



January 4, 2021

To: Jason Darrah, Darren Enns
Town of Banff Administration

Gentlemen:

Thank you for the opportunity to consult with the Bow Valley Naturalists on the draft Town Of Banff Special Events Policy, especially, when the entire Town administration is busy and deeply engaged with trying to limit the community spread of Covid 19.

We believe that the Town administration has made significant progress in the draft document, tidying up a number of the grey areas and resulting in clearer guidelines for administrative decision making. We are also pleased to see a number of changes in the language, with the overall document reading more “park centric and community focused”. These are positive changes.

We also recognise that this is a difficult time for the business community and it’s a challenging time to make any significant policy changes, especially changes that may be perceived as a potential roadblock to economic recovery. This is a challenging document to write, mainly due to the scope of the document. It is one thing to write policies around smaller community-based events and another thing to write a comprehensive document that includes both large and small events.

To recap our concerns with special events, we are concerned with the following:

1. Those special events that have a significant noise factor (loud music/event announcers) that interfere with potential nature connections, both in and adjacent to the townsite. It’s our belief that most visitors come to Banff National Park for some type of nature connection, some deeper and wilder than others. We are very fortunate to live with so many green spaces outside our back door. While all urban areas have a certain level of background noise, even on a busy day in Banff, it’s still possible to find a nature connection in places such as the green strip behind the Administration Building, the adjacent wetlands near the stables or even a simple walk along the Bow River. However, nature connections are both visual and aural. Booming bass and loud, excited announcers can dominate the soundscape, alienating both visitors and residents from any nature connection within earshot.
2. Those special events that exclude other park visitors from areas of public space and that are reserved for the exclusive use of paid participants. Living in Banff with a commercial cap and a fixed town boundary, we are all acutely aware of how limited our space is. Jammed trailheads, limited access to popular areas such as Moraine Lake and Lake Louise and the desire to keep human use out of wildlife corridors adjacent to the townsite are further examples of how limited accessible space is to all of us. While the decision to allow exclusive use of the 1A or the Legacy Trail is strictly in the domain of Parks Canada, we are at a loss to understand why the Town, which should be so sensitive to the issue of space and accessibility, would condone or promote events that exclude visitors and residents from other public spaces. It is our belief that Parks Canada unenthusiastically embraces these events only due to external pressures.

3. The emphasis on “entertainment” events or “exclusive participation sporting events” that bear little or no connection to mountain culture and fail to provide a net benefit to community spirit, residents or visitors. While some of these events may be positive for participants, even Banff-Lake Louise Tourism’s own visitor summer survey indicated that for most visitors, special events did not contribute meaningfully to their national park visit. And council is well aware that many residents (and even a number of small business owners) feel strongly that some of these events detract significantly from a quality of life, business and park experience perspective. We also believe that these types of events contribute to the growing perception of crowding and the over commercialization of Banff National Park, as the image of the Town and the Park are so intertwined.
4. We are always concerned about the potential impact on Parks Canada staff resources for those special events that are not confined to the town boundary but also use adjacent park lands. These are resources that should be used for ecosystem monitoring and protection and not end up being diverted to monitor the impacts and the safety of a few special participants.

We have the following three specific policy suggestions:

1. ***The need for Town of Banff to develop destination event metrics.*** While the draft policy provides a brief definition of what a *destination event* is, it raises far more questions than answers. And this is a very important issue as “*destination events*” are by far the most controversial of the special events. *Destination events* range from a benign mix of tourism and community events such as “Snow Days” to major sporting events that have or have had a significant impact on visitors and residents, such as the “Gran Fondo” and the “Banff Marathon”. These *destination events* are typically Banff Lake Louise Tourism (BLLT) sponsored initiatives. One of the challenges for the Town, is that while the BLLT has various metrics for measuring the relative success of a *destination event* such as sustainability objectives, the amount of international promotion or hits, etc., the Town has no metrics beyond a noble but vague broad policy commitment that special events should “enhance the quality of life for both residents and visitors, create memorable national park experiences...” Ultimately this approach leaves the BLLT in the driver’s seat with the Town, residents and visitors along for the ride. We do not believe that the Town needs to develop metrics for most special events but we feel strongly that all *destination events* need to have metrics developed by the Town of Banff to ensure that these events are meeting the stated policy objectives.
2. **A rationalization of special event caps.** Under the draft policy, 48 days of sporting events and 24 days of food and beverage events are permitted per year. We are at a loss to understand where this number came from and have seen no supporting rationale for that number. We appreciate Council’s desire to have a limit but where is the supporting rationale for a number that is higher than the number of weekends in the year or in other words, no limit at all? With the limitation on special events during peak summer visitation period, the remaining combined number of sporting and food and beverage events means there is potential for multiple special events every weekend from early fall through late spring. This begs the obvious question as to how many special events could be held in a year before they are no longer “Special”? More ominously, there is no clarity in the policy document as to how many *destination events* might be permitted in a given year.

3. ***The need for policy clarity specifically around “destination events”*** The draft policy is essentially silent on this issue, other than briefly defining focus, complexity and the sole stated goal of “attracting more visitors”. A definition based on the sole goal of attracting more visitors, particularly when visitation numbers in themselves are controversial both within and outside the community just isn’t good enough. Especially when both the townsite and the park are bumping up against peak visitation thresholds. As stated earlier, destination events are by far the most controversial of the special events. It’s our belief that the Town of Banff needs to rethink about how destination events fit in with a future vision for Banff. We feel that the day of hosting large sporting events or concerts in a busy National Park has come and gone. Times are changing. What may have been appropriate, perhaps even desirable 25 years ago, is arguably much less desirable with visitation pressures swelling so dramatically. The demise of the Subaru Triathlon, the Gran Fondo, Dragon Boat Races and the near demise of Melissa’s road race are all indicators of how much more difficult it is to manage or hold sporting events with today’s visitation levels and environmental standards.

During our discussion, we asked “what would happen if one of the destination sporting events were to fold?” We were concerned to hear that “it would likely be replaced with a similar (controversial) sporting event”. We feel that answer is indicative of a lack of aspirational vision and direction from Town Council and senior administration. The focus on the new policy document should be on “what we want to be”, not necessarily on “what we were”. Since the BLLT is the prime proponent of *destination events* shouldn’t the policy document be providing a broad vision to the BLLT as to types of events it is willing to entertain, how many and when? Shouldn’t residents be aware of what this vision is, if any? Council has indicated that it wishes to leave special event decision making with Town administration and if so, shouldn’t Town administration have better tools and policy to specifically guide *destination event* decision making?

In our discussion, we described how adjacent communities have hosted successful nature-based destination style events such as the Columbia Valley’s “Wings over the Rockies”, Waterton’s “Wildflower Festival” and Jasper’s “Night Sky Festival”. While these specific events may or may not be appropriate in a busy place such as the Town of Banff and Banff National Park, we’re left wondering why a town that strives to be a model national park community continues to embrace disruptive entertainment and sporting events, while leaving the nature-based celebrations to other communities?

Which memories, do we want to leave with visitors and residents? Traffic jams, exclusion from public places and a cacophony of announcers and blaring music? Events that pit the community against one another or events that are embraced by all visitors and full of community volunteers? Events that may attract some visitors but drive away others? Events that are unique, provide enhanced nature experiences, and cement the Town of Banff’s place as a model community within a National Park and World Heritage site? Or events that continue to feed the perception of crowding, noise and over commercialization?

The vast majority of community based special events are positive and not a concern for our members. Particularly those events that are truly open to all, do not inhibit access to park lands, those that do not result in widespread noise impacts. We particularly favour those celebratory events that are ultimately anchored in a sense of community participation, landscape and culture. And while we have a preference for seeing more nature based, national park focused activities, we recognise that not every special event need be nature or park focused. Community spirit and fun shared with neighbours, friends and visitors are also important.

We've asked some tough questions with the hope of provoking a thoughtful discussion. It is not our intent to criticize anyone on Council, Town administration or our friends in the Banff Lake Louise Tourism Bureau. We are grateful for the opportunity to provide policy feedback.

Sincerely,

Reg Bunyan
Bow Valley Naturalists VP

Cc Leslie Bruce BLLT
Cc Banff Town Council
Cc Banff National Park