



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

July 7, 2021

Superintendent Dave McDonough,
Parks Canada,
Banff Field Unit,
Via e-mail: dave.mcdonough@pc.gc.ca

2021 Banff National Park Draft Management Plan

Dear Superintendent McDonough,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the Draft 2021 Banff National Park Management Plan.

AWA, founded in 1965, works throughout Alberta towards more representative and connected protection of the unique and vital landscapes that are the source of our clean water, clean air and wildlife habitat. With over 7,500 members and supporters in Alberta, across Canada and around the world AWA remains committed to ensuring protection of wildlife and wild places in Alberta for all Canadians.

Many of AWA's key park values and principles, such as the overriding importance of ecological integrity, live in the draft management plan. However, AWA would like to see stronger actions to privilege ecological integrity and better, more precise, systems for measuring progress on the ecological integrity front. AWA's comments on the draft management plan are attached.

We look forward to your response and seeing how you will integrate these comments into the final management plan.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

Devon Earl, Conservation Specialist
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2021 Banff National Park Draft Management Plan

Alberta Wilderness Association (AWA) offers the following comments for consideration by Parks Canada for the 2021 Banff National Park Draft Management Plan.

AWA finds that the overall goals of this plan are good, but that the plan lacks specific measurable commitments to achieve these outcomes in many cases. AWA supports implementing “targets that identify tangible steps that demonstrate measurable progress toward achieving each objective” (p. 8); however, we don’t agree that all of the targets are tangible or measurable. It is often unclear how targets will be measured, where, and when. In other cases, it is unclear what steps will be taken should the monitoring results not meet the prescribed standards. Each target should be tangible and measurable, and be reported on annually to assess progress towards the stated objectives.

Ecological Integrity

AWA supports the vision statement that “ecological integrity is the first priority of Park Management” (p. 7), and that ecological integrity is woven into many of the draft management plan’s objectives. We offer the following comments to further support this focus and improve upon outcomes during the life-cycle of the plan:

- The draft management plan and *State of the Park* assessment have recognized high visitation as one of the greatest challenges for Banff and that access management/site limits will be needed to protect key locations. Therefore, AWA requests a more explicit commitment to creating a visitor use management (VUM) framework to incorporate into the management plan. The “People Moving Strategy” will address some aspects of this challenge; however, a VUM strategy will be needed to manage the Park’s increasing popularity and site-specific challenges.
- As described in the draft management plan (p. 6), the proposal to twin the rail line for passenger service between Calgary and Banff is likely to be tabled again during the 10-year span of the plan. We request that the draft management plan include a commitment to an environmental impact assessment for this proposal if it proceeds past the conceptual stage. Impacts to wildlife movement in the Bow Valley corridor should figure prominently in such an assessment.
- Offer detailed descriptions of the specific mitigations that are being implemented in partnership with CP Rail to improve habitat conditions and wildlife movement in the park (p. 9)
- As it relates to “collaborating with land managers in neighbouring areas on shared challenges and initiatives” (p. 9), will Parks Canada participate in provincial Regional Planning processes to ensure that adjacent public land use does not impact the ecological integrity of the park?
- AWA supports Parks Canada’s plan to assess “opportunities to decommission and relocate trails and other facilities out of high-quality habitat to settings that offer improved recreational experiences but lower habitat value” and to “actively manag[e] human disturbance in corridors so that current levels of use by wary species are maintained or improved” (p. 9)

- Which tools does Parks Canada plan to use to educate visitors on safe enjoyment and responsible behaviours around wildlife (p. 9)?
- AWA supports the targets described in Objectives 1.3, 1.4 and 1.5 for maintaining habitat and connectivity of keystone species in the Park, improving ecological integrity through restoration, and improving the status of local species at risk (p. 11-12). The target for grizzly bears states that: “Grizzly bear habitat security is maintained or improved.”; how progress towards these objectives will be measured needs to be specified.
- Objective 1.4 proposes that: “The ecological integrity of the park is improved” (p.12). With regard to this objective, the target for invasive vegetation species should be more ambitious. It should aim to decrease diversity and extent of invasive vegetation species in the frontcountry as well as the backcountry. Additionally, plans to improve ecological integrity by prescribed burns need to guarantee the importance of old-growth forests for biodiversity and species-at-risk such as threatened woodland caribou (in the event that, in the future, caribou are re-introduced into the Park).
- As part of Objective 1.5 (p. 12), how will Parks Canada be communicating and distributing the “tools and information needed to ensure [stakeholder and visitor] actions support conservation of species at risk”? E.g. public signage, newsletter updates, Parks Canada staff, online posts, open data. Will the recovery measures described in the *Multi-species Action Plan for Banff National Park of Canada* (Parks Canada Agency, 2017) be reported on in the annual assessment of this plan?
- AWA supports Objective 2.2 to create sustainable visitor experiences that do not harm the ecological integrity of the park. However, the targets listed are vague and immeasurable. Stating that “plans are in place to address these issues” and “A variety of methods are used to manage [...] activity in areas that are ecologically sensitive” (p. 14) does not add value to this plan. Specific, measurable targets are needed.
- There is no mention in this draft plan of biodiversity monitoring and management. This should be included as a key component of the plan, because loss of biodiversity represents a major threat to ecological integrity, ecosystem services, and human wellbeing. Objectives and targets surrounding this should be science-based and should be at the forefront of management practices.

Transportation

AWA appreciates that the draft management plan recognizes that: “Research has shown [...] that building more parking and pull-offs is, at best, a temporary solution.” We support the planning currently taking place under Banff National Park’s People Moving Expert Advisory Panel, and continue to recommend that a landscape ecologist participate in this process.

Including “scenic drives” as a core component of Objective 2.1 (p. 13) is inappropriate. AWA sees this ambition as one encouraging increasing motorized vehicle use in the Park. AWA believes this compromises the Park’s ecological integrity.

Commercialization

AWA supports Parks Canada limits on the amount of development and commercial activity within Banff National Park (BNP). AWA agrees that commercial development space in the communities of Banff and Lake Louise has now been fully allocated, that no further footprint should be created (p. 5) and that legal limits should be in place to manage future development (p. 18).

- AWA strongly supports the statement that: “Outside park communities, no new lands are alienated for commercial development through lease, license of occupation or agreement, except for essential infrastructure (e.g. infrastructure for water, wastewater) ancillary (i.e. secondary, subordinate to, and in support of) the primary existing use, unless there is a clear ecological or public safety benefit to doing so.” (p. 18) On page 19, the draft plan proposes: “The developed footprint at the park level is maintained or reduced from 2021 levels.” AWA believes the direction here should be “must be maintained and should be reduced from 2021 levels.”

Traditional Knowledge and Land-Use

The continuous involvement of Indigenous communities in the management of Banff National Park is vitally important. We support and encourage Parks Canada to continue incorporating traditional knowledge, land use and language into Park management, and consulting with local First Nations. We are encouraged by the objectives described in the park management plan, including:

- Indigenous histories and presence in the park are represented with truth and integrity and shared through Indigenous voices (p. 13)
- Ongoing guidance of the Indigenous Advisory Circle (p. 15)
- The lands and waters that comprise modern-day Banff National Park are managed in ways that respect the cultural and spiritual significance of the place to Indigenous peoples (p. 15)
- Identifying ways to engage Indigenous youth in Banff National Park (p. 16)

Climate Change

AWA supports the objectives to consider and adapt to climate change, and lead in sustainable development. However, more should be done to reduce greenhouse gas emissions. Businesses should be required, not encouraged, to reduce their carbon emissions (p. 21). An educational program should be added to focus on the severity, causes, and effects of climate change (for example, Parks Canada should show visitors what the current climate trends will mean for the future of the Park’s glaciers). Visitors to the park need to be aware of these issues and understand how important it is to take steps to reduce greenhouse gas emissions and mitigate the effects of climate change.

Education

Although visitor education was a recurring theme throughout the draft management plan, descriptions of education activities were somewhat limited. Following our previous submission to Parks Canada, we encourage Parks Canada to continue strengthening non-commercialized park operated education programs to help ensure that all wildlife interactions are in the best interest of wildlife, including:

- Establishing a short, online training program for backcountry users before receiving a camping permit. This program should include information on health and safety, wildlife interactions, reducing pathway and site erosion, and respecting other backcountry users.
- Ongoing use of site restrictions during sensitive seasons for wildlife.