



Banff
National Park

What We Heard:

Summary of Public Comments

Lake Louise Ski Area Draft Site Guidelines for
Development and Use

July 2015

Context

Canada's Mountain National Parks have a long and distinguished history. Their story began in 1885 with the establishment of Canada's first national park in Banff. Over the years that followed, the popularity of these destinations grew to international acclaim, leading to the development of staging areas for visitors to experience and learn about these exceptional wild places. Today, a visit to the Mountain National Parks represents an opportunity to step into the wild on your own terms, whether that means a short visit to the edge of a townsite, a day's skiing in some of Canada's most challenging ski areas, or a weeklong trek deep into the vast expanses of the untouched backcountry.

The Mountain National Parks of Banff, Jasper, Kootenay, Yoho, Waterton Lakes, Mount Revelstoke and Glacier continue to be one of Canada's pristine natural landscapes, with 23,000 square-kilometers of protected wilderness. Dotted into this wilderness are the Banff, Jasper, Waterton Lakes, Lake Louise and Field townsites, varied outlying commercial accommodations and the four Mountain Parks ski areas of Lake Louise, Sunshine Village, Mount Norquay and Marmot Basin. To put this into perspective, Banff and Jasper National Parks are 97 per cent and 98 per cent designated wilderness, respectively, protected from future development in the *Canada National Parks Act*.

The Mountain National Parks continue to be conservation leaders in Canada and the world, with leading-edge programs for prescribed burns, aquatic restoration, wildlife corridor enhancements, and species at risk, among others. Investments in ecological integrity conservation will be close to \$26 million this year, an increase of more than \$11 million compared to 2011. Close to \$17 million will be spent in Banff National Park alone.

Limits to development in Canada's national parks were established in the late 1990s and early 2000s as a result of extensive analysis and public review. The process is completed for townsites and outlying commercial accommodations, so that commercial development can only occur within clearly prescribed limits and conditions. Until recently, the Mountain Parks ski areas were the only remaining major leaseholders without growth limit plans in place. The ski area planning process has since been completed at Mount Norquay and Marmot Basin, leading to an increase in net designated wilderness in Banff and Jasper National Parks and planned development at these areas to improve visitor experience while accomplishing ecological gains.

Providing long-term certainty for Banff's internationally acclaimed ski areas as a cornerstone of winter tourism is outlined in the *2010 Banff National Park Management Plan*. In order to manage development and commercial activities to protect and celebrate

national park heritage values, Parks Canada has committed to working with each ski operator to develop Site Guidelines that include negotiated permanent limits to growth in a manner that:

- Builds on and enhances Banff's international reputation for unique national park skiing experiences;
- Supports the maintenance or restoration of the park's ecological integrity;
- Facilitates memorable national park visitor experiences and educational opportunities; and
- Provides ski area operators with clear parameters for long-range and business planning in support of an economically healthy operation.

The largest leaseholders in the Mountain National Parks include the Lake Louise Ski Area, Sunshine Village and Mount Norquay in Banff National Park, as well as Marmot Basin in Jasper National Park. Carefully managing development and use of the ski areas ensures sustainability, high-quality visitor experiences and maintenance of ecological integrity.

In order to ensure long-term land use certainty for the management of ski areas in the Mountain National Parks, Parks Canada developed the *Ski Area Management Guidelines 2006*. These guidelines are Parks Canada's overarching policy to guide ski area planning for ski areas located within the Mountain National Parks; they set out a clear and predictable approach for Parks Canada and the ski areas to prepare and establish Site Guidelines and Long-Range Plans, as well as to provide opportunities for public participation in the planning process. The *Ski Area Management Guidelines* are consistent with and support the implementation of the park management plans for Banff and Jasper.

The Commissioner of the Environment and Sustainable Development audited the approach taken by Parks Canada for evaluating visitor activities and development projects, with specific examination of the process to develop Site Guidelines and the first Long-Range Plan for Mount Norquay. The Commissioner concluded in 2013 that for each visitor activity and development project examined, Parks Canada had assessed potential impacts of proposals on ecological integrity through environmental assessments, including an assessment of cumulative impacts, and public consultation. The Commissioner also found that the Mount Norquay Long-Range Plan, approved by the Minister of the Environment, reflected key mitigating measures stipulated in the Site Guidelines and associated Environmental Impact Assessment.

This proven approach was also used by Parks Canada in the development of the Site Guidelines for the Lake Louise Ski Area.

The guidelines set out the following parameters:

- Ensure ecological integrity will be maintained or restored;
- Contribute to facilitating memorable national park visitor experiences and educational opportunities; and
- Provide ski area operators with clear parameters for business planning in support of an economically healthy operation.

The Guidelines establish that all national park ski areas are required to develop Site Guidelines and Long-Range Plans for the approval of the Parks Canada Agency.

Site Guidelines

Site Guidelines achieve the following:

- Identify parameters to guide potential future development and use;
- Establish negotiated, permanent limits to growth; and
- Ensure land use and future projects or proposals are consistent with Parks Canada policy for ski areas and park management plans.

This long view of potential development allows for future project approvals to be made in a holistic manner that considers potential cumulative effects and how to mitigate any negative impacts.

Once approved, the Site Guidelines provide ongoing policy direction for projects proposed in subsequent Long-Range Plans.

Developed by the Parks Canada Agency in collaboration with the Lake Louise Ski Area, the Lake Louise Ski Area Site Guidelines for Development and Use are developed in compliance with the *Ski Area Management Guidelines* and the *2010 Banff National Park Management Plan*.

A Strategic Environmental Assessment (SEA) was conducted to assess potential cumulative impacts of proposed development.



The SEA was prepared by Parks Canada, and was reviewed by independent leading environmental scientists prior to being released for public consultation. Together, the Site Guidelines and SEA provide the parameters and mitigations for commercial growth.

Public Participation Process

Public engagement on the Lake Louise Ski Area Site Guidelines for Development and Use was planned and managed in accordance with the *Ski Area Management Guidelines*' process. Three weeks is the standard comment period for most major public consultations in the Mountain National Parks, and is consistent with the comment periods of other federal consultations such as those required under the *Canadian Environmental Assessment Act 2012*. Parks Canada worked to ensure public awareness of public participation opportunities through the placement of ads and proactive outreach with local media, hosting three open houses in Banff, Calgary and Lake Louise, and direct outreach with stakeholders. Consultations for the Lake Louise Ski Area draft Site Guidelines were held from June 1, 2015 to June 21, 2015 inclusive. Through this process, Parks Canada sought new information that could inform the SEA and the draft Site Guidelines as well as general feedback on the two documents.

During the formal three-week public engagement program, feedback was received from across the country and internationally in the form of direct feedback received at the open houses, formal correspondence and comments submitted on-line. Respondents were asked the following questions:

Site Guidelines

- Which elements of the site guidelines do you support/have concerns with and why?
- Any additional topics or information you feel should be included?

Strategic Environmental Assessment

- Any additional environmental considerations you feel should be considered?
- Any additional or alternative approaches to addressing potential impacts or issues that should be considered?

More than 1,200 public comments were registered, read and analyzed. Comments varied in scope and detail. For comparison, 145 comments were received for the Mount Norquay Site Guidelines and more than 1,450 comments were received for the associated Long-Range Plan.

In many instances, feedback was broad in nature about commercial development in the national parks and not directly related to the draft Site Guidelines for Development and Use

or the SEA. Many remarks seemed to be generated by campaigns as evidenced by numerous identical form letters.

Parks Canada considered what was heard through the public engagement process, including concerns and new information that could inform the SEA and the Site Guidelines.

Aboriginal Engagement

A concerted effort was made to inform local and regional Aboriginal groups of the engagement process related to the draft Lake Louise Ski Area Site Guidelines for Development and Use, and to provide key background information. One Aboriginal group requested additional information, which was provided, and Parks Canada responded to another group requesting more specific details.

What We Heard – Summary of Public Comments

Major themes from submissions fell into the following categories:

- Policy
- Visitor Experience
- Environmental Considerations
- Public Participation Process

Policy

Comments in this category were in relation to the legislative and policy frameworks under which ski areas in national parks fall, including the proposed amendments to the *Canada National Parks Act*, the *Declared Wilderness Regulations* and the *Ski Area Management Guidelines*.

Several respondents regarded the project as a balance between environmental protection, visitor experience, terrain, capacity and expansion in accordance with the *Ski Area Management Guidelines 2006*. A number of respondents felt that the project would facilitate much needed upgrades to keep the ski area attractive and competitive with other ski areas, both inside and outside of Banff National Park. In addition, some respondents supported the project as being an important catalyst to provide economic benefits locally and regionally and encourage tourism.

Concerns expressed in this category included a perceived weak rationale to support the project and the appropriateness of Parks Canada's role in supporting the economic viability of the ski areas, and that the priority should be on preserving and improving ecological integrity. Respondents felt there were other choices for skiing within the park and regionally. Others questioned the need for the project, citing a flat ski market and

unpredictable snow falls. Some felt the project caters to skiers only, while others commented that there was sufficient development in the park and that preservation should take precedence over development. Others questioned the appropriateness of ski operations in a UNESCO World Heritage Site and a national park, and whether new commercial development in national parks is either warranted or appropriate.

Some expressed their opposition to changes to declared wilderness areas in the Canada National Parks Act. Others questioned the governing principle in the *Ski Area Management Guidelines 2006* that considers removal of undeveloped lands from the leasehold to become designated wilderness constitutes a “substantial environmental gain.”

Visitor Experience

Comments in this category reflected elements in the Site Guidelines relating to increased opportunities for winter activities and changes to summer use.

Supporters felt the proposal would facilitate improved visitor experiences that are worthy of a world-class ski resort in Canada’s first national park. Many individuals wrote about the important role the Lake Louise Ski Area plays as a cornerstone of winter tourism in Banff National Park, noting its importance as a local employer and that many businesses depend of the viability of the ski areas to bring visitors to the park. Others opined that the tourism economy of the whole region benefits from the visitor offer provided by Lake Louise Ski Area. The current and ongoing growth of Calgary was noted along with their support for Site Guidelines that are forward-looking to anticipate future demands and needs. Supporters felt that with a new plan the upgrades of facilities (lodges, lifts, parking, terrain) could now proceed.

Others felt the proposal would create improved and expanded skiing for beginner and intermediate skiers, as well as new opportunities for experienced skiers in the back bowl areas. Many respondents said the proposal would have the additional benefits of decreased congestion on hill, improved sightseeing vistas in the summer, opportunities for improved interpretation and education on-site, improved parking and improved safety. Several respondents also commented that national parks were protected places for people to enjoy and experience, not to be protected from people.

Some respondents expressed concerns that increased skier capacity would result in more congestion in the park including roads, accommodations, restaurants and highways. Others felt that the project would only benefit skiers and would detract from nature in a protected place. A number of respondents said they would prefer to keep the ski area as-is.

Environmental Considerations

Comments in this category were in relation to potential environmental impacts and proposed environmental gains. In some cases it was difficult to ascertain whether respondents were commenting on the Site Guidelines or the Site Guidelines and the SEA.

Some respondents felt the lease reduction and reconfiguration would provide a net benefit to the environment. These individuals saw the proposal as an example of responsible stewardship and sustainable business practices by an organization working in a national park. Most felt that relocating summer user to higher elevations would reduce human-wildlife conflict and provide grizzly bears with better access to high-quality habitat. Most supported proposed changes in the leasehold that would enhance the maintenance or improvement of the effectiveness of the Whitehorn Wildlife Corridor.

Other respondents felt the draft plan overestimated the net environmental benefit to lease reconfiguration, while at the same time remaining supportive of the return of Purple and Wolverine bowls. These respondents felt that the development of new terrain within the lease and licenses of occupation for Hidden Bowl and West Bowl offset any potential gains of lease reconfiguration. Most concerns with the development of new terrain were expressed with respect to potential development of Hidden Bowl. Many respondents expressed concern that development of new terrain currently not in the lease and expansion of existing infrastructure would be detrimental to species such as grizzly bears, wolverine, mountain goats and species at risk such as Whitebark pine and Westslope cutthroat trout. A number of reviewers felt that potential extension of summer visitor hours would negate potential environmental gains associated with the relocation of the summer visitor use operation. Some respondents felt the documents were deficient in baseline data, and that cumulative effects and some wildlife species such as lynx were not addressed. A few respondents raised concern about the sustainability of infrastructure including roadways and traffic congestion, and water treatment systems and downstream water quality in relation to future ski area growth.

In a number of cases it was apparent that comments were based on limited review or interpretation of the SEA or the Site Guidelines. In other cases it became apparent that the intended direction in these documents was not clear to readers.

Public Participation Process

A number of respondents noted that they appreciated the opportunity to comment on the draft Site Guidelines and that they had easy access to the required documents. Some open house attendees said they felt the Parks Canada presentation was informative along with the displays, handouts and other aspects.

Several respondents commented that the length of the public review period was insufficient. Other comments included concerns about the overall process and whether all of the concerns raised would be reflected in the final documents.

Next Steps – Long-Range Plans

The next step in the management and planning process applicable to the Lake Louise Ski Area and all ski areas in national parks includes Long-Range Plans. Long-Range Plans are to include implementation of the major proposals and requirements outlined in Site Guidelines such as parking and transportation strategies, best management practices, environmental management and monitoring system, and a heritage tourism strategy. Whereas Site Guidelines provide the scope of what can be considered, Long-Range Plans outline specific projects to achieve approved direction as per the Site Guidelines. Long-Range Plans are subject to a Detailed Impact Analysis in accordance with the *Parks Canada Directive on Impact Assessment 2015* and the requirements of the *Canadian Environmental Assessment Act 2012*. The public will also have an opportunity to comment during the Long-Range planning process.

Parks Canada will continue to work with the Lake Louise Ski Area throughout the Long-Range planning process to ensure plans meet the requirements as identified in the approved Site Guidelines and SEA.