

Mr. Kevin Van Tighem
Superintendent
Banff National Park
Box 900
Banff, Alberta T0L 0C0

November 27, 2009

Re: Comments on Banff National Park Management Plan Review 2009

Dear Mr. Van Tighem,

On behalf of the Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SA), please accept this letter on the aforementioned subject. As you are aware, CPAWS SA is part of a national non-profit organization dedicated to protecting Canada's wilderness. CPAWS SA has been involved in many aspects of the management of Banff National Park since its inception in 1965 and appreciates this opportunity to provide comments. The Banff National Park management plan (hereafter referred to as "the Plan") is monumental as it sets precedent for all National Park management plans across the country. It is imperative this plan effectively address *The National Parks Act*, which maintains that giving "first priority to the maintenance or restoration of ecological integrity" should be the focus of park management.

Our submission is organized into three sections: overall comments, main issues, and specific comments in the attached Appendix.

Overall Comments

CPAWS SA supports Parks Canada vision to connect people to nature through educational experience, strengthen Aboriginal peoples' involvement in parks, extend World Heritage Sites and maintain healthy ecosystems through conservation of the grizzly bear, re-introduction of plains bison and possibly the woodland caribou. We are very concerned, however, that the Plan is vague in many areas and appears to have an underlying economic agenda. The plan falls short of defining a robust rationale for increasing visitation, particularly at the stated 2% per year. The intent of the Plan is enabling rather than prescriptive, thereby opening the door to a host of actions (new activities, events, development and changes in zoning). We feel this, combined with a lack of accountability, would ultimately compromise the park's ecological integrity.

Main Issues

Park Visitation and Ecological Integrity – CPAWS SA supports increasing visitation to our National Parks, providing it is designed to keep people connected to nature and foster an ethic of environmental stewardship and awareness of park values. Although the Plan is designed to integrate the three elements of Parks Canada's mandate (heritage protection, education and visitor experience), it has an overriding shift towards increased visitation, education and visitor satisfaction. There is a lack of focus and accountability to maintaining and restoring ecological integrity; this is of considerable concern. We would like to see some justification for the 2% per year annual increase in visitation. Increasing visitation should not be at the cost of the Park's ecological integrity.

Throughout the plan, there is an assumption that increased visitation will lead to increased appreciation of a park. Social research shows that people do not need to visit a park to appreciate it. We look forward to collaborating with Parks Canada to ensure that external and internal educational programs and any increased visitation foster an appreciation of National Parks in Canada.

Purpose of New Activities and Events – CPAWS supports activities and events taking place in parks that meet the main purpose of a National Park. Following the Guiding Principles and Operational Policies of Parks Canada, “*Only outdoor activities which promote the appreciation of a park’s purpose and objectives, which respect the integrity of the ecosystem, and which call for a minimum of built facilities will be permitted.*” This infers that ski hills and golf courses do not add to the appreciation of a park’s purpose. This is contrary to the direction on page 32. As such, Parks Canada needs to use detailed guidelines for the purpose of new activities and events to ensure long-term accountability in the management of the park.

Specific Long-Term Measurements for Accountability – CPAWS SA strongly believes that the Plan needs benchmarks of ecological success; these should be the first indicators of success in all of the Plan’s strategies. The Management Plan should include specific long-term measurements and accountability with the results focusing more on the fundamental tenet of ecological integrity. We encourage Parks Canada to use a precautionary approach to the Plan allowing for an adaptive management¹ framework that would enable plan flexibility and amendments to the objectives and implementation tactics as required.

Ecosystem Based Management – We appreciate the importance of setting ecosystem priorities within Banff and encourage Parks Canada to use more detailed success indicators to influence the Plan in the long term. Parks Canada research has focused on both ecological (species resource requirements, habitat composition) and social (visitor satisfaction and expectations) factors for several years. We applaud the diversity of these research efforts. We encourage Parks Canada to take defined measures that *integrate* these bodies of research to effectively implement ecosystem-based management objectives that maximize visitor satisfaction without impacting ecological integrity.

Climate Change – We support increasing the creation of parks to do more than merely reflect the diversity of ecosystems in Canada. Parks and protected areas play an integral role in mitigating the impacts of climate change. Parks provide expanses of core habitat and wilderness areas. For parks to effectively address climate change, however, they must be effectively connected to prevent a checkerboard effect. Connectivity must be planned for within the boundaries of parks (e.g., highway over/under passes) and outside of park boundaries (e.g., wildlife corridors that connect protected areas). Connectivity also needs to be reflected in the management plans of adjacent parks. For example, management plans of Banff and Jasper National Parks need to define similar objectives to ensure that wildlife continually crossing the park boundary is not subject to different pressures or policy as they move through the landscape. Parks Canada has the opportunity to play a leadership role in Canada’s climate change adaptation strategies; management plans need to reflect the importance of climate change and connectivity in park planning.

Zoning and Wilderness Area Declaration – On page 70 of the Plan, Parks Canada requests an amendment to the Declared Wilderness Boundary for the following: permanent lease boundaries for ski areas; future

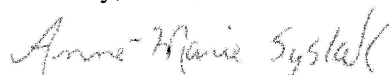
¹ CPAWS views ‘adaptive management’ as a circular form of management whereby monitoring programs assess how effectively tactics are meeting management objectives. Results from monitoring programs are used to amend tactics to ensure the management objectives are being met over the long term. This carefully planned management approach is not simply ‘trial and error’ or ‘learn as you go’ but requires advance preparation and needs to be explicitly stated as the management approach to be effective.

gravel extraction adjacent to highways 1 and 93; and limited future development of new facilities, renewable energy and communication towers. Parks Canada needs to be more specific with regard to changes in zoning and the areas involved. Changes to zone 2 wilderness areas require amendments to the *National Parks Act*. Without details in the Plan, this could invite a diversity of developments, and set a precedent that laws can be changed, resulting in the negation or compromise of the park's ecological integrity. A detailed study is needed to justify these actions. Changes to wilderness boundaries should be used as a **last** resort and must be based on extensive research.

Lastly, while there are many areas that CPAWS SA supports in the Plan, we feel there are substantial changes needed to revise the Plan to bring it into accordance with the *National Parks Act*. As such, we kindly request a second review process subsequent to the revisions of the proposed Plan.

Thank you for providing CPAWS SA this opportunity to comment and for the continued long-term collaborative relationship that CPAWS SA has had with Parks Canada. We look forward to working with you to strengthen this management plan and collaborating on its implementation. Please contact me (403-232-6686 or amsyslak@cpaws.org) if you would like to discuss any of these comments in further detail.

Sincerely,



Anne-Marie Syslak
A/ Executive Director CPAWS SA

Cc: Sheila Luey, Parks Canada
Eric Hébert Daly, CPAWS National Executive Director
Katherine Thompson, Executive Director, CPAWS Northern Alberta Chapter
Chloe O'Loughlin, Executive Director, CPAWS British Columbia Chapter



Appendix: Specific Comments on the Banff National Park Management Plan Review 2009

Areas of Support

- Parks Canada's efforts to strengthen the involvement of Aboriginal peoples in parks and share their historical and cultural knowledge of the area.
- The renewal of the Banff East Gate as a place of welcome and education for visitors, the renewal of the Cave and Basin as a keystone of park heritage, and the attention to the Icefields Parkway as a place that supports the natural and cultural protection goals of the park.
- A regional transit system could be a great way to showcase eco-living in the park and provide stewardship messaging to users.
- Parks Canada's efforts to increase the awareness and scope of the World Heritage Site within Alberta and BC.
- Creating educational opportunities for youth, urban Canadians and new Canadians is a wonderful way to introduce people to parks and foster awareness of the significance of National Parks and protected areas. CPAWS SA looks forward to the possibility of collaborating with Parks Canada on this educational initiative.

Park Visitation

- Where is the rationale and market research justifying the 2% per annum increase in visitation?
- We support the idea of fostering park stewardship but feel strongly that this push should be from the public for park appreciation and NOT from the park's commercial sector.
- Any targets for growth need to be carefully managed to focus on educational opportunities and take place during periods of the year where there is capacity to accommodate them. Access and heavy use should be kept in areas where it already exists, thereby limiting negative impacts.
- Quality experiences focusing on parks and wilderness should not be sacrificed for the main purpose of increasing visitation.
- Parks Canada's promotional efforts should focus on educational values and awareness along with the importance of National Parks and protected areas.
- We would like to see research testing the assumption that increasing the number of new visitor opportunities directly links to the success of visitor experience.

Purpose of New Activities and Events

- Providing a wide variety of recreational opportunities does not necessarily equate to enriching visitors' connections to Canada's mountain heritage.
- Given the overuse of the term *sustainability*, Parks Canada needs to provide a detailed definition of what is intended by a "Sustainable tourism product".
- Parks Canada needs to demonstrate that all new developments, activities and events will improve visitor satisfaction and appreciation for National Parks, not just get more people into the park.
- Parks Canada should focus on quality not quantity in the Plan. More visitors and activities should NOT supersede ecological integrity and should be focused on park values.
- We are concerned that the Banff Triathlon has been approved prior to the approval and implementation of this plan, which leads us to question the transparency and accountability of Parks Canada to the approval of special events. Please explain how this triathlon will foster an appreciation of Banff National Park for those who participate.

Science and Ecosystem Management

- We applaud Parks Canada's continued efforts in citizen-based science as a means to create learning opportunities about parks and wilderness. Any monitoring programs that engage citizens should not compromise the scientific integrity of the studies nor replace robust, professionally executed scientific research as an aspect of park monitoring and adaptive management.
- On p.27, the idea of no net environmental loss is difficult to achieve. We would like to see language and measurable indicators of success that demonstrate an environmental gain, not tactics to mitigate environment impacts to benefit development.
- On p.36, CPAWS is supportive of re-introducing a breeding population of extirpated Plains Bison to the park and welcomes the feasibility study to restore Woodland Caribou.
- On pages 35-37, in regards to grizzly bears, Parks Canada needs to set a threshold level of what human disturbance is acceptable while securing grizzly habitat. Relocating trails out of high-quality grizzly bear habitat is ideal however we caution that these old trails need to be restored and that trail relocation to higher sub-alpine slopes could affect sensitive ecosystems. The annual known human-caused mortality of female grizzlies should include ALL females, not just independent ones. In addition, a mortality rate of 1% for females is too high, and no acceptable mortality rate for other age/sex classes is provided. A mortality rate of 0.5% for females and 2.8% for the entire population is more appropriate. There is a continued need for bear education and awareness.
- We commend Parks Canada's efforts to work with Canadian Pacific rail to minimize bear mortality along the railway.
- We would like to see more specifically defined measurable indicators of success so that Parks Canada has more accountability with respect to the long-term outcomes of the Plan.

Other Comments

- On p. 13, we are concerned about one of the indicators for success being minimal restrictions on use. Restrictions are in place to protect resources and public safety and these should not be swayed or rationalized in setting limits with respect to conservation.
- In Section 5.6, we would like to see more specificity with regard to development in this key strategy. A lack of detail in this section could open the door to undermine the ecology of the area.
- In 6.2.4 of Key Actions for Lands Adjacent to the Town of Banff, we are concerned about increased mountain biking. Mountain biking has a far greater impact on erosion than hiking and often leads to an increase in surprise encounters with wildlife. Parks Canada will need to carefully manage any mountain biking trails and ensure there is never biking when bears are in the area.
- On p. 42, we question the Park's need for another gondola. There will undoubtedly be ecological impacts associated with this development and we have not seen any social research proving this development will significantly contribute to visitor satisfaction or address visitor expectations. Summer development of ski hills needs to assess the long term impacts to the ecological integrity of this prime summer habitat. This information needs to be integrated with social research demonstrating visitor expectations for recreational opportunities in these areas.
- P. 42, discusses the Banff air strip. CPAWS would like all landings to be logged and emergency and diversionary purposes be qualified. Any inappropriate landings must be penalized. We also ask that there be minimal maintenance of the strip.
- On p. 46, we applaud Parks Canada's efforts to restrict growth within the town of Banff and maintain the 8000 cap threshold. We are concerned that the 2% growth target gives the commercial sector ammunition to push this limit. Please explain how you propose to cap development and growth when there is pressure to increase visitation and use of the area.
- On p. 57, we question the need for additional hut developments in the Main Ranges, and challenge that it is internally inconsistent with maintaining limits on development and habitat security within declared wilderness boundaries. Parks Canada needs to outline what is or is not acceptable within declared wilderness zones.