

Proposed Lake Louise Ski Area Expansion: A shell game 34 years in the making granted you mere days to respond

After 34 years, Parks Canada released draft development guidelines for the Lake Louise Ski Area. It then gave you three weeks to comment on them. I'm writing this as if you still had time to participate in the public engagement process. I think this style underlines well just how insufficient and ill-considered the Parks Canada approach to this very significant development was.

Read through them and you may be tempted to see them as an impressive feat of "bait-and-switch." We've seen this story before, most notably with the Marmot Basin Ski Area in Jasper National Park. The proposed guidelines still may be viewed at <http://www.pc.gc.ca/eng/pn-np/ab/banff/plan/gestion-management/lakelouise.aspx>

By swapping a number of wilderness areas in and out of leasehold territory, Parks Canada claims to have realized "environmental gains" that then are used to justify exempting the leaseholder from the Ski Area Management Guidelines. The result? It looks to me like significantly expanded activities and developed area.

Somehow a 30 percent increase to the skiable area and a 92 percent increase to the number of daily visitors count as an "environmental gain." Impressive.

Environmental gains?

The problem is that many of the claimed gains don't necessarily actually exist. They consist of undeveloped and largely untouched land being removed from the ski area's leasehold. This land would not have been subject to unfettered development; it still would have been subject to manage-

ment by Parks Canada. For them to have been developed in any case would have implied questionable future actions on the part of Parks, ones that would run contrary to that agency's core mandate of maintaining ecological integrity.

Make no mistake about it. The land proposed for removal from the leasehold is indeed – as is claimed – ecologically valuable alpine habitat for sensitive species including grizzly bears, wolverines and mountain goats. But so too are the areas proposed for addition to the resort and developed as "skiable areas" (complete with at least one or two new ski lifts).

Parks Canada's approach to these development guidelines screams "entitlement." The entire document is based on the assumption that the ski area operator has a "right" to develop on the site. Of course they have no such thing, rather AWA reminds Parks Canada that the prerogative to develop should be properly regarded as a privilege conferred on the operator by virtue of being grandfathered into the park management plans.

What are the tradeoffs?

Parks Canada has to claim there are important environmental gains here. Without that claim there's absolutely no shred of support for the development guidelines. The agency writes: "The four substantial environmental gains **make it possible** to consider the following exceptions to the Site Guidelines." (my emphasis) Parks Canada's 2006 *Ski Area Management Guidelines*, the governing policy document for the management of ski areas in all mountain national parks, clearly dictates that exceptions to the guidelines can only be granted "if there are Substantial Environmental Gains."

The Lake Louise Ski Resort hopes to be granted several exceptions in return for those gains. They are:

- a 356 hectare expansion to the skiable area in the West and Hidden Bowls (these hectares lie outside the current lease and contain habitat arguably as valuable as what the leaseholder would relinquish)
- 111 hectares of added skiable area within

the current leasehold;

- expanded summer use;
- a new summer-use lodge;
- two new ski lifts;
- additional parking capacity (expanded from 1,176 spaces to 3,256 spaces); and
- a near doubling of the lift capacity (from 6,000 skiers per day to 11,500 skiers per day).

AWA has serious apprehensions about many of those proposals. We are always concerned about expanded summer use in any ski resort and, in this case, the vastly expanded year-round capacity is equally problematic. The proposed Hidden Bowl development is especially concerning; it is a wilderness area outside the sight lines of the current ski hill and should remain undeveloped.

It is particularly distressing that there are no specific mitigation measures required (beyond the development of a strategy that “addresses concerns”) for the additional traffic along the resort access road. This road itself cuts through and disrupts sensitive wildlife habitat in the form of the Whitehorn Wildlife Corridor – the draft guidelines claim to protect this area. There is a contingency for “measures to manage visitor access and maintain vehicle disturbances at levels below 30 vehicles per hour” on the access road. However, this would only apply in the event the operator chooses to extend operations even further than those nominally delineated by the draft guidelines. These visitor/vehicle access measures should be required no matter what.

There are also plans to reconfigure the existing developments to bring summer use out of the lower elevations that are frequented by grizzly bears and to improve snowmaking processes to reduce water withdrawals from local watercourses during low-flow periods.

These are positive steps as far as they go, and AWA generally supports them. We believe all activities (not just summer use) should be moved to higher-elevation areas and likewise that water withdrawals should be reduced at all times of year, not just during low-flow periods. Water flows in the Pipestone River and Corral Creek provide important ecosystem function even during spring floods and other times of higher flow.

Call now – operators are standing by!

Okay, I should call this section “Don’t Call Now – Operators Aren’t Standing By Anymore.” The procedural approach Parks Canada took was very, very wanting. If you’d been able to read this before the deadline came and went here’s what I would have said...

Also an egregious procedural problem with the draft guidelines is the consultation process. A long-range plan for the ski area was released in 1981, with an expectation that permanent development guidelines would soon follow. They didn’t.

So we’ve been waiting 34 years for some action on developing guidelines. Now they are suddenly released – without any warning or advance notice – and the public has a mere three weeks to read and digest the 89-page document and to respond. After a 34 year hiatus the public gets a measly three-week consultation period. By the way, three weeks is the absolute minimum required period according to Parks Canada policy. Then there are the open houses. There are three of them. They meet for seven and one-half hours in total. If you don’t live in or can’t travel to Calgary, Banff, or Lake Louise you’re out of luck.

Frankly, this is insulting. It gives a strong impression that the entire plan is a fait-accompli waiting to receive the rubber-stamp of approval. We do not see any rational ecological need for this sudden rush to bring this into existence after decades of waiting, and are arguing for a more lengthy consultation period. For goodness sake, give the public ample time to consider the guidelines. In the meantime, AWA will be submitting our response, including those concerns outlined above.

In the absence of any revision to the consultation period, feedback will be accepted until midnight on June 21. AWA encourages the public to voice their concerns during this short window of opportunity.

- Sean Nichols