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Dear Mr. den Otter,

On behalf of the Canadian Parks and Wilderness Society – Southern Alberta Chapter (CPAWS SAB), please accept these comments on the BIA of the Canada 2016 - FIS World Cup Cross Country Test Race.

CPAWS SAB is part of a national non-profit organization dedicated to protecting Canada's wilderness. Since CPAWS SAB's inception in 1967, we have had a long history of involvement with many aspects of Banff National Park and its management and continue to champion ecological integrity as the first priority for park management as mandated by the Canada National Parks Act.

CPAWS SAB supports sustainable outdoor recreation in National Parks that promotes connection to nature and aligns with the mandate of prioritizing ecological integrity in park management. Based on these statements, CPAWS SAB has some concerns with the FIS World Cup Cross Country Race and Test Race. Given that the Test Race has, by all appearances, been approved our comments address the larger picture and scope of the 2016 race.

### **Declared Wilderness**

CPAWS SAB is concerned that approximately one third of the proposed race will occur within Zone II Declared Wilderness. Zone II Declared Wilderness is designated to preserve the natural character and the unique opportunities associated with the area (Banff Management Plan 2010). The Banff Management Plan also states that within Wilderness areas "visitors have exceptional opportunities to experience adventure, remoteness and solitude associated with 'Rocky Mountain wilderness' adventure opportunities."

Although the Test Race will only include approximately 150 people, the 2016 race has the potential to change the experience of the trail system and increase the use of this wilderness area by thousands of people. It is our opinion that a competitive race is not consistent with providing the "remoteness and solitude" of the National Park experience or protecting Wilderness values.

We are also concerned about the potential need to modify or widen the trails in the Wilderness areas to accommodate the 2016 race. Modifying or disturbing habitat in Wilderness areas would set a dangerous precedent for other developments or large events in Wilderness areas in both Banff National Park and all of Canada's National Parks.

## Fairview Wildlife Corridor

The Race route is proposed to go through the Fairview corridor. The Banff Management Plan (Section 5.2.1.4) indicates that the objective for this corridor is to “Maintain and restore secure wildlife corridors within the park (e.g. the Cascade, Fairview and Whitehorn corridors) and collaborate to assist the protection of larger-scale corridors (e.g. Yellowstone to Yukon, Bow Valley–Vermilion Valley corridor) by maintaining or improving habitat quality and minimizing displacement of wildlife. Likewise Section 5.3.3.12 outlines that the objective for wildlife movement corridors is to “maintain high-quality habitat through managing and minimizing human disturbance in identified wildlife movement corridors.”

The BIA indicates that there is little to no effect to the corridor as there is an existing trail that goes through this area and current human use. However, from the perspective of restoring or maintaining the corridor, increasing the number of people, traffic, congestion, etc. in the corridor does not align with this objective as the race in no way improves the effectiveness of this corridor. Rather than dismissing the impacts of the Race to this corridor, based on its current level of fragmentation, Parks Canada should focus on restoration of the corridor.

CPAWS SAB believes that the FIS World Cup Cross Country Test Race is not consistent with the objectives of the Banff Park Management Plan. The event is not consistent with protecting ecological integrity or connecting people to nature and wilderness. Given that a world-class ski facility is located in Canmore, less than 100km from the proposed site, we suggest that this location would be a more compatible site for the 2016 World Cup Cross Country Race.

Due to the potential for disturbance to the Wilderness area and Fairview Wildlife Corridor from the large number of people and associated activities as part of the World Cup Cross Country Race, CPAWS SAB does not support this event at its currently proposed location.

Thank you for the opportunity to provide comments on the proposed FIS World Cup Cross Country Race and Test Race. Please feel free to contact me to discuss any of our concerns further.

Sincerely,



Anne-Marie Syslak

Executive Director

Canadian Parks and Wilderness Society – Southern Alberta Chapter



Katie Morrison

Conservation Director

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