



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

The Honourable Steven Guilbeault  
Minister of Environment and Climate Change  
House of Commons  
Ottawa, Ontario, K1A 0A6  
Delivered by email to: [Steven.Guilbeault@parl.gc.ca](mailto:Steven.Guilbeault@parl.gc.ca)

February 4, 2025

**Re: Designate the Banff Railway Lands Area Redevelopment Plan for a federal impact assessment**

Alberta Wilderness Association (AWA) calls on you to exercise your discretion to designate the Banff Railway Lands Area Redevelopment Plan (ARP) as a project under Section 9(1) of the *Impact Assessment Act* (IAA), as requested by Bow Valley Naturalists in their letter dated January 14, 2025.

AWA is the oldest Alberta-based environmental conservation group with more than 7,500 members and supporters in Alberta and around the world. AWA seeks the completion of a protected areas network and good stewardship of Alberta's public lands, waters, and biodiversity to ensure future generations enjoy the abundant benefits they provide.

The Town of Banff and Norquay/Liricon Capital are proposing to construct a multimodal transportation hub at the site of the historic Banff train station and adjacent grounds near the Town of Banff's west entrance. The current proposal is based on an outdated 17-year-old Town of Banff Community Plan, and features intercept parking for over 1000 automobiles and infrastructure to support potential passenger train operations.

Bow Valley Naturalists have outlined several considerations in favour of a designated project, which include:

- Rebuilding trust
- Basing Impact Assessment on Facts
- Complex Land Tenure Relationships Involving Both Parks Canada and Transport Canada
- This Project Challenges the Ability to Contain Banff Within Its Legislated Boundaries
- The Project Is, In Essence, A Designated Project
- This Project Further Complicates an Emergency Evacuation
- Process Guarantees – A Level Field
- Planning for a Fire Emergency: Growth of Infrastructure Should be Put on Hold
- This Project Threatens the Integrity of a Regional and Internationally Wildlife Movement Corridor.

AWA has additional concerns beyond those submitted by Bow Valley Naturalists, which include:

- The developable area left in Banff is limited and should serve the goals of Banff National Park, townsite, and Canadian public first above private interests.

- The ARP does not provide planning to help address private vehicle congestion in Banff National Park and the Bow Valley in the near-term and lays future policy directions that threaten the region's ecological integrity.
- The addition of 410 new parking stalls and expansion of human footprint on the north side of the railway lands further narrows an already constrained and threatened wildlife corridor.
- Increasing intercept parking for private vehicles in Banff is a short-term solution to reducing traffic congestion in the townsite, as these stalls will inevitably fill up without other concurrent mass transit strategies that remove vehicles entirely from the area.

On January 31, 2025, AWA submitted feedback as part of the public engagement survey on the draft Terms of Reference for the Strategic Environmental Assessment (SEA) of the ARP. Our feedback included the following concerns:

- Contribution to greenhouse gas emissions and associated implications for climate change from land use changes (i.e., emissions released from the destruction of wilderness ecosystems) and increased vehicle emissions in the region.
- Potential contribution to flood risk and flood intensity as the proposed north parking lot lies within a flood plain and concrete does not absorb water at the same rate as native soils and vegetation. (i.e., Replacing native vegetation with concrete could lead to increased erosion from faster moving water during flood events).
- Risks associated with proposed multi-modal transit. The purpose of the ARP is to develop multi-modal transit and explicitly includes mention of a passenger train. Yet the scope of the SEA excludes references to a mass passenger transit rail. This means that the potential impacts of increased train activity (and associated disturbances) in the region could possibly be excluded from the environmental assessment.

The federal government has an obligation to comprehensively review the impacts of projects that are carried out on federal lands to ensure that all environmental, social, health, and economic factors have been considered. Federal authorities must not carry out projects on federal lands that are likely to cause adverse environmental effects, which is why the ARP needs to be considered as a designated project under the IAA to ensure that all environmental effects (including cumulative impacts) have been considered before the project proceeds. The risks of the ARP need to undergo a comprehensive review before it can be approved.

Sincerely,



Phillip Meintzer  
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