



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

July 18th, 2022

Sal Rasheed
Banff Field Unit Superintendent
Parks Canada
By email: banff.superintendent@pc.gc.ca

Re: Sunshine Village Ski Area Draft Long-Range Plan and Detailed Impact Assessment

Dear Mr. Rasheed,

Alberta Wilderness Association (AWA) appreciates this opportunity to provide input on the Sunshine Village Ski Area Draft Long-Range Plan (LRP) and Detailed Impact Assessment (DIA). As you may know, AWA is one of Alberta's oldest conservation organizations, with over 7,500 members throughout Alberta, Canada, and worldwide. AWA strives for the completion of a connected protected areas network and the good stewardship of Alberta's lands, waters, and biodiversity.

According to the Canada National Parks Act, "Maintenance or restoration of ecological integrity, through the protection of natural resources and natural processes, shall be the first priority of the Minister when considering all aspects of the management of parks". Sunshine Village Ski Area is an important part of the ecosystem within Banff National Park. AWA is concerned that the predicted residual negative effects of the proposed projects on water quality, fish and fish habitat, vegetation, and wildlife are not consistent with Parks Canada's goal of maintaining ecological integrity as a first priority. If mitigation strategies are not enough to protect valued ecosystem components (VECs) such as species-at-risk, projects that affect these VECs should be reconsidered.

Certain components of the projects described in the LRP, such as the Goat's Eye II Chairlift and glades, are expected to disturb critical habitat in Cayuse Creek for westslope cutthroat trout and bull trout (both listed as threatened under the federal *Species at Risk Act*). The operational phase of the project is also expected to change flow from an increase in domestic water use/withdrawals from Healy Creek, Sunshine Creek, Rock Isle Lake, and the Bourgeau Well, reducing habitat availability for westslope cutthroat trout and bull trout. It is not acceptable for any project to disturb critical habitat for these imperiled species that have already lost the majority of their historic habitat to human activity and development. It is not adequate to state that "effort will be made during detailed design to site the developments outside the defined riparian zone for the identified drainage". AWA asks that the projects that are expected to encroach riparian habitat associated with Cayuse Creek, or alter water flow in identified critical habitat not be approved and not move forward, as they do not align with the priority of Banff National Park to enhance ecological integrity. These threatened trout species are an important

component of the ecological integrity which must be protected within Banff National Park, and already face severe threats from human activities and climate change cumulatively.

The detailed impact assessment acknowledges that alpine vegetation communities are expected to be impacted by the Goat's Eye II ski lift upper terminal and by any ski lift towers in the alpine. Alpine vegetation is very susceptible to impacts from human use and climate change. For example, trampling can have long-lasting effects on alpine vegetation, and short growing seasons in the alpine along with soil compaction means that recovery is slow.

AWA is concerned that the impacts to vegetation communities cannot be adequately assessed without a full vegetation inventory of vascular plants, bryophytes, and lichens, which has never been done for Sunshine Village Ski Area. Evaluating the status of bryophytes and lichens is on the [priority list](#) of research activities for Banff National Park. The Sunshine area hosts a high bryophyte diversity because of its high moisture content and the combination of both siliceous (silica) and non-siliceous substrate areas. Several species of siliceous and non-siliceous mosses have been documented in ad hoc studies. Mosses play an important ecological role in alpine communities by providing food and habitat for terrestrial and aquatic organisms, conserving fungal diversity, contributing to nutrient cycling, water retention, and preventing soil erosion. Bryophyte and other vegetation diversity must also be studied in the old growth areas of Sunshine, which are ecologically unique in Banff National Park. There are no other areas in the Park where subalpine old growth forest merges with the alpine in the Continental Divide. We request that a baseline vegetation inventory be completed by qualified experts, and stronger visitor management be implemented to limit impacts to alpine vegetation. Without adequate knowledge of vegetation communities in the project area, effects of the project on wildlife that rely on this vegetation can also not be fully understood.

Whitebark pine habitat is expected to be impacted by the construction of the Goat's Eye II chairlift. Because this is a federally listed species-at-risk, any habitat lost from construction and operation of this project should be compensated by a requirement to restore habitat for this species elsewhere in Banff National Park.

The DIA report suggests that increases in human presence will not change grizzly bear habitat security because this presence will primarily be in the winter when bears are hibernating. This is inaccurate because grizzly bears and black bears come out of hibernation in March or April, and the ski hill does not typically close until the May long weekend (and was open for one week in July this year). This indicates that there could be considerable overlap between high human presence at Sunshine Village and grizzly bears searching for spring forage. The DIA report should acknowledge this to accurately reflect possible impacts of the project on grizzly bears.

The cumulative effects section in the DIA is not adequate because it does not discuss the effects of these projects in combination with ongoing impacts from past, present and foreseeable projects in the area, in any additive or synergistic manner. Instead, this section summarizes possible impacts of these projects that are discussed in other sections and potential impacts of future developments that haven't been

defined. Given that the majority of habitat connectivity in the Bow Valley has already been lost (studied in bears and wolves, but applicable to other wildlife species), the DIA needs to carefully consider how the effects of these projects interact with the ongoing and predicted effects of other projects. The impacts associated with all existing and planned developments should be modelled at the Landscape Management Unit scale to be useful in informing meaningful, science-based decisions.

AWA looks forward to hearing how these comments will be meaningfully addressed to conserve ecological values within the Sunshine Ski Village Area and Banff National Park as a whole.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Devon Earl', written in a cursive style.

Devon Earl, Conservation Specialist

Cc: Sunshine Village Ski Area Public Engagement, lrp@skibanff.com