinterpreted Parks Canada's historic dedication both to visitor use, and to park protection. Thus according to the Panel, "a proper reading of the National Parks Act of 1930 reveals that... there was no dual mandate." Rather, ecological integrity was the one and only goal.¹² Such a revision of the plain language of the Act calls into question the legitimacy of the general process by which parks policy is made, and in particular it

Applying electric shocks to the shoreline waters in an attempt to kill juvenile fish was attempted, but was discontinued because it proved ineffective.

raises the issue of informed public involvement. Since new guidelines for outlying commercial accommodations and ski areas are to be settled within the parameters of the EI Panel conclusions, the economic impact of the revised understanding of ecological integrity is bound to be significant. Moreover, these same assumptions are also bound to establish the context of future amendments to the National Parks Act as well as of future changes to regulations and interpretive guidelines made by Parks Canada under the terms of the Act.

Prudent observers acknowledge the importance of wildlife biology in formulating parks policy. There has, however, been very little critical analysis of the assumptions guiding the discourse about ecological integrity. Instead, much of the discussion has focused on the ethical and political significance of such commercial and recreational activities as downhill skiing, golf, and tourist activities in the Banff townsite. Yet hardly four per cent of Banff National Park has ever been available for such activities.¹³ Moreover, even the Angus Reid poll showed that two out of three respondents were in favour of existing ski hill devel-

11 Parks Canada Agency, *Unimpaired...* vol. II, pp. 11-5.

12 Parks Canada Agency, *Unimpaired...* vol. II, pp. 2-5.

13 Author's correspondence with Greg Kingdon, Parks Canada Agency (11 Sept. 2000).

opment. In contrast, only one in five respondents thought there was “too much” ski hill development, which is the position that has consistently been advocated by environmental preservationists in all recent major policy reviews. At the same time, ski hill area and OCA operators in and around Banff have maintained that they do not want *more* but *better* development within their current lease areas. There has been very little discussion about what better development means, which may be no surprise if the governing assumption is that *any* development is bad.

The aggressiveness of the environmental lobby and their unwillingness to compromise on these matters are clear indications of an ideological commitment, as distinct from a policy position about which reasonable people may disagree and debate. The grave defect of ideological argument, of course, is that it prevents dispassionate analysis, reasonable conversation, reasoned disagreement, and accommodation of divergent interests through prudent compromise. If conviction and commitment result in increasingly narrow policy choices, then it grows ever more difficult to bring alternative perspectives into the discussion. This clearly constricts the political space left for rational and balanced debate. Elizabeth May, executive director of the Sierra Club of Canada, and former advisor to federal Environment Minister Tom Macmillan, expressed this perspective eloquently: “I have never believed that environmental groups should compromise.”¹⁴ To the extent that such an attitude characterizes environmental preservationists and restorationists, and to the extent it influences the development and application of policy by Parks Canada, sound

management of the parks in response to the dual mandate of protection and enjoyment becomes highly questionable.

Moreover, such a pre-established position makes any effort towards a conciliatory approach to policy-making more difficult and ends up compromising the integrity of the whole process. Debate over the future of the park turns into a debate about the integrity of a

value system, or ideology, not the biological integrity of the park or the need for long-term stewardship. In this way, as we shall see, a common sense understanding of ecological integrity is transfigured into a vision of pre-Columbian or perhaps pre-lapsarian innocence. This process entails a major revision of what constitutes an acceptable standard of human use and enjoyment as well as a redefinition of the purpose of Canada’s national parks.

Alternative perspectives and voices

We begin with an examination of recent trends in the discussion of wilderness conservation by analyzing a distinct blend of values, activism, and science that gives the contemporary environmentalist agenda its ideological (or perhaps its religious) dimension. Rather than balancing environmental concerns with other social and economic interests, ideologically inspired environmentalists advocate an “ecocentric ethic” that defines policy questions in terms of absolute and unquestionable environmental ideals. We will see that the policy review process that began with the Banff-Bow Valley Task Force in 1994, and that culminated in October 2000 with a series of amendments

“I have never believed that environmental groups should compromise.”

—Elizabeth May, executive director
of the Sierra Club of Canada

14 Elizabeth May, “Notes From the Executive Director,” *Scan: Sierra Club Activist News* 1, no. 4 (Fall 1999), p. 2.

to the National Parks Act (Bill C-27), has relied on scientific discourse to tilt the policy field in favour of a very narrow but well articulated and well funded coalition of ideological interests.

After discussing the implications of the current approach to parks policy, we will present a number of alternative perspectives and voices that might help to reopen the conversation between those who seek to enjoy the parks by protecting them and those whose commitment to doctrines of “ecological integrity” seem to imply an end to, or at least a drastic reduction of, use by human visitors. As the principle of “ecological integrity” is increasingly used as a rhetorical device to justify the restoration of large tracts of public and private land to conditions of what advocates consider to be a pristine pre-Columbian wilderness, the social and economic costs of the new management approach are frequently ignored. Rather than relying solely on centralized command and control approaches to formulating

environmental policy, based on a largely unexamined scientific discourse, innovative and constructive alternatives exist that would permit market mechanisms to protect the scarcity and natural value of Canada’s wild places.

Banff has the potential to become a model of balance in conservation policy. By documenting how the focus of ideologically-inspired environmental restorationists have narrowed the policy agenda of Parks Canada in the Banff area, this *Public Policy Source* aims to separate the rhetoric from the reality in order to re-assess both new and traditional approaches to wilderness conservation. In order to plan for a healthy and sustainable future, a strategy that will reconcile human needs with environmental protection is an obvious desideratum. Serious discussion of a balanced public policy regarding Canada’s national parks is rendered difficult, not to say impossible, so long as wilderness protection and human enjoyment are assumed to be mutually exclusive.¹⁵

Ideology: Trends in Wilderness Conservation

Conservation

The wilderness conservation movement has changed greatly since 1885, when some 26 square kilometres on the north slope of Sulphur Mountain, Alberta, were declared protected Crown lands and legally designated for public use. In 1883 two workers employed in the construction of the Canadian Pacific Railway discovered the sulphur-laced hot water that subsequently became the Cave and Basin Hot Springs, the initial space that eventually grew into Banff National Park. Information about the discovery of the hot springs and an appreciation of its obvious tourist

appeal spread quickly through the ranks of the railway workers. Several among them with entrepreneurial flair addressed proposals to the Minister of the Interior in whose gift the disposition of the lands lay. He decided not to grant private title but determined that the Crown would retain control for the beneficial enjoyment of all Canadians.

In 1886 the land was surveyed and the boundaries of the Hot Springs Reserve were defined. The Dominion Lands Commissioner reported that “a large tract of country lying outside the original reservation presented features of the greatest beauty, and was admirably adapted for a national

¹⁵ The proposed national round table to discuss parks policy with 80 select stakeholder representatives, originally scheduled for mid-November 2000, has been postponed until spring 2001, because of the federal election.

park." In April 1887, a bill to establish a national park was introduced to the House of Commons, and on 23 June, 1887, the Rocky Mountains Park Act was passed. Over the next few years five additional mountain parks were created. From the start, therefore, an intergenerational obligation to preserve wilderness was bound to the prudent and sustainable use of natural resources for the benefit and enjoyment of all Canadians.

It is perhaps worth emphasizing again that the mountain parks were established to fulfil and actualize a double purpose, namely *protection and use*. The logic was obvious: in order to be enjoyed by future generations, the land had to be protected. It was to be protected in order to be enjoyed. It was assumed as a matter of course that there would be a balance established between social purposes, the most basic of which was wilderness preservation; economic development would ensure that the "benefit, education and enjoyment" contemplated in the 1930 *Parks Act* might become a reality. Recreational facilities and capital investments were undertaken to ensure that recreation, use, and enjoyment would be possible. In short, because it was intended from the beginning to make Banff a tourist destination, the famous CP Hotels were built, and the ski hills and the back-country trails were created. Because of contemporary revision of the initial purposes of the mountain national parks, it is important to recall that a multiple use strategy is not an anomaly, but was what inspired the creation of Banff National Park in the first place.

Early private investment ensured park success

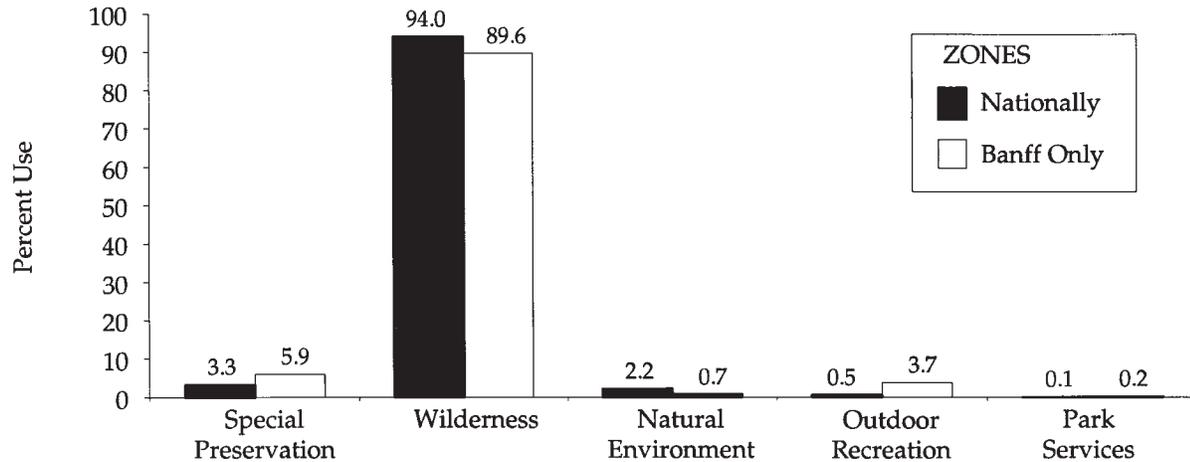
Initially, the entrepreneurial vision of the CPR was needed to prompt the Dominion government

to create the Hot Springs Reserve. Before the CPR lay down the track and built the first hotels to accommodate visitors from Canada and abroad, few people had an opportunity to experience the spectacular beauty of this wilderness area. As Dennis Duffy recently reminded *Globe and Mail* readers, the Dominion government was reluctant to establish a nature preserve because of the cost. "A park in Banff," he wrote, "made sense if a way could be found to make it pay for its own upkeep."¹⁶ The concessions that the CPR paid to Ottawa in order to introduce tourist facilities into the Rockies could, the government reasoned, help support its upkeep, and thus make the park possible. Today, the Banff Springs Hotel, Chateau Lake Louise, and Jasper Park Lodge are among the country's most architecturally significant and well-used heritage facilities. From those modest historic origins, Canada's national system of protected areas now stretches over 224,266 square kilometres, covering about 2 percent of Canada's land mass. The province of Alberta is a special guardian of Canada's wilderness: the 69,500 square kilometres protected in the province represents over ten-and-a-half percent of its area.¹⁷

The symbolic and substantive value of wilderness to Canadians is reflected in the steady increase in amount of reserve lands set aside by both federal and provincial governments.¹⁸ Voluntary private stewardship programs like those organized by the Nature Conservancy and Ducks Unlimited have also contributed significantly to this progress.¹⁹ These represent significant increases over the course of a decade, reflecting growing environmental awareness on the part of both politicians and private individuals. Banff itself has grown from the original 26 square kilometres set aside around the hot springs, to cover 6,641 square kilometres today. Three provincial

16 Dennis Duffy, "How a Park Was Won," *Globe and Mail* (20 May 2000), p. B12.

17 Federal Provincial Parks Council, *Working Together: Parks and Protected Areas in Canada* (Oct. 2000). Available at www.parkscanada.gc.ca/Library/fppc/english/index_e.htm.

Figure 1: Land Use in Canadian National Parks

Source: Parks Canada, "Land Use Zoning."

Available at: http://parkscanada.pch.gc.ca/natress/inf_pa1/ECO_DES/ZONING/LAN_USEE.HTM

parcs, one wilderness park, four wilderness areas, and three Canadian heritage rivers also afford the region special protection.

Park zoning

The Banff region of the Rocky Mountains has become a large, ecologically distinct, and highly regulated space. The area within the national park, for example, is regulated by strict zoning laws. Each of Canada's national parks are designated into five zones (figure 1):

1. *Special preservation.* (3.25%) Motorized access and circulation is prohibited in these areas.
2. *Wilderness.* (94.01%) Human interference is kept to a minimum in these areas. Outdoor
3. *Natural environment.* (2.16%) Open to outdoor recreation requiring minimal services. Facilities must be of a "rustic nature." Controlled motorized access is allowed, although public transit is preferred. Park management plans may define provisions for terminating or limiting private motorized access.
4. *Outdoor recreation.* (0.48%) A broad range of activities, services, and facilities directly accessible by motorized vehicles. Park management plans may define provisions for limiting private motorized access and circulation.

18 In the past 10 years alone, more than 38 million hectares were added to Canada's parks and protected areas network, achieved through the designation of more than 1,000 new protected areas. This is nearly double what it was in 1989. World Wildlife Fund Canada, "Milestones Achieved But Government's Promises to Protect Canada's Wilderness Still Fall Short," News Release (6 July 2000). See also Federal Provincial Parks Council, *Working Together: Parks and Protected Areas in Canada* (Oct. 2000).

19 See Laura Jones, Laura Griggs, and Liv Fredericksen, "Environmental Indicators," 4th edition, *Fraser Institute Critical Issues Bulletin*, (Vancouver: Fraser Institute, 2000), p. 47.

5. *Park services.* (0.09%) National park communities containing a concentration of visitor services and support facilities. Specific activities, services, and facilities are defined and directed by a community planning process. Major park operations and administration are based here.²⁰

Increasingly stringent rules also limit residency in the park to people providing services to park visitors. In this historic and legislative context, it is worth noting from the start that critics who have so strongly opposed commercial and recreational activities in Banff are focusing their concerns on a relatively small area of the park that is available to human use. We will see, however, that they have made some highly imaginative arguments to expand their focus from the Banff townsite and recreational ski hills to a very much larger area.

Whatever the basic strategy of wilderness advocates may turn out to be, it is unquestionably true that much of the debate over national park policy has in fact focused on the municipal planning for the town of Banff and its surrounding areas. Moreover, the perspective advanced in the Banff-Bow Valley Study and in subsequent reviews, consultations, and reports has sought to implement a public land use policy that reflected the private agendas of a narrow understanding of the purpose of national parks. According to the BBVS, for example, “Commercial interests will ease out aesthetic and spiritual values, to the detriment of the creativity of the nation.”²¹ This is a large, even a grandiose claim, presented without

supporting argument and without a coherent account of what these alleged “spiritual values” are or how they may be connected to “the creativity of the nation,” which is itself a surpassingly obscure notion. Moreover, it is difficult to see what these undefined “values” and national creativity have to do with sound land use and wildlife management policies. As we shall argue in the following section, such opinions and evocations reflect a reinterpretation and reconfiguration of parks policy and of the mandate of Parks Canada through the lens of a novel and highly contentious environmental paradigm.

Preservation

The early conservationism that gave Canada and the United States their first national parks can be contrasted with the preservationism of John Muir, founder of the Sierra Club. Muir believed that nature preserved from forestry, grazing, and other development activities would allow people to “enrich their own little ongoings with Nature... [by] washing off sins and cobwebs of the devil’s spinning... [through] getting in touch with the nerves of Mother Earth.”²² This highly metaphorical, even sacramental language, which has come to typify much of the preservationist rhetoric today, inspired the “wilderness movement” of the 1930s, with Aldo Leopold and other biologists emphasizing the “intrinsic value of self-willed nature,” opposing predator control in order to protect what they called “charismatic” species.²³ Subscribing to the belief that modern social values (the “commercial interests” identified by the

20 Parks Canada, “Land Use Zoning.” Available at http://www.parkscanada.pch.gc.ca/natress/inf_pa1/eco_des/zoning/lan_u_see.html.

21 Banff-Bow Valley Study, *Banff-Bow Valley: At the Crossroads*, Summary Report of the Banff-Bow Valley Task Force (Robert Page *et al.*), Prepared for the Honourable Sheila Copps, Minister of Canadian Heritage (Ottawa, ON: 1996), p. 31.

22 Quoted in Allen K. Fitzsimmons, *Defending Illusions: Federal Protection of Ecosystems* (Lanham, MD: Rowman & Littlefield Publishers, 1999), p. 4.

23 Michael Soulé and Reed Noss, “Rewilding and Biodiversity: Complementary Goals for Continental Conservation,” *Wild Earth* 8, no. 3 (Fall 1998), p. 20.

BBVS), were harmful to natural environmental harmony, the language and goals of the early preservationist movement informed the more radical “deep ecology” notions Arne Naess developed during the 1970s. Rejecting the multiple use principle that had characterized park policy, contemporary preservationists frequently appeal to an “ecocentric” paradigm derived from Naess, Leopold, and Muir that challenges man’s privileged position in the natural world. Historically speaking, human beings have developed a rich variety of interpretations of nature, of human nature, and of the relationship between human and natural beings. It is certainly intelligible enough that a utilitarian and technological approach to nature as a resource should help inspire a romantic alternative.²⁴ However legitimate it may be for anyone to seek for, and perhaps find, divine inspiration or other spiritual comforts in the experience, rather than balancing human needs alongside the importance of environmental protection, the (usually capitalized) Earth must now come first, in a reversal of modern social priorities. According to Peter Lee of the World Wildlife Fund (WWF), the task of organizations such as his is one of “changing, even if in a small way, today’s dominant social paradigms.”²⁵ The new paradigm contests the traditional human-centred understanding of public policy-making, and casts the discussion in a rhetoric of rights, most of which are understood to be self-evident and non-negotiable. Thus, for example, human rights are held to be no higher than the “rights” of nature. Monte Hummel, President of the WWF, de-

clared: “I believe nature has rights, natural systems have rights...”²⁶ One can certainly acknowledge the right of Monte Hummel or of anyone else to hold whatever eccentric beliefs they wish in exactly the same way that people can pronounce lakes, rivers, mountains, and caves to be sacred. The question of concern in this analysis, however, is that some of these eccentric opinions, which may or may not be held by individual environmentalists, do not provide a sound foundation for the development and implementation of sensible public policy concerning Canada’s national parks. We will see that efforts to formulate a coherent parks policy on the basis of a kind of mystic ecocentrism introduces several additional and unnecessary constraints.

Defining the issues: science or spiritualism?

More than idiosyncratic spiritual beliefs and eccentric opinions are involved in the modern preservationist agenda. The adoption of bureaucratically-centralized land use management policy and the discourse of new conservation science have also advanced preservationist goals. In the United States for example, the 1964 Wilderness Act began by defining wilderness into existence.²⁷ By designating wilderness as a general category of land capable of receiving blanket legal protection, environmental activists were at a stroke capable of taking broad offensive action without the bother of dealing with smaller, already legally defined areas.²⁸ Thus, the cam-

24 See Barry Cooper, *Action Into Nature: An Essay on the Meaning of Technology* (Notre Dame: University of Notre Dame Press, 1991), ch. 9.

25 Peter G. Lee, “Back From Chaos,” in Arlene J. Kwasniak ed., *A Legacy of Land: Conservation Easements and Land Stewardship*, Proceedings for a conference held in Edmonton, AB, 18-19 June 1998 (Edmonton, AB: Environmental Law Center: 1999), p. 49.

26 Farley Mowat, *Rescue the Earth! Conversations With the Green Crusaders* (Toronto: McClelland and Stewart, 1990), p. 35. See also Roderick Nash, *The Rights of Nature: A History of Environmental Ethics* (Madison: University of Wisconsin Press, 1988); and Joel Schwartz, “The Rights of Nature and the Death of God,” *Public Interest* no. 97 (Fall 1989), pp. 3-15. Christopher D. Stone and Lawrence H. Tribe have explored the idea of representing nature in courts of law.

27 Alston Chase, *Playing God in Yellowstone: The Destruction of America’s First National Park* (New York: The Atlantic Monthly Press, 1986), p. 45.

campaign to preserve the “old-growth” forests of the American northwest from logging during the mid-1980s shows how efforts at broad scale legislated preservation of large tracts of land can be significantly enhanced by cultivating allies in the scientific community.

The key to the success of the campaign, which centred around the spotted owl in much the same way that today’s campaign to restrict human use and activity in Banff focuses on the grizzly bear and the wolf, lay in establishing a large area of protected habitat. Alston Chase has described how the Sierra

Legal Defence Fund (SLDF) enlisted demographer Russell Lande to help establish a scientific rationale for greater spotted owl protection. The environmental activist put the demographer in touch with scholars who could produce data for a novel theory, called “island biogeography,” that argued how a species could become extinct if its habitat were not spread over a wide, connected region. The SLDF helped to find peer reviewers willing to write supportive letters.²⁹ While it is important that public policy for protected areas be based on sound science, there is an obvious danger in reversing the process and soliciting “science” in support of a preferred policy. Scientific discourse, unlike politics, is in principle not about compromise.

Biodiversity crisis

The rhetoric and imagery of crisis has also been used to mobilize popular and political sup-

port for wilderness preservation. Despite evidence of conservationist success, the rhetoric of environmental crisis and the warnings of impending biological catastrophe have continued

without let or hindrance.

The WWF, for example, has issued annual report cards to both federal and provincial governments since the launch of the Endangered Spaces campaign (a joint initiative with the Canadian Parks and Wilderness Society, CPAWS), grading them on their progress in fulfilling the WWF understanding of governmental commitments to “completing” Canada’s park system.

All levels of government

have systematically scored poorly, despite the steady increase in reserved and protected lands. Alberta, with the third most protected lands of all the provinces, has been judged particularly harshly. Since 1992, the Sierra Club of Canada has also taken to publishing annual environmental report cards, judging, among other things, government commitment to biodiversity protection. Again, the reviews have been consistently negative.

The nature of this alleged crisis is further complicated by an absence of agreement within the scientific community (far less policy-makers) as to how to measure the “biodiversity” that is supposed to be in crisis. There is disagreement about what constitutes a species; there is disagreement about how to count species (however defined) within an ecosystem (which is also an ambiguous concept); and there is disagreement about measuring species per area, in multiple or overlapping

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28 Ron Arnold, *Ecology Wars: Environmentalism as if People Mattered* (Bellevue, Washington: The Free Enterprise Press, 1987).

29 Chase, *In a Dark Wood*, pp. 244-60.

ecosystems.³⁰ In other words, the fundamental and unresolved problems associated with biological classification—the absence of any consensus on cataloguing species—and measurement—the absence of consensus on estimating their numbers—allow preservationists to make extravagant claims.

The sixth great extinction

Notwithstanding the scientific ambiguity of the concept of species, it has been used in a rhetorically charged way to evoke the threat of a “sixth great extinction,” which is now said to be under way, and which is the first to be caused by “unnatural” human activity.³¹ In a speech at the 35th Anniversary dinner for the Canadian Parks and Wilderness Society, for example, former president Harvey Locke warned that “until humanity embraces Nature as something more than an object of greed, we will inflict on this Earth an extinction event equivalent to the death of the dinosaurs.”³² Dave Foreman, former Earth First! president (and currently the chairman of the Wildlands Project), has described how, based on “disturbing anecdotes and bits of data,” E.O. Wilson and others have used fossil records to calculate the current rate of extinction, and concluded that one-third of all species on Earth could

become extinct in 40 years.³³ This is but one of many alarming projections of biological extinctions. The wide range of the estimates, however, undermines their predictive merit and persuasiveness. For example, Wilson estimated that current rates of species extinction are between 1,000 and 10,000 times that which existed before human intervention; Jessica Hellmann estimates that 10,000 species go extinct per year; Jeffrey McNeely of the World Conservation Union estimates between 50,000 to 100,000 species may disappear each year; Robert May projects an annual extinction rate of 75,000 per year.³⁴ However, without an accurate or comprehensive catalogue of species with respect either to name or to number, it is difficult to determine the rate of their disappearance. Despite his own dire predictions, in 1992 E.O. Wilson admitted that the very concept of species “has serious flaws.”³⁵

In spite of these grave predictions, it is broadly accepted in the scientific community that extinction itself is a natural process.

Over 99 percent of species that have ever existed have become extinct; five mass extinctions have been recorded, the most recent occurring about 65 million years ago.³⁶ Wading through the litany of

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30 Fitzsimmons, *Defending Illusions*, p. 97.

31 The Wildlands Project, “‘Sixth Great Extinction’ eliminating plants, animals at alarming rate,” *Fact Sheet* received in TWP information package. See also Dave Foreman, “From Scenery to Nature,” in J. Bairds Callicott and Michael P. Nelson, eds. *The Great New Wilderness Debate* (Athens, Georgia: University of Georgia Press, 1998), p. 573.

32 Harvey Locke, “Wilderness and Spirituality,” speech to the CPAWS 35th Anniversary Dinner (19 Nov. 1998). Available at <http://www.cpaws.org/wildatheart/hlocke-wilderness-spirituality.html>. Reprinted in part in the *Calgary Herald* (16 January 1999), p. H6.

33 Dave Foreman, “From Scenery to Nature,” p. 573.

34 Ronald Bailey, *Earth Report 2000: Revisiting the True State of the Planet* (New York: McGraw-Hill, 2000), p. 208.

35 Fitzsimmons, *Defending Illusions*, p. 98.

ambiguous definitions concerning species, spaces, and the diversity of each, one thing becomes clear: today's apparent crisis exists more within the universe of rhetoric than in reality.

From species to spaces

If policy-makers strongly and fervently believe there is a biodiversity crisis, the fragile scientific basis for it is not likely to concern them. Policies established in a crisis atmosphere, however, are likely to bear the attributes of their origin. In addition to domestic sources advertising a growing peril to "endangered species," an increasing number of international organizations and agreements devoted to environmental problems have also contributed to the problem. The report of the World Commission on Environment and Development (the Brundtland Commission) of 1987, for instance, had such an effect. The Brundtland Report has become a landmark study, frequently cited by environmentalists and policy-makers alike. Thus, the suggestion of the Report that the nearly 4 percent of the Earth's land area then being managed for explicit purposes of species and ecosystem conservation be tripled, became the basis for the World Wildlife Fund Canada's 1989 Endangered Spaces campaign.

The goal of the campaign was to establish a network of protected areas of "at least 12 percent of the lands and waters of Canada" by the year 2000.³⁷ The figure of 12 percent was officially adopted as public policy in 1992, when the Cana-

dian Tri-Council (of Canadian Council of Ministers of the Environment, Canadian Parks Ministers Council, and Wildlife Ministers Council of Canada) signed "A Statement of Commitment to Complete Canada's Networks of Protected Areas." Provincial governments have also agreed to this strategy, as evident in initiatives such as Alberta's Special Places 2000 program.

Moving goal posts

Whatever the scientific merit of the 12 percent figure, if governments accepted it and worked towards it, that would constitute a major achievement for environmentalists for which they might claim credit. In-

stead of claiming a political victory, however, the environmentalist lobby moved the goal posts. Thus, Monte Hummel and Arlin Hackman of the WWF "clarified" what was called the "12 percent fixation" at the halfway point of their campaign. They argued that the figure of 12 percent was never intended as a specific target or ceiling, but rather it identified a bare minimum that governments must meet.³⁸ It now turned out that the real goal was to protect 100 percent of Canada's natural regions. As with the scientific controversy over what constitutes a species, there is no consensus on what a "natural region" might be. The absence of a uniform system of classification, however, is no barrier to strident advocacy. According to Hummel and Hackman, Canada had 453 natural regions, of which only 18 (a mere 4 percent) were protected. In fact, the number of "natural regions" has increased over the years

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36 Laura Jones, "Crying Wolf? Public Policy on Endangered Species in Canada," *Fraser Institute Critical Issues Bulletin* (Vancouver: Fraser Institute, 1999), note 12, p. 52.

37 Monte Hummel and Arlin Hackman, "Introduction," in Monte Hummel ed., *Protecting Canada's Endangered Spaces: An Owners Manual* (Toronto: Key Porter Books, 1995), p. xiii.

38 Hummel and Hackman, p. xiii.

making it even more difficult to protect an “adequate” percentage of them. Thus it was by the standard of a “moving target”³⁹ that Alberta recently scored an “F” for improving only 1.56 percent in the past five years, despite the fact that Alberta already had 10.6 percent of the province protected.⁴⁰ This is well above the national average of 6.6 percent.⁴¹

In Canada, the WWF campaign indicates that the preferred policy response among environmentalists is no longer so limited as an endangered species act. In order to protect biodiversity, legislated protection for endangered spaces is necessary. With an ecosystem approach to land management, governed by moving targets and shifting boundaries, the preservation of what are called natural systems and processes would ensure the protection and conservation of individual species within it. It would address multiple levels of biological diversity—“from genes to the entire biosphere. Otherwise we might miss something.”⁴² In Canada, recent debate over proposed Species at Risk Act (SARA) also draws attention to the broadening of the agenda to the protection of spaces, rather than species. The chief concern among environmentalists today is that the existing legislation does not provide mandatory protection for the habitat of species considered endangered. Opponents of SARA, such as farmers and ranchers in the prairie west, are con-

cerned that their livelihoods are endangered far more than any wildlife that shares their land. SARA died on the order paper when the 2000 federal election was called.

In some respects, American legislation provides a model and a warning for Canadians. There, the Northern Rockies Ecosystem Protection Act (NREPA) is perhaps the most persistent attempt to achieve a bioregional central land management regime.⁴³ Encompassing highly flexible concepts such as species viability, connectivity, and reserve system design, it proposes to link together over 16 million acres of federal roadless land by means of connecting corridors. Supported by environmental groups such as Greenpeace and the Sierra Club, the bill was first introduced in Congress in 1992, reintroduced in 1993, and again in 1995. It was most recently brought before Congress in 1997, in an attempt to codify the bioregional strategy advocated by environmental coalitions such as the Wildlands Project.⁴⁴ Driven by the goal of protecting all native life and processes, the strategy contemplates a vast a bioregional network of core reserves, buffer zones, and wilderness corridors between and among them. For Canadian preservationists, these efforts south of the border are models of advocacy, particularly for individuals interested in “rewilding” North America.

39 They acknowledged that the targets are moving, noting that since the beginning of the campaign, Nova Scotia had gone from 9 to 77 natural regions, Alberta from 17 to 20, Yukon from 13 to 23, and British Columbia from 57 to 77 natural regions. Hummel and Hackman, xvii.

40 Lynne Koziy, “World Wildlife Fund Again Gives Alberta Failing Grade,” *Calgary Herald* (7 July 2000), p. B4. World Wildlife Fund Canada, *Endangered Species Progress Report*, no. 9 (1998-1999). Available at www.wwfcanada.org/.

41 Federal Provincial Parks Council, *Working Together*.

42 Reed Noss, “From Endangered Species to Biodiversity,” in Kathryn A. Kohn, ed. *Balancing on the Brink of Extinction: The Endangered Species Act and Lessons for the Future* (Washington: Island Press, 1991), p. 230.

43 See Noss, “From Endangered Species to Biodiversity,” p. 229; and R. Edward Grumbine, *Ghost Bears: Exploring the Biodiversity Crisis* (Washington, DC: Island Press, 1992), p. 120. Grumbine recalls more than three attempts to get a national biodiversity bill passed through Congress. In 1989, the *National Biological Diversity Conservation and Environmental Research Act* would have devoted financial and institutional resources to the conservation of “endangered biological systems.”

44 See <http://www.wildrockies.org/Talus.Campaign/NREPA.nrepa.html>; and Fitzsimmons, *Defending Illusions*, pp. 218-223.

Rewilding

In recent years, the preservationist agenda has not so much changed (for one of the tiers of the rewilding strategy is the establishment of large core areas) as broadened to encompass a growing geographic territory. Adopting an “ecosystem approach,” activists have changed their focus from species to spaces, looking to the field of conservation biology for scientific justification for a wide ranging political agenda. Thus, Reed Noss (former science director of the Wildlands Project) can advocate that conservationists insist “every wild and natural area be saved, and that many degraded areas be restored to viability by closing roads and introducing species.”⁴⁵ Noss is fully aware that he is advocating a political as much as a wildlife project. His demands are unequivocal and his approach is uncompromising: “Wilderness recovery must not be compromised in an effort to appear reasonable; the time for compromise, if ever, was when North America was still a wilderness continent.”⁴⁶ The historical fact that North America has not been a “wilderness continent” since the end of the last ice age some 10,000 years ago does not warrant the notice of those set upon the task of wilderness recovery, rewilding, and wilderness restoration. Their views, in fact, are so far from the original conservationists that they make the preservationists who preceded them look responsible and moderate. Nevertheless, such opinions have inspired the proposals mentioned earlier to poison mountain lakes or elevate the CPR.

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warning for Canadians.**

The political project advocated by Noss and his allies is conventionally called “rewilding.” The creative vision behind the rewilding strategy took shape in 1991, when the Wildlands Project (TWP), was born from an alliance between conservation biologist Michael Soulé and environmental activist Dave Foreman. Currently coordinating 30 projects across North America, TWP also serves as a clearinghouse for information on rewilding projects and planning, as well as providing funding, networking, and technical expertise. Rewilding is essentially a politicized hybrid of several traditional approaches to wilderness conservation. Part theory, part political program, rewilding strategies have three essential components: the establishment of “core reserves,” attention to “keystone species,” and strategies to “connect” the core areas. Michael Soulé and Reed Noss have called these the three C’s: cores (core areas of wilderness, surrounded by specially managed buffered areas), carnivores (the keystone species/predators upon whom the integrity of the ecosystem is said to rest), and connectivity (wilderness corridors linking larger connected areas).⁴⁷ The Wildlands Project claims to have established a new agenda for the conservation movement. No longer is it a question of preserving duck habitat or protecting rare species: the Wilderness Project seeks to “recover” whole ecosystems in every region of North America. Thus, Noss proposed that at least half the land area of 48 contiguous American states be set aside; of this total, 50 percent would be returned to a “wilderness state,” which meant that 25 percent of the lower 48 states would be depopu-

45 Reed F. Noss, “Wilderness Recovery: Thinking Big in Restoration Ecology,” in J. Baird Callicott and Michael P. Nelson, eds. *The Great New Wilderness Debate* (London: The University of Georgia Press, 1998), p. 535.

46 Noss, “Wilderness Recovery,” p. 535.

47 Soulé and Noss, “Rewilding and Biodiversity.”

lated and another 25 percent turned into buffer zones.⁴⁸

To most Canadians (as to most Americans) the vision of TWP looks like nonsense. In fact, however, it is an integral part of a very practical coalition of environmental activists. TWP joins both radical and more mainstream elements in a political program that aims to alter the rules of both public and private land ownership. The Project encourages the private purchase or donation of the land to be rewilded, but the central target of their campaign is government: governments can legislate new core areas of wilderness into existence, or tighten the rules of human use in existing protected areas.⁴⁹ This has clear implications for the existing recreational and visitor activities in the national parks in both Canada and the US that form the “core” of these rewilding strategies. As their website announces, “Business-as-usual will no longer be possible.”⁵⁰

Wildlands project backed by prominent environmentalists

A list of TWP affiliates reads like the Who’s Who of the North American environmental movement in the year 2000: Michael Soulé is science director (replacing Reed Noss); Dave Foreman is chairman; CPAWS’ Harvey Locke is President, while

Mary Granskou (former CPAWS executive director) is also a board member. What unites them is not so much a concern for wildlife conservation as the dream of “the day when grizzlies in Chihuahua have an unbroken connection to grizzlies in Alaska; when grey wolf populations are restored from Durango to Labrador; when vast unbroken forests and flowing plains again thrive and support pre-Columbian populations of plants and animals; when humans dwell with respect, harmony, and affection for the land; when we come to live no longer as strangers and aliens on this continent.”⁵¹ Lest sober Canadians think this kind of rhetoric is the sole province of reckless Americans, the same vision informs the

Yellowstone to Yukon (Y2Y) conservation initiative of which Canada’s mountain parks form the most important core area.

Initiated in 1993, Y2Y is one of the rewilding projects affiliated with the Wildlands Project. Like TWP itself, it claims the support of a large network of environmental groups and private foundations. Federal funding has also been channelled through environmental groups into Y2Y planning efforts, and Canada’s Heritage Minister, who has responsibility for the parks, has expressed approval of the interconnected strategy.⁵² The final report of the Ecological Integ-

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 —Reed Noss (*former science director of the Wildlands Project*)

48 Randy T. Simmons, “Fixing the Endangered Species Act,” in *Breaking the Environment Policy Gridlock* (Stanford: Hoover Institute Press, 1997), p. 83.

49 M.E. Soulé, “An Unflinching Vision: Networks of People Defending Networks of Land,” in D.A. Saunders *et al.*, eds., *Nature Conservation 4: The Role of Networks* (Surrey, Beatty & Sons, 1995), p. 6.

50 See http://www.twp.org/aboutus/the_vision/themeans_content.htm

51 See http://www.twp.org/aboutus/the_vision/ouridea_content.htm.

rity Panel glowingly reviewed the Y2Y initiative as part of “the new paradigm of protected areas.”⁵³ Founded on the notion that this region is “the world’s last best chance to retain a fully functioning mountain ecosystem,” Y2Y aims to recreate a connected wilderness zone stretching across the Rocky Mountains from Northern United States, through Alberta, British Columbia, and the Northwest Territories, to the Yukon. This project covers almost 500,000 square miles of public and private land.

The economic consequences of such environmental mega-projects have only just begun to be addressed by members of the business and resource communities who stand to be most directly affected by the proposals. Governments and the general public have largely failed to recognize, or be informed about the social and economic impact of the project. A few interested parties have noted that Y2Y carries with it large economic costs. The Alberta Chamber of Commerce, for instance, warned that “The addition of any new protected areas in the eastern slopes has the potential to severely impact businesses.”⁵⁴

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Any serious debate on the advisability of Y2Y must take into account the economic impact of the proposal. The assumption of proponents, however, is simply that things will work out. The CPAWS account, for example, holds that “Within that rewoven natural fabric, communities will find new prosperity as they become aware, adjust to, and learn to benefit from, the population and economic changes that are creating ‘the New West.’”⁵⁵ This same sanguine appraisal of rewilding an enormous tract of land some 1,800 miles long is found in the Wilderness Society report by Ray Rasher and Ben Alexander, *The New Challenge: People, Commerce and the Environment in the Yellowstone to Yukon Region*.⁵⁶ The opinion of the Y2Y activists regarding the economic consequences of their proposal was challenged by the Chancellor Partners report, but there has been almost no serious debate about the advisability of the Y2Y initiative.

Rewilding efforts such as Y2Y are not unique to the west, where the presence of North America’s largest parks and protected areas has helped cap-

52 Government of Canada (Hansard) Standing Committee on Energy, Environment and Natural Resources (28 June, 2000).

53 Parks Canada Agency, *Unimpaired...* vol. II, p. 9-2.

54 Alberta Chamber of Commerce, *Approved Policy Book* (2000). Chancellor Partners Management Consultants, *The Potential Economic Impact of the Y2Y Initiative on the Forest Industry and the Economy of British Columbia*. Prepared for the Forest Alliance of British Columbia (October 1998). This report estimated the impact of Y2Y on BC’s timber harvest and associated economic benefits. It projected a direct loss of over 25,000 jobs and an adverse indirect effect on over 80,000 jobs, amounting to about 5 percent of the total economic activity in BC.

55 Canadian Parks and Wilderness Society, “Why the Y2Y?” Available at www.rockies.ca/cpaws/education/new-resources.html.

56 Ray Rasher and Ben Alexander, *The New Challenge: People, Commerce and the Environment in the Yellowstone to Yukon Region* (Washington, DC: Wilderness Society, 1997). See also Ray Rasher and Ben Alexander, “The Changing Economy of Yellowstone to Yukon: Good News for Wild Lands?” *Wild Earth* 10, no. 1 (Spring 2000), p. 99.

ture the imagination and stirred the passions of environmentalists keen to restore what they wrongly believe to be a pre-Columbian natural harmony. Similar initiatives have been spearheaded in more populated parts of central Canada and the US as well. An example is Adirondacks to Algonquin (A2A), modeled and organized by many of the same “co-operators” as the Y2Y initiative. The impetus for A2A came from the Ottawa Valley Chapter of the Canadian Parks and Wilderness Society who were afraid of development pressures from the urban centres of Toronto, Montreal, Ottawa and Kingston. The six million hectares included in A2A plans (three times the size of Prince Edward Island) winds

through dozens of towns and through the heart of eastern Ontario’s cottage country.⁵⁷ Most of the land required to link the parks is privately owned and is located in two different countries. Neither of these factors is considered particularly troubling. Land can be expropriated by changing the law, and as for political boundaries, “the natural system does not recognize these boundaries. To preserve that system, we must look beyond the lines that have been drawn on maps.”⁵⁸ As with all rewilding schemes, A2A has as potentially devastating implications for private property rights and public land use in eastern Canada as Y2Y does in the west.

Policy

Ecosystem management

Despite the fact that the science behind these bioregional approaches to wilderness conservation (as applied in North America to Y2Y, A2A, or other initiatives proposed by the Wildlands Project and its affiliates) remains extremely controversial, advocates are having growing success in influencing the domestic policy agenda. Enlisting sympathetic members of the scientific community to add authority to their visions, rewilding advocates seek to institutionalize their agenda by changing ecological regulations governing land management rather than engage in a political debate about their proposed regulatory regimes. Gaining acceptance of the ecosystem management approach is the first step for advocates. The first step for a policy analyst, how-

ever, is to try to determine what these terms actually mean.

To begin with, “ecosystem management” is an administrative notion that has become loosely tied to the elusive concept of “ecological integrity.” The 1994 Parks Canada Guiding Principles and Operating Procedures defines ecological integrity as “a condition where the structures and functions of an ecosystem are unimpaired by stresses induced by human activity and are likely to persist [unimpaired by human-induced stresses].”⁵⁹ To a reader with common sense, the notion of ecological integrity appears to be a positive and responsible guiding principle. Unfortunately, it is a principle that does not translate easily into substantive and stable public policy.

57 “A-to-A Project Seeks to Link National Parks,” *Globe and Mail* (12 October, 1999). See also “Algonquin to the Adirondacks: Following the Path of the Lynx,” *The Wilderness Activist* (Spring 1998), p. 7.

58 See <http://www.atoa.org/whoarewe.html>.

59 Parks Canada, *Guiding Principles and Operating Procedures* (Ottawa, ON: Minister of Supply and Services Canada, 1994), p. 146.

Defining ecosystems

The grave defect of the ecosystem approach to the realities of nature or of the environment, as with all “systems approaches” to non-fabricated realities, is that there is no non-arbitrary way to measure or define the boundaries of the system. That is, while it is possible to define a telephone system or a missile guidance system, there is no way similarly to define an ecosystem or even a political system. The reason one can define a telephone system is because it was constructed as a system in the first place. Ecosystems, however, do not exist in nature; they exist in human discourse, usually scientific discourse. As geographer Allan Fitzsimmons has noted, “Ecosystems are only mental constructs, not real, discrete, or living things on the landscape... While the ecosystem concept may be helpful as a tool for researchers to better grasp the world around us, it is far too ambiguous to serve as an organizing principle for the application of federal law and policy. As spatial units, ecosystems represent a geographic free-for-all.”⁶⁰ The habit of mistaking the scientific experience of concepts and models of reality for the common sense experience of reality itself is hardly confined to devotees of “ecological integrity,” and “ecosystem management.” This “fallacy of misplaced concreteness,” as Whitehead called it, has been characteristic of the modern understanding of scientific technology. Ignoring this fallacy has become the effective condition for the conduct of contemporary scientific discourse.⁶¹ Thus, when

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—Allan Fitzsimmons, geographer

Y2Y advocates speak so easily of an abstract “region” extending from southern Colorado to the northern Yukon and Alaska, they have no need to specify beforehand just what that region might be: their very words define it.

These self-referential definitions become scientific dogma through the creation of “geographic information systems” (GIS), which are an attempt to mask the ambiguity of the previously noted “geographic free-for-all,” in the apparent precision of a computer model. A GIS combines a mass of spatial data concerning vegetation boundaries and individual species distribution in a computer database, resulting in a model that certainly has every appearance of being scientific. Of course, GIS mapping may or may not be a useful tool in land management and land-use planning. The point to be emphasized, however, is that the integration of data within a GIS is an intellectual or conceptual exercise, not an empirical or descriptive activity. It necessarily involves a process of human abstraction and data manipulation resulting in a deceptive picture of spatial precision that necessarily masks the constant, dynamic forces of real ecological change.⁶² Again, notwithstanding the questionable scientific status of GIS-based maps, they have come to form the basis and rationale for new regulatory regimes, which means that the theoretic precision of GIS mapping is “scientifically” persuasive.

60 Allan K. Fitzsimmons, “Ecosystem Management: An Illusion?” *PERC Reports* 17, no. 5 (December 1999), p. 3.

61 This is, clearly, a large topic. See, however, A.N. Whitehead, *Science in the Modern World* (London: Macmillan, 1925), ch. 4, p. 10. For a fuller account of the issue, see Cooper, *Action into Nature*, ch. 7.

One of the preliminary stages in any rewilding scheme such as Y2Y involves establishing ecological boundaries for proposed core areas, buffer zones, and wildlife corridors. For policy-makers in the Banff area, the ecologically-mapped area of the Central Rocky Ecosystem (CRE) has been the focus of debate. Advocates assert first that a 42,000 square kilometre “ecological unit” exists (covering lands in Alberta, including Banff National Park and Kananaskis Country, and additional land in British Columbia) and that it “has significant but not complete closure.”⁶³ In real estate terms, the land assembly for the CRE is still under way. The open-ended implications of such rhetoric is considered dangerously misleading by geographers and scientists such as Fitzsimmons, Guilio A. De Leo, and Simon Levin (among others), who stress the point that ecological communities are “open, loosely defined assemblages with only weak evolutionary relationships to one another.”⁶⁴ Even ecologists such as Norman Christensen et al., who are supportive of the ecosystem management approach, admit that “there is no single appropriate scale or time frame for management.”⁶⁵ The Greater Yellowstone Ecosystem, for example, has been estimated to cover

anywhere from 5 to 19 million acres, depending on who is defining it.⁶⁶ Despite its underlying conceptual elasticity, the CRE has been presented as if it were a precise and relatively contained area of study; moreover, an emotional charge has been added to the area, which has been evoked as the “critical link in the Yellowstone to Yukon landscape.”⁶⁷ Of course, such classifications may indeed be descriptively helpful, in the same way that a network of roads can be designated the “Yellowhead Route” or the “southern transprovincial,” but they are by no means ecologically definitive.

Costs of ecosystem management not identified

The ecosystem management approach, and the subsidiary notion of ecological integrity (EI), has inspired some of the most controversial proposals for Banff National Park. It is self-evident even to advocates that notions such as ecological integrity do not come without a price. Alleging the existence of negative effects of the Trans-Canada Highway on wildlife mortality and genetic diversity, one EI solution noted above has been to propose to bury or elevate large stretches of the

62 Fitzsimmons, *Defending Illusions*, p. 54. The appeal of systems analysis to intellectuals and bureaucrats alike can hardly be denied. It has led to some unusual alliances and interlocking directorates. For example, the Miistakis Institute for the Rockies (MIR) is a valuable resource for environmental activists and scientists. Co-founded by the Canadian Parks and Wilderness Society, University of Calgary, University of Montana, Glacier National Park, and Waterton National Park, it provides technical support for various regional environmental groups and projects, including assistance in mapping conservation/habitat areas, and in hosting web sites (they have hosted the CPAWS website, for example). The Institute is financially supported by university departments, environmental groups, private foundations, corporations, and government. Among the projects supported by the Institute are the Eastern Slopes Grizzly Bear Project, the World Wildlife Fund Carnivore Conservation Project, and the Yellowstone to Yukon Conservation Initiative. In turn, Dave Poulton (CPAWS) and Brad Robinson (Y2Y) are on its board of directors.

63 Stephen Herrero, P.S. Miller and U.S. Seal, eds., *Population and Habitat Viability Assessment for the Grizzly Bear of the Central Rockies Ecosystem* (Apple Valley, Minnesota: Eastern Slopes Grizzly Bear Project, University of Calgary, and Conservation Breeding Specialist Group, 2000), p. 4.

64 Guilio A. De Leo and Simon Levin, “The Multifaceted Aspects of Ecosystem Integrity,” *Conservation Ecology* [online] 1, no. 1:3 (1997). Available at <http://www.consecol.org/vol1/iss1/art3>; and Fitzsimmons, *Defending Illusions*.

65 Cited in Fitzsimmons, “Ecosystem Management: An Illusion?” p. 5.

66 Fitzsimmons, “Ecosystem Management,” p. 4.

67 Stephen Herrero and Mike Gibeau, “Status of the Eastern Slopes Grizzly Bear Project (ESGBP): May, 1999,” Eastern Slopes Grizzly Bear Project, University of Calgary, Calgary, Alberta, 1999.

highway. The costs of such a venture have been estimated to range between \$20 million and \$130 million per kilometre.⁶⁸ For Jacques Guérin, chair of the Panel on Ecological Integrity, this was a serious suggestion: "A highway on stilts—it sounds crazy, but maybe at some point it will become worth it."⁶⁹ It is perhaps worth pointing out that Guérin did not provide cost estimates or a timeline to indicate when this "crazy" scheme would become "worth it."

More to the point, such a proposal for an enormous capital investment, which "sounds crazy," is based on highly questionable scientific premises, to say nothing of the enormous environmental disruption that constructing the "stilts" to elevate the Trans-Canada Highway would entail. Indeed, much of this sort of advocacy is little more than a kind of romantic projection of human experiences onto poor benighted wildlife. According to Paul Paquet of the Central Rockies Wolf Project (CRWP), for instance, what is involved is a "a quality of life issue for these species. They live right now in an impoverished environment, a wilderness ghetto."⁷⁰ Similar romantic dreaming has likewise motivated the consistent findings of annual studies on wildlife corridors in the Bow Valley, which have consistently advocated the restoration of the Banff Springs Golf Course to "pristine montane conditions."⁷¹

Humans not featured in study

It is also worth noting that since 1995, Parks Canada has annually commissioned researchers affiliated with the Central Rockies Wolf Project to undertake these studies. To outsiders, this action by Parks Canada looks like bureaucratic capture of ostensibly independent research. In any event, marginal attention has been devoted to the study of the quality of life of the existing human population in and around Banff. Moreover, the rhetoric that so easily embraces the notion of "pristine conditions" can do so only by ignoring the very real impact that natives had on the territory that now is part of Banff Park, an impact, incidentally, that most "rewilding" advocates would consider adverse in the extreme.⁷²

The mounting restrictions on human use and enjoyment of the park (apart from the use and enjoyment of the park by wildlife biologists on the Parks Canada payroll) is inversely related to the amount of reserved land needed to accommodate "capacity" populations of wildlife in their "natural" ranges. As indicated above, however, it is highly questionable whether the needs of wild animals can be permanently and objectively measured. The flux of elk population in Banff, for example, has been enormous. Between 1792 and 1872, early explorers reported sighting elk once every 31 days.⁷³ Today, as every visitor to Banff

68 Candace Savage, "A Highway Runs Through It," pp. 35-42. See also Parks Canada, *Banff National Park Wildlife Transportation Workshop*. The cost of a four-lane, 200 metre stretch of elevated roadway has been estimated to be \$12.5 million; to bury the same stretch of road would run over \$23 million. This compares to the almost \$2 million price tag for a wildlife overpass of the same distance.

69 See Alanna Mitchell, "The Park That Shows Banff How its Done," *Globe and Mail* (5 July 1999), p. A1.

70 "Animals at Risk in Banff National Park," *Daily Commercial News* 73, no. 43 (2 March 2000), p. B7.

71 See S. Stevens, C. Callaghan and R. Owchar, *A Survey of Wildlife Corridors in the Bow Valley of Banff National Park, Winter 94/95* (Banff, AB: Callaghan & Associates, 1996); and D. Duke, *Wildlife Corridors Around Developed Areas in Banff National Park, Progress Report, Winter 1997/98* (Banff, AB: Parks Canada, 1999).

72 See, for example, Charles E. Kay, "Aboriginal Overkill: The Role of Native Americans in Structuring Western Ecosystems," *Human Nature* 5, no. 4 (1994), pp. 359-98; much of Kay's work was summarized in a Parks Canada publication, *Research Links* 3, no. 2 (Fall 1995), pp. 20-21.

knows, they can be pests, especially in the town-site.

A recent study of the wildlife corridor around Canmore, commissioned by four regional environmental lobby-groups—CPAWS, the Bow Valley Naturalists, Canadians for Corridors and UTSB Research—suggests that even the best of scientific efforts cannot guarantee properly functioning wildlife corridors.⁷⁴ The study, conducted by Jacob Herrero Environmental Consulting and a (GIS) computer mapping company, concluded that the wildlife corridors designed to allow animals to co-exist with tourist development east of Calgary are a failure. In the meantime, a surge of bear attacks during the summer of 2000 have led Kananaskis (provincial) officials to close all trails and hiking areas in the Canmore Nordic Centre Provincial Park, Ribbon Creek, Wind Valley, the Evan Thomas hiking area and portions of the Bow Valley Wildlands Park.⁷⁵ Environmental groups are now calling for the proposed \$1.5 billion Three Sisters development east of Canmore be re-examined to accommodate a renovation of the corridor.

On the other side of the issue, commercial operators in and around the Banff area rely on Long Range Plans (LRPs) as an element of stability necessary to undertake business plans. Moreover, Parks Canada has said that adhering to these LRPs is an important priority for them as well. But when new information is suddenly intro-

duced into an otherwise stable regulatory environment by environmental consultants who rely on the highly flexible notions of ecosystems, wildlife corridors, natural ranges, and the like, prudent long-term planning concerning land use grows much more difficult. In principle, one conclusion seems obvious enough: handing over an indefinable ecological jurisdiction to wildlife biologists with little or no interest in, or knowledge of, the economic consequences of their “scientific” conclusions necessarily results in an uncertain business and policy environment.

Science needs to be examined

The growing emphasis on allegedly scientific management principles for Canada’s national parks invites greater scrutiny into the nature of the science being employed. The testimony of the federal Heritage Minister before the Standing Committee on Energy, Environment and Natural Resources on 28 June, 2000, was in this respect quite revealing. The Committee was reviewing Bill C-27; the Minister, responding to questions about the controversy surrounding well-publicized proposals to restore the “ecological integrity” of Banff National Parks including proposals mentioned above to remove poppies at Lake Louise and poison Moraine and Bighorn Lakes, replied: “I would love to get involved to that level of detail, but I leave it to the scientists.”⁷⁶ In other words, the Minister responsible for Banff Park considered the decision to rip out

73 C.E. Kay and C.A. White, “Long-term Ecosystem States and Processes in the Central Canadian Rockies: A New Perspective on Ecological Integrity and Ecosystem Management,” in R.M. Linn, ed. *Sustainable Society and Protected Areas* (Hancock: George Wright Society, 1995), pp. 119-32.

74 Wendy-Anne Thompson, “Canmore’s Animal Trails Failing, Study Says,” *Calgary Herald* (13 Sept. 2000), p. A4. Jacob Herrero Environmental Consulting et al. *Assessing the Design and Functionality of Wildlife Movement Corridors in the Southern Canmore Region*. Prepared for BowCORD Bow Valley Naturalists, Canadians for Corridors, Canadian Parks and Wilderness Society, UTSB Research (Sept. 2000).

75 Eva Ferguson, “Hungry Bears Force Closures in Park,” *Calgary Herald* (9 September 2000), p. B1. See also Alberta Environment, “Kananaskis Country Trail Report” (updated 26 Oct. 2000). Available at http://www.gov.ab.ca/env/parks/prov_parks/kananaskis/KCINFO/trail.ht ml.

76 Government of Canada (Hansard) Standing Committee on the Energy, Environment and Natural Resources (28 June 2000).

ornamental gardens and sterilize mountain lakes to be a scientific, not a political or worse, an ideologically-inspired, decision.

No one denies that sound scientific knowledge is necessary for guiding officials in their decisions governing the wise use and protection of Canada's national parks. It seems clear, however, that environmental preservationists and restorationists with a fluent command of the scientific discourse of wildlife and conservation biology have become central actors in everything from establishment of jurisdictional boundaries to the definition of appropriate activities within, and even beyond Canada's national parks. In other words, there is good reason to be concerned that ideology as much as science is inspiring current and proposed regulatory and land management regimes.

Conservation biology

Politics is as much about the distribution of scarce resources—who gets what—as it is about justice, order, and the precarious and temporary but public representation of the meaning of life. Like human existence, it aims high in its aspirations; its realities, however, are dependent on more practical considerations. It is important to keep these practical realities in sight in any discussion that merges the aspirations and the necessities of politics with the discourse of disciplines such as law or science. As has the language of law, the

discourse of science has come to assume great moral authority in politics and society. Claiming an accuracy, empiricism, and objectivity that sets it apart from ordinary political debate, scientific discourse can provide its proponents with a powerful rhetorical technique to translate their interests and preferences into public policy. Nowhere is this clearer than in the politics of wilderness conservation.

Handing over an indefinable ecological jurisdiction to wildlife biologists with little or no interest in, or knowledge of, the economic consequences of their “scientific” conclusions necessarily results in an uncertain business and policy environment.

Over the past two decades, conservation biology has become, by its own understanding, a value-laden blend of science and activism tailored to specific political purposes. Michael Soulé, the father of conservation biology (founder of the

Society for Conservation Biology and co-founder of the Wildlands Project, an applied version of the conservation biology mission), explains: “As growth and technology eat away at nature, they also cause social disintegration. Moreover, each of these diseases exacerbates the other in an accelerating downward spiral of human alienation and species loss.”⁷⁷ Such language is revealing, and it has nothing to do with any commonsense understanding of science. Grizzly bear scientist Stephen Herrero (now head researcher for the Eastern Slopes Grizzly Bear Project) echoed these sentiments in a 1970 paper published in the scientific journal *Bioscience*. Describing his “soul-deep love of nature,” Herrero admitted: “I know my biases and values have significantly influenced even the scientific or factual data that I have collected.”⁷⁸ It is a short step from an awareness that personal bias can influence the methods of data

77 M.E. Soulé, “An Unflinching Vision: Networks of People Defending Networks of Land,” in D.A. Saunders *et al.*, eds. *Nature Conservation 4: The Role of Networks* (Surrey: Beatty & Sons, 1995), p. 1.

78 Stephen Herrero, “Man and the Grizzly Bear (Past, Present, but Future?),” *Bioscience* 20, no. 20 (November 1970), p. 1148.

collection and analysis to designing research projects that confirm—which is to say, that express—personal preferences and commitments.

As the goals of scientific and activist communities merge, however, the realities of politics threaten (or promise) to undermine sound scientific method. Explicitly “mission-oriented,” the goals of conservation biology are expressly tailored to the perceived policy problem at hand.⁷⁹ Research programs and institutes have begun to devote themselves not only to the cause of sound science, but to influencing public policy. Parks policy in the Banff area in particular has been significantly modified by the efforts of a small, tightly-bound group of environmental scientists, who, while asserting their status as independent researchers, are significantly funded, staffed, and resourced by the federal government. Their research is then publicized by environmental activists and lobbyists as the scientific basis to justify the interventionist policies they advocate. In fact, political agitation and scientific discourse have become two elements of a single, unified strategic initiative.

Environmentalists influential in scientific panels

The Eastern Slopes Grizzly Bear Project (ESGBP) was established in 1994, billed as a joint venture between University of Calgary researchers, con-

servation groups, government, and business. The project is guided by the unique blend of science, ideology, and activism characteristic of contemporary environmentalism. Oriented towards specific park management issues, the project is part human impact assessment and part political strategy.⁸⁰ A Project Steering Committee uses strategic targeting to determine its research agenda,

Research programs and institutes have begun to devote themselves not only to the cause of sound science, but to influencing public policy.

and even to structure its data analysis and frame its goals. The ESGBP is largely responsible for making grizzly bears a focal species for what they call “cumulative effects assessments” (CEAs) of people and development in Banff.

CEAs have formed the rationale for many of the policy changes that have been made in Banff National Park over the past five years. Much of the scientific data for these assessments were produced for the Banff-Bow Valley Study, and focused on certain “key ecological indicators” of which grizzly bears and wolves figured prominently. Two years into a five-year research project, Stephen Herrero reported on the status of the grizzly population and habitat, and Paul Paquet, director of the Central Rockies Wolf Project (CRWP), was responsible for wolf research.⁸¹ The cumulative effects of stressors on vegetation (Peter Achuff), aquatic systems (David Schindler) and elk (John Woods) were also measured and aggregated for the assessment. The purpose of the CEA, apparently, is to raise alarm over the

79 Mike Gibeau, “A Conservation Biology Approach to Management of Grizzly Bears in Banff National Park, Alberta,” Ph.D. Dissertation, Resources and the Environment Program, University of Calgary, Calgary, Alberta, ch. 5. Reed F. Noss and Allen Cooperrider, *Saving Nature’s Legacy*, p. 84.

80 Mike Gibeau, “A Conservation Biology Approach,” ch. 5.

81 The CRWP was established in 1987, with Paul Paquet joining as director in 1989. It operates in conjunction with the Wolf Awareness Inc., a charitable foundation registered with the Canada Customs and Revenue Agency. Between the years 1994 and 1997, Wolf Awareness Inc. received over \$43,000 in government funding. Wolf Awareness Inc., Registered Charity Information Return.

“alienation” of wolves and bears from the prime montane habitat in and around the park.

When the species in question are also described as “keystones,” they become exponentially important in the campaign to save spaces. Keystone species are said to play a pivotal role in regulating ecosystem diversity.⁸² Such wide-ranging predators as bears and wolves are also sometimes called “umbrella species,” since their habitat needs can be used to justify large reserve areas, which will in turn support a great range of other species. Such metaphorical language is based not

on the actual science of biology but on policy advocacy. Thus Noss, for example, described these creatures as “charismatic megavertabrates” because they serve as highly evocative symbols of major conservation efforts.⁸³ Typically, they are among the dominant species of a particular trophic level (i.e., place in the food chain). However, in 1996, this “top-down theory” focusing on large carnivores such as grizzly bears and wolves was staunchly rejected in the scientific journal *American Naturalist*; at the November 1998 London Zoological Society carnivores conference, for example, not a single paper on the theory was presented.⁸⁴ It is at least equally common for

scientists to assume that the lowest trophic level serves as the key regulatory role (“bottom-up theory”).⁸⁵ Michael Soulé has dismissed such critics with the contention that while “the ecological community as a whole is not convinced yet... in the next decade, it will be.”⁸⁶ Wildlife biologists

commissioned to study Banff (and increasingly, Parks Canada itself) appear convinced right now, and are using the habitat and population data of these charismatic, megavertabrate carnivores to provide justification for reserving, or rewilding, increasingly large areas of public and private land. Despite its controversial status as

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science, the doctrine of “keystone species” was given broad acceptance by the government-sponsored Banff Bow Valley Study, and is currently being integrated into new park management strategies.⁸⁷ Given the historical role of humans as predators in what is now Banff Park, and given the historical impact of the real “keystone species,” namely *homo sapiens*, on “ecosystem diversity,” however defined, it is a major omission to ignore the human use of the area over the past few hundred years.

Some members of the scientific review committee of the Banff Bow Valley Study were willing to ac-

82 Noss, “From Endangered Species to Biodiversity,” pp. 233-35.

83 Noss, “From Endangered Species to Biodiversity,” pp. 233-35.

84 Alanna Mitchell, “Saving Carnivores May Be Key to Avoid Ecosystem Collapse,” *Globe and Mail* (12 Oct. 1998), p. A4.

85 See, for example, C.E. Kay, “Are Ecosystems Structured From the Top-Down or Bottom-Up: A New Look at an Old Debate,” *Wildlife Society Bulletin* 26, no. 3 (1998): pp. 484-498.

86 Alanna Mitchell, “Saving Carnivores.”

87 In a 1996 article in *BioScience*, the same year the study was released, 10 scientists observed that, “ecologists still lack the empirical basis needed to detect, interpret, and predict general patterns in the occurrence of keystone species or to apply the concept to management.” See Mary E. Power *et al.*, “Challenges in the Quest for Keystones,” *Bioscience* 46, no. 8 (Sept. 1996), p. 618.

knowledge that “a capacity to predict precisely what is going to happen in the future with some of these ecological indicators is not possible,” but then immediately added that it was not “necessary” to have such a capacity either.⁸⁸ This is unquestionably true: a capacity for accurate prediction is by no means “necessary” to make public policy. Such a capacity is, however, necessary if administrators are going to make sound public policy in the area of wildlife management in a national park. Notwithstanding the absence of adequate predictors, species numbers, especially those of large carnivores such as bears and wolves—the charismatic megavertabrates—are being used as an important benchmark for evaluating the general ecological health of the Banff Bow Valley area (as well as being made the baseline for policy decisions concerning land management and use in Banff National Park). Rather than letting uncertainty undermine the new approach to ecosystem management, advocates invoke the notion of a “precautionary principle.”

This “principle” underlay the conclusion of the Banff-Bow Valley Study: “We must postpone making decisions that could harm the environment, until we do know, until we are sure.”⁸⁹ The EI Panel commissioned by Parks Canada has also advocated a definition of ecological integrity that facilitates management according to the precautionary principle: “There is no implicit requirement for ‘proof’ that particular components of the ecosystem are necessary for its persistence nor to engage in any debate about it.”⁹⁰ Of course, no one disputes the prudence of taking precautions. The problem with turning this morally elevated notion into a decision-making principle is two-fold: first there is no

principle by which this principle can be applied in any particular instance, and second, in this particular instance, the invocation of the “principle” serves only to obscure the transparently obvious fact that advocates of a specific regulatory policy are relying on highly contentious science. Perhaps if enough people (including wildlife biologists with no particular environmentalist axe to grind) repeat the slogan loudly and often enough, a sufficiently draconian regulatory regime can be imposed. And draconian regulatory environments are not conducive to scientific investigation, even for environmentalists.

Grizzly moralism

The wildlife biology dealing with large carnivores, even before they are transfigured into charismatic megavertabrates, is particularly helpful in advancing the policy preferences of preservationists and restorationists. Because bears and wolves, for example, typically range over large areas, the argument for setting aside ever larger areas as wilderness preserves can be bolstered by the opinion that the land in question—the Y2Y corridor, for example—is part of the natural or historic habitat range of the animal involved. Leaving aside the issue of the scarcity of historical data for such “keystone species” as grizzlies, it is apparent that the chief component of the rhetoric used to advocate more space for grizzlies is moral intensity. Thus, wild nature, which is somehow more incarnate in bears than in newts, reminds us of our “humility” and thus holds the promise of reducing the “arrogance” inherent in modern technological society. Grizzly bear researcher Stephen Herrero, for example, has argued that “hu-

88 Banff-Bow Valley Study, *Banff-Bow Valley: At the Crossroads*, Technical Report of the Banff-Bow Valley Task Force (Robert Page *et al.*) Prepared for the Honourable Sheila Copps, Minister of Canadian Heritage (Ottawa, ON: Supply and Services Canada, 1996), p. 396.

89 Banff-Bow Valley Study, *Banff-Bow Valley: At the Crossroads*, Summary Report, p. 5.

90 Parks Canada, *Unimpaired...* vol. II, pp. 1-16.

man beings, in visiting grizzly country, face a situation which educes qualities phylogenetically [based on natural evolutionary relationships] developed in man, but which are often not allowed simple expression in our modern and complex technological society."⁹¹ Harvey Locke expressed the same sentiments using language less opaque than that favoured by Herrero. Locke lamented having lost his childhood experience of "magic in nature" and explained his membership in CPAWS as a way of expressing his "connection to creation" and "duty to try to protect Her." Most environmentalists, he explained, have relied on rational arguments. He proposed, instead, that they should take advantage of an "unsatisfied spiritual hunger" that is said to exist among Canadians and "reach out at the level of values to the religious community, to First Nations and other spiritualists and to engage in charting a brighter future for creation."⁹²

Freedom of religion is, of course, an important part of Canadian constitutional liberty and, Locke is surely at liberty to worship at the altar of his choice. Moreover, if he is anxious over having lost the magic of childhood, his plight is bound to evoke sympathy from adults. There is, however, more to his touching confession than an appeal to a sort of romantic religious gnosticism. In this same article, which was initially delivered as a speech at a CPAWS banquet, Locke indicated that he had already begun the work of putting his "dreams" into practice. The "long-range visioning meetings" of the CPAWS national board, he said, confirmed their advocacy of Y2Y and the Wildlands Project. The immediate result was

CPAWS "Wild at Heart" campaign, "designed to make our values about nature or prominent part of our work" at "the intersection between spirituality and the environment."⁹³ In short, Locke's animus against modern technology and his idiosyncratic religious opinions and commitments constitute the moral—or rather, moralizing, hectoring—core of the preservationists' and restorationists' arguments for such otherwise mundane and commonsensical public policy issues as protection and restoration of grizzly bear populations and habitats, along with protection of human hikers and other park users.

Other religiously-inspired environmentalists include Michael Soulé of The Wildlands Project. He has given voice to a highly imaginative apocalyptic scenario. "As nature flies apart," he says, "so does society; and as alien species invade habitats, alienation negates human congress."⁹⁴ On the other hand, Robert Bailey has ridiculed the preference for native over non-native species as "ecological xenophobia." Ridiculous though it may appear to common sense, just such "xenophobia" has inspired the various rewilding programs and the proposals to poison mountain lakes and replace poppies with weeds. Bailey pointed out the rather obvious fact that, in reality, no scientific criteria exists for distinguishing between "disturbed" ecosystems and allegedly pristine ones.⁹⁵ This basic problem in wildlife biology makes scientific evaluation of the alleged "biodiversity crisis," even more problematic: exotics are frequently not counted as part of the biological stock of an ecosystem, and their functional value (either for the ecosystem or for humans) is usually dis-

91 Herrero, "Man and the Grizzly Bear," p. 1151.

92 Harvey Locke, "Keep Faith with Nature," *Calgary Herald* (16 Jan. 1999), p. H6. Also available at <http://www.cpaws.org/wildatheart/hlocke-wilderness-spirituality.html>.

93 See <http://www.cpaws.org/wildatheart/index.html>.

94 M.E. Soulé, "An Unflinching Vision: Networks of People Defending Networks of Land," in D.A. Saunders *et al.*, eds., *Nature Conservation 4: The Role of Networks* (Surrey: Beatty & Sons, 1995), p. 1.

95 Robert Bailey, "Preaching Ecological Xenophobia," *National Post* (3 August 2000), p. A16.

missed.⁹⁶ Moreover, the place of human nature or human animals in any biodiverse context is almost always conceptualized as one or another type of “alien” or “disturbing” species.⁹⁷ In other words, the religious or vaguely spiritual commitments of preservationists and restorationists have led them to make use of scientific and quasi-scientific discourse for decidedly unscientific purposes.

Native species emphasized

In searching for strategic allies, the preservationists and restorationists have, as have other interest groups, looked to international NGOs. Thus in May 2000, in Nairobi, Kenya, the discussion at the fifth Convention on Biological Diversity proceeded to consider the issue of “alien” species as if it were a self-evident premise rather than a highly contested question in contemporary scientific ecology.⁹⁸ Obviously such international meetings of advocacy groups can become “a germination level for environmental policy ideas.”⁹⁹ As we have seen in Banff, these specific notions have been given policy currency in the previously mentioned plans of Parks Canada for Bighorn and Moraine Lakes. A religious preference of na-

tive over non-native species becomes even more bizarre when the natives involved are human. Indeed, the enlisting of First Nations as allies in the spiritual crusade of environmentalists simply looks expedient.

The appeal of natives to non-natives emphasizes an “aboriginal ethic” that respects an unmediated, holistic relationship with nature. CPAWS trustee emeritus, J. Stan Rowe, for example, looks to indigenous culture to “teach us the fundamentals of living with one another and with Earth in ways that are relation-based rather than consumption-based, responsibility-based rather than right-based. We look at these aboriginal cultures and marvel at their ways-of-living that seem so

wholesome compared to our own.”¹⁰⁰ Likewise in 1998, the CPAWS newsletter, *Wilderness Activist*, claimed that aboriginal and environmentalists shared certain “philosophy and prin-

ciples.” More important, however, as Juri Peepre, a past-president of CPAWS, observed, was the practical usefulness of an alliance with natives: “Working through land-claims agreements is one of the best tools available for gaining on the ground protection” of wild areas.¹⁰¹ Peepre added, “First Nations can benefit from CPAWS’

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96 Fitzsimmons, *Defending Illusions*, p. 102.

97 Another version of the aesthetic or religious impulse of preservationists and restorationists is what Peter Lee of the World Wildlife Fund calls the “Noah Principle,” which he describes as “the religious belief that our fellow passengers on Spaceship earth have a right to exist.” Peter G. Lee, “Back From Chaos,” in Arlene J. Kwasniak *et al.*, eds., *A Legacy of Land: Conservation Easements and Land Stewardship*, Proceedings of a Conference held in Edmonton, Alberta, June 18-19, 1998, (Edmonton: Environmental Law Centre, 1999), p. 46.

98 See IUCN, “Alien Species that Threaten Ecosystems,” Information paper at the Fifth Meeting of the Conference of the Parties to the Convention on Biological Diversity,” Nairobi, Kenya (15-26 May, 2000).

99 Robert Boardman, “The Multilateral Dimension: Canada in the International System,” in Robert Boardman, ed. *Canadian Environmental Policy*, p. 226.

100 J. Stan Rowe, “Ecocentrism and Traditional Knowledge.” Available at http://www.ecospherics.net/pages/Ro993tek_1.html.

101 “Our Natural Allies: First Nations,” *Wilderness Activist* (Spring 1998). p. 11.

public advocacy clout. We're well-respected and we know how the government agencies think."

The environmental movement has clearly recognized the need for strategic alliances and moral justification in the battle over public lands policy. Native Canadians look like a group that might be useful in this regard. As noted above, however, the actual practices of Indians in wildlife and forest management were anything but benign.¹⁰² More to the point today, however, things look rather different to the actual members of First Nations.

For example, the Siksika Nation has threatened to occupy sites on (sacred) Castle Mountain in Banff National Park. The band was intending to use the protected land for housing, and elk and buffalo ranches. Since the Parks Act prohibits individuals from taking up residence or doing business on park land, the Siksika have launched a lawsuit along with five Treaty 7 bands in southern Alberta, suing the federal government over rights to natural resources such as timber, oil, gas, and other minerals.¹⁰³ The fishing practices of natives from the Burnt Church reserve in New Brunswick do not inspire confidence in the holistic and wholesome spirituality of the Mi'kmaq on Miramichi Bay. The Grand Chief of the Assembly of First Nations, Matthew Coon Come, informed the federal environment minister that First Nations had a right to hunt any animals, whatever the Species at Risk Act might have to say.¹⁰⁴ Similarly, it is unlikely that the restorationists would approve of the extensive

**... the actual practices of
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clear-cutting done by natives on forested parts of the Morley reserve just east of Banff. Within a few months in 1994, about 20 percent of the pine and spruce on the reserve was hauled to BC, through the park, for milling.¹⁰⁵

While one can hardly criticize First Nations for wanting to share in the social and economic benefits stemming from the development of resource potential, it hardly coincides with the romantic mythical vision of a special (morally superior) aboriginal ethic towards nature. Even a superficial awareness of the historical practices of Indians in North America ought to have indicated to spiritually-inspired environmentalists that First Nations would be unreliable allies in their crusade.¹⁰⁶

In any event, many native communities are today no longer willing to be used as pawns in the greater regulatory agenda of powerful environmental groups. The divergence between aboriginal and environmentalist interests prompted the signing of the First Nations Protocol on the Environment, Central Coast of British Columbia, Canada, in 1997. It specifically forbade environmental groups from using "any crests, totems, dances, songs, or other symbols of our First Nations culture for the purposes of representing our First Nations."¹⁰⁷ Other aboriginal people have also objected to the distortion of their "natural" interest. For example, Fabienne Bayet, an Australian Aboriginal (and self-proclaimed "environmentalist, conservationist, greenie") explains the source of this resentment,

102 See Kay, "Aboriginal Overkill and Native Burning," and references in this article.

103 Wendy-Anne Thompson, "Natives Threaten to Seize Castle Mountain," *Calgary Herald* (10 May 2000), p. A1.

104 Andrew Duffy, "Natives Fight Hunting Ban on Species at Risk," *Calgary Herald* (16 Aug. 2000), p. A8.

105 Lisa Dempster, "Reserve in Battle Over Timber Profits," *Calgary Herald* (28 Dec. 1997), p. A1.

106 Fitzsimmons, *Defending Illusions*, p. 90.

noting that “Aboriginal people now perceive national parks and wilderness legislation as the second wave of dispossession which denies their customary inherited right to use land for hunting, gathering, building, rituals, birthing rights.”¹⁰⁸ In the future it may not be unreasonable to antici-

pate increasingly divergent views between restorationists intensifying their spiritual efforts and natives seeking economic and, indeed, recreational benefits.

Process

Activism

In this section we will consider not the idiosyncratic motivations and spiritual aspirations of individuals in the environmental movement but the place of several leading environmentalist organizations in the formation of public policy in Canada. Today, the environmental movement draws its support from across the political spectrum, cutting across traditional ideological (left-right) lines. It is currently estimated that there are 12,000 environmental groups operating in the United States. Of the more than 75,000 registered charities in Canada, over 3,000 are devoted to environmental issues of one sort or another.¹⁰⁹ The core activities of these groups range from public education, to advocacy and lobbying, to more

radical acts of civil disobedience and “ecoterrorism.” Leaving aside the straightforward criminality of tree-spikers and sabotage artists—who presumably do not enjoy charitable status—most environmentalist groups are a combination of a conventional pressure group and what social scientists call a “new social movement.”¹¹⁰ In consequence, there is a tendency for many of these groups to practice a kind of dual politics, “mixing the pressure group’s pragmatism with the social movement’s commitment to the goals of social transformation.”¹¹¹ When groups pursue objectives of large-scale social, political, and economic transformation, the result is often a policy position where compromise, conciliation, and the conventional operations of brokerage politics are difficult to undertake. One way

107 See Patrick Moore, “The End of the Rainbow for the Rainbow Warriors? Aboriginal Chiefs Denounce Anti-Forestry Campaign,” from submission to the Federal Parliamentary Committee on Natural Resources, 13-14 May, 1999, Vancouver, BC. Available at <http://www.greenspirit.com/endofthe.htm>.

108 Fabienne Bayet, “Overturning the Doctrine: Indigenous People and Wilderness—Being Aboriginal in the Environmental Movement,” in J. Baird Callicott and Michael P. Nelson, eds. *The Great New Wilderness Debate* (Athens, Georgia: University of Georgia Press, 1998), p. 318.

109 See <http://www.wwfcanda.org>.

110 Ronald Inglehart has pointed to the growth of a new “postmaterialist class” in post-war industrial societies for whom quality of life issues (free speech, equality, environmentalism) takes precedence over basic needs issues (food, shelter, security), as the vanguard of “new social movements.” Organized along non-traditional ideological lines (left/right), new social movements are characterized by oppositionist politics and non-hierarchical organization. See, for example, Ronald Inglehart, *The Silent Revolution: Changing Values and Political Styles Among Western Publics* (Princeton: Princeton University Press, 1977); Ronald Inglehart, *Culture Shift in Advanced Industrial Society* (Princeton: Princeton University Press, 1990); Neil Nevitte, *The Decline of Deference* (Peterborough, ON: Broadview Press, 1996).

111 Jeremy Wilson, “Green Lobbies: Pressure Groups and Environmental Policy,” in Robert Boardman ed. *Canadian Environmental Policy: Ecosystems, Politics, and Processes* (Toronto: Oxford University Press, 1992), p. 109.

of dealing with this difficulty is to move from a position of external opposition to one of internal transformation. Many pressure groups, including environmentalists, have realized the benefits of setting an agenda from inside the tent, as distinct from agitating for change from the outside. The activities and actions of environmentalists read like a case study in regulatory capture undertaken not by an industry, but by a social movement.

The environmentalist network

World Wildlife Federation Canada President Monte Hummel has provided personal insight regarding his education in the realities of environmental politics. Co-founder of the radical Pollution Probe in 1969,¹¹² over the years he has come to recognize the importance of establishment connections and tactics. Speaking about his stint as a professor of environmental studies at the University of Toronto, he remarked, “I was spinning students out into the system. They were becoming executive assistants to ministers and I was building a tremendous network of people... and I realized that we had an opportunity to parachute some of our people into problem areas, whether it was political or corporate.”¹¹³ Today, WWF Canada is a multi-million dollar venture employing 57 salaried professionals, considered by one sympathetic observer to be “the ultimate class act of the conservation establishment.”¹¹⁴ In the 1998-99 fiscal year, over \$1.8 million dollars of their revenue (15.2 percent of their total) came from government: \$1,798,377 comes from the federal government, \$56,964 from the provinces. Of these revenues, 27.4 percent goes to research and grants, 23.1 percent to conservation awareness, 0.4 percent to lobbying efforts, 63.4 percent to

program implementation, and 11.6 percent to fundraising and other administrative activities.¹¹⁵

Of the other environmental groups devoted to the advocacy of preservation of wilderness in Canada, the Canadian Parks and Wilderness Society is probably the most prominent. Claiming 13,000 members throughout 10 branches across the country, they are well positioned at the local as well as at the national level. CPAWS devotes its energies to four areas: new park establishment, park integrity (“focused on improving the management of existing wilderness parks to better protect ecological integrity”), natural connections (“focused on linking protected areas with functional habitat corridors such as Yellowstone to Yukon, and Algonquin to Adirondack”) and legislative policy reform. These focal areas effectively mirror the policy agenda of the federal government for the national parks. Proposed changes to the legislation on national parks, for example, would fast-track the establishment of new national parks, and strengthen ecological integrity as the interpretive foundation by which new and existing activities would be measured. Likewise, the final report of the Panel on Ecological Integrity cited the importance of bioregional planning, strongly supported by CPAWS.

The long history of effective symbiosis between government and environmental activists was explicitly acknowledged on the occasion of the release of the Report of the Panel on Ecological Integrity, when the federal Heritage Minister prefaced her speech with a special mention of CPAWS founder Gavin Henderson. As a matter of course, the organization has also benefited

112 Hummel has said of this period, “I was a raging leftist. I mean Marxism wasn’t nearly far enough left for me. I was an anarchist...” Mowat, *Rescue the Earth!* p. 31.

113 Mowat, *Rescue the Earth!* p. 31.

114 Mowat, *Rescue the Earth!* p. 29.

115 WWF Canada, Registered Charity Information Return.

from significant government funding over the years.¹¹⁶ Ottawa also grants money for CPAWS and its members and supporters to undertake specific projects. Again as a matter of course, CPAWS receives significant funding from granting organizations such as WWF Canada and other private foundations.¹¹⁷

CPAWS does not limit its advocacy to targeted research, straightforward lobbying, and public relations. Given the new access to the judicial system afforded by the Charter of Rights and Freedoms and a general growth in the litigiousness of Canadians, it is no surprise that increasingly in recent years, CPAWS has pursued its objectives in the courts.¹¹⁸ In the fall 1998 CPAWS newsletter, the president (David Thomson) and executive director (Mary Granskou) noted: "Never in CPAWS' history have we fielded so many lawsuits, and we see no end in sight." This litigation is significantly aided by the financial and legal expertise provided by the Sierra Legal Defence Fund (SLDF) of California. The SLDF was established in

Canada in December 1990 to provide free legal services to Canadian conservationists. Besides advancing strategic litigation, the SLDF coordinates cooperative efforts between environmental groups, provides strategic counsel to grassroots organizations, and prepares scientific analysis and research.¹¹⁹ The organization also champions its "strong and credible presence in the development of effective environmental laws," which is

**"Never in CPAWS' history
have we fielded so many lawsuits,
and we see no end in sight."
—CPAWS newsletter**

to say that SLDF obliges governments by providing them with draft legislation. Funded through a combination of public donations and foundation grants, the Fund generated revenues of just under \$3 million in 1999.¹²⁰ While separate from the Sierra Club of Canada (SCC), SLDF maintains affiliations with both SCC and its American sister organization, Earthjustice Legal Defense Fund (formerly the American Sierra Club Legal Defense Fund). The Sierra Club of Canada Foundation, benefiting from the charitable tax status that is denied the Club and Legal Defence Fund because of their political activities, was given a \$10,000 grant in 1999, courtesy of the federal government.¹²¹

The appointment of the SLDF as legal advisor to the Panel on Ecological Integrity is a clear indication that it has become a powerful presence in the

Canadian environmental policy sector. A brief survey of some of the past cases that have involved the SLDF in issues arising from litigation in the Banff area indicates that it acts for a wide range of clients, all of

whom oppose the traditional multiple-use policy for the national parks. Besides serving as legal advisor to the EI Panel on the future of Canada's parks, the SLDF assisted the Canadian Parks and Wilderness Society, Alberta Wilderness Society, Bear Society, Bow Valley Naturalists, and Jasper Environmental Society. The SLDF and its clients brought legal challenges to a wide array of economic activities, from the Cheviot mine east of

116 Canadian Parks and Wilderness Society, Registered Charity Information Return. In 1995 CPAWS received a \$21,951 government grant.

117 CPAWS established the Foundation for Canadian Parks and Wilderness in 1993 to help support the activities of the Society.

118 David Thomson and Mary Granskou, "Message From the President and Executive Director," *Wilderness Activist* (Fall 1998), p. 2.

119 See <http://www.sierralegal.org>.

120 Sierra Legal Defence Fund, *1999 Annual Report*.

121 Sierra Club of Canada Foundation, Registered Charity Information Return.

Jasper Park, to the proposed Lake Louise convention centre, and river rafting on the Bow. The EI Panel Report reflected the opinion of the SLDF that Canada's environmental assessment regulations were inadequate: the success of environmental assessments was, to the EI Panel, *prima facie* evidence that they were too weak.¹²² The Canadian Environmental Assessment Act is now up for five-year review.

Regional activists

At the regional level, the Alberta Wilderness Association is one of the province's oldest conservation groups. Founded in 1965, it bills itself as a "frontline advocacy organization." Of its more than \$300,000 in revenue generated in 1998-99, almost 15 percent comes from government funding (the provincial government granted them \$6,900). AWA employs six salaried professionals.¹²³ Other regional groups, such as the Bow Valley Naturalists (annual revenue around \$16,000) are less bureaucratic, but still useful allies and collaborators on campaigns and petitions to reduce and end development in the Banff Bow Valley Area.¹²⁴

The Eastern Slopes Grizzly Bear Project (ESGBP) warrants a unique mention in any consideration of a support structure for environmental activists in the Banff area. While the annual budget for the ESGBP in 1994-1996 has been around \$350,000 per year, over that same time they managed to

raise over \$1,100,000 for their cause. These funds came from Canadian taxpayers through Parks Canada (46%), the oil and gas industry (34%), the Alberta Government (11%), other research grants (4%), the forest industry (3%), conservation groups (1%), and land development industry.¹²⁵ Despite the fact that over half of their funding comes from government and that many of their key people are present or former Parks Canada employees also on the government payroll, the ESGBP attributes much of its success in influencing public policy, to "providing messages as experts outside of government" since "no matter what the credentials, government employees lack the necessary credibility."¹²⁶ The pose of independent expertise certainly makes for successful public relations, but the real clout comes from having ESGBP people directly involved in developing park policy. "The Parks Canada's Representative on the Steering Committee [of the ESGBP, Jillian Roulet], ultimately became the main author of the park management plan."¹²⁷ The strategy is clear: keep the ESGBP, as an organization, independent of Parks Canada, but ensure that government officials are represented on the key decision-making committees of the "independent" organizations. It is an effective recipe to ensure that "credible," which is to say, ESGBP, policy becomes integrated with "the park management plan."

The fact that environmental interest groups have been successful in getting their policy preferences

122 Parks Canada, *Unimpaired...* vol. II, pp. 12-14. The Panel cites the fact that out of 962 projects listed by Parks Canada with the Environmental Assessment Agency registry from 1 April 1998 to 31 March 1999, only 6 projects were rejected through the environmental assessment process.

123 Alberta Wilderness Association, Registered Charity Information Return.

124 Bow Valley Naturalists, Registered Charity Information Return.

125 Stephen Herrero *et al.*, "The Eastern Slopes Grizzly Bear Project: Origins, Organization and Direction," conference proceedings of the Canadian Council on Ecological Areas, 1998, 5.

126 Stephen Herrero, Jillian Roulet and Mike Gibeau, "Banff National Park: Science and Policy in Grizzly Bear Management," 11th International Conference on Bear Research and Management, 1998, (in press), p. 8.

127 Herrero, et. al. "Banff National Park: Science and Policy in Grizzly Bear Management," p. 7.

recognized by government actors is not in itself surprising. All federal and provincial environment ministers routinely consult with leaders of environmental groups, especially with the powerful "Group of 8" contingent, of which the WWF and CPAWS are a part.¹²⁸ In exchange for this access, the groups help with things such as the legitimization of departmental officials and the provision of expert support in bureaucratic turf wars.¹²⁹ Thus, governments and their ministries are both actors and targets in debates over public policy. In one sense this is just politics as usual; in addition, however, the rigid set of assumptions that environmental activists bring to the table means that, to the extent they are successful, the effective menu of policy options is constricted.

Interests of state?

The analysis of the relationship between government and advocacy, interest, or pressure groups has long been a staple of political science in Canada. In the past decade or so, with concern for what has come to be called the "embedded state," analysts have increasingly highlighted the paradoxical character of this relationship. One would expect that interest and advocacy groups would directly seek out targets in the government and provide them with information and policy suggestions or seek indirectly to influence government policy by influencing public opinion to which government policy is presumed to respond.

In fact, however, matters are seldom so simple. In a path-breaking study, *Interests of State*, Leslie Pal showed how, in response to the national unity "crisis" in the 1960s, the Citizenship Branch of the

Secretary of State initiated a "social animation" program that would provide financial support to particular advocacy groups.¹³⁰ Intended to further a progressive policy agenda and advance the spirit of participatory democracy, those targeted to receive this special funding were multicultural, official language minority, and feminist groups. This program channelled public funds into private lobbying efforts in support of government-sponsored initiatives such as official bilingualism and more liberal social policy.

Government funding of interest groups

A similar dynamic appears to be supporting the goals and agenda of the environmental movement. One important indicator of government support for advocacy programs is the amount of funding interest groups and their projects receive. Until 1986, the Department of the Environment relied on ad hoc requests for money on a project-by-project basis; only after criticism from the Auditor General was its grants system reorganized into specific categories. The Class Grants Fund, which provided sustaining grants to environmental non-governmental organizations (ENGOs), received 65 applications in its first year of operation; within a year this number jumped to 500.¹³¹ Other grants were distributed under the Canadian Environmental Network Coalition, an umbrella organization made up of over 1,500 Canadian environmental groups. It provided a core/sustaining grant of \$250,000.¹³²

One of the latest government funding vehicles for environmentalists is the EcoAction Community

128 Jeremy Wilson, "Green Lobbies: Pressure Groups and Environmental Policy," pp. 118-119.

129 Wilson, "Green Lobbies," pp. 118-119.

130 Leslie Pal, *Interests of State: The Politics of Language, Multiculturalism, and Feminism in Canada* (Montreal: McGill-Queen's University Press, 1993), pp. 102-3.

131 Leslie Pal, *Interests of State*, p. 5.

132 Leslie Pal, *Interests of State*, pp. 5-6.

Funding Program. Launched in September 1995 as "Action 21," the federal Environment Minister identified the program as the vehicle by which the Liberal government would redeem its promise of environmental action as outlined in the party's *Red Book*. Ten million dollars would be set aside annually to support interest groups and projects.¹³³ Like the "social animation" funds of the Secretary of State citizenship programs before them, significant amounts of money were directed to advocacy groups through Action 21 and associated "community animation" grants. The Canadian Parks and Wilderness Society has been a frequent recipient of the grants, as has been the Alberta Wilderness Association and the Federation of Alberta Naturalists. Recent examples in the Banff area include \$8,500 to CPAWS for its "Bow Valley Area Public Involvement Campaign," to sponsor a public awareness campaign (including a video and brochure) on the importance of preventing any further economic development in the Bow Valley corridor. Likewise they provided \$35,000 to AWA, CPAWS and the Federation of Alberta Naturalists for their "Albertans

for Wild Places Campaign," the purpose of which is to assist local individuals and organizations in planning, recruitment and advocacy skills; an additional \$31,500 went to CPAWS to take its project on the preservation of ecosystems and biodiversity to into the schools, and a further \$30,220 went to a program on biology conservation sponsored by the Friends of K-Country and CPAWS.¹³⁴

Pal's study showed clearly enough that the results of government-sponsored "community animation" programs are usually highly questionable. There may well be a community of interest between certain Parks Canada officials and members of "animated" advocacy groups. At the same time, however, when the service that Parks Canada is supposed to provide to all Canadians is directed from Ottawa in support of one group of local interests at the expense of other local interests, tensions can run high. The result, in the example of Banff, has been little short of a public relations disaster both for the Minister and increasingly for the department as well.

Politics

Banff-Bow Valley Study

This section of the analysis will examine in more detail the impact of the spiritual or ideological dimension of the wilderness preservation, or restoration movement, on the policy agenda of Parks Canada. Following the 1990 incorporation of Banff as a town under the laws of Alberta, the gulf between environmentalists and those favouring community development grew wider and deeper. Formal incorporation trans-

ferred some municipal powers from the federal bureaucracy to an elected Town Council. The federal government, however, retained final authority on planning, land use, development, and environmental issues. With the triennial general assembly of the International Union for the Conservation of Nature—the World Conservation Union—scheduled to meet in Montreal in October 1996, environmental groups took the opportunity to bring their arguments about a "development crisis" in Banff before an international audience

133 Environment Canada, "Another Red Book Promise Fulfilled," News Release (29 Sept. 1995). Available at http://www.ec.gc.ca/press/red1_p_e.htm.

134 Available at <http://www.mb.ec.gc.ca/community/ecoaction/funding/ba01s08.en.html>.

and the international media. Complaisant journalists responded to the alarming allegations of environmentalists with headlines more alarming still: Banff might be removed from a list of “World Heritage Sites.” There was next to no explanation of the genesis of this list nor what, if anything, delisting might entail. It was, in fact, symbolic politics at its very best: large headlines, deep anxieties, no substance. The result, however, was that the federal Heritage Minister launched the two year, \$2.4 million Banff-Bow Valley Study.¹³⁵

The Banff-Bow Valley Study was run by a federally appointed, five-member task force commissioned to examine the state of the Banff-Bow Valley and provide recommendations for a revised management approach. The geographic area of study was 3,504 kilometres (53 percent of the total area of Banff National Park) of the park’s Bow River watershed from the headwaters near Bow Lake to the East Gate of the park. Its conclusions would establish benchmarks for the future interpretation of the mandate of Parks Canada, and of regulations governing land use in the park. A great deal of emphasis was placed on stakeholder/public participation in the study. Fourteen interest sectors were represented at the initial round table: national environment; local environment; municipal government; federal government; Siksika First Nations and Wesley First Nations; park users; infrastructure/transportation; social/health/education; commercial outdoor recreation; commercial visitor services; tourism/marketing; culture/heritage; and the Banff Bow Valley Study Task Force itself.¹³⁶

Despite the apparent effort to involve all stakeholders throughout the round table process, many participants objected to being limited to

discussing broad strategic goals, rather than interpreting the results of any technical studies. These studies included a historical analysis, management framework review, visitor behaviour research project, ecological and tourism outlook projects, and a study on appropriate activities for the park. Among these technical studies, the ecological outlook project stands out as having produced both the raw data, and predictive models that informed the bottom-line conclusion of BBVS Task Force. In keeping with the origin of the entire exercise, they were appropriately alarming: “if we continue along our present road, Banff cannot remain a national park.”¹³⁷ A close analysis of the argument, assumptions, concepts, and data that led up to this conclusion, however, casts doubt on its reasonableness.

We have already indicated the questionable scientific assumptions employed in the creation of predictive models. They were, nevertheless, a major element in the creation of the Ecological Outlook Project (EOP), used to “evaluate the cumulative environmental effect of the forces at work in the Banff-Bow Valley and to predict how current behaviour, trends and decisions will shape its future.”¹³⁸ The other major component of the EOP was the Futures Outlook Project (FOP), designed to provide an analysis, model, and prediction of human geographical impact. The FOP used specially customized computer software to simulate several future scenarios for land use and development. In any such modelling process, however, the assumptions of the simulation model underwrite its results.

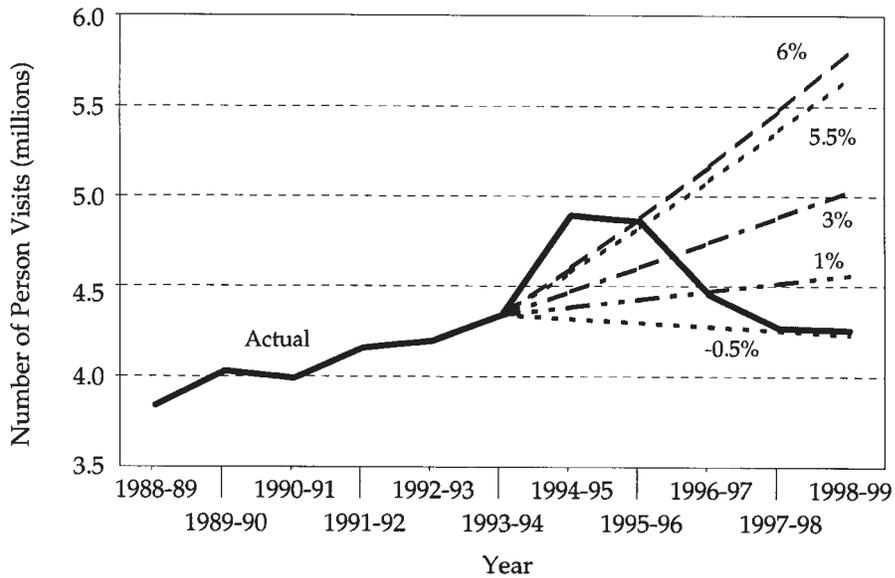
The problem is indicated clearly enough with an examination of the procedures used to model future numbers of visitors to the park. A number of

135 “Saving Canada’s Wilderness—Perhaps,” *Economist* 341, no. 7988 (19 Oct. 1996), p. 51.

136 Banff-Bow Valley Study, *Banff-Bow Valley: At the Crossroads*, Summary Report, p. 10.

137 Banff-Bow Valley Study, Summary Report, p. 6.

138 Banff-Bow Valley Study, *Banff-Bow Valley: At the Crossroads*, Technical Report, p. 366.

Figure 2: Banff National Park Visitation Trends and Estimates

Source: Parks Canada. *Visitor Use Statistics 1993/1994*. Ottawa: Strategic Business Planning Branch. March 1995.

different rates of increase were used, from -0.5 to 6.0 percent, but only the high-end estimators appeared in the Summary Report and only they were reflected in the final conclusions to the efforts of the Task Force. One again, the rhetoric was alarming: "Past trends of human influence in the Valley cannot be sustained if ecological integrity is to be maintained in the park."¹³⁹ The mean increase in the rate of visitation was 5.46 percent. Using this rate compounded to 2020, a whopping 19 million visitors were expected. Using a 3 percent rate, estimates were for 10 million visitors by that time.

The actual numbers of visitors to the park since the time of the study tell a different story (figure 2). An increase in attendance in 1994-95, from 4.3 million to almost 4.9 million, was followed by a steady decrease: from 4,892,551 person visits in 1994-95 to 4,257,218 person visits in 1998-99—a

cumulative drop of almost one percent. If one discounts the anomalous surge in attendance in 1994-95, the drop amounts to over 13 percent. The discrepancy between the rhetoric of crisis and less dramatic fluctuations in the number of visitors both illustrates the need for caution when interpreting data generated by computer models, particularly when they amount to little more than linear estimations, and indicates how otherwise competent statisticians can allow their "biases," as Steve Herero called them, to overwhelm their scientific integrity.

The scope and depth of the Banff-Bow Valley Study was unprecedented. Notwithstanding the efforts made by the Task Force to include a wide variety of interests, at the end of the day, the study's conclusions reflected the growing orthodoxy of conservation biology. The BBVS had no independent research arm but relied on outside and "independent" work by client groups such as the Eastern Slopes Grizzly Bear Project (ESGBP), or the Central Rockies Wolf Project (CRWP). Accordingly, the data and, in general, the scientific discourse generated from these sources became the primary source of data and analysis; it was openly acknowledged by the Task Force, however, that major data gaps existed concerning the human use and economic activity in the area. The gaps related to trend data, to information on visi-

139 Banff-Bow Valley Study, Technical Report, p. 372.

tor activities, and to statistically valid information on the use of backcountry facilities.¹⁴⁰ Former Task Force member Brent Ritchie (Professor of Tourism Management at the University of Calgary), noted that the perspective on park use supplied by tourism and tourist services was underrepresented in terms of the database, and the research and analysis of what data was there was itself inadequate and out-of-date.¹⁴¹ In contrast, the environmentalists had mobilized an impressive network of organizational, scientific, and financial resources prior to the study, along with a large number of sympathetic wildlife biologists, all of whom were focused on the effort to rewrite parks policy. Their success is eloquent testimony to the organizational strength of the environmental movement that, by forming alliances within a sympathetic scientific community, was able to turn a discussion on land management and use decisions into a mandate for reducing and phasing out human use and economic development from the park. It meant, as well, that the interests of the tourist industry as well as commercial and transportation interests were left to react to an already established agenda with considerable momentum behind it.

Panel on Outlying Commercial Accommodation

Following the release of the BBVS, the Task Force's recommendations for centralized ecological management were given considerable publicity as well as political currency. Environmental

groups claimed their views had been (once again) vindicated by science. Many voices called upon the Heritage Minister to act quickly and end "Disneyfication" of Banff. She responded with a development moratorium, announcing that no new land would be available for commercial development in Banff. Once again, tensions between Banff council and Ottawa heightened as the federal government established strict new guidelines for park management and a community plan for the townsite.

Four months after the one-year development moratorium was announced, the Heritage Minister

"When a ski-area's lease runs out, shut the things down, yank the equipment, raze the buildings and reclaim the access road."

—*Ben Gadd, Alberta Wilderness Association*

established a five-member Panel to review the redevelopment guidelines for outlying commercial accommodations (OCAs), and the draft ski area guidelines that had been tabled for discussion by Parks Canada and ski area operators. The ski area operators—Banff Mount Norquay, Marmot Basin in Jasper, Skiing Louise and Sunshine Village—all

participated. The collaborative drafting of the guidelines was intended to provide direction for future planning and operation of the ski areas located within the mountain parks. This "work in progress," was designed to provide a basis for discussion between the various stakeholders. Once again, the round table format was adopted in an effort to involve a wide range of interested stakeholders. Individual consultations were also held prior to the public workshops. Even though a wide range of interests were involved in the drafting of operational guidelines for the management of their businesses, the ecological as-

140 Banff-Bow Valley Study, Technical Report, p. 392.

141 See also J.R. Brent Ritchie, "Policy Formulation at the Tourism/ Environment Interface: Insights and Recommendations from the Banff-Bow Valley Study," *Journal of Travel Research*, 38 (November 1999), p. 109.

sumptions built into the BBVS set the parameters for discussion. The consequence was that a reasonable compromise, let alone a meeting of minds, proved impossible to achieve.

Individuals representing environmental groups were unanimous in rejecting the draft guidelines in their entirety. Ben Gadd of the Alberta Wilderness Association (AWA), for example, considered downhill skiing to be entirely inappropriate for parks. His recommendation: "When a ski-area's lease runs out, shut the things down, yank the equipment, raze the buildings and reclaim the access road." He argued that caps on the number of skiers and moratoria on further developments and improvements would have the positive effect of making the ski areas less attractive to skiers, less profitable, and thus easier to close. His hard-headed understanding of ski hill economics was coupled to the striking rhetoric of cliché. Downhill skiing, he said, is "the crack cocaine of recreational economics: dirty, damaging and addictive as hell."¹⁴² Jill Seaton of the Jasper Environmental Association (JEA) summarized her perspective on park use with the observation that it is "totally out of keeping with the philosophy of a national park to manipulate the elements by means of technology."¹⁴³ This view, if it means anything intelligible at all, if implemented, would presumably shut down a lot more activities than downhill

**The activities that the
environmental movement
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on a per visitor basis.**

skiing. Even the Canadian Parks and Wilderness Society (CPAWS), which claims to represent a moderate view in conservation policy, suggested that "there are precedents for removing ski-hills and restoring these lands to their full potential as wildlife habitat."¹⁴⁴ About the only difference between CPAWS and the AWA or the JEA is the sophistication of their rhetoric. Scientific discourse at least looks intelligible beside the unfocused opinions of technophobes.

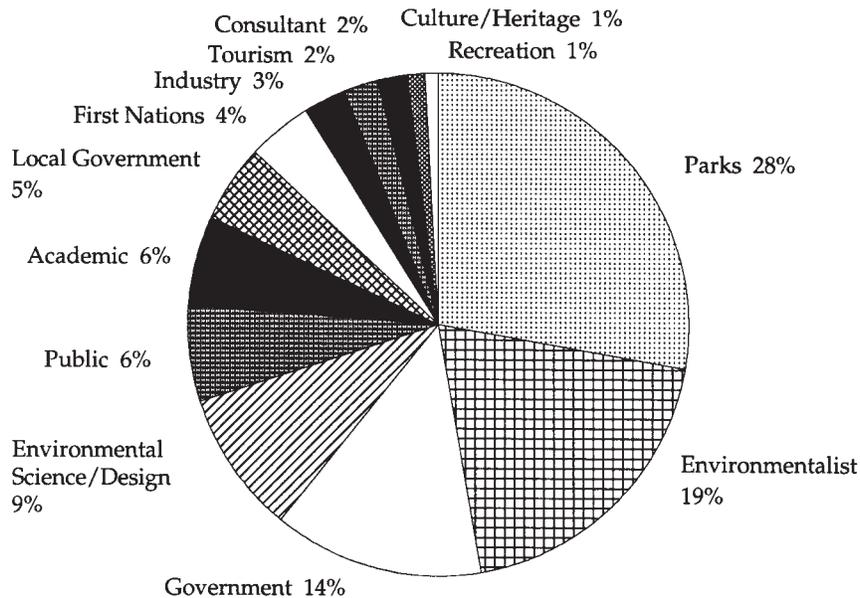
One of the many paradoxes of ideological or spiritual opposition to the dual mandate of the parks is that the activities that the environmental movement most derides appear to cause the least damage on a per visitor basis.¹⁴⁵ Once again, as with so many other questions, the issue becomes one of interpretation. The Heritage Minister had established apparently clear parameters within which recommendations were to be made: development guidelines for both OCAs and ski hills were to follow the principles of "appropriate use," clear limits to development, management practices reflecting their location within a national park, and "no net negative impact." Nobody denies the need for controlled development in Banff; and certainly no businessperson would be running commercial operations in or around the park without fully recognizing the sensitivities of their environment. But whose criteria will determine "appropriate-

142 Round Table Submission to OCA Panel Review of *Draft Guidelines for the Development and Operation of Ski Areas in Banff and Jasper National Parks* (16-18 Dec. 1998).

143 Round Table Submission to OCA Panel Review of *Draft Guidelines for the Development and Operation of Ski Areas in Banff and Jasper National Parks*.

144 Round Table Submission to OCA Panel Review of *Draft Guidelines for the Development and Operation of Ski Areas in Banff and Jasper National Parks*.

145 Brent Ritchie made this observation with specific reference to objections against "tourism activities" such as shopping on Banff Avenue, but the same can be said for the concentrated visitor use of ski areas. See J.R. Brent Ritchie, "Policy Formulation at the Tourism/Environment Interface: Insights and Recommendations from the Banff-Bow Valley Study," *Journal of Travel Research* 38 (November 1999), p. 109.

Figure 3: Participation in Ecological Integrity Panel

Source: Fraser Institute.

Ecological Integrity Panel

The extended review of Canada's park policy, which began with the Banff-Bow Valley Study in 1994, culminated on March 23, 2000, with the release of the report of the Panel on Ecological Integrity. Appointed in 1998, the eleven-member panel had been mandated to review the management and organization of the entire national park system. If the BBVS had recommended a new management philosophy for Banff, the EI Panel advocated a new environ-

mental paradigm for Parks Canada as a whole. This essentially became a task of organizational design, as the Panel debated how to "heal" the bureaucratic agency responsible for overseeing Canada's national parks.¹⁴⁶

This conclusion, reiterated throughout the Panel's 127 recommendations, raises questions concerning the relative influence of competing interests over the course of the 16 months of consultation in 9 national parks and 9 cities. Since interested individuals were invited on the basis of their perceived ability to contribute to the ecological integrity mandate of the Panel, a review of the participants reveals just whose contributions were perceived valuable. In order to determine the relative influence of various interest sectors, a database was compiled listing all the workshop participants as supplied by Parks Canada.¹⁴⁷

ness?" And is "net negative impact" to be determined on purely biological grounds, or is there room for cost-benefit analysis that accounts for other social and economic interests as well? While the objective of the OCA Panel was to let commercial operators and the public be heard in an open and effective manner, the federal government did not release the report until over a year after its completion. The government then announced that the findings of the report would be interpreted in context of the report of the concurrent Panel on Ecological Integrity. When the rhetorical sledgehammer of "ecological integrity" is capable of overwhelming its practical application, commercial activities continue to be deemed inappropriate and human use and enjoyment of the park becomes further restricted.

146 Parks Canada Agency, *Unimpaired...* vol. II, pp. 2-3.

Three of the 11 Panel members were affiliated with an environmental group (CPAWS);¹⁴⁸ five others were experts in environmental science and wildlife management. Of the workshop participants, over 19 percent were affiliated with environmental groups, over 27 percent represented parks and protected areas, and 9 percent were in the environmental science sector. In contrast, less than 6 percent of the participants were from either the industry or tourism sectors (figure 3).

The overall conclusions of the panel clearly reflect the different levels of influence the several sectors had in the policy review process. The main themes of the preservationist and restorationist approach to the environment, analyzed above in the “Ideology” and “Policy” sections of this *Public Policy Source*, echo throughout the report. The recommended upgrade of the “science” capacity of Parks Canada is estimated to cost \$28 million per year in additional funding.¹⁴⁹ The purposes to be served by vastly increasing the production of scientific discourse by Parks Canada are clear enough. Given the apparently regrettable fact that “the ecological function and the ecological ethic are compartmentalized within the organization, effecting in a sense a ‘green ceiling,’” one series of recommendations calls for the transformation of the new Parks Canada Agency into an advocacy organization.¹⁵⁰ Here the “social animation” programs of the 1970s and 1980s analyzed by Pal would no doubt form the models to be emulated.

The language used to describe the organization and operation of Parks Canada also had to be

cleaned up. Indeed, a kind of Orwellian semantic overhaul was recommended because “the adoption of business language within Parks Canada (terms such as ‘CEO,’ ‘clients,’ ‘business plans,’ ‘revenue’)... clashes with the values of a conservation-based organization and symbolizes the importance of the revenue and development themes.”¹⁵¹ On the other hand, the EI Panel was very concerned that the term “ecological integrity” was not used often enough in proposed action plans. We have seen, however, that EI is scientifically ambiguous. Nevertheless, extensive monitoring of the use of this highly symbolic but substantively empty term was called for. There must be “a content analysis of each park’s interpretation program... to measure the degree to which ecological integrity is being communicated.”¹⁵² Expenditures designed to produce more scientific discourse or to measure the number of times empty terms such as “Ecological Integrity” appear in Parks Canada pamphlets, other publications, and in the daily language of management, is some distance removed from the common sense purposes most Canadians understand to be the responsibility of Parks Canada. The endpoint of this bizarre bureaucratic initiative will come when the production of scientific discourse reaches the point that Canadians will be enjoined from enjoying the parks and wilderness they are paying so much to protect.

Parks Canada Agency

By the time the EI Panel reported, the Parks Canada Agency Act (Bill C-29) had turned the national parks service into an independent agency

147 See appendix for methodology and frequency table.

148 These Panel members are Juri Peepre, Stephanie Cairns, and Pamela Wright. Peepre is past president and current trustee of the organization, while Cairns and Wright are current national trustee nominees.

149 Parks Canada Agency, *Unimpaired...* vol. II, appendix p. G:8.

150 See recommendation 2-9.

151 Parks Canada Agency, *Unimpaired...* vol. II, p. 2-6.

152 Parks Canada Agency, *Unimpaired...* vol. II, p. 10-10.

with greater human resources and financial flexibility. Responsible for overseeing Canada's 38 national parks and 3 marine conservation areas, the agency's budget for 1997-8 was \$362 million, \$70 million of which came from internal revenues, the rest from taxpayers. The Agency currently employs approximately 5,000 employees, of whom more than a third are seasonal. While most operate outside the National Capital Region, they are still responsible to the CEO, and ultimately, the Minister of Canadian Heritage, both of whom operate from Ottawa.

The creation of a new Parks Canada Agency rests on the conviction that strategic reorganization can be a way of meeting specific policy problems.¹⁵³ The use of organizational design as a policy instrument was especially prevalent in the 1970s, for purposes of horizontal policy coordination (in areas such as transportation, science and technology, regional and economic development, and social development), but can also combine regional and coordinative responsibilities to attack specific policy problems.¹⁵⁴ For example, the Atlantic Canada Opportunities Agency (ACOA) in 1987 was an administrative reorganization of an existing complex of programs, agencies, and boards that, by intent at least, would deal with regional economic disparities in Canada. The point of such exercises is not to deliver on the promise held out by reorganization (and ACOA was as great a failure as other government programs directed at Atlantic Canada, for largely the same reasons),¹⁵⁵ but to build a specific set of assump-

tions into the mandate and policy agenda of the "new" agency. Accordingly, by turning the national parks service into a separate corporate entity, a new set of fundamental assumptions could be written into the bureaucratic structure of Parks Canada itself, with the consequence that thereafter anyone doing business with the new organization would, and could, do so only on the basis of the new and hereafter unquestioned assumptions. The experience of the OCA Panel, the findings of which were based on the EI assumptions of the BBVS, is a preview of things to come.

When the Act passed, CPAWS executives Gordon Nelson and Mary Granskou described their hopes for its effect, remarking that "CPAWS and others want to be a partner in guiding the direction of the *entire* national park system—dealing with systemic issues, instead of being consulted only on individual parks."¹⁵⁶ This new human resource potential was duly noted in the EI Report, which pointed to the approaching retirement of approximately 60 percent of the Parks Canada staff as an opportunity to improve the ideological compatibility of the Agency's work force.¹⁵⁷ In June, CPAWS executive director Mary Granskou was appointed to a senior national parks policy role. CPAWS' Melissa Slatkoff was given a federal appointment in August. CPAWS trustee and former EI Panel member Stephanie Cairns has recently been appointed to the ecological integrity advisory committee, as was the Canadian Nature Federation's Kevin McNamee. This is CPAWS "partnership" in action.

153 M. Paul Brown, "Organizational Design as Policy Instrument: Environment Canada in the Canadian Bureaucracy," in Robert Boardman ed. *Canadian Environmental Policy: Ecosystems, Politics, and Process* (Toronto: Oxford University Press, 1992), p. 25.

154 Brown, "Organizational Design as Policy Instrument," p. 25.

155 See Fred McMahon, *Retreat From Growth: Atlantic Canada and the Negative Sum Economy* (Vancouver: Fraser Institute, 2000).

156 Gordon Nelson and Mary Granskou, "A New Start For Parks," *Wilderness Activist* (Fall, 1998), p. 7. Emphasis in the original.

157 Parks Canada Agency, *Unimpaired...* vol. II, p. 2-11.

Alternatives

The future of public policy in Banff National Park, and indeed in all of Canada's national parks, now depends on the integration of the new EI mandate into the management protocols and operational practices of the new Parks Canada Agency. The same power of definition that saw "Wilderness" legislated into being in the US, is intended to take place through the interpretation of "Ecological Integrity" as a tenet of national park management. The most recent definition has come from the EI Panel: "An ecosystem has integrity when it is deemed characteristic for its natural region, including the composition and abundance of native species and biological communities, rates of change, and supporting processes." The actual regulatory meaning of each of the key terms in this definition is to be established by environmentalists fluent in the conceptually flexible scientific discourse to which we have previously directed the reader's attention. Perhaps more important, as EI Panel Chair Jacques Gu erin noted in his testimony to the House Committee considering Bill C-27, the amendments to the National Parks Act are to transform the principle of ecological integrity from a declaratory clause (as in the Bill's predecessor, Bill C-70) to a binding action clause.¹⁵⁸ The change ensures that EI is to be interpreted not simply as a principle of conservation and good stewardship, but rather as a proactive mandate for restoration, and ultimately for the rewilding, of areas brought under the jurisdiction of a committed minister and crusading officials within a reinvigorated Parks Canada Agency.

Rent hikes and increasing personal and economic costs of compliance with a centrally-managed but micro-regulatory regime have undermined the ability of existing commercial operations to compete.

While Bill C-27 is in form a consolidation of previous amendments to the National Parks Act, in substance it is a reflection and legislative embodiment of many of the trends manifest in the policy review process over the past several years. The characteristic attribute of recent policy trends is the ease with which centralized bureaucratic authority and ministerial control have been abused to the detriment not merely of commercial operators in the parks, but of all Canadians. No one would argue against the maintenance of

ecological integrity in the common sense understanding of the term as an important priority for parks management. But what has been consistently demanded by environmentalists is that ecological integrity, understood in a highly technical way that only

environmental experts can grasp and turn into policy and regulations, should be the only priority in the management of these public lands. The implications for human use and enjoyment and for local economics are not addressed. Indeed, as was indicated in the previous section, the review of such issues is considered inappropriate when national park issues are under discussion. The Panel on Ecological Integrity has resoundingly sided with the preservationists and restorationists on this point.

Rent hikes and increasing personal and economic costs of compliance with a centrally-managed but micro-regulatory regime have undermined the ability of existing commercial operations to compete, particularly the destination ski hills. The re-

158 The bill was given Royal Assent on 20 October, 2000.

sult has been to stimulate investment in winter recreation facilities in Golden, Revelstoke, and Fernie, BC. There is, of course, nothing wrong with investors seeking to develop recreational markets wherever they see an opportunity for a return.¹⁵⁹

It is, however, false and misleading to assert that tourism operations within the national parks have proceeded with no sense of restraint. Following the release of the BBVS, CP Hotels, for example, voluntarily withdrew its proposal for a golf course expansion at the Banff Springs Hotel. Considering the strict limits already placed on development in Banff, further restrictions are bound to have an enormous negative effect on the Canadian tourist industry. In 1998, the expenditures of visitors in the Alberta's Rocky Mountain Parks (Banff, Jasper and Waterton) had an economic impact of over a billion dollars, and resulted in 28,000 person years of employment. Taxation revenues of \$401 million accrued to all levels of government, over half going to Ottawa. The provincial share was \$135 million, and local government received \$55 million.¹⁶⁰ The economic impact of ski area development and operations in the National Parks (Skiing Louise, Sunshine Village Ski Area, Marmot Basin and Mt. Norquay) was \$351 million in 1999. Skiing created 9,200 person years of employment, and generated over \$133 million in taxation revenues across the three levels of government (federal share \$71 million, provincial share \$44 million, local share \$18 million).¹⁶¹

Canadians must be presented with some sensible alternatives to the heavy-handed and ideologically-driven regulatory approach to wilderness conservation.

These impressive sources of revenue will have to be replaced as the closures and restrictions on tourism and recreational opportunity in and around Banff National Park gradually remove human beings from the park. By progressively narrowing a technical definition of ecological integrity, environmentalists whose agenda we have examined in this report have succeeded in undermining the multiple use philosophy that gave Canadians Banff National Park in the first place.

One of the conclusions to which the preceding analysis leads is hardly news to political science: a centralized approach to policy-making, including environmental policy, provides an inviting target for small, highly focused and aggrieved groups. With respect to discussions and analyses of the past, present, and future of Banff National Park, conflicts in moral outlook and ideology as well as disagreement over facts has polarized debate and turned parties to a conversation over the future of the parks that belong to all Canadians into a conflict between advocates for or against a particular view of the natural environment. It is worth bearing in mind that the social and economic costs of Canada's traditional command-and-control approach to park management are the result of political choices, not moral imperatives or biological necessities. In the same way that governments are beginning to look for innovative ways of providing better and more effective health and social services, there is growing recognition that if Canadians truly value their parks and wildlife, new revenue generation mechanisms are going to be

159 See for example, Phil Novak, "Tourism is Golden," *Calgary Herald* (19 February 2000), p. A1.

160 Alberta Economic Development, *Economic Impact of Visitor's to Alberta's Rocky Mountain National Parks 1998*.

161 PricewaterhouseCoopers LLP and Econometric Research Ltd., *The Economic Impact of Downhill Skiing at Alberta's Rocky Mountain Ski Resorts*, presented to Alberta Economic Development, Feb. 2000.

needed. Canadians must be presented with some sensible alternatives to the heavy-handed and ideologically-driven regulatory approach to wilderness conservation.

Letting parks pay

While the full-fledged privatization of national parks is probably not feasible nor perhaps even advisable, there are many market solutions that can be harnessed to the environmental cause. Lessons can be learned from comparisons of American federal and state parks. Many state parks in the US, for example, have preferred to charge park users directly, rather than close facilities. The contrasting situation of US federal parks that have rejected market mechanisms is instructive.¹⁶² The new administrative structure of the revamped Parks Canada Agency at least makes revenue retention feasible through its revolving fund. However, much of this potential revenue is being diverted into questionable “science” projects, rather than to the repair and restoration of existing facilities, services, and infrastructure within the park. In other words, the creation of the Parks Canada Agency provides an opportunity to rethink many of the highly questionable regulatory assumptions governing parks management. It would be regrettable if the result of this administrative change resulted simply in more of the same kind of research and a prolongation of an acrimonious and highly unsatisfactory situation.

Moreover, there are conservation benefits to be gained by using market mechanisms to protect Canada’s parks, not just economic ones. Revenue from user fees can also be used to mitigate environmental damage from overuse. The decline in

park visits, it is worth noting, was accompanied by an increase in entrance fees and a change from charging per vehicle to charging per person. To the extent that Banff Park is “overused,” a fee increase is an obvious way to reduce visits. In short, rather than imposing unnecessary restrictions and further closures within the park, a simple measure such as park user fees can go a long way toward regulating use.

Environmental entrepreneurship

There is strong evidence from the US that, as incomes increase, environmental amenities increase, because environmental entrepreneurs use market incentives to obtain environmental benefits. As demand for unique wilderness experiences grows, willingness to pay for such quality experiences also increases.¹⁶³ In order to be able to finance such environmental innovations, commercial operators must be able to initiate the requisite improvements to existing operations. Allowing private industry to stay competitive, even while operating within the parks, is a win-win situation: while continuing to drive the Alberta economy, they will be able re-invest in the environment and the community.

The historical record in both Canada and the US bears out the economically sound observation just made. We have already noted the complimentary relationship between the CPR and the park. Railway interests were also behind nearly all major western parks established in the US in this era: Glacier (Great Northern Railroad), Mount Rainier National Park (Tacoma Eastern Railroad), Crater Lake (Southern Pacific Railroad), Grand Canyon National Park (Santa Fe Railway).¹⁶⁴ There is no reason to think that what

162 Terry L. Anderson and Donald R. Leal, *Enviro-Capitalists: Doing Good While Doing Well*, (Lanham, Maryland: Rowman and Littlefield, 1997), pp. 167-8. See also Donald R. Leal and Holly L. Fretwell, “Back to the Future to Save Our Parks,” *PERC Policy Series PS-10* (June 1997).

163 Anderson and Leal, *Enviro-Capitalists*, p. 4.

worked well in the past cannot work well today. Indeed, the private sector still plays an important role in the protection of Canada's wilderness.

Private tourism interests, for example, responded to the BBVS proactively, with the Heritage Tourism Strategy. The Heritage Tourism Council was subsequently established to provide direction, information and tools to tourism organizations and operators in the Banff area, in order to further the Strategy goals. It provided a principled vision for future discussions on land use planning and management in Banff National

Park. The council initially included Parks Canada, the Towns of Banff and Canmore, the Banff/Lake Louise Tourism Bureau, the Banff/Lake Louise Hotel and Motel Association, the Banff Centre, the Whyte Museum, and Ski Banff/Lake Louise.¹⁶⁵ The purpose of the strategy is to "sustain our mountain parks and park communities by encouraging tourism experiences that confirm the role played by local knowledge and shared appreciation of the unique nature, history and culture of our World Heritage destination." One result has been that Chateau Lake Louise was recognized as a world leader in environmental performance by being awarded a five "green leaf" rating by the Hotel Association of Canada.¹⁶⁶ Outside the national parks system, BC's Whistler ski resort operators have initiated a "Habitat Improvement Team," a corps of managers and employees who assist local conservation

groups restore habitat for fish, wildlife, and plant species in Whistler Valley. They have also committed \$1.5 million over 5 years to "Operation Green-Up," a program for watershed restoration on its lands.¹⁶⁷ Market forces can provide positive incentives for the care of Canada's national parks when markets are able to come into being and are

allowed to operate. The well known dangers of public land management through bureaucratic regulation—the aptly named "tragedy of the commons," for example—can obviously be overcome by ever more stringent regulation. The end point towards which

regulation tends, however, is a no-use wilderness, or rather, a wilderness that is enjoyed only by the regulators whose task it is to keep everyone else out.

The obvious alternative would be to institute a regime of stable property rights and positive incentives that make environmental protection an opportunity and a responsibility, not merely conformation to regulatory necessity. Again, the administrative reorganization of Parks Canada Agency is an opportunity for innovation.

Private stewardship

Private stewardship is one of the most valuable strategies for conservation. A recent example of this is the all-volunteer Crowsnest Forest Stewardship Society, which is helping to implement

A regime of stable property rights and positive incentives could make environmental protection an opportunity and a responsibility, not merely conformation to regulatory necessity.

164 Anderson and Leal, *Enviro-Capitalists*, pp. 27-8.

165 Ladd Snowsell, "Heritage Tourism Strategy—Presentation Outline for OCA Panel; Ski Area Guidelines Review," (15 December, 1998).

166 Simon Hudson, "Cross-Cultural Tourist Behaviour: An Investigation of Tourist Attitudes Towards the Environment," (in press).

167 Hudson, "Cross-Cultural Tourist Behaviour."

an access management plan for the mountainous area around Kananaskis Country. An alliance between provincial conservation officials and the society's 2,000 volunteers and supporters, the group fulfils an educational and political role, as well as actively working towards maintaining the environment.¹⁶⁸ Responsible environmental behaviour need not be inspired by an "ecocentric ethic," nor enforced by a centralized management and regulatory regime. This is evident from the

environmental entrepreneurship demonstrated by the Heritage Tourism Strategy, and other private initiatives based on "best practices" geared towards the promotion of environmental awareness within the public, and responsible ecological stewardship among operators.

Conclusion

The combination of scientific discourse and highly motivated political activism has proved an effective means of translating ideological environmentalism into public policy. In the US, activism rather than genuine science turned the spotted owl into a rallying symbol during the fight to save the "old growth" forests of the American Northwest. A similar process has made the grizzly bear, now dubbed a "charismatic megavertabrate," into the symbol for environmental activists seeking to push development out of Banff National Park.

The mounting restrictions on access to, and activities within, Banff National Park, are testament to the growing influence that special interest groups have had on Parks Canada policy. As the focus in environmentalist circles has moved away from saving species to saving spaces, the scientific discourse and (sometimes discrete) moralizing that is invoked in support of radical "rewilding" schemes forms the basis of a new environmental orthodoxy. The Banff-Bow Valley Study, the OCA Panel review, and the Ecological Integrity Panel report included the following tenets of this new orthodoxy:

- restricting human access to wilderness
- redefining "appropriate activities" according to an increasingly narrow moral vision
- eliminating "alien" species and progressively enlarging the connected areas deemed necessary for species protection
- legislating regulatory regimes based upon expansive but vague ecological areas, rather than politically-defined boundaries

The policy review process itself reflected the "biases" of its participants, and the assumptions of its science. This orthodoxy does not reflect the genuine policy preferences of ordinary Canadians towards their national parks. Despite the extreme nature of this new orthodoxy, it is being entrenched by government-sponsored research programs and the sustained lobbying efforts of well-funded and well-connected environmental coalitions. By distorting common sense understandings of environmental protection and "ecological integrity," the original dual mandate of Canada's parks that they be both enjoyed by Canadians today and preserved for future genera-

168 George Koch, "Volunteer Society Aids in Managing Mountains," *Calgary Herald* (19 June 2000), p. B7.

tions is gradually being repealed in favour of a narrow, preservationist agenda. By expanding the jurisdiction and restorative mandate of park officials, the new National Parks Act reflects the assumptions and interests that underwrote the EI Panel recommendations, which aspire to complete the organizational redesign of the Parks Canada Agency. Parks policy reviews over the past decade have repeated the dire warnings of environmentalists.

The fact remains that neither the provision of a wide variety of visitor activities nor commercial activity threaten the integrity of the park. On the contrary, visitors and commercial activity provide the opportunity to balance human needs with environmental protection in a single park management strategy. This can only be done by local decision-making, positive incentives, and the responsible stewardship associated with secure, enforceable, transferable property rights.

Appendix

Methodology for EI panel participation

In order to determine the relative influence of stakeholders in the Ecological Integrity Panel review process, a list of all of the official participants was created in a database. The list of participants was compiled from public documents or obtained from government sources. As the list was compiled, the organizational affiliation was noted. Considering the significant cross-membership and shared goals of various organizations, individuals were also identified according to interest sector.

Groups mandated to environmental causes such as the protection or conservation of wildlife and nature were classified as 1) "Environmentalist." Where no affiliation was given, or could be determined, the participant was designated 2) "Public" (no formal affiliation or affiliation unknown). The category 3) "Tourism," includes service providers (accommodation, organized tours) while 4) "Industry" refers to those engaged in natural resource development (forestry, oil, gas etc.). 5) "Parks" encompasses both Parks Canada itself, and members of all levels of government responsible for protected areas. The category 6) "Local Government" refers to municipal government, and local planning boards; 7) "Government" re-

Participation in Ecological Integrity Panel				
INTEREST SECTOR	Participant	Special Involvement	Leader	TOTAL
Consultant	7		1	8 (1.9%)
Recreation	3			3 (0.7%)
Academic	24			24 (5.8%)
Culture/Heritage	5			5 (1.2%)
First Nations	16		1	17 (4.1%)
Environmental Science/Design	33		5	38 (9.2%)
Government	56			56 (13.6%)
Local Government	21			21 (5.1%)
Parks	108	5	1	114 (27.6%)
Industry	11			11 (2.7%)
Tourism	10			10 (2.4%)
Public	25			25 (6.1%)
Environmentalist	77		3	80 (19.4%)
TOTAL	396	5	11	412 (100%)

fers to other federal or provincial departments or affiliates. The distinction was made between these two levels, because community, as distinct from national interests are often predominant at the local level. The category 8) "Environmental Science/Design" refers to environmental science or design professionals from academia and other research institutions, or non-governmental organizations devoted to the principles of conservation biology or ecological management. 9) "First Nations" are included as a category on their own, as they are increasingly being recognized as a separate interest in new park management strategy. 10) "Culture/Heritage" includes those concerned primarily with cultural, heritage or other educational activities, 11) "Academic" refers to a miscellany of other academic experts that partici-

pated in the studies, round tables, workshops, and other public hearings of these policy reviews. 12) "Recreation refers to park users' organizations and 13) "Consultant" refers to any private consultants involved in the process.

Individuals were given an ordinal ranking of 1 (= participant) if their involvement was recorded in a Parks Canada-compiled list of participants. A ranking of 2 (= special involvement) was given the Panel's secretariat. Leaders (=3) included the members of the Panel itself. It is significant to note that participation in the workshop itself was up to the discretion of Parks Canada, the Panel members, and secretariat to determine whose input would be valuable enough to warrant an invitation.

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