



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

January 30th, 2023

Sal Rasheed
Banff Field Unit Superintendent
Parks Canada
By email: banff.superintendent@pc.gc.ca, Opinion@pc.gc.ca

Re: Expert Advisory Panel Report on Moving People Sustainably in the Banff Bow Valley

Dear Mr. Rasheed,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide feedback on the final report from the Expert Advisory Panel on Moving People Sustainably in the Banff Bow Valley. Moving people in a sustainable way is an integral part of maintaining and improving ecological integrity in Banff National Park, and AWA applauds Parks Canada for taking steps to improve issues such as traffic congestion in popular areas of the park.

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.

While AWA supports the commitment to create a strategy to move people sustainably in Banff National Park and the Bow Valley, we are concerned that throughout the report there is little emphasis on maintaining and improving ecological integrity. The report states that "further research will be required into the impacts of a new framework on wildlife movement, aquatics, vehicle/animal collisions, hazardous spills, and noise among other variables". These environmental considerations should have been part of the development of the strategic plan, rather than considered after the plan is made; That is the difference between stating that ecological integrity is a priority and prioritizing ecological integrity. A strategy that may improve accessibility but decrease ecological integrity should not be included or discussed in this report. As such, it is disappointing that there was a lack of panel balance and understanding of local ecological constraints.

AWA is concerned that the proposed new developments and amenities discussed in the report would have adverse ecological impacts. If mobility hubs are to be considered, their locations must consider the impacts to the environment and hubs should be placed in areas that don't coincide with important wildlife habitat, for example. Because there has to date been no ecological assessment of the best places to put mobility hubs, it was not appropriate for the panel to suggest areas for these hubs.

In addition, there are frequent mentions throughout the report of a passenger train from Calgary to Banff and of building more gondolas to transport people. There has been no assessment as to whether these modes of transportation are the best for maintaining or improving ecological integrity. As these methods of transportation are likely to have a large ecological impact, it is not clear why they are being suggested as great ways to improve visitor access. Banff National Park attracts so many visitors each year because of its outstanding wilderness value; Building new developments also takes away from the natural value and wilderness feel of this national park.

AWA is supportive of the creation of a singular system for transportation, booking, and associated user and visitor experiences, in addition to using pricing tools to incentivize the use of mass transportation. Giving visitors a way to easily access mass transportation that is less expensive than taking a private vehicle is key to reducing traffic congestion and greenhouse gas emissions.

AWA would also like to take this opportunity to express our support for the decision to close Moraine Lake Road to personal vehicles starting in summer 2023. Given that the parking lot was usually full by sunrise, personal vehicles weren't providing full access to the area for visitors. This decision reduces greenhouse gas emissions, allows better movement for wildlife such as grizzly bears, and encourages a positive shift in the way that people access popular wilderness areas.

To summarize, AWA is encouraged by the commitment of Parks Canada to come up with a strategy to move people sustainably in Banff National Park and the Bow Valley. This is important to maintain and improve the ecological integrity of this high-use and valuable area. However, we are concerned that the priority of ecological integrity is lost in many of the recommendations in the report, partially because the panel was not well-balanced with experts who could speak to local ecological constraints. We would like to see stronger discussions about how to move people in a way that doesn't negatively impact wilderness values of the park.

Please don't hesitate to reach out if you would like any additional information about AWA's comments on this report.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Devon Earl', written in a cursive style.

Devon Earl, Conservation Specialist