

**BOW VALLEY NATURALISTS VERBAL SUBMISSION TO COUNCIL AT THE BANFF
RAILWAY LANDS AREA REDEVELOPMENT PLAN HEARING**

March 20, 20224

The Town of Banff is subject to adhering to the National Parks Act which recognizes the protection and maintenance of ecological integrity as the first priority in a landscape that the community of Banff has the privilege of occupying.

Assessing impacts on ecological integrity must be based on objective, science-based decision making.

We turn to the advice of the Banff-Bow Valley Task Force which was the last, and possibly only time, this community gathered around the table together to learn what the social and natural science was telling us about how our human presence affects this valley. That expert panel concluded:

“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.”

The submission we have presented to you today, and the questions we put to you in that submission, show that this proposal poses threats to ecological integrity of the Bow Valley.

The ARP proposal includes no site-specific monitoring data to properly describe the ecological attributes of the site. Evidence in our submission demonstrates that land north of the tracks is an important wetland habitat patch including a rare landform that, if kept intact, is important to meeting the Town of Banff commitments to biodiversity, forest retention and wetland protection etcetera in the Ecosystem section of the 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. And so, we are perplexed that much of this ARP proposal seems in contradiction to that plan. Unless this ARP goes back the office and is

discussed through the ecosystem lens of the Environmental Master Plan, we have no way to be sure how this plan will affect ecological integrity and whether it is good for the community.

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 commitments by proposing to build a new parking lot in an already constricted and vulnerable wildlife movement corridor. Yet, there is no presentation of up-to-date wildlife corridor monitoring data to justify this action or to show that the proposed manipulation of wildlife movements would work. BVN's observations of how wildlife move through the area suggest it would cause harm to the effectiveness of the corridor. It is a vulnerable but functioning wildlife corridor, if you want to be sure you cause no harm, leave it alone.

It remains our opinion that this ARP is a ski area's expansion outside of its boundaries in contradiction with the Mount Norquay Long Range Plan, the Park Management Plan and the Ski Area Guidelines. Understanding the effects of such a proposal is well beyond the role of the Town of Banff and so the Town has no way to move such a proposal forward with assurance that its own decisions protect ecological integrity.

Without further development of the moving people strategy in Banff National park there is reason to believe this plan may commit land prematurely before more specific needs for convenient and robust bus, train and residual private transportation infrastructure have been clarified. 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 and we are not sure there will not be more calls for more national park land in the future.

Based on the concerns expressed in our submission, 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. 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.

We ask that this ARP proposal not proceed any further through the municipal approval process.