



Dear Wilderness Defender,

Parks Canada have recently released draft Site Guidelines for Development and Use of the Lake Louise Ski Area in Banff National Park. This document is a de-facto 42 year long range plan for the ski area that includes significantly expanded developed area on the mountain; additional lifts, lodges and warming huts; a substantial increase to summer operations; and a near-doubling of skier capacities. Couched in glowing language about supposed environmental gains that exist mostly on paper, the plan proposes to allow the ski area operator extensive exceptions to Parks Canada's overarching 2006 *Ski Area Management Guidelines* and in fact AWA believes it would result in a net detriment to the region's environment.

Parks Canada is accepting feedback on this plan until midnight on Monday June 21, 2015.

AWA asks you to take this opportunity to respond and register your opposition to yet another example of Parks Canada prioritizing commercial development in the parks over their mandate of protecting ecological integrity.

- Sean Nichols, AWA Conservation Specialist

In This Action Alert:

Draft Site Guidelines for Development and Use of the Lake Louise Ski Area

AWA

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The recently-released [draft Site Guidelines for Development and Use of the Lake Louise Ski Area in Banff National Park](#) propose to allow the ski area operator multiple expansions to their existing facilities and operations. These expansions involve the granting of several exemptions to the 2006 [Ski Area Management Guidelines](#), the governing policy document for the management of ski areas in all mountain national parks. That document clearly dictates that exceptions to the guidelines can only be granted "if there are Substantial Environmental Gains."

The claimed gains in this case are detailed in a [draft Strategic Environmental Assessment](#) (SEA) document released in conjunction with the draft Site Guidelines. They include the removal of a number of areas (Purple and Wolverine Bowls, and the Whitehorn Wildlife Corridor) from the ski area's leasehold, relocation of summer use areas to higher up the mountain, and reduced water withdrawals during low-flow periods.

In return for those gains, the Lake Louise Ski Resort hopes to be allowed a variety of different expansions. In addition to an a 356 hectare expansion to the

skiable area in the West Bowl and Hidden Bowl (currently outside the ski area's leasehold, and comprising sensitive species habitat that is arguably as valuable as the habitat in the areas that are being relinquished), the proposal includes:

- 111 hectares of added skiable area within the current leasehold
- expanded summer use;
- a new summer-use lodge;
- new ski lifts;
- additional parking capacity (1,176 spaces to 3,256 spaces); and
- an increase to the lift capacity (6,000 skiers per day to 11,500).

AWA has many concerns with both the draft SEA, and the draft Site Guidelines. A summary follows:

Overall Assumptions

1. It is unclear what the benefit, or need, for this expansion is in the first place. Several assumptions seem to be taken for granted in the draft guidelines, and never examined or justified. Annual snow sport numbers at ski hills in Canada have been relatively flat for the past decade, and other ski hills in the area have taken to offering huge discounts to maintain numbers.
2. Also unexamined is an underlying assumption that the ski area operator has some sort of intrinsic "right" to develop the mountain. In reality 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.

Concerns about the Proposed Land Swap

3. The land being removed from the ski area's leasehold would not have been free for unfettered development, but that would still have been subject to management by Parks Canada. For them to have been developed in any case would have implied questionable future actions on the part of Parks. Removing these from the leasehold is a benefit on paper only.
4. The areas proposed for addition to the resort and developed as "skiable areas" are just as ecologically valuable alpine habitat for sensitive species—including grizzly bears, wolverines and mountain goats—as those being removed. However this is barely addressed in the draft SEA, which focuses almost entirely on the habitat potential and other wildlife value of the lower and front slopes, ignoring the back bowl areas proposed for development. The data in the draft SEA relating to these areas where most of the impact will be felt is woefully deficient for any reasonable form of decision making.
5. The Hidden Bowl development especially is a wilderness area outside the sight lines of the current ski hill and should remain undeveloped.

Concerns about Expanded Use

6. The draft Site Guidelines involve vastly expanded year-round use of the lodge, including a near doubling of skier capacities, and more than doubling parking capacities. (See table below for a listing of all

- expansions.)
7. The new summer use includes the construction of a new Eagle Ridge lodge at a higher elevation than the existing Whitehorn Lodge, that would be closed to summer use (but remain open during the winter). AWA believes this should go further, and that the Whitehorn Lodge should be closed entirely.
 8. AWA is always concerned about expanded summer use in any ski resort, but in this case the vastly expanded year-round capacity is equally problematic. The additional traffic on the Whitehorn access road that goes right through the Whitehorn Wildlife Corridor negates any benefit that might be gained from removing the corridor from the leasehold.
 9. There is a contingency for “measures to manage visitor access and maintain vehicle disturbances at levels below 30 vehicles per hour” on Whitehorn Road, however this would only apply in the case that the operator chooses to extend operations even further than those nominally delineated by the draft guidelines. This should be a basic requirement no matter what.
 10. Whitehorn Road already suffers from significant congestion during peak periods. This results in many drivers leaving the hill attempting to bypass lineups by taking shortcuts along the Bow Valley Parkway, then travelling at higher than posted speeds with higher traffic volumes. This all further reduces the effectiveness of the Whitehorn Wildlife Corridor. Increasing visitor capacities will only exacerbate this problem.
 11. A proposed mitigation of installing a wildlife underpass should only be a choice of last resort when no other options are available. A crossing underpass is not likely to function effectively without extensive fencing, which will degrade animal movements year round in this sensitive corridor.

Concerns about Impacts to Water

12. The draft SEA highlights the need for water conservation and reducing drawdowns at critical times on the Pipestone River. However reading carefully it appears to be more about finding alternate sources and storage methods for increased snowmaking capability.
13. In any case AWA believes that water withdrawals should be reduced at all times of year, not just 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.
14. With the expanded use will in fact come increases in demand for (potable) water. The proposals are non-specific as to how the increases in demand, both for potable water, as well as those for sewage and snowmaking, will be met, only citing “alternative sources.”
15. The effects of a proposed snowmaking additive, Snowmax, on plant ecology and water ecology are unknown at present.

AWA is asking you to take action now. **The deadline for public comment is midnight on Monday June 21, 2015.**

Please take this opportunity to send a note to Environment Minister Leona Aglukkaq, and to Parks Canada to let them know that Albertans and Canadians are opposed to yet another example of Parks Canada prioritizing commercial

development in the parks over their mandate of protecting ecological integrity.

The documents referenced above, and all background documents and material related to the proposed ski area expansion, can be found on the Parks Canada website at: <http://www.pc.gc.ca/eng/pn-np/ab/banff/plan/gestion-management/lakelouise.aspx>.

You can send your letters to:

- The Honourable Leona Aglukkaq
Minister of the Environment
minister@ec.gc.ca
- The Honourable Stephen Harper
Prime Minister of Canada
pm@pm.gc.ca
- Megan Leslie
NDP Environment Critic
megan.leslie@parl.gc.ca
- Elizabeth May
Leader of the Green Party of Canada
leader@greenparty.ca
- Alan Latourelle
CEO, Parks Canada Agency
Alan.Latourelle@pc.gc.ca
- Melanie Kwong
Superintendent, Lake Louise – Yoho – Kootenay Field Unit
Melanie.Kwong@pc.gc.ca
- Dave McDonough
Superintendent, Banff Field Unit
Dave.McDonough@pc.gc.ca
- Alex Kolesch
Manager of Land Use, Policy and Planning for Lake Louise
Alex.Kolesch@pc.gc.ca
- Parks Canada Public Feedback
opinion@pc.gc.ca
- Lake Louise Ski Resort
info@skilouise.com

And as always, AWA appreciates being copied on any letter you send:

- Sean Nichols
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Table of proposed development and operation expansions at Lake Louise Ski Area:

	Current	Change	New
Lease (Ha)	2,190 Ha	-537 Ha	1,653 Ha
Skiable Terrain (Ha)	551 Ha	+466 Ha	1,017 Ha
Active Lifts	9	+9	18
Lodges and Warming Huts	4	+5	9

	Current	Change	New
Commercial Space (m²)	6,515 m ²	+10,485 m ²	17,000 m ²
Parking Capacity (cars)	1,176 cars	+2,080	3,256
Parking Capacity (buses)	30 buses	+20	50
Ski Lift Capacity	6,000	+5,000	11,500

Table and analysis courtesy of Bow Valley Naturalists

You can find a web version of this action alert on AWA's website [here](#).

Defending Wild Alberta through Awareness and Action

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