

WHAT WE HEARD:

Summary of Comments
on the Draft Banff National
Park Management Plan
from
Phase 2 of the Public and
Indigenous Engagement Program



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CONTEXT

By legislation, each national park must have a park management plan. When completed, it reflects Parks Canada's national direction and provides a park-specific 10-year road map for delivering on the core elements of Parks Canada's mandate — visitor experience, public understanding and awareness, and heritage resource protection.

Park management plans are reviewed regularly so that they:

- reflect new Government of Canada applicable priorities and legislation, as well as new Parks Canada direction;
- incorporate new knowledge, best practices and approaches;
- include new challenges and opportunities relevant to the park's management;
- strengthen the integrated delivery of Parks Canada's mandate within and between contiguous parks to ensure that resource protection, visitor experience, and learning opportunities are mutually supportive; and
- incorporate decisions and achievements made or advice developed through public participation processes since the previous plan.

Each new or amended national park management plan must be approved by the federal minister responsible for national parks and tabled in Parliament before it may take effect.

SHAPING THE BANFF NATIONAL PARK MANAGEMENT PLAN

Ultimately, the care, maintenance and future of all national parks rests in the hands of Canadians; consequently, their views and values are important in shaping each park management plan. Discussions about Banff's future and its next management plan began in 2016 at the Banff National Park Annual Planning Forum where the park's key stakeholders identified their preferred engagement approaches and specific items for early scoping of the new plan.

Following up on this input, Phase 1 of the Indigenous and Public Engagement Program for Banff's next park management plan focused on discussions about the vision for Banff National Park, including what components of the park and its experience are most important to protect in future; trends, values and principles to guide future park management; key challenges to be addressed by Parks Canada; aspects of the current plan/approach that should continue; and preferred engagement approaches for future input.

During this phase of the program, Parks Canada reached out to the public at large, a broad range of stakeholders including government, tourism and business, not-for profit groups, and specific Indigenous communities and the Banff Indigenous Advisory Circle.

The outcome of these discussions (summarized in an August 2019 *What We Heard Report*) resulted in more than 4,500 written and oral responses ranging from a few words to multi-page submissions. A new management plan was drafted based on this input, as well as:

- the lessons, successes and direction of previous management plans;
- Parks Canada’s legislative obligations and relevant policies;
- the *State of the Park Assessment (2018)* presenting the current condition of key indicators;
- Parks Canada Agency and Government of Canada priorities and direction;
- relevant research and trends; and
- changes in the local and regional environment, technology, and best practices.

Phase 2 of the engagement program sought input on the draft plan from the public, stakeholders and Indigenous groups. This phase resulted in:

- 2,125 written submissions ranging from a few sentences to 25 pages in length. While most comments were from individuals, 18 organizations collectively submitted roughly 130 pages of comments;
- approximately 100 responses from eight polls delivered at three online meetings;
- hundreds of verbal comments from approximately 25 hours of meetings with staff, stakeholders and community members; and
- significant discussion from the Banff Indigenous Advisory Circle at its regular meetings over a two-year period. One of the member Nations also submitted additional written comments on the draft plan.

Every written submission and oral comment was carefully considered by the planning team in conducting its analysis. Virtually all of those commenting seemed familiar with Banff National Park, having either visited or worked in the park. Most responses appeared to originate from Alberta, although responses were received from other Canadian provinces.



It should be noted that the Lake Louise Area Strategy (as referenced in Section 7.2 of the Park Management Plan) was also available for public review and comment during this same period. Comments on this strategy were analyzed separately and are summarized in a stand-alone document – *What We Heard: Lake Louise Area Strategy (2021)*.

WHAT WE HEARD

On the whole, most comments reflected a genuine regard for the park and concern for its future. Many expressed high expectations for the new park management plan and a desire to see broader issues such as climate warming, biodiversity loss, and reconciliation with Indigenous peoples addressed at the park level and beyond.

There appeared to be a general sentiment that the draft plan was going in the right direction, with broad support expressed for protecting park resources, character and authenticity; maintaining limits to development; taking a landscape-level approach; and improving the relationships and roles for Indigenous peoples in park management.

The topics most frequently commented upon were ecological integrity and protection of park resources, climate change, and the management of crowding and visitor use. Development and transportation (including parking) were also often mentioned, generally in conjunction with one or more of the most frequently mentioned subjects. Numerous respondents also commented that the strategic level of this plan made providing feedback challenging, and that additional detail regarding definitions of key terms, objectives, targets, and performance measures (including for the subsidiary plans) would be desirable.

The comments on frequently mentioned topics are summarized below. This summary is not intended to be a detailed representation of every view; rather, it is intended to be a high-level overview of the most commonly expressed ideas. The comment summaries are best read and considered as a whole, as most people mentioned more than one subject, often connecting their ideas across topics.

What We Heard

... About the Protection of Natural and Cultural Resources

Key ideas expressed on this subject include:

- The plan should more clearly articulate the value of biodiversity and importance of ecological integrity as the first priority in the management of the park.
- A landscape-level, trans-boundary approach to resource protection is ideal. Parks Canada should actively work outside the park on connectivity and increased protection of adjacent areas in BC and Alberta.
- Protection objectives and targets should be more detailed and measurable, and key terms such as “sustainability” and “improved wildlife corridor effectiveness” should be defined in detail.
- Parks Canada needs to better acknowledge that the ecosystem has a finite capacity for use. Visitation and/or specific recreational activities should not be allowed to compromise the park’s ecological integrity.
- There should be no further loss of habitat or habitat effectiveness as a result of commercial development or other human-caused disturbance such as recreational activity, light and noise.
- Wildlife mortality and the spread of non-native vegetation must be more effectively addressed.
- Refining the Grizzly Bear Habitat Security Model to address seasonality, degrees of disturbance, and other species of concern is important for science-based planning for resource protection and visitor use management.

- There is qualified support for access restrictions, including seasonal closures, prohibiting wheeled access in backcountry areas, etc., to protect sensitive park resources.
- Caribou and other species at risk should be reintroduced.
- The challenges for commemoration and preservation of historic/cultural resources should be acknowledged in the plan.

What We Heard...

About Visitation Levels and Visitor Experiences

Key ideas expressed on this subject include:

- Visitation levels in certain areas of the park are too high, and this diminishes both visitor experience and the viability of certain businesses. There should be visitor use management planning to address high visitation and its impacts on park ecosystems and experiences.
- Clear limits and/or some other type of restriction is needed to manage visitation levels in busy places. Various on-the-ground tactics were suggested, including differential pricing for non-Canadians versus local residents and businesses; parking fees, reservation systems or other regulated access for certain types of users or vehicles. A small number of comments suggested that crowding could be addressed by building more infrastructure such as campsites, parking and trails.
- To fulfill its mandate for public use and enjoyment, affordability of the total park experience must be considered when introducing user pay systems for reservations, parking, and transit. Some commented that the personal use fee paid at the gate should include parking and transit, as additional fees for these amounted to “double-dipping.”
- The idea of protecting park authenticity, character, and wilderness, and using these as considerations in decision-making is positive.
- Some people are using the park without respect for its resources, its character or their fellow park users. More public education and better/tougher enforcement of the rules by Parks Canada is needed.
- Additional large-scale events should not be allowed and future events should be nature-based.
- Many park facilities (trails, trailheads and parking) are poorly maintained or insufficient. Parks Canada should rationalize service levels so they are consistent for similar facilities across the park, and work with stakeholders to define a “desired experience” for specific sites that also works ecologically.
- New opportunities /proposals/activities should be required to demonstrate that they are “nature-positive” and can reduce the carbon footprint of the park before they are permitted.

What We Heard

... About Climate Warming

Key ideas expressed on this subject include:

- Development of a Climate Change Action Plan for the park is a positive step.
- The warming climate must be identified as one of the park's greatest challenges. Parks Canada should commit to Banff becoming a "carbon neutral park" by 2030/2035/2050, and all park roads, including the Icefield Parkway, should be designated as "carbon-neutral roads."
- The park management plan should include policy direction and targets that align with all applicable federal climate change/sustainability commitments, including fleet changes, green procurement and single-use plastic reduction, etc.
- More research is needed on climate refugia modelling, deglaciation and other ecosystem-related impacts of a warming climate.
- Park businesses should be held to higher, mandatory standards for reducing carbon emissions and resource consumption, using clean energy and sustainable construction materials, reducing waste and managing it responsibly, and eliminating single-use plastics.
- The visiting public should be educated about climate change and sustainability to encourage them to practice climate-friendly behaviours during and after their visit.

What We Heard

... About Development and Sustainability

Key ideas expressed on this subject include:

- Limits to commercial development in the park should be maintained. Maintaining the developed footprint at the park level and not providing new lands for commercial development are strongly supported. Developed footprint and disturbed footprint must be defined and measured.
- Any new development should be consistent with the natural character and purposes of the park. Redevelopment should include a requirement for decarbonization of facilities.
- All new proposals should be measured against their nature-positive contribution to the park and their ability to reduce or minimize Banff's carbon footprint and overall climate impact.
- No more large-scale built attractions or new transportation infrastructure (e.g. roads, gondola) should be permitted.
- The management plan should establish targets for all new building construction in the park, including establishing Thermal Energy Demand Intensity (TEDI) or Energy Use Intensity (EUI) scores for all new buildings, whether public or private.
- Environmental sustainability needs to be considered and described beyond climate change and local ecosystem management to include addressing reductions in resource consumption (water, wood and wood fibre, metals, plastics, and agricultural resources) by the Park economy as well as management of hazardous/polluting substances in the park. More holistic actions are required to promote and incorporate sustainability into the management, operation, and visitation of the park.

What We Heard

.. About Moving People Sustainably

Key ideas expressed on this subject include:

- To be effective, any strategy for moving people around the park (including the work of the expert panel) should not take place in isolation; it must consider ecologically sustainable levels of visitation and must be done concurrently with visitor use management planning and climate change strategies.
- Infrastructure for moving people should not increase the developed footprint of the park.
- To reduce congestion in the park, tactics and incentives should be implemented to support the use of flexible public transportation modes from Calgary and other outlying communities that are the source of most vehicle traffic in the park.
- To reduce congestion in the park, vehicle restrictions should exist on all park roads, especially those leading to popular areas. Many tactics were suggested for achieving this, including paid parking; preferential access by licence plate, reservation, type of transport (e.g. electric vehicle only, self-propelled transport only, guided tour/transit bus only); preferential access by type of activity (e.g. mountain activities vs. sightseeing); and preferential access by origin (local residents and businesses). Conversely, a small number of comments stated that there should be no restrictions on park roads, nor any fees for parking; that Park visitors have a right to drive on all park roads as part of their entry fee; and restrictions of any sort and/or parking fees are unfair and discriminatory.
- For park roads where motor vehicles are excluded seasonally but self-propelled access (cyclists, runners, walkers) is allowed, there must also be sufficient basic infrastructure (i.e. parking, toilet and garbage facilities) and clear communications about safe and respectful use.
- Fees of any sort in addition to the cost of a park pass will negatively affect accessibility for many; parking and shuttles should be free or reasonably priced, and accessible by Wi-Fi.
- Moving intercept parking (for Moraine Lake and Lake Louise) to the ski area is a good idea from a safety perspective, but must first address the wildlife connectivity and disturbance impacts associated with increased use of Whitehorn Road. (see separate *What We Heard Report – Lake Louise Area Strategy* for details)
- Strategies, tactics, and incentives that support the use of flexible public transportation modes from outlying communities in Calgary and the surrounding region are key, as they are the source of most of Banff's vehicle traffic.

What We Heard

.. About Indigenous Relations and the Future Role of Indigenous Peoples

Key ideas expressed on this subject include:

- Indigenous peoples should be better represented in all aspects of the park, including the public and private workforce, educational programming, management of the park, and in art and culture.
- Indigenous place names should be acknowledged and used on signs and other communication materials.
- The Banff Indigenous Advisory Circle should be expanded to include other groups.

- The plan should better address the cultures, histories and significance of the area to specific Indigenous groups with strong historical and present-day connections to the area, and commit to interpretive programming and general communications that explain the role and importance of specific Nations in the settlement and use of the area by non-Indigenous people.
- The plan should include a commitment to work with Indigenous groups to study and update the inventory of archaeological and cultural sites in the park, and with the guidance of elders, to work together to plan for their commemoration and care.
- The plan should include Nation-specific cultural awareness training and long-term employment opportunities for youth, as well as a commitment to ensuring the park is a welcoming place for Indigenous peoples, where they may engage in traditional practices.

HOW THE PLAN CHANGED ...

As a result of the feedback received from Phase 2 of the Indigenous and Public Engagement Program, the draft Park Management Plan underwent numerous changes throughout the entire plan to:

- improve clarity;
- refer to the importance of the features associated with the Canadian Rocky Mountain Parks World Heritage Site designation;
- acknowledge the historical and current significance of the area to Indigenous peoples, and affirm the ongoing and central role for them in the park's future, particularly with respect to the study, identification, management and care of cultural resources and sites;
- confirm the value of natural landscapes and ecological integrity in the park's vision;
- add a number of new targets, particularly in the sections pertaining to climate change and protecting natural and cultural resources, and to add timeframes and increase the specificity of some other targets;
- clearly state the intent to enhance public understanding of respectful park use, climate change and stewardship actions;
- describe Parks Canada's intent to undertake visitor use management planning for busy areas in the park, the key components of this planning, and how stakeholders will be engaged in these processes;
- better explain the goals of the Climate Change Key Strategy, expand upon its objectives so climate change adaptation and mitigation are more obviously addressed, and clarify the link between certain targets and Parks Canada's Departmental Sustainable Development Strategy;
- refine the introduction to the "Moving People Sustainably" key strategy, and describe the link between this strategy and visitor use management planning for the park's busy sites;
- affirm the limits to commercial development in the park communities of Banff and Lake Louise, and that commercial development in them will occur in the commercial zones described in the Canada National Parks Act; and
- more clearly define the considerations for the Lake Minnewanka Reservoir area plan.

The approved *Banff National Park of Canada Management Plan* can be viewed and downloaded at: parksCanada.gc.ca/banff-plan2022