

BOW VALLEY NATURALISTS

SUBMISSION TO THE TOWN OF BANFF PUBLIC HEARING INTO THE BANFF RAILWAYLANDS PUBLIC HEARING

March 20, 2024



Wildlife tracks showing how Forty Mile Creek deflects wildlife movement into the gap between the Fenlands Recreation Center on the left and the creek bank on the right. The railway lands ARP would likely have the effect of funneling more wildlife movement from a 70-meter wide segment being converted to a parking lot into this mere 15-meter wide, heavily disturbed, segment. See the wildlife corridor discussion

INTRODUCTION AND OVERVIEW

The Bow Valley Naturalists are dedicated to protection of ecological integrity and the sharing of information about natural systems. Since 1967 we have been active in Banff National Park and the surrounding landscapes by participating in public planning processes, providing educational activities and conducting two of the longest running citizen science projects in the mountain parks. All our 290 current members care deeply about protecting natural ecosystems and include dedicated naturalists, scientists, natural history interpreters and environmental assessment specialists. Many of our members have spent their professional careers in the field of protected area management. BVN has provided comments on innumerable environmental assessments, policy proposals and management plans throughout our 57 years as an organization. We are pleased to submit these comments on the Banff Railway Lands Area Redevelopment Proposal.

The following points are offered as an overview and summary. More detailed comments and questions for Town of Banff Council to consider before moving this plan further along the approval process are included below.

1. This ARP Should Not Proceed

BVN requests that the ARP not proceed any further in the Town of Banff's approval process.

This is due to fundamental problems relating to unresolved questions and a lack of recent data relating to the understanding of site-specific ecosystem components and the absence of any new infrastructure that addresses the need for a public transport hub. Approving this ARP will remove future opportunities to use the available land for essential transportation hub infrastructure and add to the cumulative negative environmental damage associated with decades of development in the Banff townsite, including loss of a rare landform that speaks to the town of Banff's UNESCO heritage.

2. Press Pause: Too Much All at Once

This plan should be paused because the Banff townsite area, and its community, are overwhelmed with too many other inter-related projects occurring at the same time with little public understanding of how these projects interact. More time is needed to understand how planning for the railway lands fits with other plans. Foremost is the need to complete the Community Plan review process which guides planning for the town. Additional interactions between this proposal, planning for Banff Avenue Square, the Lake Minnewanka area, the Mountain Avenue redevelopment, the Banff Avenue pedestrian zone, planning a phased, integrated approach to moving people in Banff National Park and mapping and planning for the restoration and protection of montane wetlands surrounding the Banff townsite need to be considered together along with how they cumulatively affect the community.

3. "No" to the Gondola

The proposal for a gondola, aspirational or otherwise, has no place in a plan proposed by the Town of Banff operating under an incorporation agreement with a National Park that does not support a gondola. We note that the Town's Renewable Energy Transition Roadmap (2019) states:

“The numerous Parks Canada sites and hotel/resort properties located immediately outside the official town boundary are inseparable from the town proper in terms of employment, tourism activities, transportation systems, water services, waste management, and other factors.”

The ARP clearly relies on gondola infrastructure across unleased lands in a national park as part of its long-range plans. In essence, through this ARP proposal, the ski area is requesting to use land for its own purposes outside of its negotiated agreements with the Government of Canada to “secure its future” while proposing a plan for growth within in Banff Townsite. It is our opinion that this is clearly in contradiction with the Mount Norquay Long Range Plan, the Park Management Plan and the Ski Area Guidelines.

4. There is No Infrastructure Proposed That Will Support Future Public Transit Needs

This ARP is essentially a proposal for the accessories to public transport that will occupy valuable lands that might provide future opportunities for meaningful public transit solutions and infrastructure. This ARP is promoted as addressing the need for public transport. Yet, there is nothing in this ARP that proposes any new infrastructure for public transportation. Nor does the ARP leave any land available for that infrastructure when it might be needed. What is proposed is move existing bus stalls at the train station to the opposite side of the railway tracks maintaining an already existing bus parking line-up, and building another large parking lot for private vehicles.

5. More Parking for Private Vehicles, No Meaningful Solutions For Banff National Park

The current trend is to reduce private vehicle parking in the mountain national parks. **By focusing attention on providing another parking lot, this proposal reduces the incentive for meaningful thinking about public transportation solutions and alternative land use options for the railway lands that may be required to facilitate those solutions.** In the meantime, valuable montane ecoregion habitat will be further degraded.

6. It is a Functioning Wildlife Corridor - Leave it Alone

To improve wildlife movement in the lands adjacent to the Town of Banff we have seen the removal of the bison paddock, closing the airport, closing the cadet camp, removing the wildlife lab, moving the community and Parks Canada horse stables and constructing numerous highway crossing structures. **This proposal threatens to step backward and compromise these efforts by proposing to build a new parking lot in an important but already constricted and vulnerable wildlife movement corridor based on an experimental concept.** That concept is not based on thorough examination and discussion of current data relating to the Fenland wildlife movement corridor.

7. No More Development North of the Tracks

Further development on the North Side of the railway tracks is not consistent with protecting ecological integrity or the natural heritage of the Banff townsite. The need for ecosystem restoration has been recognized through this ARP process. That reclamation should be undertaken, based on its own merits, and not as part of a trade-off to support more development.

8. Now is the Time for Maintenance and Restoration

This ARP further perpetuates a 140-year legacy of cumulative negative impacts on Banff National Park's ecosystems in the interest of developing the townsite. With greatly improved understanding of ecosystems, **now is a time when the Town should be looking for opportunities to compensate for past harms rather than justifying ways to mitigate more cumulative harm.** Protecting ecosystems is always a collective gain.

9. And Then There's the Town of Banff Environmental Master Plan

The Town of Banff should be proud of its Environmental Master Plan. This plan speaks to the need for maintenance and restoration of ecosystems and is a model for other municipalities to follow as they plan for sustainable communities. Those who developed this plan should be proud of their work. And so, we are perplexed that much of this ARP proposal seems in contradiction to that plan and is based on superficial understanding of the site-specific ecosystem with promises to only protect important environmental values "if possible". **The ARP should go back the office and be discussed through the lens of the Environmental Master Plan to assess if this proposal is really what is best for the community.**

BVN believes the advice of the 1996 Banff-Bow Valley Task Force remains valid today:

"Our understanding is incomplete. For this reason, we must be cautious in making any decision to allow more people, facilities, activities and services. We must exercise the principles of precaution. If we are not sure a proposed development will preserve, or even enhance, ecological integrity, we must err on the side of caution. We must postpone making decisions that could harm the environment until we do know, until we are sure."

Banff-Bow Valley Task Force letter to the Minister of the Environment in their summary report "Bow Valley at the Crossroads", October 1996.

BVN believes the information included in this submission shows that we are not sure about this proposal's impacts on the integrity of ecosystems in the town of Banff or in Banff National Park.

DETAILED COMMENTS

1/ THE PROPOSED PARKING LOT IS NOT A PUBLIC TRANSIT CONCEPT

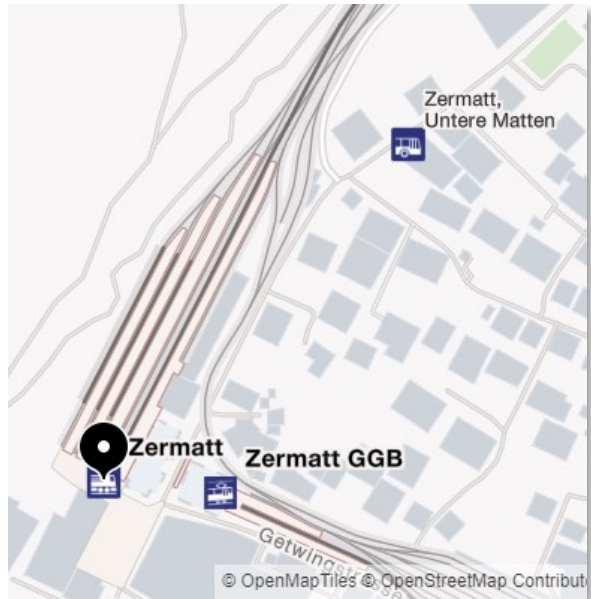
The ARP has been promoted to the public as, and makes claims of, being justified in the interest solving transportation issues being experienced in Banff National Park. However, we struggle with how the ARP addresses this need. Instead, the plan offers to use available land for amenities that might be nice to have should a robust public transit hub ever be developed. BVN is concerned that committing available land in advance of laying out a potential robust transit hub that meets the Expert Panel strategy to “work on first and last mile connectivity” will eliminate the opportunity to use that land for more essential transit hub infrastructure. It is essential to understand where train platforms will be located to service robust public transit schedules. It is likely that a seamless bus hub should not rely on a string of busses lined up end to end in the south parking lot.

Passengers will need to easily get off one bus or a train and quickly access the bus loading area for the next destination using the shortest walking distance. Lining up busses end to end along 325 meters starting approximately 150 metres from the station entrance is not “seamless”. Nor is it convenient for passengers during inclement weather. Nor does this seem to allow for arriving busses to easily mix with already waiting and departing busses. The south parking area needs to show a detailed bus platform design for how all the coming, out-going and waiting busses will conveniently line-up for convenience passenger access and orientation. It is important to understand how that layout will affect private vehicle parking stalls. We offer the following points to support this conclusion and include the images to support our concern.

Train and/or bus schedules will require multiple platforms to accommodate waiting, departing and arriving trains or busses, especially during busy times in the schedule. The current track configuration does not allow for separation of platforms and the ARP does not suggest land be set aside for additional platforms. Nor does the ARP suggest how passengers might access train platforms that are not attached to the existing station area. We realize track configuration is not in proponents’ control but this an essential question, a first step, to planning a land use layout in support of robust public transit involving trains.

Questions

Does Council believe it has enough information to understand how a bus transfer hub should be laid out for the convenience, ease of use, and comfort of passengers and how that layout will affect configuration of the ARP?

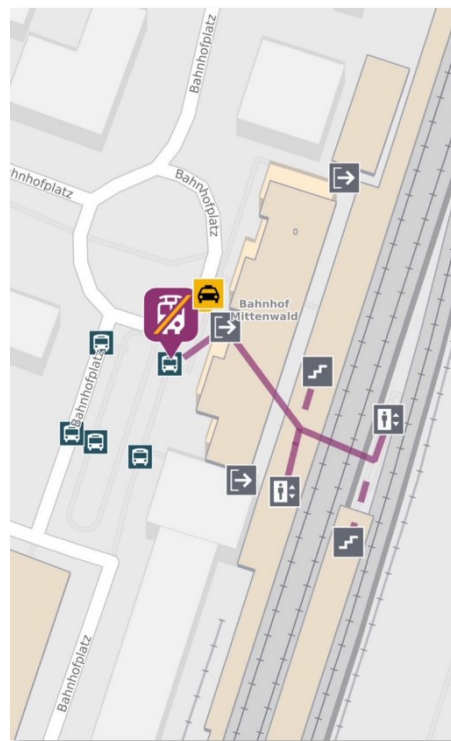


The train station layout in the tourism destination of Zermatt, Switzerland. There are 6 passenger platforms attached directly to the station with intercept parking located in multi-level parking structures in a different town. The ARP does not consider space for additional passenger platforms. Will the railway lands eventually require similar infrastructure on land not included in this ARP proposal? Source: SBB website.

If this plan is adopted and passenger rail becomes a preferred public transit option, where will multiple train platforms be located to accommodate a robust train schedule with trains waiting, arriving and departing while very active two-way freight trains are passing at high speed?

Increased pedestrian traffic across the tracks will result from the need for people to cross the tracks to and from the proposed north parking lot. It is quite likely that safety considerations, as found in similar contexts, will eventually require a pedestrian overpass or underpass. Where might this infrastructure be located and how much space will be required taking into consideration that the structure will need to be fully accessible?

If land is committed to the uses as described in this ARP, is it the Town's plan to request more national park lands in the future, possibly the corridor lands identified for reclamation, to meet the needs raised in the above questions?



Map showing the train station layout in the mountain town of Mittenwald, Germany. There are 3 passenger loading platforms attached directly to the station. By-pass tracks for non-passenger or through-rail are located farther from the station. Intercept parking is close by on the same side of the tracks with a large bus loading and parking lot located in front of the station. Passengers access to the platforms is via underground passages with stairs and elevators. Source: bahnhof.de

2/ LAND TENURE AND ZONING

In the public forum a question was asked about possible land uses, such as housing, for community needs other than those proposed in the ARP proposal. The response was that the Town does not manage this land. BVN would like to suggest that the Town does manage this land through its planning and zoning functions. Hence this hearing. This ARP should be reconsidered by the Town independently from any private sector development proposal to assess a variety of design and zoning alternatives that might better meet community, public transportation and ecosystem protection needs while being consistent with the Environmental Master Plan.

ECOLOGICAL INTEGRITY IS NON-NEGOTIABLE: RECLAMATION TIED TO FREE PARKING IS BAD POLICY

The Expert Panel on Moving People Sustainably in the Banff Bow Valley stated:

“The panel recommends that Parks Canada look at the pricing scheme to see where pricing can better incentivize and de-incentivize certain behaviors. Pricing should make public transit more attractive and personal vehicle use less so. It is a key motivator that drives behavioral change. Proper pricing is key to the success of the system overall.”

Expert Advisory Panel On Moving People Sustainably In The Banff Bow Valley (Bruce et al. 2022)

This ARP proposal promotes an economic model (ARP page 102 footnote 5) that promotes free parking in exchange for revenue from a gondola operation and ties the cost of reclamation to that free parking. This contradicts the Expert Panel perspective that pricing is an essential tool to provide an incentive for using public transit. There is no advantage to having a gondola as part of a revenue model that supports

visitors to the Town of Banff avoiding public transit in favour of free parking. There is no reason for this ARP to include a gondola for that purpose.

The proponent and the Town of Banff have made a case for ecological reclamation in the railway lands area. That reclamation should be conducted by reason of the Town's commitment to being a National Park Town regardless of any development proposal. It is unfortunate that ecological reclamation of past developments should be used as a negotiating point contingent on approval of more development within the Town boundary and, in the case of a gondola, on national park lands outside of the town boundary.

In order to avoid removing more land from the national park ecosystem, BVN believes any future free parking should be located outside of Banff National Park, most likely close to visitors' point of origin consistent with the expert panel's preference for first and last mile connectivity in a public transit system. Additional free parking should not be part of any plans for the ARP area.

Questions

Given the expert panel's identification that a pricing scheme should be part of the transportation and congestion solution, what is the Town Council's perspective on whether any parking being provided within the ARP should continue to be provided for free as proposed in the ARP?

3/ PROTECTING VALUED ECOSYSTEM COMPONENTS "IF POSSIBLE"

The ARP states that rare plants, listed species, and known sensitive wildlife areas will be protected "if possible":

"No known sensitive wildlife areas (e.g., calving areas, mineral licks, bat roosting or hibernacula) will be affected by the Plan area. Wildlife and nesting bird surveys will be conducted prior to construction and avoided or mitigated if possible." ARP page 119.

"Rare plants, as well as federally or provincially listed plant species, will be identified prior to construction and avoided if possible. Design features and other mitigations to reduce effects to rare or listed plant species will be undertaken." ARP page 124.

The use of the term "if possible" in this ARP suggests that the Town of Banff and the proponent are only interested in protecting valued ecosystem components if it does not interfere with development. Neither the Migratory Birds Convention Act nor the Species at Risk Act use the term "if possible". Disturbance must be avoided, not mitigated. Definition of ecological integrity in the National Parks Act speaks to protecting "the composition and abundance of native species and biological communities". Protecting ecological integrity therefore requires protecting much more than sensitive species "if possible", protecting ecological integrity in a national park town requires protecting the system and therefore all species.

Understanding ecosystems and patterns of plant and animal land use require long term monitoring surveys. This ARP has been in development since 2019. That represents almost 5 years during which ecosystem monitoring consistent with commitments in the Town of Banff Environmental Master Plan could have been undertaken. Yet, we are left with promises of future study after this ARP is approved.

BVN believes neither the public nor Town of Banff Council should be asked to take any decision or make any statement about the environmental impacts of this proposal until the environment has been

properly surveyed over several seasons and the proposal components can be planned to avoid disturbances or removed from the proposal if that is necessary to protect national park ecosystems.

Questions

Is it the view of the Town of Banff Council that valued ecosystems components, including those protect by federal law, need only to be protected when possible, otherwise disturbance of these component is acceptable?

Does the Town of Banff Council believe this ARP is consistent with its own commitment to the National Parks Act by promoting a plan that offers only to protect sensitive species, and only protecting them “if possible”?

Knowing the public would be asked to review information about the environmental effects of this ARP proposal, why were studies of plants and wildlife in the railway lands, consistent with the monitoring commitments in the Environmental Master Plan, not reported in the ARP?

4/ TRADING GOOD LAND FOR BAD

BVN fails to understand how giving up of an undisturbed piece of land in a national park to build the north parking lot, based on promises of reclamation of another piece of land, is a good deal. Tracking data and simple observations show that this land is a primary route for animals. Land that is being held from development in the trade-off has the following liabilities:

- Already disturbed land on which reclamation may, or may not, be successful.
- Includes a power corridor controlled by a third party who may or may not approve of any reclamation plans and likely will require the land is maintain in a condition that allows for heavy equipment access for maintenance.
- Existing clearings which serve as a fire break and may not be suited to any future reclamation plans that encourage more vegetation growth.
- Includes adjacent human activity and structures in a wildlife corridor including the CPKC staff building with no current plans for its removal.
- Promises of reclamation over a long time with no guarantee of success.
- Question assertions that the wildlife corridor will not be negatively impacted.



These tracks indicate that wildlife that move around the north side of the Fenlands facility become funneled into a 15-metre wide gap between the Forty Mile Creek bank and the building's activities and associated infrastructure. They do not seem to cross the Creek, as the ARP suggests they would, to access the north segment of the corridor.

The result of this trade-off is that the Town will contain more disturbed land, in addition to the forest already removed for the south parking lot and past expansion of the Fenlands facility lot. This is in

contradiction to the requirement for no net environmental loss, and further contributes to the cumulative effects of development in the townsite.

BVN believes the existing forest south of the Fenlands parking lot, north of the tracks, is irreplaceable natural land. It is already connected to the ecosystem functions to the east and west. It is already a functioning section of wildlife corridor and provides other habitat values. It should not be traded for lands of lesser value based on future “aspirations” of an improved ecosystem state.

Question

Does Council believe that removing the forest patch to build the north parking lot is consistent with the Environmental Master Plan target of “By 2028, tree cover and diversity profile within the townsite is at an optimal level (%)”

5/ NO NET NEGATIVE IMPACT

Development on, and in the vicinity of, the railway lands has already led to net environmental losses in Banff townsite.

These losses include, but are not limited to:

- Development of the railway infrastructure.
- Removal of forest to build the south parking lot.
- Incremental destruction of the special sand dunes to facilitate access to the south parking lot.
- Introduction of non-native species (Royal Willows) into a National Park viewscape.
- Recent destruction of a forest ecosystem, including destruction of rare landforms, to expand the Fenlands facility parking lot.
- Removal of forest to build Mineral Springs Hospital and helicopter landing pad.

The cumulative effects of all these projects make it clear that there is a consistent pattern of continuing net negative impact over time due to development in this area of the townsite. Many of these projects can be justified in historical context or as part of essential community services. BVN believes that it is now time for this pattern of net negative environmental impact on the railway lands, and generally within the townsite, should end. The last remaining patch of forest between the tracks and the Fenlands parking lot, which is representative of what preceded railway and townsite development, should be preserved in its natural state, connected to surrounding ecosystems.

Questions

What is the current remaining area of natural undisturbed land and forest in the townsite?

If the patch of forest is removed to build a parking lot, what will be the proportional loss of this remaining undisturbed land area and its effects on the Town’s commitment, through the Environmental Master Plan, to protecting forests and biodiversity in the Townsite?

6/ FLOODS, WETLANDS AND STORMWATER

Montane wetlands are among the most diverse and, at the same time, limited habitats in Banff National Park. The ARP lands north of the railway tracks include, and are in close proximity to, wetland ecosystems. The north parking lot is proposed to be located on land that floods regularly, experiences very shallow water tables, and is a wetland directly connected to Forty Mile Creek during high water events. The ARP only mentions 1:100-year floods but, as the figure below shows, the land is flooded from 40 Mile Creek at least as often as the 1:10-year flood. Ground water flooding may be more frequent. Filling this land in to create a parking lot is contrary to the Town of Banff Environmental Master Plan and will reduce the area of wetland in Banff National Park through direct disturbance and by increasing human activity on land adjacent to sensitive wetlands. Because this land is directly connected to Forty Mile Creek through flooding events it is possibly a contributor to critical habitat for species at risk inhabiting that stream through nutrient cycles and occasional provision of food items. This habitat connection should be allowed to continue.

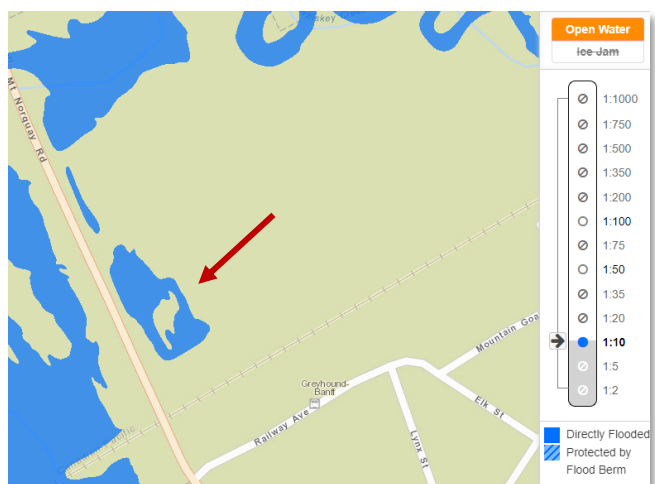
The north parking lot will result in increased stormwater runoff which will flow directly into the adjacent wetlands, need to be channelled into shallow ground water tables that connect to immediately adjacent water courses, or be channelled into containment infrastructure. While the ARP promises protection of wetlands from runoff there are no specifics and no land is designated for any infrastructure that may be required to protect wetlands from stormwater contamination such as bio swales or holding ponds. Directing stormwater underground is likely not an appropriate mitigative measure given the high-water tables with short connections to surface water courses such as Forty Mile Creek and Whiskey Creek. The Environmental Master Plan commits the Town to “reduce stormwater runoff” rather than recommending mitigations as promised in the ARP

“Work with community partners to develop a green infrastructure site-map and development plan. Prioritize developments that are collaborative, multifunctional (i.e. to conserve biodiversity, to reduce stormwater runoff, to support the green economy, to strengthen community connections etc.) and that integrate both green and grey infrastructure and connections to other green spaces.”

*BANFF ENVIRONMENTAL
MASTER PLAN: a 2019-2029 Plan for the
Environment in Banff.*

The ARP implies the north parking lot will be developed on the flood fringe. Without interpretation of the term “flood fringe” this can be misleading. In fact, the north parking is proposed be developed on land that is frequently directly flooded, certainly within every ten years. The area of wetland land that gets regularly flooded was significantly reduced with the construction of the original Banff arena and significantly reduced during the recent expansion of the Fenlands Recreation facility parking lot. Construction of the proposed north parking area in a wetland is an unacceptable cumulative loss of this local flood zone and wetland ecosystem.

The cumulative loss of wetland within the town boundary, including the historical loss of wetland to facilitate the recreation grounds and stables area, and the continuing manipulation of the Cave and Basin/Sundance wetlands water levels to protect Town infrastructure is a major net negative environmental impact for a national park



This map shows flooding for the 1:10 year frequency in the proposed north parking lot area (arrow). Flooded area is significantly greater for higher flood events. Source: Government of Alberta Flood Awareness Mapping, Inundation Layer.

town. There is a need for protection and restoration of wetlands within the town boundary as committed to in the Environmental Management Plan:

“Wetlands located within the townsite are conserved or enhanced to sustain their ecosystem services through retention, restoration and management activities by 2028.”

Banff National Park is currently conducting a wetland mapping exercise. This exercise will better define the boundaries of wetlands in the Park. In turn, this will better inform wetland restoration planning within the town boundary. This ARP should not proceed any further until Council can be informed by this wetland planning exercise.

7/ PROTECTING THE VERMILION LAKES VL4 ECOSITE

As indicated in the ARP proposal, the railway lands are within the Vermilion Lakes 4 (VL4) ecosite according to the bio-physical land classification of Banff and Jasper National Parks referenced in the ARP (Holland and Coen, 1983). This ecosite is identified as “Wet white spruce forest” in that classification system and confirms the status of this site, including the proposed north parking lot area, as a wetland. The following quotes from the land classification of Banff National Park help to describe the importance and management constraints associated with the VL ecosystem:

“WILDLIFE

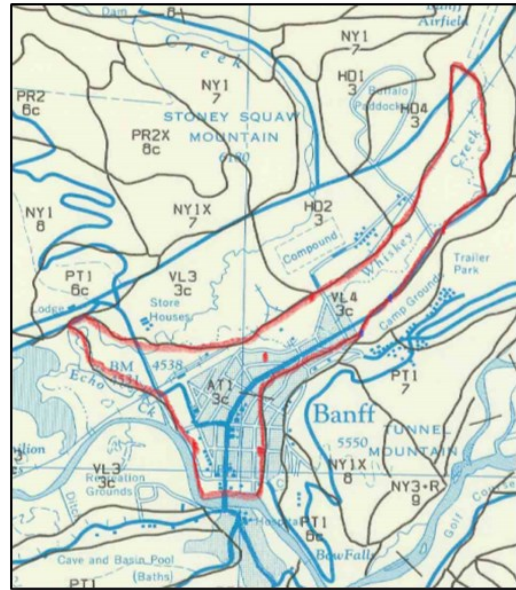
VL is very important to wildlife and is one of the most important in the two national parks. Critical winter range for elk and moose occurs here and many small mammal species reach high densities. Carnivores are attracted by these prey. Numerous bird species occur in the wetlands in high densities and many do not occur elsewhere in the parks. Uncommon raptors such as osprey and bald eagle nest in VL.”

and,

“MANAGEMENT CONSIDERATIONS

Imperfect to very poor drainage, resulting from high water tables and backwater flooding, severely limits most park uses, unless expensive construction techniques are followed. On a number of VL tracts, particularly VL1, the flooding is accompanied by active sedimentation. Major construction activities (e.g. roads) on such tracts will change sedimentation and erosional patterns.”

VL4 ecosites are very rare in Banff National Park and are vulnerable to disturbance. According to the above land classification there are only two VL4 ecosite units in the entire Bow Valley and both are significantly disturbed. The VL4 ecosite unit associated with the railway lands is almost entirely disturbed by current and historical human undertakings. The portion of this ecosite unit within the townsite boundary is almost totally dominated by human activity. The remaining patch of VL4 wetland forest where the north parking lot is proposed is likely the last remaining representative of this ecosite within



The VL4 ecosite associated with the ARP is highlighted in Red on this map from the ecological land classification of Banff National Park referenced in the ARP proposal.

the Town jurisdiction. It is very difficult to see how this ARP will adhere, as promised, to the federal policies on wetland conservation to achieve no net loss of wetland by filling a wetland in to create a parking lot.

If the Town of Banff is to live up to its biodiversity commitments in the Environmental Master Plan, “There is a net increase in biodiversity, habitats, and ecosystem health within the townsite by 2028”, this patch of VL4 ecosite must be protected in its natural state.

Question

Does Council believe it will be meeting its commitments in the Environmental Master plan to protecting biodiversity in the townsite if the north parking lot is approved through acceptance of this ARP?

ENVIRONMENTAL ASSESSMENT – A PLANNING TOOL

BVN would like to remind the Town that environmental impact assessment is not a decision tool on its own. It is a widely accepted planning tool that contributes information during the planning process. There is nothing that prevents the Town from taking advantage of this planning tool at any time in its planning process. It is disappointing that on a project of this significance that an independent impact assessment has not been undertaken or requested by the Town to provide essential information to support the municipal decision-making process. It is inappropriate for the Town of Banff to pass any judgement on the environmental effects of this proposal without being informed by an environmental impact assessment. Further it is inconsiderate of the community and other Canadians to ask them to comment and judge such a significant proposal without themselves being informed by independent environmental impact assessment.

Due to the ecosystem components affected by this proposal and the site-specific infrastructure proposals, that are more than strategic in nature, it is appropriate and consistent with governance due diligence that the Town require an independent impact assessment of this proposal. This should be done prior to undertaking any act that suggests Council accepts the impacts of the proposal and should be undertaken by an independent panel consistent with federal policy with respect projects of this scale, ecosystem sensitivity and controversy within a national park and associated with a ski area expanding its use of land within a national park for its own needs. The Town of Banff should withhold its judgement of this ARP and find a pathway to collaborate with Parks Canada and the Impact Assessment Agency of Canada to avail itself of the information that can be obtained from a comprehensive impact assessment directed by an independent panel.

8/ COMMUNITY PLAN

This plan should be paused because the Banff townsite area, and its community, are overwhelmed with too many other inter-related important projects making meaningful commentary on any one project a significant challenge. In addition, more time is needed to understand how planning for the railway lands fits with other plans. Foremost is the need to complete the Community Plan review process which guides

“We are asking for your help to solve Banff’s traffic problems and secure Norquay’s future...

...The ARP also includes references to two aspirational, future projects that would require provincial and federal government approval-- space to manage future passenger rail services to and from the Calgary Airport, and most importantly a Gondola Aerial Transit Terminus that would ensure Norquay’s economic sustainability...

...The gondola, linking Banff and Mt. Norquay, will provide financial stability and allow for much needed infrastructure investments; including the replacement of aging ski lifts, nearing their end-of-life cycle.”

*Mount Norquay ski area email communication to customers with the subject line “Subject: Banff Railway Lands ARP - Secure Norquay’s Future!”
February 27, 2024*

planning for the town. There is a need for the community to have time to properly understand additional interactions between this proposal and the following on-going planning initiatives.

- Community Plan Review.
- Planning for Banff Avenue Square.
- Lake Minnewanka area plan.
- Mountain Avenue redevelopment.
- Banff Avenue pedestrian zone.
- Planning a phased, integrated approach to moving people in Banff National Park.
- Mapping and planning for the restoration and protection of montane wetlands surrounding the Banff townsite.
- Rezoning to add density.
- Removing the requirement to build parking to go with housing.

BVN has expressed its concerns with this proposal and related parking and transportation concerns, along with the need for an economic model that is compatible with sustainability, in a submission to the Community Plan review process in November 2023. We remain concerned that Town is moving the public process for this proposal forward far too quickly and under a community plan that is knowingly out of date, while a new community plan is nearing completion.

9/ SINGLE LEVEL PARKING LOT – A WASTE OF LAND

In a Town with severe space limits for housing, let alone parking, it is strange that the proposed solution to congestion is another single-level parking lot. While BVN is not supportive of encouraging more private visitor vehicles in Banff National Park, if that is the direction the Town is supporting by moving this ARP forward, then there must be a more efficient use of space to avoid impacts on ecosystems.

It is common in space-restricted locations to build multi-level parkades to address parking space issues. The Town should consider the advantages of a multi-level, steel frame parkade, located on disturbed land. Perhaps the south lot should be used more efficiently with the following advantages being realized from a multilevel parkade:

- Opportunity to provide much more parking per area than a single lot.
- Opportunity for value-added use of space such as roof-top or side mounted solar panels, community gardens, scenic visitor picnic area, or other community-oriented recreational space.
- Opportunity for visually pleasing design.
- Parking protected from bad weather.
- Reduced need and costs for snow removal and transport to storage.
- Reduction in parking area runoff and costs of managing contaminated runoff.



Parking structures need not be massive concrete structures, as this steel frame structure demonstrates, and have environmental management advantages over open surface lots. Inset photo shows the roof of this structure apparently covered in solar panels.

- More flexibility in parking capacity during a staged transition between private vehicle use and public transit.
- Potential for repurposing at end of life. For example, conversion to housing.
- Potential for recycling after decommissioning.
- Potential for ground floor essential public transit services such as info centre and cycling support infrastructure.

Perhaps the greatest advantage of providing longer term parking supply through a multi-level parking structure is a reduction in the need for the Town to look for more national park land leading to associated disturbance of ecosystems for single-level parking should the transition to public transport be a protracted process.

Question:

Before committing to this ARP, has the Town conducted feasibility studies into the advantages of various multi-level parking structure designs as technology to reduce the built footprint of the ARP, use available land efficiently, and to reduce disturbing natural ecosystems in the railway lands and elsewhere in the Bow Valley?

10/ A RARE LANDFORM TIED TO THE UNESCO STATEMENT OF SIGNIFICANCE IS PROPOSED TO BE REPLACED BY A PARKING LOT

The town of Banff has been built on the shoreline of glacial Lake Vermilion. The subtle undulating ground between the Fenlands facility and the railway mark receding beach ridges formed by waves as the last stand of this lake receded and became the current Vermilion Lakes wetlands (Kostachuk 1980). These subtle undulations, are quite different than the adjacent sand dune often referred to in the ARP area.

The beach ridges have been formed by wave action, rather than wind, and so mark the precise locations of shorelines while wind formed dunes need not be immediately associated with a shoreline. The beach ridges in the ARP area are perhaps the rarest landform in the mountain national parks (Kostachuk 2023) but the ARP proposes that these ridges be destroyed and replaced with the north parking lot. Most of the evidence of the Town of Banff’s ancient lakeside heritage has already been destroyed in the development of the town. Destruction of beach ridges occurred most recently with the expansion of the existing Fenlands Recreation Centre parking lot when a large area of this beach ridge complex was paved over. The proposed north parking lot will eliminate the remaining examples of this landform in the Townsite. These rare landforms need to be preserved in a manner

UNESCO WORLD HERITAGE SITE Statement of Significance for the Canadian Rocky Mountain Parks

Renowned for their scenic splendor, the Canadian Rocky Mountain Parks are comprised of Banff, Jasper, Kootenay and Yoho national parks and Mount Robson, Mount Assiniboine and Humber provincial parks. Together, they exemplify the outstanding physical features of the Rocky Mountain Biogeographical Province. Classic illustrations of glacial geological processes — including icefields, remnant valley glaciers, canyons and exceptional examples of erosion and deposition — are found throughout the area. The Burgess Shale Cambrian and nearby Precambrian sites contain important information about the earth’s evolution.



The subtle undulating ground between the Fenlands facility and the railway in this photo mark the receding beach ridges formed by waves when the last stand of Glacial Lake Vermilion receded and became the current Vermilion Lakes wetlands. Protection of the remnants of these landforms offer a rare opportunity to interpret the landscape upon which the townsite of Banff was developed.

consistent with the UNESCO world heritage statement of significance for the Canadian Rocky Mountain Parks.

Possible Indigenous Significance

The ARP does not mention the beach ridges as evidence of the existence of the receding shoreline of glacial Lake Vermilion along which indigenous cultures have travelled or camped for thousands of years. It is not apparent whether this connection was presented to indigenous peoples during consultations. If this has not occurred, the significance of these landforms in the context of connecting to indigenous use of the various stages of the glacial Lake Vermilion shoreline should be discussed with indigenous peoples.

Questions

During public consultations it was indicated that the Town believes these beach ridge landforms are not as rare as BVN is suggesting and as confirmed with the geomorphologist at the School of Environmental Science at Simon Fraser University who first identified them. Before this ARP moves forward could the Town of Banff please update BVN and the general public with the information that supports their opinion that these landforms are more common than we are suggesting.

11/ PLANTS, WILDLIFE AND HABITAT

The area of undisturbed land associated with the north parking lot proposal and adjacent land includes important habitat for a variety of species. However, the ARP document provides very little data about what species use this habitat or the results of monitoring that would support the Town planning to further disturb this habitat, adding to the cumulative environmental impacts of development within the townsite. It is unfortunate that ecosystem monitoring data from the past five years, while this proposal was being developed, is not presented to provide the public and Town Council with the information needed to properly consider the environmental impact of this ARP on site specific plants and wildlife. Monitoring for bats, for example, is relatively cheap with sound recording technology and could have been used to confirm whether this species at risk is likely to be affected by removing the forest for the north parking lot. Scientifically curated and public data bases such as iNaturalist and eBird can, in just a few minutes, provide some readily available citizen science monitoring data. It is disappointing that such data was not included in the ARP environmental discussion.

“2 (1) ecological integrity means, with respect to a park, a condition that is determined to be characteristic of its natural region and likely to persist, including abiotic components and the composition and abundance of native species and biological communities, rates of change and supporting processes.”

Canada National Parks Act

In the absence of better site-specific data, rather than generic inferences from a 40-year-old biophysical inventory, Council must err on the side of the precautionary principle and take action to protect this habitat. BVN would like to remind Council that according to the National Parks Act it is important to protect not just species at risk or sensitive species. It is the whole ecosystem that must be protected which, by definition, includes all species and ecological processes typical of the landscape. Protecting biodiversity, as committed to the Environmental Master Plan, involves not just high-profile species or valued ecosystem components. It involves protecting diversity at a genetic, species, and landscape scale.

The ARP lands are of the Vermilion Lakes Environmentally Sensitive Site designated in the Banff National Park Manage Plan as follows:

“The Vermilion Lakes Wetlands was first identified and delineated in 1986 (Special Resources of Banff National Park, Achuff, Pengelly, White) as one of Banff’s “natural areas of significance”. It is bounded on the north by the Trans-Canada Highway, from the industrial compound access road west to the Bow River bridge. It includes a diversity of vegetation and many rare and significant plant species, as well as important habitat for a variety of birds, mammals, and aquatic species. The area also contains many special features: lakes, ponds, springs, rare birds, fish species-at-risk, moose winter range, elk calving areas and ungulate mineral licks. The alluvial landforms on the north and east shores of the lakes and adjacent wetlands are rich in significant archaeological resources from at least 10,700 years ago. A limited and imperiled resource globally, these wetlands support high levels of biodiversity and provide a multitude of ecosystem services including water conservation and flood mitigation—all of which contribute to climate change resilience.”

The following more site-specific information is provided for Council’s consideration to help in understanding the ARP area’s habitat beyond that information provided in the ARP documents. BVN would like to suggest that even with this additional information there is insufficient information to understand the true significance of these wetland habitats such that a decision to disturb them further could be taken. If the Town of Banff wishes to develop on these lands, detailed all-season surveys of the Railway Lands parcel and adjacent lands are warranted.

- The area where the north parking lot is proposed is part of the Fenlands wetland complex separated by relatively short travel or foraging/dispersal distance for both plants and wildlife, especially birds.
- According to eBird the Fenlands Hotspot, this area is associated with 167 bird species. A species list is included with this report.
- Of these 167 bird species, eight are identified as “Threatened” or “Species of Special Concern” according to Canada’s Committee on the Status of Endangered Wildlife In Canada.
- A number of species on the eBird list are associated with “Rare” or “Very Rare” or “uncommon” designations on the Checklist of Birds of Banff National Park.
- A Great Blue Heron (*Ardea Herodias*) rookery has been located on land immediately adjacent to the Railway lands boundary.
- Because the mature forest in the Railway Lands parcel is associated with riparian habitat it is very likely used by Little Brown Bat (*Myotis lucifugus*) for foraging and roosting. This species is listed as Endangered on Schedule 1 of the Species at Risk Act. The cumulative loss of habitat for this species within the Town’s boundary, and relatively within the Railway lands parcel over recent years is not acceptable.
- BVN has observed deer bedding sites in the north parking proposal forest suggesting that deer and use this habitat for resting activity or possibly waiting for opportunities to move at a time when human disturbances are reduced.

We note the following from the Environmental Master Plan:

#6 on page 29

- 6. Conduct a study to determine the extent and health of wetlands in Banff.
 - a. Develop wetland retention, restoration and management plan.**

The Environmental Master Plan’s ecosystems section also specifically mentions on page 25 that:

“Data related to tree cover and type is available in Banff’s Urban Forest Management Plan from 2008, but recent cover percentage and overall species diversity information is not currently collected.

Data related to Green infrastructure development, wetland health and the incorporation of indigenous ecological knowledge principles is not currently collected.”

AND,

#11 on page 30:

Conduct an impact assessment related to resident and tourist impact on the wildlife corridors near Banff (Fenlands-Indian Grounds, Sulphur and the Golf Course) and work with relevant partners to develop improvement actions and timeline based on assessment results.

AND,

#15, page 30:

Partner with Parks Canada and the Bow Valley Naturalists to develop varied citizen-science opportunities within the townsite, to contribute to local species inventory and monitoring portfolios and increase ecological awareness and capacity amongst residents.

Question

In the interest of informed, science-based decisions, why hasn’t data relevant to the above Environmental Master Plan elements been collected in the past 5 years and presented in this ARP to inform those who have been asked to comment on the ARP?

12/ FENLANDS WILDLIFE CORRIDOR – LEAVE IT ALONE!

The Fenlands wildlife corridor is an important movement corridor for many species. Its current configuration with a number segments separated by human disturbance make it vulnerable to further degradation. Data presented in Figure 7 of Clevenger et. al. (2021) referenced in the ARP documents shows with, very old data, that all segments of the corridor, from the Norquay Texas Gate to just south of the RR crossing, are used by wolf and cougar. Similar use may be expected for other species.

The width of the corridor along Norquay Road is broken into several segments between multiple human disturbances, both structures and activity. Managing the effectiveness of this corridor will likely rely on micro-managing the effectiveness of each of these segments. Loss or degradation of any one of these segments would likely be a significant challenge to the continued viability of the overall corridor.

Narrow as it seems at first glance, the 70 meters between the Fenland parking lot fence and the railway is the second widest of the segments between disturbances along the Norquay Road. BVN observations in the fall of 2023 confirmed that this narrow section contains an established wildlife trail through the site that is used by elk, deer and coyotes in addition to more dispersed movement in the open area along the tracks. When 40 Mile Creek is flowing at a high level, such as during the extended spring freshet, is considered then there is concern that the creek could pose a barrier to movement toward the north of the Fenland facility as is proposed in the ARP. When this condition occurs the segment between the Fenlands facility and the tracks may be an even more important route for wildlife. Evidence suggests even at low flows wildlife prefer not to cross the creek.

Blue and green lines in the adjacent photo represent segments of the Fenlands movement corridor, between the TCH fence and railway, that are separated by Forty Mile Creek and human disturbances, the effect of linear trail and roadway barriers notwithstanding. The longest blue segment (proposed ARP north parking lot width) at the bottom of the image shows that it is the second widest segment in the corridor and may get disproportionate wildlife movement due to 40 Mile Creek posing a barrier to accessing the longer green segment on the other side of the creek. If wildlife is directed toward the north side of the Fenlands facility at these times, as proposed in the ARP, they could be severely pinched between the building and Forty Mile Creek, the shortest green segment of this fragmented corridor.



BVN is aware that there is more robust and current information about how wildlife uses the Fenlands corridor that supports the importance of wildlife movement south of the Fenlands facility. It is our perspective that any further loss or degradation to the entire corridor and especially between the Fenlands parking lot fence and the railway tracks is an unacceptable risk to the overall effectiveness of the corridor. We are concerned that the ARP corridor redirection and restoration proposal would not be successful, especially given the other barriers to success of the enhancement scheme that are mentioned in this submission.

Wildlife corridor science is an evolving and complex topic. Access to current corridor monitoring data and possibly more structured, and focussed long-term monitoring, is needed to provide enough detailed understanding and objective discussion to support any conclusions that suggest a reconfiguration of the corridor from its current state would be advantageous to wildlife movement. Until that happens, the current corridor configuration must not be tampered with.

Question

Has the Town reviewed up-to-date wildlife monitoring data in the Fenlands movement corridor and subsequently been advised by independent professional conservation biologists, with access to that data, on the management of this corridor being proposed in this ARP?

READING AND REFERENCES

Parks Canada 2022. Banff National Park Management Plan.

Bow Valley Naturalists 2023. Submission To The Town Of Banff Community Plan Review Steering Committee, November 2023.

Bruce et al. 2022 Expert Panel Report On Moving People Sustainably In The Banff Bow Valley. Report prepared for the Parks Canada Agency.

Clevenger T. et al. 2021. Banff Railway Lease Parking and Ecological Corridors. Report Prepared for Liricon Capital.

Holland W.D. and G.M. Coen (Eds). 1983. Ecological (Biophysical) Land Classification of Banff and Jasper National Parks - Volume I: Summary and Map Supplement 2.1 and 2.2. Alberta Institute of Pedology Publication No. SS 82-44.

Kostachuk R. 1980. Late Quaternary History of The Bow River Valley Near Banff, Alberta. Masters Thesis submitted to the Faculty of Graduate Studies, University of Calgary.

Kostachuk R., 2023. Email correspondence. Adjunct Professor, School Of Environmental Science, Simon Fraser University.

Page R. et al. 1996. Banff Bow Valley at the Crossroads. Summary report of the Banff-Bow Valley Task Force presented to the Minister of Canadian Heritage.

BIRD LIST FOR THE FENLAND NATURE TRAIL eBIRD HOTSPOT

This is a list of bird sightings recorded in the habitat associated with the Banff Railway Lands land use zone. The list was generated with data from eBird. eBird is a global, public database of bird sightings and is among the world's largest biodiversity-related science projects. eBird is managed by the Cornell Lab of Ornithology at Cornell University. The list includes 167 species of birds and includes year-round sightings associated with the Fenlands Trail area that, with the exception of the Norquay Road, is contiguous with the ARP area and contains the similar habitat characteristics. The list includes 8 species that are listed on the Canadian Species at Risk public registry. These are indicated in bold red text with their species at risk status identified as SC - Special Concern, T - Threatened. We hope the Town of Banff will take pride in its role in protecting habitat for these species and not find ways to justify reducing available habitat within its planning jurisdiction.

Canada Goose	Short-billed/Long-billed	American Kestrel	<u>Kinglets</u>
Tundra Swan	Dowitcher	Merlin	Ruby-crowned Kinglet
Wood Duck	Wilson's Snipe	Peregrine Falcon	Golden-crowned Kinglet
Blue-winged Teal	Spotted Sandpiper		
Cinnamon Teal	Greater Yellowlegs	<u>Tyrant Flycatchers: Pewees,</u>	<u>Nuthatches</u>
Blue-winged/Cinnamon Teal	Baird's Sandpiper	<u>Kingbirds, and Allies</u>	White-breasted Nuthatch
Northern Shoveler	Least Sandpiper	Olive-sided Flycatcher (SC)	Red-breasted Nuthatch
Gadwall		Western Wood-Pewee	
American Wigeon	<u>Gulls, Terns, and Skimmers</u>	Alder Flycatcher	<u>Treecreepers</u>
Mallard	Bonaparte's Gull	Willow Flycatcher	Brown Creeper
Northern Pintail	Ring-billed Gull	Alder/Willow Flycatcher (Traill's	
Green-winged Teal	California Gull	Flycatcher)	<u>Wrens</u>
Canvasback	gull sp.	Least Flycatcher	House Wren
Redhead	Black Tern	Hammond's Flycatcher	Pacific Wren
Ring-necked Duck	Loons	Dusky Flycatcher	Marsh Wren
Harlequin Duck	Common Loon	Western Flycatcher	
Bufflehead		Empidonax sp.	<u>Dippers</u>
Common Goldeneye	<u>Hérons, Ibis, and Allies</u>	Eastern Phoebe	American Dipper
Barrow's Goldeneye	Great Blue Heron	Eastern Kingbird	
Hooded Merganser			<u>Starlings and Mynas</u>
Common Merganser	<u>Vultures, Hawks, and Allies</u>	<u>Vireos</u>	European Starling
Red-breasted Merganser	Osprey	Cassin's Vireo	
Ruddy Duck	Golden Eagle	Warbling Vireo	<u>Catbirds, Mockingbirds, and</u>
	Northern Harrier	Red-eyed Vireo	<u>Thrashers</u>
<u>Grouse, Quail, and Allies</u>	Sharp-shinned Hawk		Gray Catbird
Spruce Grouse	Cooper's Hawk	<u>Shrikes</u>	Thrushes
Grebes	Sharp-shinned Hawk	Northern Shrike	Mountain Bluebird
Pied-billed Grebe	American Goshawk		Townsend's Solitaire
Horned Grebe (SC)	Bald Eagle	<u>Jays, Magpies, Crows, and</u>	Varied Thrush
	Red-tailed Hawk	<u>Ravens</u>	Veery
Red-necked Grebe	Rough-legged Hawk	Canada Jay	Swainson's Thrush
Western Grebe (SC)		Steller's Jay	Hermit Thrush
Pigeons and Doves	Owls	Blue Jay	Catharus sp.
Rock Pigeon	Great Horned Owl	Black-billed Magpie	American Robin
Nightjars	Barred Owl	Clark's Nutcracker	
Common Nighthawk (SC)		American Crow	<u>Waxwings</u>
Hummingbirds	<u>Kingfishers</u>	Common Raven	Bohemian Waxwing
Calliope Hummingbird	Belted Kingfisher		Cedar Waxwing
Rufous Hummingbird		<u>Tits, Chickadees, and Titmice</u>	
	<u>Woodpeckers</u>	Black-capped Chickadee	<u>Old World Sparrows</u>
<u>Rails, Gallinules, and Allies</u>	Red-naped Sapsucker	Mountain Chickadee	House Sparrow
Sora	Yellow-bellied/Red-naped	Boreal Chickadee	Wagtails and Pipits
American Coot	Sapsucker		American Pipit
	American Three-toed	<u>Martins and Swallows</u>	
<u>Cranes</u>	Woodpecker	Bank Swallow (T)	<u>Finches, Euphonias, and Allies</u>
Sandhill Crane	Downy Woodpecker	Tree Swallow	Evening Grosbeak (SC)
	Hairy Woodpecker	Violet-green Swallow	Pine Grosbeak
<u>Shorebirds</u>	Pileated Woodpecker	Northern Rough-winged Swallow	Gray-crowned Rosy-Finch
Killdeer	Northern Flicker	Barn Swallow (SC)	House Finch
Long-billed Dowitcher		Cliff Swallow	Purple Finch
	<u>Falcons and Caracaras</u>		Common Redpoll

Red Crossbill
White-winged Crossbill
Pine Siskin
American Goldfinch
Longspurs and Snow Buntings
Lapland Longspur
Snow Bunting

New World Sparrows

Chipping Sparrow
Clay-colored Sparrow
American Tree Sparrow
Fox Sparrow
Dark-eyed Junco
White-crowned Sparrow
Golden-crowned Sparrow
Harris's Sparrow
White-throated Sparrow
Vesper Sparrow
Savannah Sparrow
Song Sparrow
Lincoln's Sparrow
Swamp Sparrow

Blackbirds

Western Meadowlark
Red-winged Blackbird
Brown-headed Cowbird
Rusty Blackbird (SC)
Brewer's Blackbird
Common Grackle

Wood-Warblers

Northern Waterthrush
Tennessee Warbler
Orange-crowned Warbler
Nashville Warbler
MacGillivray's Warbler
Common Yellowthroat
American Redstart
Magnolia Warbler
Yellow Warbler
Blackpoll Warbler
Yellow-rumped Warbler
Townsend's Warbler
Wilson's Warbler

Cardinals, Grosbeaks, and Allies

Western Tanager
Rose-breasted Grosbeak