Statements of Concern in Response to the Notice of Further Assessment for Castle Mountain Resort’s Future Development

Statements of Concern

NOVEMBER 20, 2018
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Dear Ms. Trembath,

Please find the following letter, attached, containing Alberta Wilderness Association’s request that an Environmental Impact Assessment be conducted for the proposed expansion of Castle Mountain Resort.

With regards,
Grace Wark
Conservation Specialist
Alberta Wilderness Association

"Defending Wild Alberta through Awareness and Action"

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November 7, 2018

Margot Trembath  
Environmental Assessment Coordinator, Alberta Environment and Parks  
environmental.assessment@gov.ab.ca

RE: Proposed Expansion of Castle Mountain Resort

Dear Ms. Trembath,

Alberta Wilderness Association (AWA) is writing to request that an Environmental Impact Assessment (EIA) be conducted for Castle Mountain Resort Inc.’s (CMR) proposed expansion. Founded in 1965 and with over 7,000 members and supporters in Alberta and across Canada, AWA is committed to the conservation of Alberta’s wildlife, wild waters, and wild spaces.

AWA’s request is based on the following:

1. An EIA should be conducted to assess any potential risks to the ecological integrity of Castle Wildland Provincial Park and Castle Provincial Park. The 1993 approval of Vacation Alberta’s Master Plan by the Natural Resources Conservation Board (NRCB) was based on the condition that an adjacent area of wildland would be protected, which was met by the recent establishment of the Castle Parks. AWA believes that CMR’s proposal to expand its boundaries into the Castle Parks may not only have negative impacts to the adjacent wilderness, but may also violate the terms of the 1993 NRCB decision.

2. The proposed carrying capacity of 3,952 users/day exceeds the 1993 NRCB decision of 3,200 users/day. AWA requests that, at minimum, CMR adhere to the original conditions of the 1993 NRCB decision and that an EIA be conducted to ensure that any expansion poses no further risk to ecological values of the Castle Parks.

3. Withdrawals taken from Haig Creek may reduce the surface flows of the West Castle River. CMR’s proposal includes the withdrawal of 35,922 m$^3$ of water for the purposes of snowmaking from Haig Creek, a tributary of the West Castle River. Part of the 1993 NRCB decision required that CMR “shall not take water for use in the project in a manner that will result in a reduction of surface flows of the West Castle River”. AWA requests that an EIA assess any risk that water withdrawals for snowmaking pose to the surface flows of Haig Creek and the West Castle River.

We look forward to your timely response.

With regards,

ALBERTA WILDERNESS ASSOCIATION

cc:
Brad Brush, General Manager, Castle Mountain Resort Inc., brad.brush@skicastle.ca
Julie MacDougall, Castle Parks Planner, Alberta Environment and Parks, julie.macdougall@gov.ab.ca
The ski hill has a local importance to the community and I am distressed to see them at odds with environmental concerns. I have concern for the headwaters tributaries and their importance to issues of habitat as outlined below and request sincere effort to hear and address all sides of concern. An environmental impact assessment is critical. Discussion and effort to resolve issues that arise form the EIA are important. Please take the time to respect the EIA and find solutions that address the issues.

An environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.

2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.

3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.

4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.
Dear sir:

While I no longer live close to the Castle Ski Hill, I am an angler who fishes the West Castle River both up and downstream of the Ski Hill. The habitat of the threatened West Slope Cutthroats is of paramount importance and with water removal from the aquifers feeding the Castle expansion, the cutthroats habitat will suffer. Any increase in users of the West Castle watershed cannot be tolerated.

Regards,

Don Andersen

Web site bamboorods.ca
Hello,

Please find our statement of concern regarding the Castle Mountain Resort development as an attachment.

Thank you, and have a great weekend!

Neil Keown
Chair
Alberta Backcountry Hunters and Anglers
Backcountry Hunters and Anglers
c/o P.O. Box 10294, Airdrie, Alberta, T4A 0H6

November 15, 2018

Director, Environmental Assessment, Alberta Environment and Parks
c/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower
9915 – 108 Street
Edmonton, AB
T5K 2G8
environmental.assessment@gov.ab.ca

Re: Castle Mountain Resort, Statement of Concern

Dear Ms. Trembath:

We are the Alberta chapter of the Backcountry Hunters and Anglers (BHA).

As hunters and anglers who recreate in Alberta’s public lands, we are concerned about the proposed development of the Castle Mountain Resort (CMR), as identified in the CMR disclosure document, dated Oct. 1/18, and alongside the CMR master plan (found on the CMR website).

We believe that any expansion of operations at CMR will have an impact on wildlife, wildlife habitat, and surrounding areas. Given AEP’s recent focus on the Castle Provincial and Wildland Parks, and the recognition of its diversity and natural beauty, BHA believes due diligence must be taken with respect to the proposed CMR development to ensure that this critical habitat is protected. The outdoor community is concerned that any increased development at CMR, as well as associated infrastructure, will undercut the conservation gains that were achieved through the designation of the Castle Provincial and Wildland parks. We encourage AEP to take this into consideration, and to use the findings of detailed environmental assessments to make science-based decisions, up to and including denying any additional development that would undermine the ecological integrity of the Castle Parks.

While the disclosure document identifies that limited environmental assessments have been undertaken, we would encourage AEP to request that further detailed environmental studies be completed, and the results made available to the public. BHA is particularly concerned with the impacts on wildlife (sheep, elk, grizzly bear, etc.) habitat, as well as the endangered Westslope Cutthroat Trout, specifically the impact that the diversion of Haig Creek will have, as well as the monitoring and capture of any sediments that will result from the diversions.
As this disclosure is also proposing a year-round operation, in addition to doubling accommodation units, parking lots, and the end goal of the snowmaking facility (upwards of 33 million gallons of water, upon completion), we would like to ensure that the environmental assessments take all aspects of the proposed developments into account. It will also be helpful to identify the impact upon the West Castle Wetlands Ecological Reserve (adjacent to the CMR village), in light of the increased amount of sewage that will result from the higher carrying capacity and year-round operations from the resort.

We would welcome the opportunity to discuss this further, and we look forward to seeing the outcome of the environmental assessments.

Yours truly,

Neil Keown
Chair
Alberta Backcountry Hunters and Anglers
alberta@backcountryhunters.org

cc. Minister Shannon Phillips
c. Peter Swain
c. Julie MacDougall
To whom it may concern,

Thank you for the opportunity to provide this Letter of Concern. An environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.

2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.

3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.

4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.

Regards

Laurie Camps

Sent from my iPhone
Dear Ms. Trembath,

Please see the attached Statement of Concern from the Castle-Crown Wilderness Coalition Society on the Castle Mountain Resort Master Development plan. We respectfully request a thorough Environmental Impact Assessment be carried out prior to any approval of the expansion as proposed in their Master Development Plan 2017.

Regards,

Board of Directors Castle-Crown Wilderness Coalition Society

Castle-Crown Wilderness Coalition
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403-627-5059
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CASTLE PARKS
ENJOY * PROTECT
November 15, 2018
Director, Environmental Assessment
Alberta Environment and Parks
C/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower
9915—108 Street
Edmonton, Alberta
T5K 2G8
Via e-mail: environmental.assessment@gov.ab.ca

Statement of Concern, Castle Mountain Resort Development

The Castle-Crown Wilderness Coalition (CCWC), based in Pincher Creek, Alberta, requests that the Government of Alberta, through the provisions of the Environmental Protection and Enhancement Act and the Water Act, requires Castle Mountain Resort Inc. (CMR) to carry out a thorough Environmental Impact Assessment (EIA) prior to any approval of the company’s present expansion as proposed in their Master Development Plan (MDP) 2017.

The Castle-Crown Wilderness Coalition, as a non-profit society, has been actively engaged in protecting the wilderness values of the Castle region for almost thirty years. The track record of the commitment by our membership and volunteers over those years can be found on our website <www.ccwc.ab.ca>. Our Vision remains unchanged:

“A world in which wilderness survives so that wild lands and wildlife may thrive, and future generations can know their natural beauty and diversity.”

Our working goals are stated: “As land use policies change, the CCWC will continue to promote the ongoing protection, restoration and maintenance of the Castle Wilderness as a viable and thriving wilderness.”

The organization’s close involvement with matters directly adjacent to, and affected by, CMR’s incremental developments since the company took ownership of the isolated 44-acre parcel of private land can be documented through our Stewardship and Monitoring of the West Castle
River Wetlands Ecological Reserve (WCRWER) under the Alberta Parks Volunteer Stewardship Program. Our staff and volunteers have provided untold working days helping to ensure the riparian health of the West Castle Valley.

Our Information Kiosk, established in 2011 (MLL 090053 NE 24-4-4-W5), located directly to the east of CMR’s LOC, just off the MD of Pincher Creek’s Secondary Hwy 774 Right of Way that extends into the new Wildland, has provided important educational information about the Castle Wilderness (formerly “Castle Special Management Area”) for visitors who arrive in the area with no other source of information about the area available.

Also, unfortunately, our organization’s recourse to the courts in an attempt to hold CMR and the Government of Alberta’s land managers accountable for decisions that have very direct environmental impacts, especially with respect to the health of our water and riparian resources and species at risk has its own track record in the records of the Court of Queen’s Bench, Alberta Court of Appeal and the Environmental Appeals Board.

**Statement of Concern**

A thorough and comprehensive Environmental Impact Assessment of the current Castle Mountain Resort Master Development Plan is required. In the absence of any such assessment since 1993 for this area of the Castle watershed, the list of concerns provided below is likely only a small part of the suite of concerns that the Government of Alberta should be addressing at this time. As there is not any significant mention of environmental measures being undertaken by the company within this MDP or over their tenure of the 3,200-acre lease to ensure the protection of critical ecological values both locally and regionally is a void that only an EIA can address.

Measures that may, or may not, have been undertaken by Alberta Environment and Parks management since the approval of CMR’s Area Structure Plan in 2001 need to be scrutinized and evaluated. The list of concerns raised by the Fish and Wildlife Division at that time was serious enough for the then Director of Regulatory Assurance to recommend that an EIA be required (Briefing documents, 2001-2002). Subsequently CMR received its approval on the understanding that these matters could be “managed” by the various government agencies. Consequently, CMR has received at least a dozen approvals, permits, or amendments to approvals since that time. This would be the appropriate time to put a spotlight on the conditions required and whether the agencies and CMR have indeed managed to address those concerns before any further incremental “phased in” expansion is approved.
The CCWC has identified the following items as a basic minimum for assessment:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its License of Occupation (LOC) and into the newly-designated Castle Wildland Provincial Park.

2. Habitat of plants and animals – The negative impact on the habitat of large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta. Regionally and nationally rare species of flowers and shrubs have been identified in areas adjacent to the resort and not exclusively within the WCRWER.

3. Expanded usage and time frame - Proposals for all year use and the promotion of mountain bike trails, via ferrata and “aerial activities” playgrounds on the Haig Valley section of their License of Occupation (LOC), as well as new lift construction pose a direct threat to a key critical wildlife area that up until now has escaped the ecological disruption and degradation of the rest of the LOC. Mountain goats, bighorn sheep, grizzlies and black bears all use these wilder lands and we would expect other wildlife such as wolf, cougar, lynx and wolverine to include this area in their current ranges.

4. Critical fish habitat - “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the *2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada*. The proposed developments at Castle Mountain Resort would change the water regime, and could alter, damage, or destroy portions of this Critical Habitat contrary to Section 58(1) of Canada’s Species at Risk Act.

5. Changes in water usage – Proposed changes as per the Master Development Plan would alter, and likely damage, the West Castle River Wetlands Ecological Reserve. The 6-fold increase in CMR’s water requirements from 9.5 M Imperial gallons in 2017 to the 61 M Imperial gallons at “build out” proposed in the MDP cannot be ignored, regardless of where the water may be sourced, what it may be used for or how and where it may be disposed.

6. Snowmaking Ponds - The proposal to establish snowmaking ponds on the bench area identified on Fig 4-7, 4-111 page 155 of the MDP, currently outside their present lease in the newly designated Castle Wildland, poses significant risk to adjacent and downstream
water and riparian resources, including possible risks to previously identified critical spawning reds for Westslope Cutthroat Trout and bull trout.

7. Snowmaking - The CCWC is deeply concerned about the MDP’s proposals for snowmaking outlined on page 154, 4-110 and the accompanying table of volumes required to meet CMR’s demands. CMR’s statement that there is currently no snowmaking at the resort is somewhat misleading, given the approvals already issued under the Water Act to divert 35,000 cubic meters from Haig Creek and the construction of berms to achieve these volumes. In a quick review of CMR’s applications for a variety of approvals under the Water Act over the past decade, some of which the CCWC attempted to challenge (when we were aware of them), CMR is now fully positioned to install the infrastructure needed.

8. Disposal of contaminated soil - One of the approvals issued that has alarmed our organization relates to the disposal of contaminated soil from a serious diesel spill in November 2011. At that time CMR obtained an approval (“Registration” #300065-00-00) to establish a Class 2 Landfill site on their LOC, NE24-04-04-W5. This past summer the road-building operations to the resort seemed an opportunity to conveniently dispose of that material if spread widely with the road mix. That was not permitted, and our organization has reason to believe that the material is now under one of CMR’s new snowmaking reservoirs. We sincerely hope this is not the case, but the Director will need to investigate as the "Need for Further Assessment" proceeds.

9. Sewage treatment and disposal - Section 4.6.3, 4-164, page 208 describes the existing sewage lagoon system as having the capacity for meeting the current ASP requirements only. There is no detailed provision in the MDP for how CMR plans to meet its demand at “build-out”. The maximum accommodation demand under the current Area Structure Plan (ASP) is for 225 units. At “build-out” CMR is looking at 406 units. How are we expected to accept CMR’s statement that “this system will need to be evaluated and upgraded” when there is no information on any remaining options for addressing this issue. CMR has no more acres to desecrate with another sewage lagoon.

10. Fire protection - This matter is dealt with in less than 4 lines which essentially say, “this is not our responsibility…the M.D of Pincher Creek will look after it…and, oh, by the way that would be a 40 km trip for the fire truck”. That CMR can blindly ignore the fact that the resort nearly had to be evacuated due to nearby fires in 2017 and 2018, and that the M.D of Pincher Creek has currently reviewed its fire protection services, is a matter of appalling judgement and should be of major concern to current residents within the resort. This matter alone would seem to call into question the Alberta Environmental
Protection and Enhancement Act (AEPEA) “mandatory threshold” of 250,000 visitors a year for an EIA. The location of this resort surrounded by ready-to-burn forested lands and one egress through forested lands suggests than any expansion over the current ASP is too much, purely from the public safety perspective. The California fires are raging this is written, but similar “choice” resort communities in British Columbia, to say nothing of Fort McMurray, provide plenty of cautionary evidence to take into account here and it is up to planners and regulators responsible for these zoning aberrations to “get it right”. At this point in the process this matter falls squarely on your desk.

11. Increase demand on Pincher Creek Emergency and hospital services - The current winter activities at CMR result in a steady flow of trauma patients to the Pincher Creek hospital. With CMR now looking to expand into the similarly high-risk mountain biking business, it is reasonable to assume that the hospital will now have to handle similar accidents throughout the year. This is another "external" cost borne by the Alberta public. Consideration should be given to how the proposed expansion of CMR will impact the local hospital and healthcare system. This is a fundamental “public interest” concern.

Concluding comments

A comparison of CMR’s 2001 Area Structure Plan Executive Summary with what the present MDP offers for the future is worth making. From 2001 we read:

“CMR has made a commitment to maintain a small-scale development and family-oriented atmosphere at the resort. This will be accomplished by balancing the economic and recreational needs of the ski hill with the environmental needs of the surrounding area”.

Compare this with the Vision presented in the MDP:

“A mountain owned and operated by skiers who are driven by adrenalin, not profit, that believe that the right combination of dry powder snow and challenging terrain provide experiences of a lifetime for those who live to ski.” (page 5).

The paragraph that follows (page 6) tosses a nod at the newly designated Castle Parks that are seen as simply a marketing attraction for the present managers of this resort (who are not interested in profit?).

If the CCWC was to identify one singular concern that overrides all others in this MDP, it would be CMR’s flagrant disregard for the limitations put upon their expansion ambitions by the natural resources and values associated with their isolated parcel of 44 acres within this landscape. Nowhere is this more visible than in the resort’s endless thirst for more water at a time when all science points to diminishing water resources/snowpack in our headwaters. The choice to ignore
this limitation (by pumping water from the Oldman Dam back up into the mountains?) seems utterly unsustainable, if not irresponsible. Like all of us today, CMR needs to remain committed to their earlier vision without making any further demands on our shared natural resources. Infrastructure to accommodate regional tourism should remain outside the Provincial and Wildland Parks, where the benefits can be shared by the outlying communities in the Municipal Districts of Pincher Creek and the Crowsnest Pass.

That staff from several Alberta Government Ministries as well as the M.D. of Pincher Creek have been party to the adoption of this MDP by CMR is distinctly worrisome to the CCWC in terms of any fair process for unbiased review going forward.

Thank you for your attention to our concerns.

Regards,

The Board of Directors – Castle-Crown Wilderness Coalition Society
Please find attached CPAWS Southern Alberta and Yellowstone to Yukon Conservation Initiative comments on the Castle Mountain Resort Master Plan Proposal. CPAWS Southern Alberta Chapter and Y2Y believe that the Castle Mountain Resort Master Plan Proposal requires a full Environmental Impact Assessment.

Please feel free to contact me if you have any additional questions or concerns.

Thanks!
Katie Morrison

**Katie Morrison, M.E.Des., P.Biol.**
Conservation Director
CPAWS Southern Alberta Chapter
Office: (403) 232-6686
Cell: (403) 463-6337
kmorrison@cpaws.org
Re: Statement of Concern for CMR Master Plan Proposal

Dear Ms. Trembath,

The Canadian Parks and Wilderness Society (CPAWS) Southern Alberta Chapter and the Yellowstone to Yukon Conservation Initiative (Y2Y) believe that the Castle Mountain Resort Master Plan Proposal requires a full Environmental Impact Assessment.

CPAWS Southern Alberta Chapter and Y2Y believe that the creation of the new parks and protected areas not only serve to conserve ecosystem integrity, but can serve to generate new economic opportunities associated with Parks. This will be true for the new Castle Provincial Park and Castle Wildland Provincial Park. While many of these opportunities will be recreational in nature, it is of paramount importance that the recreational aspect of park use does not result in eroding ecosystem function, which is the primary purpose for which parks are created.

Furthermore, a park is for all Albertans and developments should not be permitted to unfairly give preferential advantage in terms of access or use for those few who happen to be part of an adjacent development.

CPAWS and Y2Y assert that without conducting a robust, comprehensive Environmental Impact Assessment (EIA) as a first step, there will be no possibility these two primary concerns – protection of ecosystem function, and equal access & use as per the Castle Management Plan - will be addressed.

With that overarching concern and recommendation in mind, we believe that based on Castle Mountain Resort’s (CMR) current proposal, the following specific issues are ones we feel are problematic and need to be fully evaluated by the EIA.

**Increased & preferential use of Castle Wildland & Provincial Parks**

CMR is sandwiched between two parts of the Castle Wildland Park (CWP) in a significant watershed basin and up against the continental divide. For CMR’s purposes, this is an ideal proposed location for staging various activities within the Wildland Park and the Provincial Park, as well as the interior of BC. The proposed activities are not only acknowledged but are part of the CMR proposal. Of particular note is CMR’s proposed use of Syncline Valley and Sore Crotch Valley, adjacent but external to their License of Occupation (LOC); and the proposed extended use of the Wildland Parks for proposed expansion areas outside of the current LOC into areas C, F and G.
CMR has stated as an overarching goal of the development plan is to become a “...a highly successful, backcountry orientated all season resort.” The Castle Management Plan (CMP) states that “The Castle Wildland Park provides a high quality destination for low-impact backcountry and wilderness experiences...developed and managed in alignment with parks conservation values” (CMP pg. 6) and that ‘The protection of biodiversity and headwaters and the maintenance of ecological integrity and connectivity constitute the primary objectives for the natural values management of the Castle Area.’ (CMP pg. 4).

Therefore, it is incumbent upon CMR to ensure that:

1. The magnitude and geographic reach of CMR’s development within their LOC, and trail use in the Castle Wildland Park does not adversely impact the ecological function of the wilderness areas adjacent to their development, and;
2. The proposed use of the wilderness backcountry does not contravene the low-impact (non-motorized) management intent of the Castle Management Plan for the Castle Wildland Park, and;
3. The proposed use will not displace others or give them unfair advantage in terms of access and use.

As currently proposed, the line between what CMR can use their LOC for in terms of developing new recreational business opportunities, and how they intend to use the adjacent Wildland Park is blurring. It very much feels like CMR is seeing the Wildland Park as a convenient extension of their operations rather than as lands protected for critical important natural values and the low-impact recreation use for all Albertans.

While there is an opportunity for induced or “overflow” use into the Park to contribute to visitor experiences and interpretive education of the users, there is the risk the Wildland Park ends up a de facto extension of the CMR with their activities and clients getting greatly increased access to and preferential use of the park. For example, CMR proposes to relocate their cat-skiing operation into the Syncline valley, which is outside of and not directly connected to their LOC. CPAWS Southern Alberta and Y2Y believe that a cat ski operation is not compatible with a wildland parks purpose “To preserve and protect natural heritage and provide opportunities for compatible backcountry recreation.” Likewise, we believe that the use of a motorized cat is contrary to the prohibition on OHV’s in the Castle Parks. Such use may also cause conflict with or reduce the opportunity for other users, and will certainly result in a greater impact to the backcountry of BC and the Wildland Park and negatively affect ecological resilience and carrying capacity.

We assert that the EIA needs to examine how the proposal by CMR will impact the immediate area of their LOC footprint, but also the surrounding lands, particularly the new Castle Wildland and Provincial Parks, and whether the proposed use outside of the LOC into the Castle Wildland Park is in contravention of the management intent of the Castle Parks. This information is critical to determine the magnitude of the expansion, the conditions of the LOC, and the management success of the new protected areas. There is also a “fairness to access” question that needs to be addressed. Such assessment data is necessary for CMR to also meet the goal of prioritizing the management of biodiversity, connectivity, water resources and ecological integrity.

Land Exchange
CMR’s proposal is to reduce their LOC in terms of geography through a land swap or exchange with the Wildland Park that would then give them additional skiable terrain at the beginner and intermediate level in return for some other unused portions of the LOC going back to the Wildland Park. CMR asserts that this is a
type of skiable terrain feature they currently lack in sufficient quantities to make their resort attractive for families. They show this swap as a net gain to the Park in terms of hectares.

However, changing lines on a map is only part of the story when calculating net environmental or ecosystem gain and without full knowledge of the value of those lands with respect to wildlife habitat, movement corridors, and many other ecosystem functions, it is not clear whether such a swap would truly benefit the natural values of the Castle Parks or not.

The EIA should have a strong focus on wildlife habitat security and wildlife movement corridors. Experience has taught us that the valley bottoms tend to be the most critical for these functions. CMR’s proposal would put their extended use into valley bottoms and extend their use footprint to adjacent tributary watersheds. The Park may lose ecosystem value if such an analysis is not completed as part of the EIA.

We assert that any such “net environmental gain” calculation must be done in a more fulsome manner than simply the net sum of hectares of land exchanged. Rather, the EIA should explicitly be designed to make this calculation that would then better inform any decision with respect to a land exchange.

Climate Change

Sunk Development Costs
Climate change is no longer a “maybe someday” future consideration. It is a factual scientific phenomenon and is now manifesting itself in ways we are only beginning to fully understand. The advent of greatly increased wildfire events and the reduction or change in snow pack depth and duration are considerations that must be taken into account by the developer.

This challenge becomes more acute the greater the degree of sunk development costs incurred. That is, the more a developer invests a significant capital amount, the more likely they will want to hold on to their development scheme, even if the climatic conditions were to make such a scheme increasingly challenging or untenable. If climate change greatly reduces the amount and / or length of the ski season at CMR, how would that affect not only their business model, but the impact from other activities CMR would want to have to replace skiing? This could lead to a demand for extended (high-impact) use in the Castle Wildland Park.

Having virtually constructed a new village with many additional residents, CMR may then find themselves in a situation of having to look for additional activities or events outside the current scope of their proposal in order to keep their development relative and profitable, and to maintain the value of their sunk costs.

In addition, climate change may have very adverse effects on the watershed as a whole if the current water regime for the area was to be significantly altered. That change would be a contextual one that would in turn affect all other ecosystem components and processes relative to the CMR proposal.

We assert that the EIA should make a very careful and comprehensive study of the projected climate change scenario at CMR to gain insight into how this may affect both their business model and the subsequent impact on the ecosystem of the area. Such assessment should be robust and based on the best available science done with a scenario planning model and not simple trend analysis. This information is absolutely required to help determine the validity of this development proposal.
Water Availability

One of the specific potential impacts of both climate change and a substantial increase of visitors to CMR is on water availability and use. This includes:

- the availability of water for snowmaking, which currently does not exist;
- potable water use;
- wastewater management – in particular, impacts to the adjacent wetlands of the West Castle Ecological Reserve and the Castle River.

CMR currently has no snow-making system but proposes constructing such as part of their proposed development. Such use needs to be carefully assessed in light of current hydrological impacts and projected climate change models.

As previously mentioned, any climate change impacts are likely to have effects far beyond CMR’s water needs but could impact the entire water regime for this region. Water security is a high priority as recognized in the South Saskatchewan Regional Plan.

We assert the climate change assessment should have a special focus with respect water quantity, quality, availability, and that the assessment needs to look at a large regional study area.

We also assert that a thorough assessment of wastewater treatment and discharge be assessed in view of protecting the adjacent ecological reserve and the Castle River system.

Summer Use

CMR proposes the creation of a summer use program to include mountain biking, via ferrate, zip-lining, horseback riding, and a variety of hiking opportunities. They have also subtly alluded to the potential to offer OHV use if not restricted within the Wildland Parks.

There is currently no formal summer use program operating at CMR so any and all of these activities represent a new and additional impact to both the lands within and outside of the LOC. As such this is a very significant change in the current operational situation and bears close scrutiny in the EIA to determine cumulative impacts, and should include ecological limitations, constraints, mitigations, monitoring and adaptive management responses.

Of special concern is the proposal to construct an entirely new trail network for lift enabled mountain biking activity. While CMR has cited research they claim shows mountain biking is no different in terms of impact than hiking, CPAWS and Y2Y contest this point based on the limitations and context of the research cited as well as other literature to the contrary. Furthermore, whether hiking and biking have a different impact or not misses the point; both of these activities have impacts that are additive to the current landscape impacts and need to be assessed accordingly.

As for the potential to engage in an OHV business opportunity operating within the Wildland Park, the use of OHV’s is currently restricted to designated trails north of the Carbondale river and will be phased out entirely by 2021. CPAWS and Y2Y would very strongly oppose this activity being re-introduced in any way and/or become an added feature to this or any other development proposal.
We assert that CMR’s summer use program represents a significant, cumulative and additional pressure to the area and therefore all these activities need to be included within the scope of an EIA.

Limits to Growth
CMR has acknowledged that there are absolute limits to growth of the Castle Resort, yet what those are remained undefined. The current proposal envisions doubling the current skier capacity, as well as the number of residences with their associated traffic and parking impacts. As mentioned, the summer program is entirely new and therefore represents an additional and substantive impact.

All of this growth is predicated on the design capacity of the ski hill (Comfortable Carrying Capacity) and total residence / visitor capacity for the entire resort (Balanced Carrying Capacity). Nowhere is there any reference to the ecological carrying capacity of the development.

We assert that there is indeed a maximum capacity that needs to be determined in order to stay within the ecological threshold for a healthy, fully functional ecosystem that is the primary purpose of the Castle Parks, and that such a capacity needs to be established and informed by the EIA.

This should be a conservative limit that is monitored over time with a robust Environmental Management System by CMR, in conjunction with a Parks monitoring system for the new Wildland and Provincial Parks.

Only after such monitoring can assure Parks Managers and other land use agency managers adjust capacity limits, and whether expansion needs to be done – or not - in a series of phases, and in the full light of the monitoring data.

We appreciate the opportunity to submit a Statement of Concern in support of a full Environmental Impact Assessment of the Castle Mountain Resort Master Plan Proposal. Additionally, it is critical that impact assessment is based on a strong foundation of evidence, specifically in how social, economic, and environmental benefits, costs, and risks are evaluated. This has not been applied consistently across Canada (Westwood et al. In press) and remains an important gap in a truly rigorous, transparent approach that builds public trust in decisions. Research at the federal level has shown broad, cross-sector support for the scientific principles of open information, transparency, independence, cumulative effects, and rigorous science during impact assessment and regulatory processes (Jacob et al. 2018).

Please feel free to contact us if you have any further questions or concerns.

Yours Sincerely,

Katie Morrison
Canadian Parks and Wilderness Society – Southern Alberta
Connie Simmons
Yellowstone to Yukon Conservation Initiative
Ms Trembath,

Please find attached a Letter of Concern submitted by Crowsnest Conservation Society. We are requesting an environmental impact assessment report be required to ensure that the public and regulators can fully assess the ramifications of the proposed development at Castle Mountain Resort.

Please contact me if you require further information.

Thank you,

Judy Cooke
President, Crowsnest Conservation Society
November 16, 2018,

Director, Environmental Assessment, Alberta Environment and Parks  
C/o Margot Trembath, Environmental Assessment Coordinator  
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street,  
Edmonton, Alberta T5K 2G8  
E-mail: environmental.assessment@gov.ab.ca

Dear Ms. Trembath:

The purpose of this correspondence is to submit a written statement of concern to the Director of Environmental Assessment in regard to the proposed Castle Mountain Resort Future Development. With the information currently available, we are unable to take a position either in support or opposition to this project, but feel strongly that an environmental impact assessment report should be required so that the public and regulators can fully assess the potential ramifications of what is being proposed.

Crowsnest Conservation Society is a non-profit organization based in Crowsnest Pass, Alberta, devoted to ensuring a healthy future for the natural environment in the region surrounding our community and the people and wildlife that live in it. Castle Parks form part of our area of interest and we have several objectives in our strategic plan that may be impacted by this development. As such, we constitute a group of persons directly affected by the proposed project.

To date there has been very limited information made available on the potential impact of the project on a variety of environmental values and locally-important species, including some that are provincially and federally designated as Species at Risk. Within this scenario, we are not able to develop an informed position that would either support or oppose the proposal. We do, however, have concerns about foreseeable impacts on westslope cutthroat and bull trout populations and habitat, as well as grizzly bear
foraging habitat and endangered whitebark pine known to be found in the vicinity of the ski hill. We also have concerns about the potential impact of increased summer activity on the integrity of movement corridors used by species such as elk and bighorn sheep. We feel that a full environmental impact assessment report would be required to investigate the ramifications for these species and discuss mitigation options.

We have spoken with several people in the local area this week that would be considered persons directly affected by the proposed project. Each one was surprised to learn of the proposed development plan and the timeline for submitting a statement of concern. Although it appears that your documents have been posted to the government web site for over a month, it is clear that the communication efforts needed to share this information with affected parties have been insufficient and/or ineffective. We see this as yet another reason to require that the proponent provide an environmental impact assessment report and engage in additional communication with the local community and other users of Castle Parks.

Thank you for providing this opportunity to submit a statement of concern. We look forward to your decision.

Judy Cooke
President
Crowsnest Conservation Society
PO Box 242, Crowsnest Pass
Alberta, T0K 0E0
Email: office@crowsnestconservation.ca
Dear Margot,

I am writing to express my concern that the proposed Castle Mountain Resort expansion will be approved without the need for a complete environmental impact assessment. Based on the recent activities that have occurred to protect the sensitive ecology and watershed in the Castle wilderness, I do not see how there is any defensible position from a scientific, nor as a basic oversight to allow this development to continue without this effort.

My primary concerns are as follows:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.
2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.
3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.
4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.
5. There has been significant concern of the loss of connectivity in the landscape as it relates to the impacts on large mammals such as grizzly bears in this range. An expansion of this magnitude will certainly alter the natural environment for such animals and cannot be simply mitigated
6. The development should be considered alongside other user groups of the area that currently can navigate these wildlands in a non-commercialized manner at their enjoyment, and thus one set of users should not be able to take precedent over other groups; especially as it relates to the amount of construction and development in a highly sensitive ecological area as this will create, in trying to use an unspoiled wilderness and to maintain access to that area for generations to come. If this development is unchecked, the damage cannot be undone.

I appreciate if you can provide me a clear understanding of how this decision was made, and how we can ensure this resort expansion will not be approved until the public can understand the results of the detailed environmental impact assessment. I thank you for this opportunity to express my concerns and look forward to hearing from you.
Regards from a concerned local user,
Justin DeLong
16 November 2018

Director
Environmental Assessment
Alberta Environment and Parks
C/o Margot Trembath
Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower
9915 – 108 Street
Edmonton, AB T5K 2G8

RE: Statement of Concern – EIA needed for Castle Mountain Resort Development

To whom it may concern:

As a native Albertan and a career Wildlife Scientist, I hereby respectfully request that an Environmental Impact Assessment be required for the proposed expansion of the Castle Mountain Resort. While I currently reside and work in Manitoba, my wife and I spend our vacation time in the town of Beaver Mines, west of Pincher Creek, where my wife and her family own property. We have spent time there annually since the early 1990's and have been appalled at the degradation of public land (Forest Reserve) due to unregulated camping and off-highway vehicle (ATV/snowmobile) use. We applaud the recent changes that have been made by the province of Alberta through the establishment of the Castle Wildland Provincial Park. This action will go a long way toward protecting and restoring the natural values of the area for all Albertans, and all Canadians.

That said, the further development of the Castle Mountain Resort, as recently proposed, is concerning – especially without the rigorous scrutiny of an Environmental Impact Assessment for this type of development in an ecologically sensitive area. As you are no doubt aware, the Castle Mountain Resort is situated in the middle of critical habitat for Grizzly Bear and Westslope Cutthroat Trout. A critical review of the potential impacts of the development and associated disturbance on these, and other, species and their habitat seems prudent given the nature of the restricted corridor in which the Resort is located. Further, proposed changes in water use have the potential to impact the adjacent West Castle Wetland Ecological Reserve unless strict engineering standards and fail-safe measures are considered.

In closing, this region of Alberta is part of a relatively narrow corridor of remaining natural habitat bounded by the continental divide on one side, and intensively used private land on the other. It is extremely important as a travel corridor for some of North America’s most iconic wildlife. While the establishment of the Castle Wildland Provincial Park has gone a long way toward maintaining the ecological function of this biodiverse region, increased visitation will be a significant stressor on the ecological integrity of the area unless carefully managed. Further development of the Castle Mountain Resort, as proposed, has the very real potential to synergize the negative impacts of increased use. Thus, I again call for a rigorous Environmental Impact Assessment and public hearings to fully and transparently explore the potential impacts and mitigative measures that may be required to maintain the ecological function of the region.
Thank you for considering this request.

James Devries, Ph.D.
This is my comment and concern related to the summer expansion proposed for the Castle Mountain Resort: This should require an EIA, to understand the implications for species at risk (i.e. westslope cutthroat trout, bull trout, grizzly bears, wolverine) as well as the effect on biodiversity in general. Without that EIA it will be very difficult to provide the protection (and perhaps mitigation) required. In addition, the EIA should investigate the idea of thresholds for recreational activity, both summer and winter for this development, in this watershed.

Lorne Fitch, P. Biol.
Thank you for the opportunity to provide this Letter of Concern regarding the proposed expansion of Castle Mountain Resort. I am a local resident and have concerns. An environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.

2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.

3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.

4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.

An Environmental Impact Assessment and public hearings are needed to address these critical issues.

Sincerely,

Barbara Ann Hession
November 15, 2018

Dear Ms Trembath,

Please find attached my letter of concern.

Sincerely,

Judy Huntley
from: Judy Huntley

Dear Ms Trembath,

I am deeply concerned about the proposal to expand the Castle Mountain Resort (CMR), and request that you ensure that a thorough impact assessment be done and be public.

I have a long personal involvement with the Castle area, and I cherish it.
  • I have lived in the MD of Pincher Creek since 1973.
  • In the 1990s and early 2000s I was coordinator and later Executive Director for the Castle-Crown Wilderness Coalition (CCWC).
  • In the later 2000s to the present I have been on the Board of the CCWC.
  • I have been a volunteer weed puller and cook for CCWC.
  • I have hiked, x-c skied, snowshoed, back-country camped, and picked berries through much of what is now parks since the 1960s.
  • My children learned to ski at Westcastle.

My concerns include:
  • Concern that this proposal was not well publicized. A few days before your deadline for public input I contacted numerous local people and experts on Castle environmental matters, who had no knowledge of the proposal.
  • Concern that the GoA could possibly fail to require an impact assessment for such a large and impactful project on newly designated Park land.
• Concerns about impacts on the environment within CMR’s deeded land, on its leased land, and on the surrounding publicly owned Park land. I am concerned about the sustainability of the project, and about the future viability of our water resources (where will this water come from? Do downstream residents, communities, industry, farmers and recreationists have to give up water rights for this recreational project?), These and, of course, the danger of terrible fire must be assessed.

• I am concerned about increased noise (lifts running summer and winter with on-going construction and maintenance activities), and its effect on both quiet recreationists and wild creatures.

• I am concerned about habitat impacts on large and small mammals (from grizzlies to pikas to long-tailed shrews), on amphibians, on birds, and on huge numbers of plants - remember that the Castle Parks are, with Waterton, the most ecologically-biodiverse place in Alberta, and is a place to be respected.

• I am concerned that new ski and mountain bike lifts and trails will have significant impacts on already threatened westslope cutthroat and bull trout populations. I am concerned for the Westcastle River Wetlands Ecological Reserve.

Beyond the impacts on wildlife, water, biodiversity, and quiet recreation, I am concerned (indeed, fairly close to terrified) at the thought of impacts on the people, the land use, and the local governments of SW Alberta.

Already, local governments have invested in major water works and road upgrades for this resort. As well, they have responded successfully and stopped the extension of the Kenow wildfire that could have wiped out the resort. How will people be evacuated if (when) a severe wildfire comes to the Westcastle?

Who has dealt with all the future liability questions?

Have local medical staff evaluated what will be needed to deal with healthcare and trauma needs of all these people, many of whom will have no understanding of the challenges of wildlands? Has Alberta Health agreed to fund the trauma unit? Is CMR going to fund it? Many of these people may not have extreme insurance, and may find themselves needing serious and expensive care.

Who is going to ensure, and take responsibility for, the health of the Westcastle River Wetlands Ecological Reserve?
There is no indication in the MDP of how the many serious environmental, financial, and social impacts suggested above will be addressed.

It is essential that an assessment be conducted to answer these and, I am sure, many other questions. It appears, Ms Trembath, that it is your and your Director’s responsibility. I am counting on you to make it happen.

Yours very sincerely,

Judy Huntley
Please find attached a letter in pdf format.

Please acknowledge that letter has been received and is readable.

Thank you,
Andy

__

Andy Hurly

[PERSONAL IDENTIFIERS REMOVED]
Statement of Concern, Castle Mountain Resort Development

Every summer since 1992, I have conducted research (hummingbird ecology and behaviour) in the West Castle Valley, just 3.2km north of the Castle Mountain Resort. Further, each year I recreate in the same area.

There are many aspects of the proposed development that cause me very little concern, and I recognize the multiple benefits of increased tourism in the area. I do however, have serious concerns about some aspects of the proposed development because they are likely to cause ecologically significant impacts on water, fish and wildlife – the very things that have been protected in the new Castle Parks.

Expansion Beyond Existing License of Occupation
Granting of the original LOC was highly controversial and extension into new areas should be subject to close examination and public approval. The current proposal to surrender current areas of little value to Castle Mountain Resort in exchange for areas of great value is not a fair transaction given the likely impacts on fish and wildlife (see below).

Syncline Brook Valley Development
This valley has extremely high habitat value to grizzly bears (Farr et al. 2017), and to other wildlife. Value will be lost in the development footprint itself, and more widely in the valley due to habitat fragmentation and disturbance caused by people and machinery. Further, Syncline Brook is federally designated critical habitat for Westslope Cutthroat Trout. Any negative impacts on that watercourse could lead to serious actions by the Federal Government against Castle Mountain Resort and possibly against the Government of Alberta.

Hydrology
I believe that it is well established that changes to forest cover have measurable impacts on snow accumulation, the amount of water lost to evaporation and transpiration, and the amount and timing of melt water flowing into streams and rivers. Added to this is the alteration of natural flows in and from
Haig Creek due to damming and snowmaking. Given the critical status of Westslope Cutthroat Trout and Bull Trout, we must have a very clear and quantitative understanding of hydrological impacts. Vague considerations about which factors enhance and which factors diminish flows are insufficient. We require actual quantitative analyses concerning the amounts and timing of flows.

West Castle Ecological Reserve
This stretch of the West Castle River is important to trout populations both for spawning and for overwintering habitat (Farr et al. 2017). Seemingly small impacts here could result in large impacts on trout populations.

Critical Habitat and Migration Corridors
The ecological impact of Castle Mountain Resort is already extensive, and the development plan proposes doubling of visitation, tripling of accommodation, and approximate doubling of overall footprint. The increased footprint and activity will certainly negatively impact wildlife, but we do not know by how much. Again, good quantitative information is required to inform decisions.

Risk
We risk making poor decisions in the absence of good information, hence the need for an Environmental Impact Assessment. This will reduce risk to fish and wildlife. This will reduce risk to the Public. This will reduce the risk to Castle Mountain Resort of making significant investments only to find that they must abandon them (e.g. Federal protection of Westslope Cutthroat Trout habitat). This will reduce the risk of using recent financial investment as a justification for continued development even when new information might indicate that development should cease (i.e. the Concorde Fallacy). An Environmental Impact Assessment will provide information on which impacts are trivial, which impacts are significant but can be mitigated, and which impacts must be avoided.

Given the enhanced protections of new Provincial and Provincial Wildland Park status, I believe that it is essential that we have very good information on the impacts of the activities identified above, and thus it is appropriate to initiate an Environmental Impact Assessment and public hearings.

Sincerely,

T. Andrew Hurly, Ph.D.

Reference:
Hello,

I recently learned about the proposed expansion of Castle Mountain Resort in the Castle Parks. I am writing this letter to express my concerns, particularly that this may occur without the opportunity for an environmental impact assessment (EIA) or public consultation.

Southeastern Alberta is a very important place for biodiversity, including important habitat for wildlife. In the interests of time and space -- since the deadline to provide feedback is only two days from now -- I focus my comments on two species (westslope cutthroat trout and grizzly bears) and the role of science in impact assessment.

**Westslope cutthroat trout**: This species is listed as threatened under the federal Species At Risk Act. Critical habitat for westslope cutthroat trout has been identified in the Castle region, including Syncline Brook, and both the West and South Castle rivers and their tributaries. The major threats to this species are habitat loss, overharvesting, and non-native species, with habitat degradation and population declines from a number of human activities -- this includes road networks and recreation that degrade sensitive habitat. I am concerned that an increase in human recreation via expanding the CMR would add pressure to an already-threatened species. The 2014 recovery strategy for Alberta populations of this species lists "activities likely to result in the destruction of critical habitat for Westslope Cutthroat Trout" (Table 3), including sedimentation and habitat loss/degradation via linear disturbance, high intensity or frequent off-highway vehicle use, and recreational access (provincial parks). This is predicted to affect spawning, nursery, overwintering, feeding, and/or cover for this species. As such, it is reasonable to assume that expansion of the CMR could negatively affect this species, with potential impacts more broadly across the region.

**Grizzly bears**: A great deal has been written about linear disturbance and human recreation affects large mammals and carnivores, including grizzly bears. Grizzly bears were listed in Alberta in 2010, with the underlying cause of the province's low grizzly bear population found to be habitat disturbance. This includes people using grizzly bear habitat that causes habitat fragmentation and conflicts with people. The Alberta grizzly bear recovery strategy emphasized the importance of maintaining grizzly bear access to secure (i.e., low risk of mortality) habitat, which logically includes not increasing human activity or linear disturbances. Recent research conducted in Alberta demonstrates the negative effect that motorized recreation has on grizzly bears -- it is possible that mountain biking and other activities related to the proposed CMR expansion could also negatively affect the movement and behaviour of this species. As environmental scientists and managers, we should be studying these problems and seeking ways to reduce negative impacts, not proceeding with development without a comprehensive EIA and evidence-based mitigation.

**Science and impact assessment**: I have worked on impact assessment for a number of years in British Columbia and at the federal level, specifically focused on strengthening the role that evidence plays in how social, economic, and environmental benefits, costs, and risks are evaluated. This includes peer-reviewed research, convening scientific and policy experts, policy engagement, and public awareness (details may be found at [http://www.aerinjacob.ca/impact-assessment.html](http://www.aerinjacob.ca/impact-assessment.html)). There is broad, cross-sector support for the scientific principles of open information, transparency, independence, cumulative effects, and rigorous science...
during impact assessment and regulatory processes. However, this means that an EIA must be conducted for the proposed CMR expansion.

Thank you for the chance to provide feedback. I urge Alberta Environment and Parks to require an EIA to be conducted and that it be held to high standards, including scientific integrity, public consultation, and weighing the long-term ecological health of the region. I look forward to hearing from you about this issue.

Sincerely,

Aerin Jacob

**Personal Identifiers Removed**
Thank you for the opportunity to provide this Letter of Concern. An environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.
2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.
3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.
4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.

An Environmental Impact Assessment and public hearings are needed to address these critical issues.

Jane
Dear Sir/ Madam

Thank you for giving me the opportunity for my concerns to heard concerning the proposed Castle Mountain Resort expansion.

I must admit that I have been a little late in reading the Public notice and as such I may be missing some key points. However I feel strongly that development in such an ecologically rich area should definitely be subject to an environmental impact assessment.

Some very quick initial concerns of mine are:

- Impact to the Castle Wildland Park
- Changes to water usage and impacts on water courses which in turn have impact on wetlands and tributaries.
- Habitat impact to fish and large mammals
- Current intangibles that increased human impact will have.

I generally trust and respect the science that goes into these assessments and feel that all interested parties/stakeholders can benefit from the science too.

I feel that the Government of Alberta would be remiss to not ensure that every precaution is taken to ensure that the development/expansion of the Mountain Resort does not result in permanent negative affects to the land that it is neighbor to.

As such - I respectfully ask that you ensure that an assessment is a requirement for this development.

All the best

Alan Joiner
HELLO,
To consider allowing any development of the Castle ski hill after ramming closures and new park designations to the Castle area is foolish.
Was this all not sold under the auspice of protecting our headwaters, protecting fisheries and maintaining large contiguous blocks of habitat for animals (like apex predator Grizzly bears)?
To consider allowing it without proper consultation after such measures have been taken really fly on the face of conservation, and make me question the intent of the current government and their commitment to conservation.
Please perform the proper consultation phases, and lets keep the Castle ski area contained. No development.

Sincerely,

Gary Larson
Margot Trembath
Environmental Assessment Coordinator

Please see the attached Statement of Concern.

Peter Lee
November 14 2018

Peter Lee

Director, Environmental Assessment
Alberta Environment and Parks
C/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower
9915—108 Street
Edmonton, Alberta
T5K 2G8
Via e-mail: environmental.assessment@gov.ab.ca

Statement of Concern, Castle Mountain Resort Development

A credible environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated provincially protected area, the Castle Wildland Provincial Park.

2. The proposed expansion and proposed developments is within or will affect prime habitat for Grizzly Bear in the region.

3. The proposed expansion and proposed developments is within or will affect critical habitat for Westslope Cutthroat Trout.

4. Proposed substantial changes in water use from the proposed developments and the negative effect on the ecology of the area, including within the proposed expansion area.

5. Negative impacts on critical wildlife and vegetation areas within the Castle Wildland and Provincial Parks; also within the most ecologically-biodiverse region in Alberta.

A credible Environmental Impact Assessment and public hearings are needed to address these critical issues.

Sincerely,

Peter Lee
From: Bob McInnis
Sent: Wednesday, November 14, 2018 2:40 PM
To: AEP Environmental Assessment
Subject: Castle Mountain

Director, Environmental Assessment, 
Alberta Environment and Parks C/o Margot Trembath, Environmental Assessment Coordinator 
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street, Edmonton, Alberta T5K 2G8

As a citizen of Alberta and someone concerned about conservation practices, I thank you for the opportunity to provide this Letter of Concern. An environmental impact assessment is required due to the critical issues listed below:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park. After 40 plus years of negotiation and planning the new Castle Wildland Provincial Park must maintain the integrity of its boundaries.
2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.
3. Changes in water use per the Master Development Plan would alter, and potentially damage, the West Castle Wetlands Ecological Reserve.
4. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta and need to be preserved as such.

Make Today Remarkable, for future Albertans

Bob McInnis
Provocateur
Coach/Consultant
www.makeityourproblem.com
Director, Environmental Assessment, Alberta Environment and Parks
℅ Margot Trembath, Environmental Assessment Coordinator

Dear director,
I write to encourage your department to conduct an environmental assessment of the impacts that will come with the roll out of the Castle Mountain Resort Master Development Plan.

I understand that it's been more than 20 years since there has been an EIA in the area and in the meantime traffic and use in general has increased in and around the resort. With the proposed developments of CMR's Master Development Plan actualized there will of course be even more and more aggressive changes on the surrounding area.

Firstly, will the Castle Provincial and Wildland Parks be compromised if the boundaries of the Resort's LOC are changed?

I am particularly concerned about impacts to wildlife such as the grizzly and black bear populations, to the trout populations, to mountain goat and bighorn sheep communities.

I wonder what a drain there will be on regional water supplies (already overused as witnessed by the low water in the Oldman Dam come mid-summer) and water allocation licences with increased numbers of recreationists and equally how will waste water be dealt with?

What will the impacts be on surrounding communities, such as Beaver Mines?

We have been recreationists in the Castle region for 52 years, we have picked berries, hiked, crosscountry skied plus we have skied at Castle Mountain from the inception. It is our source not just of recreation but of rejuvenation, artistic muse and spiritual renewal. We will be directly affected by the major changes contemplated by the Master Development Plan.

Thank you for taking our considerations into account.

David McNeill
Lindle Farley
Margot Trembath
Environmental Assessment Coordinator

Ms. Trembath,

Please see the attached Statement of Concern.

Thank you.

Gordon Petersen
Gordon Petersen

Director, Environmental Assessment
Alberta Environment and Parks
C/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower
9915—108 Street
Edmonton, Alberta
T5K 2G8
Via e-mail: environmental.assessment@gov.ab.ca

Statement of Concern, Castle Mountain Resort Development

There are a number of areas of serious concern in the CASTLE MOUNTAIN RESORT MASTER DEVELOPMENT PLAN, MAY, 2017.

Critical issues include:

1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.

2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.

3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.

An Environmental Impact Assessment and public hearings are needed to address these critical issues.

Sincerely,

Gordon Petersen
Dear Minister,
I have just seen the proposal to expand the Castle Ski Hill, and also just saw that I only have until today to send my letter. This will be brief.
I do not understand how you can close the mountain to some activities and not others. I strongly disagree with your proposal. If you would contact me regarding my concerns that would be greatly appreciated.
Renae Pocock

Sent from my iPhone
To whom it may concern:

This proposed project absolutely needs to undergo an environmental impact assessment before expansion occurs.

Thanks,

Logan
Statement of Concern re: Castle Mountain Resort Master Development Plan

I am asking the directors of the Regulatory Assurance Division to make sure that Castle Mountain Resort (CMR) be required to complete a full Environmental Impact Assessment before anything further is done - at their expense.

I have reviewed the CMR proposal and looked at the maps and frankly it is very shocking to say the least! CMR plans to go outside their license of occupation into Syncline Brook Valley with Cat Skiing and also to the West with another beginner ski area. Not to mention the use of more water, more housing, more people.

There really needs to be a Environmental Impact Assessment!

It has been over 20 years since any credible E.I.A. has been done in the West Castle Valley and the surrounding area. A lot of new information is now available, such as the species at risk in the valley, which are the grizzly bears and the west slope cutthroat trout.

Syncline Brook Valley has been closed to all ORV for over 20 years and needs to remain this way - not opened up to development. A huge part of the grizzly bear study took part in this valley with the collection of hair samples on barb wire by Andrea Morehouse! On one hike up the valley I counted 30 trees that had been used to have the barb wire on. Also, one of the few areas in the Castle that Mt Goats live - on Syncline Mt and around to Gardner Creek. Bighorn sheep also live on the mountains around and on the ski hill. More impact on them as well. Plus all the other animals in the valley, as it is a narrow valley and a corridor for them to move - up and down and across.

We do not need to disturb our wildlife for the commercial gain of CMR.

The area around Haig Lake and the new Paridice Lake hike will really be impacted by the CMR new development. This is a highly used grizzly and black bear valley, and they will be displaced or harassed by the increase of more people, riding bikes, berry picking, hiking and climbing. I heard of 2 hiking groups that had to turn around or came into contact with bears while hiking to Paridice Lake this summer. Most likely a lot more than this as well.

To let CMR expand beyond their boundary should be unheard of!

This area is now a Provincial and Wildland Park, with The West Castle Wetland Ecological Reserve across the road. All to be highly protected.

Sincerely
Wendy Ryan
An addition to my letter of last night:

> I must express that I will be directly effecte with CMR’s master plan and the need for the E.I.A.

>>

> I have worked and recreated in the whole of the Castle since 1980.

>>

> Further to my letter of last night, I thought you should know a little about myself and why I am very passionate and concerned over the CMR Master Development Plan.

>>

> To go back to the 1980’s;
> - I was a partner with my husband in a trail riding and outfitting business in the South Castle Valley and we travel extensively. Taking out our clients in the summer and fall to appreciate the area as much as we did. (1980-1989) As well as being a steward to save the Castle and bring protection to this area from logging and gas exploration.

>>

> I am currently the Lift Operator Manager at Castle Mountain Resort.

> Working now for 34 seasons at the ski hill with many changes on the ground and the name as well.

>>

> - For the last 11 years I have been working as The Stewardship and Out Reach Co-ordinator for the Castle Crown Wilderness Coalition. This position as taken me to every corner of the now Castle Provincial and Wildland Park, where I have been working on invasive plant removal (with over 300 bags a year), a hike leader, Stewardship Lead for the Big Sage Natural Area and the West Castle Wetland Ecological Reserve - WCWER (which includes provincial park reporting), reporting to Blairmore Forestry on issues and infractions, Fish and Wildlife and the MD Field Agriculture officer of Pincher Creek; attending meetings and communications.

>>

> While working this summer in the West Castle Valley up stream of CMR, it was a very noisy summer, with construction banging and large motors running everyday.

> I cycled up the valley to work on the removal of invasive plants for a week, covering the many meadows, roads/trails and old logging camps.

> I have never seen as many cyclers and hikers in this valley since there is no longer any Off Road Vechcals. It will only become more enjoyed as time goes on, as this is the experience that Albertans are looking for in a Wilderness area. BUT with a possible expansion to CMR this very narrow valley will be compromised for the wildlife, fisheries (as there are redd zones for Bull Trout) and it is also known for west cutthroat trout and Harlequin Ducks.

>>

> I will be directly effecte in many ways by any further developed at CMR in my work there with the increase of people and infrastructure.

> More noise and the need for more water, the stress that is ever present over snow making needs to the resort and more water for house hold and resort use!

> The sewage lagoon is the first thing you see driving into the resort

> and is adjacent to the West Castle Wetland Ecological Reserve (the highest dedication to protection in Alberta Parks - similar to our National Park Standards) Can the wetlands be protected by the increase to the size of the lagoon?
The ever present invasive plants on the resort are staggering and have been left un-attended because of lack of care by the resort and have only just been started to be addressed this summer. The magnitude of the amount of disturbed soil and invasive plants to be managed will take many many years and a dedicated direction and a load of money to eradicate.

With the increase of traffic over the last couple years, the new road construction and snow removal, I have seen a lot of new invasive plants along the West Castle Road, which takes weeks for my staff and I to control by walking and digging every plant that we find! This will only become worse without the help of CMR controlling their invasive plants and not having them drug down the road with winter grading, dirty equipment, and visitors driving over the weeds and driving the seed load in their tires down the road.

All these things are stressful to me!

I will be directly effected also in my summer enjoyment of the West Castle Valley with leading my yearly hikes to Haig Lake, Middle Pass Lakes, Rainy Lakes, up Syncline Brook, South Fork Lakes and the hike form CMR to Syncline main parking lot I am also an avid cross country skier and use the West Castle Valley, beyond the main Syncline Trails and also up the Syncline Brook Valley and along the WCWER to the Syncline main parking lot.

This is also one of my favourite areas to go in with my horses on a pack trip to the upper headwaters of the West Castle River.

The loss of the current low impact of the valley will be sadly missed by myself and my friends.

I have organized the West Castle Wetland Ecological Reserve Weed Pull for 11 years with an average of 32 volunteers coming out each year to help control invasive plants in the wetlands and along the West Castle River. This is a joint event supported by many local weed control groups and volunteers across South West Alberta.

The true value of the NEW Wildland Park is to ensure the protection of wildlife, waterways and the elimination of ORV’s.

On Nov 14, 2018, at 9:51 PM, Wendy wrote:

To: Director, Environmental Assessment, Alberta Environment and Parks % Margot Trembath, Environmental Assessment Coordinator 2nd Floor, Petroleum Plaza, South Tower, 9915 — 108 Street Edmonton, Alberta T5K 2G8 E-mail: environmental.assessment@gov.ab.ca Statement of Concern re: Castle Mountain Resort Master Development Plan

I am asking the directors of the Regulatory Assurance Division to make sure that Castle Mountain Resort (CMR) be required to complete a full Environmental Impact Assessment before anything further is done - at their expense.

I have reviewed the CMR proposal and looked at the maps and frankly it is very shocking to say the least! CMR plans to go outside there licence of occupation into Syncline Brook Valley with Cat Skiing and also to the West with another beginner ski are. Not to mention the use of more water, more housing, more people.

There really needs to be an Environmental Impact Assessment!

It has been over 20 years since any credible E.I.A. has been done in the West Castle Valley and the surrounding are. A lot of new information is now available, such as the species at risk in the valley, which are the grizzly bears and the west slope cutthroat trout.
> Syncline Brook Valley has been closed to all ORV for over 20 years and needs to remain this way - not opened up to development. A huge part of the grizzly bear study took part in this valley with the collection of hair samples on barb wire by Andrea Morehouse! On one hike up the valley I counted 30 trees that had been used to have the barb wire on. Also, one of the few areas in the Castle that Mt Goats live - on Syncline Mt and around to Gardner Creek. Bighorn sheep also live on the mountains around and on the ski hill. More impact on them as well. Plus all the other animals in the valley, as it is a narrow valley and a corridor for them to move - up and down and across.

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> The area around Haig Lake and the new Paridice Lake hike will really be impacted by the CMR new development. This is a highly used grizzly and black bear valley, and they will be displaced or harassed by the increase of more people, riding bikes, berry picking, hiking and climbing. I heard of 2 hiking groups that had to turn around or came into contact with bears while hiking to Paridice Lake this summer. Most likely a lot more than this as well.

> To let CMR expand beyond their boundary should be unheard of!

> This area is now a Provincial and Wildland Park, with The West Castle Wetland Ecological Reserve across the road. All to be highly protected.

> Sincerely

> Wendy Ryan
November 15, 2018

Director, Environmental Assessment
Alberta Environment and Parks
C/O Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower,
9915 – 108 Street, Edmonton, Alberta T5K 2G8

To whom it may concern:

It has only recently come to our attention that Castle Mountain Resort Inc. (CMR) is proposing to expand their winter ski and snowboard resort to include summer activities, increased winter activities and the development of additional base area facilities to accommodate a larger number of visitors. CMR’s proposed expansion will have a direct and negative impact on registered fur management area (RFMA) 2842. RFMA 2842 encompasses CMR and therefore, any expansion outside of the current department license of occupancy (DLO) will infringe on our right to harvest furbearing animals within the bounds of RFMA 2842. As such, we list the following concerns:

- We are concerned that the consultation process was not well publicised and that we were not given specific notice of this proposal.
- We are concerned that the proposed DLO boundaries will take away trapping opportunity by infringing on our historic trapping area. This will result in lost income for our business operation.
- We are concerned that the proposed backcountry ski areas (particularly backcountry Castle South and Backcountry Catskiing Syncline Valley) will lead to an increased chance of user conflict. We go to great lengths to ensure that the public is largely unaffected and mostly unaware of our trapping activities. Expansion into these areas will mean we will have to remove traps from the area or risk capturing dogs that are illegally off leash. Increased users in the area certainly means our traps and associated set-ups are at a greater risk of being tampered with by people opposed to trapping.
- We are concerned that the increased footprint, increased number of people and increased user activities proposed by CMR will have a negative impact on furbearers and furbearer habitat that the newly created Castle Park and Wildland are in place to protect.

As such, we ask that the Director take in to consideration our concerns when determining if an environmental impact assessment report should be required for this project.

Sincerely,

David

Scott Seward

Layne Seward

Blair Seward

PERSONAL IDENTIFIERS REMOVED
PERSONAL IDENTIFIERS REMOVED
PERSONAL IDENTIFIERS REMOVED
PERSONAL IDENTIFIERS REMOVED
Director, Environmental Assessment,
Alberta Environment and Parks
C/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street,
Edmonton, Alberta T5K 2G8

Director,
I write today to express my concern regarding further proposed development of the Castle Mountain Resort. I am not necessarily opposed to this development but feel an Environmental Impact Assessment is essential for a comprehensive understanding of the impact of this plan. It is only prudent to scrutinize every change to the few remaining natural ecosystems we enjoy in our province. I am most alarmed about the potential fluvial repercussions inherent in a development of this scale and nature. Surely we should go the extra kilometer to insure there are protections for this unique and once pristine area.
Yours Sincerely,
Arnold Smith

Arnold J. Smith, B.Ed.
<table>
<thead>
<tr>
<th>From:</th>
<th>Sam Smith</th>
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</thead>
<tbody>
<tr>
<td>Sent:</td>
<td>Friday, November 16, 2018 4:30 PM</td>
</tr>
<tr>
<td>To:</td>
<td>AEP Environmental Assessment</td>
</tr>
<tr>
<td>Subject:</td>
<td>Castle Mountain</td>
</tr>
<tr>
<td>Attachments:</td>
<td>To Whom It May Concern_Castle.docx</td>
</tr>
</tbody>
</table>

Hello,

Please find my letter attached regarding Castle Mountain Resort expansion.

Thanks,
Sam
To Whom It May Concern:

I write to you today to express my concern for expansion of Castle Mountain Resort. As a hydrologist, I am very concerned about the manner in which development may proceed. The West Castle watershed, and Castle watershed too, are critical headwater sub-basins of the Oldman. Considering the current water licensing situation in the Oldman basin as well as the heavy reliance on irrigation (>90% of water use in 2010), water quantity and its management in the headwaters is not to be taken lightly.

I’ve met some of the maintenance staff for the ski hill, and observed other staff behaviours both on and off the job. Many of the staff are among the ignorant crowds that have criticized your government’s creation of the provincial and wildland parks, mostly out of concerns surrounding OHV use. Destructive hobbies and loss of sobriety seem to be priorities of the maintenance staff (including mechanics), who seem to actively enjoy mudding and snowmobiling. I do not believe the two activities do the same level of damage to the landscape, but their overall ignorance towards safety on and off the job as well as discontent with the current government is concerning in a department that directly impacts the landscape and could have a larger impact moving forward. The use of alcohol and drugs is almost a requirement of living or working among the Castle community, and they embrace a wild-west free for all party atmosphere year-round which surely reduces their ability to think clearly or comprehend potentially negative impacts of their day to day duties, as well as creative ways to proactively manage their actions. If everything is being done properly, there is no reason to feel threatened by the government or fear improved management.

For example, the man in charge of the water treatment lagoon has limited, if any, formal training and doesn’t even understand basic water chemistry. It is unfortunate considering the creative way in which they address waste water. With the way their treatment system is set up, they are required to use chlorinated water to make snow. The idea has been offered to him that the use of chlorine in the water, which creates additional salts, weakens hydrogen bonds such that water molecules require more energy to freeze and remain frozen while reducing the energy needed to move back into a liquid state. Once its liquid form, water adds thermal energy to the snowpack and hastens melt further. This is partly why snow melted so rapidly in 2013 and resulted in extreme flooding. As a result of their snow making process, more snow is added to the base temporarily, but due to its chemistry, melt of both natural and artificial snow is enhanced. They are already in a chinook zone and certainly do not need to help the melting process, particularly at lower elevations where snow cover greatly influences the duration of the operating season. When the concept of salts and their effect on melt was explained he denied the potential for that to be a problem but couldn’t back up that statement. This individual also expressed dismay with the water licensing situation, saying something to the effect of “They won’t give us any more water, but it’s ours, and we need more water to make more snow.” I believed the land is leased, not owned, but perhaps that is not understood, or entitlement is an issue. Unfortunately, both possibilities are easy to believe. There are many people of questionable character in the maintenance department. To think they may oversee even more of this precious resource that could be instead meeting instream flow needs or used downstream is scary.
Why is it that an environmental impact assessment is not absolutely necessary? The resort is skilled in communicating resource management and environmental attitudes to the public but based on experiences of frequent visitors to the area, those actions and attitudes only really exist on their website. I recognize the following example are federal parks issues, but Sunshine and Lake Louise have had review and assessment in recent accusations of mismanagement as well as expansion requests. Ski hills are looking to make money, and you are the only people that can hold them accountable for their actions in the pursuit of profit. This is a hill hurting for money that likely cuts more corners than we are aware of to maintain their current operations. Have you ever been around when they start up their Cat Skiing machine, the Powder Stagecoach? It spews an unnecessary amount of black exhaust that makes some participants cough and is an excellent symbol of the lengths they are willing to go to grasp at money making opportunities without spending extra funds. I am unimpressed with staff across all levels of Castle Mountain Resort and would never trust them to run an expanded version of the resort, as I already question their ability to do well at the current scale. These are the people and attitudes that would manage considerable water use in an already over-allocated basin. Bearing in mind the limited training and poor attitudes regarding water management and environmental stewardship among the staff, it is extremely concerning that such a large development may proceed in a manner that reduces and/or overlooks the resort’s already low level of accountability. It will be heartbreaking if these people who pretend to hold the environment in high regard, but are in many cases under-educated or unethical, are granted their desire to make more money.

I hope you understand the archaic thinking you are dealing with and that if you don’t hold them responsible by requiring an impact assessment, severe degradation of yet another headwaters sub-basin is imminent. I understand the potential profits to the tourism sector, and the motivation behind creation of the parks considering possible tourism increases, but these are not people nor practices we want to be showcasing to the world. Faster and/or larger chairs would certainly take away from Castle’s claim to endless powder stashes, as it is currently the slow and small chair capacity that helps to maintain the supply of fresh snow. Yes, it might be nice if lift line waits were shorter on weekends (the only time when additional infrastructure could be beneficial to winter operations), but resilient headwater landscapes are arguably more important. This letter only really speaks from a water-based point of view, but there are also species at risk in the West Castle valley, other fish and wildlife issues (including over-fishing), linear disturbances, emissions, waste management and cumulative effects arising from increased human traffic to consider among the list of glaring reasons why expansion is not a win for Albertans and the public lands we should be proud of. Increased summer activity will certainly displace native plants and wildlife, increase pest management expenses and in turn further contaminate water supply, all while raising water quantity and treatment needs significantly. Please consider an ethical review process if you wish for these parks to retain their beauty and ecological function, as Castle Mountain Resort does not understand their current environmental impact nor their potential future footprint if this project proceeds. If this development goes through without an impact assessment and the current management status quo is maintained, the area will certainly be worse off than it was when OHVs, random campers and other destructive land uses were more prevalent.
From: Heather Smith
Sent: Tuesday, November 13, 2018 2:11 PM
To: AEP Environmental Assessment
Subject: Castle Mountain expansion.

With such limited time available before your deadline of November 16, 2018 the least we can say is that an Environmental Assessment needs to be made before any decisions can be made regarding expansion and gigantic fingerprint by Castle Mountain Resort.
It is once again a slippery slope; and as past governments have failed to protect wild lands, we hope you are not doing the same to appease a few.

Sincerely

Ted and Heather Smith
This requires further review before and if approval is granted.

Keith Sumner

Castle Mountain Resort Development

Notice of Further Assessment

Castle Mountain Resort is currently a winter ski and snowboard resort in the MD of Pincher Creek #9 on the NE 24-04-04 W5M, which is public land held under a license of occupation (DLO). Castle Mountain Resort Inc. is proposing to add summer activities, increase the winter activities and develop additional base area facilities to accommodate a larger number of visitors.

The proposed summer activities would include lift-serviced mountain biking, x-country mountain bike trails, hiking and sightseeing, via ferrata (a defined alpine climbing route equipped with fixed cables) and an aerial adventure park. Additionally, there would also be more programmed events and festivals. Increased winter activities would involve additional proposed lifts and ski runs. At buildout, the resort could have a maximum of 156,000 visits in the winter season and 31,000 visits through the summer season, for a total annual visitation of 187,000. This would be a phased development as indicated in the Master Development Plan.

This project is subject to regulation under the Environmental Protection and Enhancement Act and the Water Act, however it is not a mandatory activity as defined by the Environmental Assessment (Mandatory and Exempted Activities) Regulation. To determine if an environmental impact assessment report should be required for this project, the Director is seeking public input.

This public notice is an invitation to any person directly affected by the proposed project to submit a written statement of concern to the Director.

A disclosure document containing a complete project description is available at:
- http://www.skicastle.ca/notice-of-further-assessment/

For further information on the Castle Mountain Resort development contact:
Brad Brush, Castle Mountain Resort Inc.
Brad.Brush@skicastle.ca
PO Box 610, Pincher Creek, Alberta T0K 1W0
403-627-5101 ext. 222
Fax # 403-627-3515

Written statements of concern must be submitted by November 16, 2018 to:
Director, Environmental Assessment, Alberta Environment and Parks
C/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street, Edmonton, Alberta T5K 2G8
E-mail: environmental.assessment@gov.ab.ca

Privacy Statement
By providing your personal information and comments you are consenting to the public disclosure of your name and comments. You should not include any information in your comments you do not want disclosed publicly. Other personal information, for example addresses, phone numbers and email addresses, will be removed. This personal information is being collected under the authority of Sections 33(a) and (c) of the Freedom of Information and Protection of Privacy Act and is managed in accordance with Part 2 of the FOIP Act. Your name and comments are being disclosed under the authorization of Section 35(1)(a)(ii) of the Environment Protection and Enhancement Act. Your personal information will only be collected, used and disclosed for the purpose stated above and for no other purpose without your specific written consent or unless required to do so by law.

If you have any question about the collection, use and disclosure of your personal information, or should you wish to have your personal information removed, please contact the Environmental Assessment Registrar at 780-427-5828, environmental.assessment@gov.ab.ca
Dear Ms. Trembath;

Please see our attached Statement of Concern with respect to your Public Notice, Castle Mountain Resort Development. If you have a response, please contact me at the coordinates in the signature box, below.

David Mayhood, President
Timberwolf Wilderness Society
12 November 2018

Director, Environmental Assessment, Alberta Environment and Parks
c/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street
Edmonton, Alberta T5K 2G8      E-mail: environmental.assessment@gov.ab.ca

Re: Statement of Concern: Public Notice, Castle Mountain Resort Development

We discovered the above undated notice this morning. We request an Environmental Impact Assessment and a public hearing on this major project for the following reasons.

1. The project involves expansion well beyond the legislated boundaries of Castle Mountain Resort, within a provincial park;

2. developments proposed in the Syncline Valley will affect designated critical habitat for threatened westslope cutthroat trout, and can be expected to destroy a part of that habitat, contrary to section 58(1) of Canada’s Species At Risk Act;

3. additional development in the West Castle Valley, in the riparian zone of the West Castle River, threatens critical habitat of threatened westslope cutthroat trout and threatened bull trout, with potential consequences under Canada’s Fisheries Act; and

4. the additional development will require additional water and additional water treatment facilities, affecting the protected West Castle Wetlands Ecological Reserve, an already damaged protected site.

Additionally, we strenuously object to the stipulation that responding parties must be, in your words, “directly affected.” All Canadians have the right to respond. Albertans own the land, Canada has constitutional authority over the waters and fish affected, and Canada also has designated the westslope cutthroat trout and its critical habitat as protected. Citizens are entitled to communicate with their government on any subject whenever they please. We believe the “directly affected” restriction is unconstitutional.

Sincerely,

Timberwolf Wilderness Society

David W. Mayhood, President

Please send any responses directly to personal identifiers removed
To:
Director, Environmental Assessment, Alberta Environment and Parks
c/ 0 Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 — 108 Street
Edmonton, Alberta T5K 2G8 E-mail: environmental.assessment@gov.ab.ca

Dear Ms Trembath;

Attached is additional material and evidence that is part of our Statement of Concern of 12 November 2018 with respect to your Public Notice, Castle Mountain Resort Development. If you wish to respond, please contact me at the coordinates in the signature box, below.

David Mayhood, President
Timberwolf Wilderness Society
14 November 2018

Director, Environmental Assessment, Alberta Environment and Parks
c/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street
Edmonton, Alberta T5K 2G8       E-mail: environmental.assessment@gov.ab.ca

Re: Statement of Concern: Public Notice, Castle Mountain Resort Development

In further support of our statement of concern dated 12 November 2018, we would like to add the following information. Cited literature is listed on the accompanying sheet.

**Grizzly bears.** There is potential for grizzly bear denning sites within the proposed snowcat ski terrain in the Syncline Valley, an area well known to hold grizzlies, and that appears to be favourable for denning (Vroom et al. 1980, Pigeon et al. 2014). Snowcat operations in that terrain could prevent its use for denning by grizzlies, drive bears from their dens in midwinter, or even injure or kill grizzlies in their dens. Grizzlies in Alberta are threatened, and are protected as threatened under the Endangered Species Act in the USA as well. The small population in the Castle region (~50 animals), is part of a Canadian-American transnational population (Proctor et al. 2012), raising international concerns.

**Evidence in support of statements 1—4 in our Statement of Concern of 12 November 2018.**

1. See BHA (2017:Figures E-5, 4-1).

2. Access to the proposed catskiing terrain in the upper Syncline Valley is not shown (BHA 2017). The terrain strongly suggests that access will be a low-standard trail up Syncline Creek. Runoff from, and stream crossings along such a trail would pose a threat to threatened, federally protected westslope cutthroat trout and their critical habitat (DFO 2014).

3. See BHA (2017, e.g., 4-162 and elsewhere). Acceptance of this proposal would commit governments to a pig-in-a-poke, allowing unspecified additional developments on the West Castle River floodplain/riparian zone of unknown design. Without an EIA, we don’t know whether ANY further developments of ANY design are tolerable. The West Castle River above and below the West Castle Development is critical habitat for bull trout and westslope cutthroat trout (Boag and McCart 1993, Boag and Hvenegaard 1997). The entire West Castle River stands a good chance of being designated federally under the Species At Risk Act as critical habitat for the recovery of westslope cutthroat trout (e.g., Mayhood 2014).

4. See BHA (2017, e.g., 4-162 and elsewhere)
Timberwolf’s Status as a Directly Affected Party

The following information is offered in support of our status as a directly affected party.

1. Timberwolf Wilderness Society (Timberwolf) is incorporated under the Alberta Societies Act;

2. Timberwolf acts to protect and improve wild lands and wildlife habitat along the Eastern Slopes of Alberta through legal, political and public action.

Specifically, Timberwolf has launched successful legal action in federal court to ensure that Canada’s Species At Risk Act is enforced to protect listed species and their critical habitats in Alberta. It has conducted and published scientific research to support protection of at-risk species. Support for these statements is provided in the document accompanying this letter.

Our concerns are not limited to the issues raised in our Statement of Concern to you of 12 November 2018 and herein, but are offered only as examples of some of the serious issues that must be addressed by an Environmental Impact Assessment of the Castle Mountain Resort Development, and a public hearing on that subject. Timberwolf will continue to comment on whatever matters affect our interests with respect to this development.

Sincerely,

Timberwolf Wilderness Society

David W. Mayhood, President

Please send any responses directly to

Page 2 of 2
Literature Cited


Timberwolf Research


**Timberwolf Litigation**

2017: Timberwolf Wilderness Society, with Alberta Wilderness Association and University of Calgary Public Interest Law Clinic, applied to Federal Court of Canada to order the Minister of Fisheries, Oceans and the Coast Guard to post statutorily required summary of progress on more than 2-year overdue Action Plan for the recovery of westslope cutthroat trout (Alberta population). Result: Action Plan Summary issued by Minister of Fisheries, Oceans and the Coast Guard.

2015: Timberwolf Wilderness Society, with Alberta Wilderness Association and University of Calgary Public Interest Law Clinic, applied to the Federal Court of Canada to order Minister of Fisheries and Oceans to issue a Critical Habitat Order, required by statute, to protect the critical habitat of westslope cutthroat trout (Alberta population), then more than one year late. Result: Critical Habitat Order issued by new Minister of Fisheries, Oceans and the Coast Guard.
Please find attached a pdf copy of my statement of concern re. the above proposal.
Thank you for your attention to this and please let me know if you require a snail mail copy, given the current uncertainty of the postal services.
Have a great day, James Tweedie
To:
Director, Environmental Assessment, Alberta Environment and Parks
% Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 — 108 Street
Edmonton, Alberta T5K 2G8 E-mail: environmental.assessment@gov.ab.ca

From:

James Tweedie

Statement of Concern re. Castle Mountain Resort Master Development Plan

As a resident of the Pincher Creek Municipality who has lived here since 1972 and has had the privilege of enjoying the backcountry of the Castle Wilderness and being able to raise our now-adult children to appreciate the vulnerability of this landscape to the pressures of our human activities, I make this Statement of Concern regarding CMR’s current proposal to expand their commercial “adrenalin-driven” (their Vision Statement) playground activities beyond their present footprint in the heart of the Castle. I call on the Director of the Regulatory Assurance Division to ensure that CMR is required to complete a full Environmental Impact Assessment before any further incremental expansions of this unsustainable tourist resort are allowed.

Background.

The background history of CMR’s incremental expansion of their activities since 2001 will be fully familiar to you, including the very serious recommendations by Ms Jillian Flett, Director of the Regulatory Assurance Division to the ADM and DM of Alberta Environment that an EIA should be required at that time. (See Briefing notes dated October 15, Oct 26, Nov 27, Dec 5, Dec 18 2001, January 9, 2002) Her abrupt about-face under pressure from the Director, Alberta Land Administration Division, ASRD became the subject of the Judicial Review initiated by the Castle-Crown Wilderness Coalition (the CCWC, of which I remain a Director), resolved at Court of Queen’s Bench by the judgement of Madame Justice Kenny that the Minister’s decision NOT to call for an EIA was “patently unreasonable” (Court of Queen’s Bench, Castle-Crown Wilderness Coalition v. Flett, 2004 ABQB 515). The fact that that judgement was subsequently overturned at the Alberta Court of Appeal (CCWC v Alberta (Director Regulatory Assurance Division, Alberta Environment), 2005ABCA 283) based on the supremacy in law of the Minister’s discretionary powers did nothing to resolve the recognized potential negative impacts of CMR’s development activities on the surrounding public lands and especially wildlife resources of the area, nor did it do anything to dissipate the highly charged public and political controversy surrounding such an apparently unsustainable project.
Quite the most remarkable observation by the Appeal Court Judges in that case, to my mind, can be found in Paragraph 58, where they appear to have a very narrow / zero-sum game view of the purpose of an EIA: “For example, if, as has been suggested, the development encroaches on a wildlife corridor, only not proceeding will ensure that the encroachment does not occur. An EIA is not required to come to that conclusion.” As a layperson I would expect an EIA to identify issues of concern in a credibly scientific manner and provide some benchmark of the current status of those issues, as well as some options as to how some negative outcomes might be mitigated or managed. It is with that view of an EIA that I am making this call for an EIA, as I suspect Ms Jillian Flett, the Director, was doing in 2001/2.

2017/2018 CMR Master Development Plan proposal.

It is now more than 25 years since any credible Environmental Impact Assessment has been carried out in the Westcastle Valley and its surrounding areas of public lands that, since 2015, have been designated as Wildland or Provincial Park. CMR’s present MDP provides no evidence at all to demonstrate either positive or negative effects of their activities on the natural resources of these lands, or even the lands under their own LOC, and without a benchmark EIA to refer to it is hard to have much confidence in any assertions made either by CMR itself, or by our government employees, that everything is positive and in the public interest. (As an aside, their chosen cover photograph of their extensive ski terrain in summer hardly inspires confidence.) From my perspective as a hiker, cross-country skier, occasional observer and recorder of changes around the West Castle River Wetlands Ecological Reserve (WCRWER) under Ab Parks Volunteer Stewards program and leader of some hikes over the years, the impacts of the resort development under CMR’s management during the summer months, at least, seem overwhelmingly negative: massive snowmelt spring erosion from ski trails, unceasing noise pollution from construction and maintenance activities that can be heard far and wide throughout the valley and a constant battle against the dispersion/proliferation of invasive species (including into the WCRWER). Even such a “positively” intended program as CMR’s “Fire Smart” clearings have resulted in devastating changes to the immediate previously lush understory microclimate of the valley floor, as witnessed by the loss of one of southern Alberta’s most productive mushroom-gathering sites that has been enjoyed by people from all parts of the region for generations.

For a start, we do know from any number of studies over the years how critically important this particular area of the Westcastle Valley is for such “at risk” species as grizzly bears and west slope cutthroat trout, by virtue of the very special attributes of the berry-bearing south-facing slopes in the case of the former, and of the water quality and temperature for egg deposition redds for the latter. Therefore, even the most cursory review of the MDP tells me that CMR either has chosen to remain ignorant of these matters or has assumed that the participation in their advisory committee of government employees such as Rob Simieritsch and Peter Swain allows them off the hook for addressing these concerns. The proposal to expand their LOC to the south,
and the exploitation of the Haig Valley and basin for mountain-bike terrain and other “family-fun play” activities runs in direct contravention to the recommendations made by Fish and Wildlife Division staff in 2001:

“Regional staff have indicated that areas directly south of the current development are prime habitat for grizzly bears in the region. This new information raises the awareness that the west side of the West castle River is grizzly bear habitat and the need to assess mitigative measures to protect grizzly bears (wildlife) in the region.” (Oct 15, 2001, Briefing Note to ADM)

Likewise, CMR’s choice to expand its cat-skiing operations into the Syncline Valley run directly counter to the Federal Species at Risk Act (SARA) requirements for Alberta Environment to protect our fast-diminishing Westslope Cutthroat trout-bearing streams.

With respect to other issues identified by the Director as needing to be addressed in 2001/2, CMR conveys the assumption that the designation of the surrounding lands as Provincial and Wildland Parks effectively absolves the company from any responsibilities/liabilities stemming from the resort. It was not clear to the Director in 2001, nor is it clear today, how CMR's activities contribute to the overall cumulative effects of human activities in the region - something that an EIA is supposed to help address.

Since 2001 the company has received a number of permits and amendments from the government, that have allowed their incremental development to move ahead, especially under the AB Water Act with reference to such matters as water allocation, sewage treatment and snowmaking. The public has no way of knowing whether all conditions have been met or whether other unforeseen negative impacts have occurred.

In 2001 the Director was recommending an EIA be required just to address the winter issues.

If this new expansion by CMR is to go ahead with any sense of public confidence in its sustainability as an all-season resort (which appears to be its only option in face of diminishing early winter snowpacks), an EIA that focuses on this new dimension is imperative and will provide a good measure of how significant environmental indicators may have changed for the better or worse since 1993, as well as providing options for mitigative measures and conditions to limit the potentially negative environmental impacts.

**Scale of proposed “project”**

While CMR and your office is careful to state that this project does not fall under the provisions of AEPEA that would call for a mandatory EIA, based on visitor numbers, the scale of CMR’s proposal reflected in the MDP is certainly comparable to the controversial proposal by Vacation Alberta Corporation in the early 1990s, especially
with respect to the summertime commercial mountain biking ambitions for the Haig Mountain area of their LOC, currently identified as critical grizzly bear habitat.

The single simplest indicator of that scale can be found in the various MDP figures and tables is the resort’s anticipated water requirements “at build out”: 61,287,575 imperial gallons in contrast with the existing volume of 9,525,475 gals, namely a 6 fold increase at a time when the water resources for the Oldman Watershed are already known to be over-allocated to the multiple competing downstream interests. The MDP makes no reference to the fact that this water is now going to be pumped back up into the mountains from the Oldman Dam close to Cowley so that the resort will not be constrained by the limitations of its local Westcastle aquifer. How sustainable is that?, one has to ask.

You will of course be familiar with the other tables and figures in the MDP addressing CMR’s future requirements for accommodation, built space, overall visitation numbers etc that may not reflect such a radical multiplier but nonetheless indicate significant doubling or tripling from existing conditions. All of this being contemplated in the strict topographical confines of the Westcastle valley. The apparent assumption by CMR that the designation of the surrounding public lands as Provincial and Wildland Parks automatically gives them a green light to re-activate a Vacation Alberta style all season resort has to be questioned. Many of the same issues of contention that arose at the public hearing in Pincher Creek in 1993 are still with us today. Avoiding them may be convenient politics but would be an inexcusable disservice to the general public and to the future viability of our local and regional natural resources if this resort is to be approved.

“Notice of Further Assessment”

The “Notice of further assessment”, taken in the context of materials presented in CMR’s Master Development Plan, leaves a person wondering what, if any, assessments have been done and by whom. Nothing in CMR’s materials provide any substance on such matters as they relate to the local and regional environmental concerns. Any input or advice provided to CMR from the various GOA staff who are acknowledged as part of the “Advisory Group” is completely invisible to the public. At the same time, it is precisely these public employees (or their predecessors) who have had the administrative authority to allow (or disallow) the range of CMR’s incremental expansions over the past 25 years and more particularly since the 2001 Area Structure Plan debacle. At this juncture the public has a right to know the full scope of these permits and licences and amendments without having to engage in the laborious, expensive and biased process of Freedom of Access to Information requests that we have been forced into in the past.

From my own experience as a Director with the Castle-Crown Wilderness Coalition who has had many occasions to interact with GOA Managers of different departments at the local and regional level over the years, I can only express my frustration with an
“assessment process” that is carried on exclusively behind closed doors. When I first enquired about CMR’s plans to seek a change in their Area Structure Plan (at the Municipal level) in 2014, I think it was, I was informed that there was no plan yet and that we would be informed when it was finalized…subsequent meetings with our regional AEP Managers have elicited the same line: “We want to see their full roll-out before we will set our staff to working on it” - that from Rob Simieritsch, whose name appears as part of their Advisory Council. I fully understand that those consultations are entirely appropriate, but then as public we should expect to get full disclosure about what has been addressed and already permitted....the document is entirely silent on all/any env matters.

This is especially relevant since CMR has undertaken a number of pre-emptive moves within their existing LOC, presumably with Rob Simieritsch’s and Peter Swain’s approval.... most notably the creation of berms at high elevations to create a reservoir for snowmaking (which we attempted to appeal at the time). Likewise we had already challenged their amendments to their water licence and alterations to the sewage lagoon in previous appeals and were summarily dismissed. These were not, and are not now, frivolous matters. The public has a very real right to know what is going on within the public lands granted to CMR’s control under their LOC and other licences.

**Determination re “Directly affected”**

As a longtime resident and ratepayer in the MD of Pincher Creek and tax-paying citizen of Alberta and Canada, I make no special claims to be more or less “directly affected” by these matters than any other citizen of the country who is concerned that our actions in the present do not foreclose the viability of our natural resources for the future. Given that this project is proposed for lands held in isolated title amounting to approximately 44.65 acres and a Licence of Occupation for the use of Public Lands amounting to approximately 3,200 acres, it is self-evident that any narrow legalistic determination of “standing” renders any claim to be completely circumscribed. My past experience with seeking standing under a number of regulatory boards (ERCB, NRCB, AEUB, EAB) tell me that, at the end of the day, the determination can be utterly arbitrary and adherence to any precedents is at the mercy of contentious lawyers. I trust that the “public interest” surrounding these matters will be the key factor in the determination of such standing. As a longtime member and Director with the Castle-Crown Wilderness Coalition I am more than happy for my concerns to addressed by that organization on my behalf.
I want to comment on the proposed Castle Mountain Resort Development.

The area was developed as a park to protect wildlife, wild places and to protect the headwaters of waterways of southern Alberta. To me development is development whether that be logging, mining, or tourism. They all have a detrimental effect on the environment. In this province we have a real problem protecting wild places. As the area sits now if we leave it alone so that it is foot access only it can be enjoyed by all at the lowest impact level possible. Everyone benefits if by no other measure than to know that it is protected from any negative effects.

To allow a preferred group special access to make money on this special area is wrong in my mind and does nothing to protect the area, the wildlife or the headwaters.

This development has been opposed for at least 25 years by the people that it means the most to. Please end this and protect the area so that all can enjoy the lowest impact back country left in southern Alberta.

Thank you,

Mark Virginillo
Please receive this as my letter of concern concerning the proposed expansion of the Castle Mountain Resort. I urge you to require an environmental impact assessment for this proposal for the following reasons:

1. The Master Development Plan indicates potential expansion of Castle Mountain Resort into the newly-designated Castle Wildland Provincial Park.

2. Syncline Brook, West Castle River and its tributaries, and South Castle River and its tributaries are all Critical Habitat for Westslope Cutthroat Trout. The proposed expansion of Castle Mountain Resort may impact the water regime, and alter, damage, or destroy portions of Critical Habitat contrary to the Species at Risk Act (Canada).

3. Changes in water use per the Master Development Plan may impact the West Castle Wetlands Ecological Reserve.

4. There will be loss or degradation of habitat with attendant impacts on mammals, amphibians, birds, and diversity of plants. This is the most biologically diverse region of Alberta.

Thanks for considering my views. I look forward to a response and notice of hearing.

Cliff Wallis P. Biol.
Thank you for the opportunity to provide this Letter of Concern. An environmental impact assessment is required due to the critical issues listed below:
1. The Master Development Plan contemplates the expansion of Castle Mountain Resort beyond its LOC and into the newly-designated Castle Wildland Provincial Park.
2. “Syncline Brook”, “West Castle River and tributaries”, and “South Castle River and tributaries”, are all identified as Critical Habitat for Westslope Cutthroat Trout in the 2014 Recovery Strategy for the Westslope Cutthroat Trout (Oncorhynchus clarkii lewisi), Alberta Populations in Canada. The proposed developments at Castle Mountain Resort would change the water regime, and alter, damage, or destroy portions of this Critical Habitat contrary to Canada’s Species at Risk Act.
3. Changes in water use per the Master Development Plan would alter, and likely damage, the West Castle Wetlands Ecological Reserve.
4. Habitat impacts on large and small mammals, amphibians, birds, and huge numbers of plants. The Castle Wildland and Provincial Parks are the most ecologically-biodiverse place in Alberta.

Shirley Young