

**Public comments on
proposed Terms of
Reference for Stone
Creek Resorts Inc.
Gondola Project**

From: Devon Earl <dearl@abwild.ca>
Sent: June 10, 2022 4:03 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Project Proposed Terms of Reference
Attachments: 20220610_lt_awa_aep_silvertip_gondola_canmore_ptor.pdf

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Hello,

Please see the attached letter outlining Alberta Wilderness Association’s comments on the Silvertip Gondola Project Proposed Terms of Reference Environmental Impact Assessment Report.

Sincerely,
Devon

Devon Earl
MSc Ecology, BSc Environmental Science
Conservation Specialist

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

We live and work across the traditional lands of the First Nations and Métis peoples of Alberta, including Treaties 4, 6, 7, 8 and 10. We express gratitude and respect for these lands and commit to advancing reconciliation with Indigenous peoples to ensure justice, equality, and sustainability for all people and the natural world we rely on.

455-12 St NW Calgary, AB T2N 1Y9
403.283.2025 www.AlbertaWilderness.ca



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

June 10th, 2022

Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks
Email: environmental.assessment@gov.ab.ca

Re: Silvertip Gondola Project Proposed Terms of Reference Environmental Impact Assessment Report

To Whom It May Concern,

Alberta Wilderness Association (AWA) appreciates the opportunity to provide comments on the Proposed Terms of Reference Environmental Impact Assessment Report (the ToR) for Stone Creek Resorts Inc. proposed Silvertip Gondola Project (the project). As you may know, AWA is one of Alberta's oldest conservation organizations. With over 7,500 members across Alberta and worldwide, AWA is committed to the completion of a protected areas network and the good stewardship of Alberta's lands and waters to ensure a sustainable future for all.

In our April 2017 letter to the Ministry of Environment and Parks regarding this project, AWA expressed concerns that the proposed project, the majority of which falls within the Bow Valley Wildland Provincial Park, is not an acceptable development within a Wildland Park and would set a truly unacceptable precedent. As you know, the area is an important regional wildlife corridor that is vital to the persistence of healthy populations of many species of large mammal. This important concern still remains unaddressed. Additionally, AWA is very disappointed with the lack of discussion regarding cumulative impacts of this project with other developments in the Bow Valley, and the lack of consideration of climate change impacts and greenhouse gas emissions.

According to Alberta Parks, Wildland Provincial Parks are intended to be "large, undeveloped natural landscapes that retain their primeval character". A gondola clearly is not in alignment with this intent due to the construction, mechanization, and permanent habitat fragmentation that would be required to complete this project. Rather than moving forward with an environmental impact assessment (EIA) of the project, it should be rejected outright. Recognizing that the project is to move forward with EIA, the ToR should require a discussion of how this project aligns with the Bow Valley Protected Areas Management Plan and the South Saskatchewan Regional Plan, along with any other relevant plans. If legislation is to be amended to accommodate this development, there should be a discussion about why these amendments are justified based on the values of Albertans and the Town of Canmore. It should be made clear why this development is acceptable and will not set a negative precedent for other Wildland Provincial Parks, further compromising environmental values.

The largest environmental concern in the Bow Valley is the cumulative impact of development and human use on wildlife and other environmental values. Recent research within and around the Bow Valley indicates that wildlife habitat and movement have been negatively impacted by anthropogenic development and human activity, and that further development will continue to exacerbate this problem. Therefore, a cumulative effects assessment should be a requirement during the EIA process for

this project. This assessment needs to include impacts of both infrastructure and increased human use to all identified ecological values including wildlife.

Responsible management of this ecologically important area depends on understanding past, present, and future cumulative effects. To allow development that would exacerbate already high human use pressures in the Bow Valley would compromise the environmental and wildlife values that make this area so special. In addition to indicating how this project can mitigate negative impacts to wildlife and other ecological values, the ToR should require a description of how these values could be improved given that they are already under high pressure from anthropogenic impacts.

Finally, there is no mention in the ToR of the impacts this project will have on climate change and greenhouse gas emissions. This must be included as climate change poses a serious threat to valued ecosystem components like wildlife and biodiversity. The greenhouse gas emissions of construction and operation of this project should be included in this assessment, as well as how they will be mitigated to reduce any negative impacts.

We look forward to seeing how these concerns will be meaningfully addressed within the ToR to incorporate discussion of land-use intent, cumulative effects, and climate change issues.

Sincerely,
ALBERTA WILDERNESS ASSOCIATION

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

Devon Earl, Conservation Specialist

From: Judy A [REDACTED]
Sent: June 12, 2022 3:57 PM
To: AEP Environmental Assessment
Subject: Opposed to Silvertip Gondola Project

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June 11, 2022

Attention: Director, Environmental Assessment, Regulatory Assurance, Alberta Environment and Parks
environmental.assessment@gov.ab.ca

Re: Proposed Silvertip Gondola Project, Stone Creek Resorts

I live in Canmore and am a born and raised Alberta. I love our natural environment and place high value on ecological integrity that allows wildlife to continue to move, rest, feed and reproduce on the landscape. Wildlife needs to be able to thrive, not just survive. I am opposed to the Silvertip Gondola Project.

The Silvertip Gondola Project proposes to encroach into Bow Valley Wildland Provincial Park and crown land, outside the Town of Canmore. I do not support removing land from Bow Valley Wildlands PP or allowing this development within the Park, or on any crown lands.

My concerns -

- **Impact on wildlife habitat** - The Bow Valley is a major wildlife corridor between the protected areas of Kananaskis Country and Banff National Park, and one of the most important east-west connectors in all of the Yellowstone to Yukon region. Canmore is dealing with impacts on wildlife throughout the Bow Valley as development pressure continues. "Annexing" Park land that we know is used by Big Horn Sheep, particularly in the winter, and as a lek for Dusky Grouse in the spring, is not acceptable. We also know that Lady Mac is part of a narrow migration route that is used by Golden Eagles twice a year. We need to protect the remaining habitat that surrounds Canmore. The noise of the gondola during construction and operation WILL have an impact on wildlife. I note that the Silvertip EIA does not in any way refer to the **cumulative impacts** of this development within the Bow Valley regarding impact on wildlife and wildlife movement. *This is critical.* ALL proposed developments in land surrounding Canmore MUST include cumulative impacts. Wildlife are already at a tipping point in their ability to survive and we cannot to make this worse. All of these impacts are NOT acceptable with Park values.
- **There needs to be a full, independent recreation impact assessment.** - "Lady Mac" is a very popular hiking route and has high recreation value for locals and tourists alike. Trail data shows that Lady Mac, along with Ha Ling, Yamnuska and East End of Rundle, receive similar volumes of hikers as the busiest peaks in Colorado. These are highly valued destination peaks. This non-motorized, recreational use is fully compatible with the Bow Valley Wildland Park management plan and Wildland Parks policy, unlike the proposed gondola, gift shop,

restaurant, rope way, etc. The area above the proposed gondola station is also very tricky terrain and opens up the Province and Stone Creek Resorts to the risk of accidents with people arriving by gondola who are not prepared or experienced. The huge number of people already visiting this area on foot will be affected and this will have a negative impact on tourism. The noise of the gondola and the intrusion of the built form in the natural landscape WILL impact existing recreation. This area is already heavily used and we do not need to add more people, or year round use with a gondola, which will also have an increased impact on wildlife.

- **Carbon Emissions** - there will be significant carbon emissions to build and operate this proposal. In this day and age, this is something we can do without. Will there be more helicopters to service the gondola? We do not need more helicopters!
- **Resident Impacts** - I certainly would not want to be the residents living in the area of the gondola and being impacted by the noise pollution. Residents will also be subjected to light pollution during evening operation. I personally will also be impacted by light pollution which I will see across the valley from my home. There needs to be a noise and light impact assessment. The majority of this proposed gondola would happen outside the Town of Canmore but residents and the Town WILL be affected.
- **First Nations consultation** - This is landscape deeply connected to the history and culture of the Wesley, Chiniki and Bearspaw of the Îyâñhé (Stoney) Nakoda, Tsuut'ina, the Siksika, Piikani and Kainai Nations of the Niitsítapi (Blackfoot Confederacy), and the Métis Nation of Alberta. The EIA terms of reference do not adequately address Indigenous consultation with all Nations who have cultural connections to this area. The EIA needs to address how Indigenous Nations will be engaged and what will happen if Indigenous views conflict with the project.

I do not support the building of this gondola, encroaching into Bow Valley Wildlands Provincial Park, or amending the current Area Structure Plan to the Silvertip area of the Town of Canmore to accommodate this proposal.

Respectfully,
Judy Archer

[Redacted signature]

--

Judy Archer (she/her)

[Redacted signature]

In the spirit of respect, reciprocity and truth, I honour and acknowledge the Canmore area, known as “Chuwapchipchiyan Kude Bi” (translated in Stoney Nakoda as “shoots in the willows”) and the traditional Treaty 7 territory and oral practices of the Îyârhe Nakoda (Stoney Nakoda) – comprised of the Bearspaw, Chiniki, and Wesley First Nations – as well as the Tsuut'ina First Nation and the Blackfoot Confederacy comprised of the Siksika, Piikani, Kainai. This territory is also home to the Shuswap Nations, Ktunaxa Nations, and Métis Nation of Alberta, Region 3. I acknowledge all Nations of this land and honour and celebrate this territory. I am grateful to live here. îsnî'yes.

From: Liz Auksi [REDACTED]
Sent: May 22, 2022 11:27 AM
To: AEP Environmental Assessment
Subject: STONE CREEK RESORTS INC. PROPOSED SILVERTIP GONDOLA PROJECT

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Director, Environmental Assessment, Regulatory Assurance Alberta Environment and Parks

Dear Sir/Madam:

I am writing to express my concern for the above project's impact on primarily wildlife habitat and corridor reduction and secondly on impact to the residents of the Bow Valley.

Expansion of Canmore beyond its current 'allowed' borders should not occur as it impacts wildlife habitat. The more development that is allowed in this area, the less 'space' there is for wildlife - there are already questions as to whether there is sufficient space for them.

Lady MacDonald should remain as a hike-in trail, again allowing us to share the space with wildlife rather than take it over as will happen if large numbers of people ascend using a gondola. The infrastructure required at the top for the gondola will also decrease the wildlife habitat area.

Any gondola/tourist attraction requires a large amount of available parking. Using Lake Louise as an example, their large parking area where you can take a bus into Lake Louise town, the lake itself and Moraine Lake, used to be a campground (late 70's, early 80's) where it could be argued there was some wildlife habitat ... a paved parking lot has none.

I applaud the building of true employee accomodation which would greatly help workers in the Bow Valley ... getting them to work could be done more simply and less expensively than a gondola.

Please do not allow this project to go forward.

Liz Auksi, Ph.D.

From: Kim Babiy [REDACTED]
Sent: June 10, 2022 10:23 AM
To: AEP Environmental Assessment
Subject: No to the Gondola on Mt. Lady MacDonald

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Hello,

I would like to express my opposition to the proposed gondola development on Mt Lady MacDonald.

Habitat fragmentation is already a significant problem in the Bow Valley due to the development of the town of Canmore acting as a horseshoe from one side of the valley, across the valley bottom, and up the other side. Wildlife face significant obstacles navigating the town site already. More development in an already overdeveloped area is unconscionable. In my mind, any further development in Canmore, be it a tourist attraction or a recreational property development which proposes to double the size of the town, is a hard NO.

Canmore's natural environment, and Bow Valley wildlife specifically, cannot sustain further human pressure. No further development should be approved.

Sincerely,
Kim Babiy
[REDACTED]

From: Tannis Baker [REDACTED]
Sent: June 8, 2022 1:04 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Proposal

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Hello there:

I am writing to express my concerns re the Silvertip/Lady MacDonald Gondola proposal.

As far back as 1996, the Banff-Bow Valley Study concluded that the region was on a path that would erode the very values for which it was known and loved by residents and visitors alike.

Fast-forward to 2022, when researchers published a study based on 20 years of wolf and grizzly bear movement data and concluded that the Bow Valley has already lost up to 85 per cent of its best wildlife habitat.

Adding to that research is a soon to be released report from Y2Y and the ALCES Group on a cumulative effects modeling project for the Bow Valley.

Ninety-three per cent of the project footprint is within the Bow Valley Wildland Provincial Park, which does not permit tourism attractions such as a gondola. The current regulations associated with this provincial land designation prioritize non-motorized recreation uses and the preservation and protection of natural areas.

The gondola project has been proposed several times in recent decades. When the current version of the project came forward in early 2021, the Government of Alberta confirmed that it was inconsistent with the current land management direction set forth under the Wildland Provincial Park protected area designation, as well as the provisions of the South Saskatchewan Regional Plan.

The current Terms of Reference, or scope, for the project's EIA come from a standardized government template. This generic approach does not address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation and industry.

Wildlife and mountain landscapes are a primary reason that people choose to live in and visitors come to Canmore and the Rockies. Town planning documents clearly reflect this priority and the Tourism Canmore-Kananaskis strategic plan highlights the region as one with a respect for the environment and celebrating an authentic mountain lifestyle. Environmental sustainability was cited as the number one priority during public engagement in developing the tourism strategy.

Best regards

Tannis Baker

From: Trish Bartley [REDACTED]
Sent: June 10, 2022 2:07 PM
To: AEP Environmental Assessment
Subject: Gondola

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Please do not allow the gondola up Lady Macdonald! It will further affect wildlife, reduce to ambiance of our town and increase the number of tourists. We do not have the infrastructure, medical services etc to support that. Stop it in its tracks! Please!

Trish

From: Gareth Thomson <gareth@biosphereinstitute.org>
Sent: June 10, 2022 12:48 PM
To: AEP Environmental Assessment
Subject: our comments on the draft Terms of Reference for the proposed Silvertip Gondola
Attachments: Biosphere Insitute comment on gondola EIA.pdf

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Those comments are attached.

I would appreciate confirmation of receipt of this note.

Have a great day!

Thank you

Gareth Thomson (he, his)
Executive Director
Biosphere Institute of the Bow Valley
Call or text: 403-678-7746

I work, live, and play in the Bow Valley, part of the Treaty Seven region that is the traditional territory of the Blackfoot Confederacy, the Tsuut'ina, and the Stoney Nakoda Nations. The Salmon People to the west and the Buffalo People to the east have long understood this valley to be a shared space.

[Book a meeting with me](#)
www.biosphereinstitute.org
www.facebook.com/Biosphere.Institute

10 June 2022

Director, Environmental Assessment
Regulatory Assurance, Alberta Environment and Parks.
By E-mail: environmental.assessment@gov.ab.ca

Re: comments on the draft Terms of Reference for the proposed Silvertip Gondola

Dear Director:

Thank you for the opportunity to provide these comments. I note the following:

As one of the most important places for wildlife in Alberta region, the Bow Valley deserves rigorous environmental assessments for development proposals that reflect the best science and needs of this place. If this project is to proceed, we need to get it right.

I find that the current Terms of Reference is a generic approach that does not address the current realities of the Bow Valley, already challenged by significant human-induced pressures from development, tourism, recreation and industry.

The Bow Valley is also a major wildlife corridor, and one of the most important east-west connectors, between the protected areas of Kananaskis Country and Banff National Park. The EIA must ensure we protect the landscapes that provide habitat and safe travel for wildlife, especially as they adapt to the impacts of a changing climate.

With so many pressures on the Bow Valley, every planning decision must be made with an understanding of overall cumulative effects. Unfortunately the words "cumulative", "cumulative impacts", or "cumulative effects" do not appear in the current document. That is an oversight that should be corrected. The EIA should call for the inclusion of recent science that clearly quantifies historic, present and future impacts of development on wildlife movement.

As one of the top three most popular hiking peaks in the Bow Valley there also needs to be a standalone section of the EIA focussing on "recreation impact assessment", where impacts to existing, historical use (ie., the very popular trail up Lady Macdonald) are considered.

...2

The EIA fails to make specific reference to key species that rely on this area for their survival and habitat security – this should be remedied. This includes...

- Bighorn sheep
- Golden eagle. The Golden Eagle/raptor route lies along this ridge; it is a very narrow corridor that extends from Mexico to Alaska, and is a truly north American movement corridor that is used twice each year.
- Dusky grouse. I have personally observed dozens of birds in mating leks in the Silvertip meadow, in May.

Further, the EIA should...

- outline how all Treaty 7 First Nations will be provided the opportunity to fully engage
- define how the project meets current laws, regional plans, strategies, and other guidelines
- provide more clarity around human safety requirements in this risky alpine environment
- ensure that any socio-economic components of this EIA reflect the values of the community
- expand on a monitoring & mitigation plan for impacts to humans and wildlife.

Thank you for the opportunity to comment. Should you have any questions, I can be reached at Gareth@biosphereinstitute.org, or 403-678-7746.



Gareth Thomson
Executive Director

From: Bryce Brown [REDACTED]
Sent: June 12, 2022 2:35 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola proposal

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Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

I am writing to share my concerns about the proposed Silvertip Gondola in the Bow Valley Wildland Provincial Park.

The Bow Valley is a major wildlife corridor between the protected areas of Kananaskis Country and Banff National Park, and one of the most important east-west connectors in the Yellowstone to Yukon region. Many large mammals such as deer, elk, bighorn sheep, wolves, cougars and grizzly bears depend on this corridor that is rapidly shrinking due to the growth of Canmore. A study published this year, based on 20 years of wolf and grizzly bear movement data, concluded that the Bow Valley has already lost up to 85% of its best wildlife habitat.

The proposed gondola route would cross what remains of this important wildlife corridor. Ninety-three per cent of the project footprint is within the Bow Valley Wildland Provincial Park, which under current regulations does not permit tourism attractions such as a gondola. This provincial land designation prioritizes non-motorized recreation uses and the preservation and protection of natural areas.

With so many pressures on the Bow Valley, every planning decision must be made with an understanding of overall cumulative effects. It is of critical importance that the environmental assessment for a proposed gondola in Canmore prioritizes preserving nature. Every effort must be made to ensure we protect the landscapes that provide habitat and safe travel for wildlife, especially as they adapt to the impacts of a changing climate.

The EIA for the proposed gondola should:

- Detail the intent and impacts of this project and consider existing and future development across the Bow Valley
- Be backed up by recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Expand on a monitoring & mitigation plan for impacts to humans and wildlife

Thank you for taking the utmost care in preserving our wildlife habitat for generations to come.

Bryce Brown
Canmore AB

From: K. Morrison <kmorrison@cpaws.org>
Sent: June 13, 2022 10:25 AM
To: AEP Environmental Assessment
Subject: CPAWS Southern Alberta Comments on Silvertip Gondola Project Proposed Terms of Reference
Attachments: CPAWS SAB_Silvertip TOR_Jun132022.pdf

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Please find attached CPAWS Southern Alberta’s comments on the Silvertip Gondola Project Proposed Terms of Reference. Please let me know if you have any questions.

Thank you,

Katie Morrison

Katie Morrison, M.E.Des., P.Biol.

(she/her/hers)

Executive Director

[CPAWS Southern Alberta Chapter](#)

Office: (403) 232-6686

Cell: (403) 463-6337

kmorrison@cpaws.org



Advocating for Southern Alberta’s parks and wild spaces since 1967. Help us fight for nature by [donating today!](#)
CPAWS Southern Alberta acknowledges that we work in the traditional territories of the Siksikaitstapi (Blackfoot Confederacy), comprised of the Siksika, Kainai, Piikani, and Amskapi Piikani First Nations; the Tsuut'ina First Nation; the Stoney Nakoda, including the Chiniki, Bearspaw, and Wesley First Nations; the Ktunaxa Nation; and the Métis Nation of Alberta. Today, southern Alberta is home to Indigenous people from all over North America.



Corinne Kristensen, Director
Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks
environmental.assessment@gov.ab.ca

June 13, 2022

Re: Silvertip Gondola Project Proposed Terms of Reference

Dear Corinne Kristensen,

The Southern Alberta Chapter of the Canadian Parks and Wilderness Society (CPAWS) has been an active voice for the protection and effective management of Alberta's parks and public land for over 50 years. We work with scientists, communities, industry, stakeholders, and the public to influence and advocate for evidence-based land use decision making in Alberta. CPAWS Southern Alberta has been working on and monitoring the Stone Creek Silvertip developments and area structure plans for over a decade. We have also invested considerable effort over the past 30 years working with an array of stakeholders and government to ensure that provincial lands in the Bow Valley are protected as and that adjacent public lands are well managed to support wildlife habitat and connectivity. We bring a holistic, landscape perspective when considering developments like the Silvertip gondola. We have several concerns regarding the Terms of Reference (ToR) for the Silvertip Gondola Project's (hereafter: the project) environmental impact assessment (EIA).

In this submission, we provide an array of comments to strengthen the project's ToR, but we would like to make it clear that we are in strong opposition to this development proceeding. Current wildlife science and park management research has shown that this scale and scope of development in a sensitive wildlife corridor will have irreversible impacts to wildlife, their habitats, and functionality of the corridor itself. The latest research found that current anthropogenic development has reduced connectivity an average of 85% in the Bow Valley¹. Future developments of this scale should not even be considered within the ecological limits of this landscape. The project will also require amendments to the South Saskatchewan Regional Plan (SSRP), and the management intent and boundaries of the Bow Valley Wildland Provincial Park. The management intent of a wildland park is to "retain large areas of high quality, natural landscape where opportunities for backcountry recreation and tourism activities... are provided in a way that ensures the retention of the land in a natural state and

¹ Whittington, J., Hebblewhite, M., Baron, R.W. *et al.* Towns and trails drive carnivore movement behaviour, resource selection, and connectivity. *Mov Ecol* **10**, 17 (2022). <https://doi.org/10.1186/s40462-022-00318-5>

minimizes interference with natural processes. Facility design will be minimized.”² This protected area designation is designed to prevent development of project such as what is being proposed. The SSRP and Bow Valley Protected Areas management park management plan clearly do not allow for a commercial tourism development of this scale and scope (e.g., gondolas) and should not be amended to allow for the project.

Our comments pertaining to the ToR follow these general themes as per the layout of the ToR document: 1) general considerations; 2) public engagement and Indigenous consultation; 3) project description; 4) environmental assessment; 5) socio-economic assessment; 6) monitoring.

General Considerations

The gondola will traverse multiple land jurisdictions, starting in the Town of Canmore and going through Bow Valley Wildland Provincial Park and MD of Bighorn lands. All of this development occurs within Treaty 7 First Nations land. The project goes through the upper and lower Silvertip wildlife corridors, which are provincially designated and managed to prioritize wildlife movement. Given the jurisdictional complexity and ecological importance of this area, the ToR should reflect the uniqueness of this landscape. The ToR, however, is presented as a standard version of environmental impact assessments occurring anywhere in the province. This lack of regional and local specificity in the ToR suggests the proponent has not conducted due diligence in their preparation. As such, it is difficult to assess the ToR’s validity and robustness to the Bow Valley landscape and its unique challenges and land designations.

The Town of Canmore declared a State of Climate Emergency in 2019, which is intended to reaffirm a commitment to addressing climate change. By 2030, the community of Canmore will reduce its GHG emissions by 30% below 2015 levels. The ToR needs to quantify how the project will impact the Town of Canmore’s overall GHG emissions and how those emissions can be addressed so that the Town may still achieve its goals. The ToR also needs to quantify how the GHG emissions from the gondola relate to vehicle traffic up the Silvertip Road. Part of this should include a data-driven traffic analysis that 1) defines the number of expected vehicles traveling up the Silvertip Road before, during, and after project construction; and 2) how the changing number of vehicles and the operation of the project impacts overall GHG emissions.

Research shows that human use in the Bow Valley and throughout the wildlife corridors is one of the biggest threats to wildlife corridor functionality and effectiveness. Yet, this ToR does little to acknowledge or provide specific direction to quantify human use and its existing and future impact to wildlife movement, habitat security, and corridor functionality. Stone Creek Resorts should provide direction in the ToR to identify data gaps regarding human use practices through the corridor and an analysis of best management practices to reduce those existing impacts. In addition, the ToR should define parameters for the EIA to model future human use patterns during construction and operation

² Alberta Environment and Parks. 2002. Bow Valley Protected Areas Management Plan. ISBN: 0-7785-2221-0, Edmonton, Alberta. 64 pp.

of the project, and project how that increasing human use will impact wildlife habitat security and human-wildlife conflict.

The ToR discusses identifying baseline data and impacts for ecological features but does not discuss avoidance or mitigation of impacts for most assessed valued features. There is no current requirement for mitigations to be identified in the EIA, with the exception of impacts to wildlife. This is a massive gap in the effectiveness of the EIA. All identified impacts in the EIA should describe if impacts can first be avoided and if not provide recommended mitigation activities, all recommended mitigations should be tied to a monitoring activity. This is the basis of how EIAs function and it is completely inadequate that this ToR does not provide this direction for the EIA.

Public and Indigenous Consultation

While there are legal requirements for public and Indigenous consultation with a development of this size and scope, the Proponent should be aware of the local controversy that the project generates and take legal requirements further to engage the community more meaningfully.

Public Consultation

The ToR should specify the objectives and goals of public consultation, which the EIA can then address through appropriate public consultation tools. The ToR should also require the development of a comprehensive public consultation plan and the distribution of a “What We Heard” document that summarizes public input and demonstrates where and how it was incorporated into the final proposal. In areas where public input conflicts with the project, the EIA should recommend a course of action to mitigate or minimize that conflict.

Indigenous Consultation

There are seven First Nations in Treaty 7: the Stoney Nakoda Chiniki, Bearspaw, and Wesley bands, the Piikani Nation, the Sikisika Nation, the Blood Tribe, and the Tsuut’ina Nation. The ToR should mention these Indigenous Nations by name and require a detailed consultation strategy for each based on their interest, capacity, and their defined perception of impact. The level of engagement should be defined through the legal requirements of the Aboriginal Consultation Office and the requests from the Nations’ consultation offices. Site visits will likely be required and should be accounted for in the EIA Indigenous consultation section. In addition, the EIA should identify which Nations would like to be involved in cultural monitoring projects whereby the impacts of the project to Traditional and Current land uses are quantified, monitored, and addressed.

Project Description

The project requires changes to several pieces of legislation and policies in order to be approved. This is hugely problematic because it demeans the extensive and collaborative efforts of Albertans to define designated protected areas if their boundaries can simply be amended to allow for a specifically non-permitted use. In addition, the SSRP sub-regional planning commitment includes a spatial human-footprint assessment that should guide further development. This assessment has not yet been completed, and it seems premature to consider a new development without it. While Stone Creek

Resorts acknowledge these changes are required, they fail to require the EIA to address the implications of these changes on other Wildland Provincial Parks, other aspects of the SSRP, or implications to other pieces of legislation/regulations that may be impacted. The EIA should describe the implications of changing the SSRP and implications for other land uses and management intents defined in the SSRP. The EIA should also detail the process required to amend the legislation/policy, justify why those changes are needed, and describe how the changes align with the current management intents of the various land designations.

The constraints section should also define how the project meets the requirements and intent (or does not) of the:

- Alberta Land Stewardship Act (ALSA)
- Bow Valley Protected Areas Management Plans for Bow Valley Provincial Park and Bow Valley Wildland Provincial Park
- Tourism Canmore-Kananaskis' regenerative tourism strategy
- Travel Alberta's outdoor recreation goals
- Human Use Management Project of the Bow Valley (HUMR)
- Projects defined by the Human-Wildlife Coexistence Technical Working Group for the Bow Valley
- Town of Canmore guiding documents, including the Municipal Development Plan

The project has generated concern from many Canmore residents regarding the town's population increase and impacts to the sense of place of living in the Bow Valley. Our members in the Bow Valley lack understanding of why the project is needed, especially when there already exist three gondolas and one sightseeing chairlift in Banff National Park that take people to the tops of mountains. The ToR should require the EIA to include a data-driven demand analysis demonstrating the need for this project within the context of local and regional tourism, including but not limited to how many people want to see this development proceed, how those needs are not met by existing gondola infrastructure, and projected numbers of people who will use the gondola based.

There are many features of this landscape that act as natural and social constraints to a development of this scope and scale. The EIA should describe the current human use patterns, trail conditions and designed purpose, and trail density in the project area. The EIA should also describe how the construction of the project may alter these features. For example, if a road is required for construction, that road may become a recreational trail and contribute to increasing human use of the wildlife corridor if it is not decommissioned.

Environmental Assessment

The EIA will be conducted at different spatial scales. We recommend that the regional scale encompass the entire Bow Valley from west of Banff to Dead Man's Flats, and from Lake Minnewanka to the north to the Spray and Wind Valleys to the South. Recent research has used this spatial scale to model cumulative effects and has shown that the impacts of developments of this scope stand to irreversibly impact wildlife connectivity and movement. The EIA needs to quantify cumulative effects at

a similar scale. The cumulative effects analysis needs to take into the account the existing and overall impact of development in the regional study area and then define how this project adds to those effects, providing a more comprehensive and meaningful understanding of cumulative effects.

The Lower and Upper Silvertip corridors are a highly used landscape with the existing Silvertip residential area, the golf course, and a high density of recreational trails. Some of these trails fall within the designated wildlife corridor and others do not. Throughout the EIA, it will be important to quantify and model impacts associated with development footprint (both construction and operation), recreational trail creation (both sanctioned and un-sanctioned), and the increase in human use in the corridor spatially and temporally (based on operating hours, days of the week, monthly, seasonally, and annually).

The Environmental Assessment of the ToR is missing several essential components associated with this project, as described in the table below.

Feature/Valued Component	Recommendation for inclusion in the ToR
Climate change	<ul style="list-style-type: none"> • A quantifiable estimate of how the project contributes to local GHGs.
Waste and wastewater	<ul style="list-style-type: none"> • A description of how wildlife and people will be affected.
Wildlife	<ul style="list-style-type: none"> • A thorough estimate of the impact to sheep habitat in the project area, particularly the meadow to the south of the proposed gondola upper terminal. • Clarity around mapping of terrestrial species distributions and population densities, many of whom have larger home ranges than the project area. • Analyses should discuss the lower and upper Silvertip corridors separately when quantifying the impact of the various gondola stations. • The ToR speaks to “understanding how increased habitat fragmentation may affect wildlife”, which is currently a data gap. The EIA will need to include data collection that quantifies the baseline functionality of the upper and lower Silvertip corridors from both an infrastructure and human use perspective. • Key biodiversity areas need to be included in the EIA as part of unique sites and special features. • How noise of construction and operation will impact wildlife habitat use and movement, including resident wildlife and migratory birds. • The ToR speaks to species at risk, but common species are also an important part of local biodiversity and need to be included. • Define impacts to migratory birds, particularly raptors, and resident birds.
Bow Valley tourism	<ul style="list-style-type: none"> • Quantification of how the project will increase overall tourism to Canmore and the implications of this increase from ecological, social, and economic perspectives.

Landscape features	<ul style="list-style-type: none"> • Ensure measure of “existing habitat disturbance” includes ALL linear disturbances in the project area, both sanctioned and un-sanctioned trails
Cumulative Effects	<ul style="list-style-type: none"> • The EIA will need to define how cumulative effects from the development and the increased volume of people in an important wildlife corridor will impact overall habitat quality and security for bears, elk, sheep, and migrating birds. • Ensure a full cumulative effects assessment that includes a spatially relevant regional study area and integrates seasonality in the analysis. The cumulative effects assessment should also include noise from construction and project operations, as well as light pollution impacts on wildlife and Canmore residents at night.
Human-wildlife coexistence	<ul style="list-style-type: none"> • The EIA needs to describe how human-wildlife coexistence will be enhanced with this project. This will inherently involve a description of the risks of wildlife habituation to recreationists, the sound and lights of gondola operation, and the potential exposure to attractants (e.g., garbage or other human waste).
Trails	<ul style="list-style-type: none"> • The EIA needs to model the displacement of current recreational activities as well as the potential increase in non-sanctioned trails created when people get off the at the summit gondola station and hike down the steep face of the mountain. • The EIA should quantify how increased human use will impact existing visitor experience on the already popular Lady Mac and Montane traverse trails.

Socio-economic assessment

The ToR is particularly weak in its requirements around public health and safety and socio-economic assessments. There are grave risks with bringing thousands of people to an unpredictable alpine environment. People have died by being blown off Mount Lady MacDonald, some of which were experienced mountain scramblers and hikers. More clarity is required to accurately define the safety risks and the required measures to keep people safe. In addition, the EIA should provide an estimate of the capacity and resources required by Kananaskis Public Safety to conduct rescues on the mountain when visitation increases. The ToR should require that Kananaskis Public Safety are engaged in the development of these recommendations.

Sub-categories that should be included in this broad section include:

- Town of Canmore planning goals and policies
- MD of Bighorn planning goals
- Local communities’ vision of the future and approach to development
- Economic realities, including liability in the event of an accident, the cost of rescue on the town and MD economies, changing in tourism and service availability, added burden to municipal infrastructure and public services
- Impacts to the viewshed and the community identity when people see a gondola from anywhere in town.
- Impacts to community identity and culture

Monitoring

The whole EIA process is set up to quantify potential impacts, provide recommendations for mitigation or avoidance, and then to monitor the effectiveness of those recommendations. The monitoring section of this ToR is disappointing and will not generate the meaningful results required to understand the long-term implications of this development on wildlife, people, or the Bow Valley landscape. There should be an overarching monitoring plan with goals and objectives that guides the development of the monitoring programs. The required monitoring programs should be defined in the ToR and include, but not be limited to, wildlife movement and habitat use, cumulative effects, recreational displacement, recreationists experiences, and economic realities for the Town of Canmore and the MD of Bighorn. Each of these reports should contain defined thresholds and indicators, as well as recommended courses of action if thresholds are violated. All monitoring plans should define the time frame at which data will be collected and used to inform adaptive management practices.

Concluding thoughts

This project should not be permitted within the legislative, ecological, and social realities of this landscape. However, if the project is to proceed, the Terms of Reference for the EIA need to be considerably strengthened and acknowledge the uniqueness of this landscape, the significant development pressure it is already facing, the character of Bow Valley communities, and the diversity of Indigenous groups that have a deep connection to this landscape since time immemorial. Should this project proceed to the NRCB for review, we look forward to providing more extensive comments at that time.

Respectfully,

Katie Morrison

A handwritten signature in cursive script, appearing to read 'Katie Morrison', written in black ink.

CPAWS Southern Alberta
Executive Director

From: alasdair coats [REDACTED]
Sent: June 13, 2022 5:46 PM
To: AEP Environmental Assessment
Subject: Proposed Gondola on Lady MacDonald mountain.

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Dear Sir/Madam,

I am writing to oppose the construction of a Gondola up Lady MacDonald Mountain.

First and foremost, ninety-three per cent of the project footprint is within the Bow Valley Wildland Provincial Park, which does not permit tourism attractions such as a gondola. The current regulations associated with this provincial land designation prioritize non-motorized recreation uses and the preservation and protection of natural areas. So how can we allow a Gondola? Once we start making exceptions, who knows what other developments will follow.

Secondly, a provincial park is for the enjoyment of ALL Canadians, not for any one person or company to plunder for their own personal or corporate gain.

This mountain is a popular hiking trail for thousands of people every year. They hike up it to enjoy the pristine beauty of the mountain. Why should one person or company be allowed to spoil that for their own gain or profit? Especially when it has been especially set aside as a park for posterity.

The route would cross a designated habitat patch and an important wildlife corridor. This would obviously be detrimental to wildlife. Again, why would you allow this, when the wildlife corridor has already been designated for a purpose: to give the wildlife space to move along the valley. Every new development like this is one more nail in the coffin for wildlife.

As for food, beverage and retail outlets, we already have a proliferation of these in the valley bottom. Why on earth would we allow more of these to be built on the top of a mountain. This will absolutely and totally ruin this iconic mountain for all who choose to enjoy it in its natural state.

In the past, I have heard the developer say that, "We need to do justice to these mountains." If he truly wants to do justice to these iconic mountains, then leave them alone, and protect them, just the way they are. They are perfectly beautiful, awesome and magnificent in their own natural setting. Nothing any human can do will improve them. We need to learn to leave nature alone. Every time we interfere with nature, we mess things up.

Please do not allow this development to take place.

Sincerely,

Al Coats. (Presently a resident of Black Diamond, but a past and future resident of Canmore, and an avid hiker and lover of nature.)

From: Glen Crawford [REDACTED]
Sent: June 10, 2022 2:07 PM
To: AEP Environmental Assessment
Cc: Louise Crawford
Subject: Bow Valley gondola proposal

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Attn. Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

We are writing to express our strong disapproval of the proposed gondola on Mt. Lady MacDonald in Canmore. The fact that the large majority of this operation is within Bow Valley Wildland Park should in itself be justification enough to turn it down. The proposed path would traverse a designated habitat patch and an important wildlife corridor in the already wildlife stressed Bow Valley.

In looking at how the process might proceed, the current Terms of Reference, or scope, for the project's Environmental Impact Assessment come from a standardized government template. This generic approach does not address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation and industry.

In addition, the people in this community have spoken out for development plans that prioritize and ensure the health of the mountain landscape. Town planning documents clearly reflect these values of acknowledging and working within the limits of geography and ecological capacity.

Wildlife and mountain landscapes are also a primary reason that visitors come to Canmore and the Rockies. The Tourism Canmore-Kananaskis strategic plan highlights the region as one with a respect for the environment and celebrating an authentic mountain lifestyle. In our view, a gondola would be a serious degradation to all these values.

We urge you to turn down this entire proposal.

Sincerely,

Glen & Louise Crawford

Canmore

From: bruce dalton [REDACTED]
Sent: May 29, 2022 9:11 AM
To: AEP Environmental Assessment
Cc: Lindsay McLaren
Subject: Lady MacDonald gondola proposal

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This is a terrible idea!

The land above the montane traverse trail is closed as a wildlife corridor. Construction of a gondola would mean violating the closure. Even after that the gondola would traverse above the corridor . Animals are very sensitive to things overhead (predators try to attack from above) and will vacate the area.

This is not an amusement park . People of Alberta want to enjoy wildlands in their natural state. It should not be for sale to rich and powerful entrepreneurs.

Please do a thorough environmental assessment and then reject this ridiculous proposal.

Thank you.

Bruce Dalton

[REDACTED]
Calgary, Ab

Sent from my iPhone

From: Brenda Davison [REDACTED]
Sent: June 9, 2022 1:43 PM
To: AEP Environmental Assessment
Subject: Gondola in Canmore

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Dear Director of Environmental Assessment, Regulatory Assurance Alberta Environment and Parks:

Re: Silvertip Gondola in Canmore, Alberta.

We adamantly oppose the development of the Silvertip gondola. Our concerns are two fold.

The first major concern is that the gondola will have a negative impact on the functionality of the wildlife corridor that lies on the northeast slope of the valley. This corridor was established to allow wildlife to traverse the valley from Kananaskis Country to Banff in a safe way. That is, it would provide a quiet route outside the built area of the townsite, allowing both wildlife and humans to coexist without dangerous encounters.

Since it was established, many studies have been undertaken that show the system is working as intended. Many wildlife species are using the corridor to move through the valley.

Imagine though that a gondola crosses the corridor. There will be constant human noise above the animals that extends out for hundreds of metres. This sphere of human influence may convince the animals to change direction and either go down into town which creates conflicts, or turn back altogether making the corridor cease to function. Going higher is not a solution for the animals either, because the gondola runs to the top of the mountain.

Humans, both tourists and locals, have succeeded in occupying and developing almost all of the useable land in the Bow Valley here. We have taken the very best habitat for wildlife, which is the river bottom area. We have taken the second best habitat, which are the benches on the northeast slopes. It would be greedy and inhumane to also now take away the Silvertip corridor from the wildlife, a corridor that so many Canmore citizens have fought to create and preserve for so many years.

We believe that the person who has the title of Director of Environmental Assessment, Regulatory Assurance Alberta Environment and Parks should almost as a requirement of his position be required to advocate for FUNCTIONAL wildlife corridors.

Our second concern is that the gondola will add more pressure on our human population, too. Canmore is already dealing with heavy usage by tourists. Residents who live here are surrounded with traffic, noise, and congestion. No neighbourhood is without a pretty constant flow of tourists. We live here but our neighbourhoods do not belong to us. They are impacted by a pretty constant flow of visitors. Town council and residents have been trying to find solutions for quite a while now. The huge increase in traffic related to the gondola is going to severely affect the people whose homes are on the north east side of the valley. Don't they have a right to enjoy their homes?

Finally, let's consider the real reason that people, both tourists and residents have come to Canmore. Isn't it for the wild, majestic beauty of the mountains here? If the gondola is built, anyone looking east will now see a human blemish smack dab in the middle of Lady MacDonald. Gone the wild peaks, replaced by human structures.

Please reject the development of a gondola onto the public lands above Silvertip.

Yours truly,
Brenda and Paul Davison



Canmore

From: Lisa Downing [REDACTED]
Sent: June 13, 2022 9:55 AM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Proposal-Canmore

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Dear Director of Environmental Assessment, Regulatory Assurance Alberta Environment and Parks:

Re: Silvertip Gondola in Canmore, Alberta.

We adamantly oppose the development of the Silvertip Gondola in Canmore.

This proposal does not bring any benefit to the community, nor the environment. In fact, it would be a huge detriment to both.

Here are our concerns:

1. The gondola would cross a crucial wildlife corridor. The community of Canmore and AB Parks have been working for years to establish this corridor as well as keeping it viable.. To install a gondola would certainly have a huge negative effect on the corridor. It would essentially cut off any travel for wildlife on that side of the valley.
2. Canmore already has more than enough tourists coming to the valley. We are bursting at the seams with people. Adding another 200,000-300,000 visitors to the valley would be the tipping point for not only our municipality and our way of life here, but also for the wildlife.
3. We need to steward what we have now. We need to look at the cumulative impacts of what has already occurred in the valley. This valley cannot sustain more of the same i.e. increased tourism, more expensive houses, less affordability for the average Albertan.
4. The gondola would cross through the Bow Valley Wildland Park. Gondolas are not permitted in the park, therefore this proposal should not be considered at all.

We urge you to reject this proposal full stop and stop wasting our taxpayers money and time in assessing this proposal.

Yours truly,

Lisa Downing and Shanne Leavitt

[REDACTED]
Canmore, AB
T1W 2K2

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From: Myrl Eddy [REDACTED]
Sent: June 11, 2022 6:58 AM
To: AEP Environmental Assessment
Subject: Bow Valley proposal for gondola

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I am writing to Express my objection to the above proposal. It is an invasion that will preclude wild life and opportunity for hiking this natural area in peace and hope for sharing the space with wild life. Those who wish for this type of commercialized gondola activity are able to access it at Sulphur Mountain. We see what that area (Sulphur Mtn) has become and do not want this in the Bow Valley area. Thank you for reconsidering this plan.
Myrl Eddy
Calgary

From: Sue Falkner-March [REDACTED]
Sent: June 9, 2022 5:21 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola proposal- Public Engagement Process

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To the Director, Environmental Assurance, Regulatory Assurance-Alberta Environment and Parks;

My husband and I have lived in Canmore for 47 years. We have seen many changes to our mountain town in those years, as you can well imagine!

We feel it is important to voice our concern about the latest tourism proposal that has come forward for your approval: the Silvertip Gondola proposal.

We strongly disagree with the idea of a Gondola in Canmore for several reasons.

Our first and most important reason is the negative impact such a proposal will have on wildlife. Wildlife in this valley already have to navigate numerous developments, multiple trail users etc. Canmore has become a bottleneck to wildlife's ability to traverse through this valley. They sure don't need another tourist attraction that will impact a major wildlife corridor and a habitat patch.

Our second reason is the personal impact this gondola will have on our quality of life. We live in a condominium in the Silvertip neighbourhood. The proposed route for the gondola will impact us with the noise from the gondola and most certainly traffic congestion at the road out of our neighbourhood, that we must navigate to go anywhere in Canmore. The area they are proposing for the Gondola parking lot is located near a road that brings people in to town from the highway. It will be very congested if this goes ahead. It is also a road that our new Fire Hall is being constructed on.... So our precious wildlife and local resident's quality of life are the 2 big concerns for us.

In our opinion and many other local resident's opinions, Canmore is at a saturation point for tourism. Our quality of life has been impacted in many negative ways due to the overwhelming number of visitors we have. Downtown belongs to the visitors. Local residents "grit their teeth" when we need to go to the grocery store or bank and wade through the crowds. We often cannot use our dog parks and local lake in the summer because there is no room to park. Getting from point A to B in Canmore has become a trial in patience, on all weekends and during the summer, because of gridlock created by the sheer number of visitors...and the list goes on.

Yes, tourism has brought much needed economic stability to Canmore but there is such a thing as enough!! We do not need a Gondola that is estimated to "attract" 300,000 visitors per year.

There are already Gondolas at Sulphur Mountain and Sunshine Ski resort that visitors can take to see this area from the top of a mountain- do we need to impact wildlife and residents with yet another one?? We have not heard one local resident speak out in favour of this proposal.

As a community we value our wildlife and want to protect them through these turbulent times of climate change and Bow Valley pressure from human use.

As a community we are tolerant of the need to have tourism but please help us maintain some quality of life for the local population. Please do not approve a proposal that will take us well past our saturation point.

As we see it, the only positive outcome will be for the developers pocket book. That is not a good enough reason to approve this proposal.

Thank you for your time and consideration, Sue Falkner-March and Gord March

Sent from my iPhone

From: Keith Ferguson [REDACTED]
Sent: June 10, 2022 2:08 PM
To: AEP Environmental Assessment; Keith Ferguson
Subject: Stone Creek Resorts' proposed Silvertip Gondola Project in Canmore - Terms of Reference

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Attn: Director, Environmental Assessment, Regulatory Assurance, Alberta Environment and Parks,
environmental.assessment@gov.ab.ca

Re: Stone Creek Resorts Inc. proposed Silvertip Gondola Project in Canmore

Date: 10 June 2022

Dear Director,

Please find below my recommended edits and additions to the Proposed Terms of Reference for the Environmental Impact Assessment Report for Stone Creek Resorts Inc. proposed Silvertip Gondola Project (<https://silvertipgondola.com/wp-content/uploads/pTOR-Silvertip-Gondola-Final-April-20-2022.pdf>).

I am a local full-time resident in the area and will be directly and adversely affected by this proposed Project.

Thank you,

Keith Ferguson

Canmore, AB

2 PROJECT DESCRIPTION

2.1 Overview

With regard to [D] construction schedule, add: Describe the times during the day, and the days of the week, during which construction will take place.

Add: Describe the times of operation of each part of the Project (including hours per day, which days each week, and how much of the year).

Add: Describe the equipment and vehicles to be used during construction and during operations (including helicopter use and frequency), any temporary access routes, location and sizes of visitor parking, and estimated number of visitors and associated vehicles.

2.2 Constraints

Add: Describe and map each protected or restricted area potentially affected by the Project (including the provincial park and the upper and lower wildlife corridors in the Silvertip area).

3 ENVIRONMENTAL ASSESSMENT

3.1 Air Quality and Noise

Edit title to read: 3.1 Air Quality, Noise, Light and View-scape

3.1.1 Baseline Information

Edit [A]: to read "... by construction noise and vibration or dust, or by lights or changes to the view, from construction or operation"

3.1.2 Impact Assessment

Add: Describe potential effects on local residents of changes to the view-scape (e.g., Project infrastructure affecting enjoyment of the natural forest view and natural beauty of the mountain), and of Project-related lights (including lights in and around the proposed facilities at mountaintop, flash photography by visitors, and lights on gondola towers visible during darker hours), during construction and during operations.

3.5 Vegetation

3.5.2 Impact Assessment

Add: Describe and map the location and number of trees that will be removed or modified, during construction and during operations.

3.6 Wildlife

3.6.2 Impact Assessment

Add: Describe the importance of, and overview past studies on, the use of this part of the Bow Valley for various wildlife species in terms of habitat and movement, including a map showing the relevance of the valley in terms of regional wildlife corridors.

Edit [B]: add “and species of local concern (including mule deer, elk, black bear, grizzly bear, cougar and bighorn sheep)” after “on key indicator species”

Add: Analyze the potential for increased numbers of people entering the local protected or restricted areas for wildlife (including the provincial park and upper and lower wildlife corridors) as a result of the Project (e.g., one-way hikers using the gondola seeking a direct route between one gondola station and another), and the potential effect of that on the effectiveness of these areas for their intended purposes.

Add: Describe the cumulative effects (i.e., the effects of the Project in combination with the effects of other past, present and reasonably foreseeable future projects and activities) in the montane, subalpine and alpine areas in terms of habitat, disturbance, and connectivity for wildlife. Include a sequence of maps for the relevant part of the Bow Valley, covering recent past decades and the future, to aid in visualizing these cumulative effects over time – include past and reasonably foreseeable developments, appropriate zones of influence around developments, and indicate the portion of the valley effective for wildlife habitat and movement for various species (taking, for example, mountain slopes into account).

Edit [C](a): add ‘municipal’ so that it reads: consistency of the plan with applicable regional, provincial, federal and municipal wildlife habitat objectives and policies.

3.8 Land Use and Management

3.8.1 Baseline Information

Add: A description of existing protected and restricted areas potentially affected by the Project (including the provincial park and the upper and lower wildlife corridors in the Silvertip area), including: the background, intent, and restrictions in place for each such area; the purpose of such restrictions; and the efforts that local residents, the town of Canmore, and others have made towards the effectiveness of these areas in meeting their intended purposes.

3.8.2 Impact Assessment

Add: Describe and assess the potential effects of the Project on each of the protected and restricted areas, including potential effects of additional visitor traffic passing through, and of additional people entering, such areas; the current restrictions that would need to be changed to allow the Project to go ahead; and the potential impact that such lifting of restrictions for a commercial project such as the Project might have on the public’s future trust in, and compliance with, remaining restrictions.

7 SOCIO-ECONOMIC ASSESSMENT

7.2 Impact Assessment

Add: potential effects on local trail use and enjoyment (including effects on trail users' enjoyment of unspoiled nature), and of additional Project-related traffic on local residents.

From: Mitchel Flynn [REDACTED]
Sent: June 10, 2022 11:01 AM
To: AEP Environmental Assessment
Subject: Proposed Canmore Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Please take a very, very careful/thorough review of the new proposed gondola in Canmore. This is such an environmentally sensitive area and is already seeing a ton of pressure from increasing human development/use. Given the current state of the environment, this is hardly the time to be doing more damage to one of the world's most beautiful natural places.

Thank you for your consideration,

Mitchel Flynn

From: Gloria Folden [REDACTED]
Sent: June 11, 2022 1:38 PM
To: AEP Environmental Assessment
Subject: Gondola in Canmore and Banff

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Please...too many people already in the mountains already. Please promote tourism in the rest of Alberta and divert it away from the mountains.

How about a bike path between Edmonton and Calgary winding through all the villages and towns with Rodeos, theatres, quaint hotels and restaurants.

“If you build it they will come” - great tourist attraction and a way to spread much coveted tourist dollars to other parts of the province. Overseas tourists would fly into one city and out of another -open-jaw fares.

NO TO GONDOLAS - OUR ANIMALS WILD ARE ALREADY THREATENED.

Sincerely,

Gloria Folden
[REDACTED]
Canmore, AB T1W 2L7

From: ANNE FOLTZ [REDACTED]
Sent: June 10, 2022 1:56 PM
To: AEP Environmental Assessment
Subject: Mt. Lady Macdonald

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I wish to express my opposition to the plan to build a gondola to the top of Mt. Lady McDonald in Canmore. This is an important area for wildlife and must be protected. This development has been proposed previously and shelved. Now is the time to shelve it permanently.

Anne Foltz
Calgary

Sent from my iPhone

From: Jennifer Gagné [REDACTED]
Sent: June 3, 2022 9:02 PM
To: AEP Environmental Assessment
Subject: Public feedback on the Silvertip Gondola

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Hello,

I would like to provide feedback on the proposed gondola at Silvertip in Canmore during this initial engagement on the Terms of Reference for the preparation of the Environmental Impact Assessment is currently underway, which will be closed as of June 13, 2022. (<https://silvertipgondola.com/>)

Feedback:

- There is obviously something missing from this proposal. What is being put at the summit of the gondola? What is winter-usage? Regardless of whether the summit is going to be a simple off-station with trails, or a full-blown casino, washroom facilities, at a minimum, will be required to mitigate the impact on the environment. More information is required before true public input can be provided.
- I live in Canmore. A gondola is not required in this community. It is not required to reduce vehicle transport - there are already amazing bike and walking trails between Silvertip and the Palliser.
- The top of the Sulphur Mountain gondola in Banff looks like a lit UFO at night. We do NOT need this in Canmore. Canmore is beautiful as is. Again - there is clearly long-term planning information missing from this proposal and it should be revised before true public opinion can be gathered.
- With the approval of Three Sisters Mountain Village, there will already be a HUGE disruption to wildlife in the valley, beyond what there already is. A gondola is not required to add to the disruption throughout this pinch point in the valley. There are multiple gondolas readily available for summer and winter use throughout the valley. Another is not required.

Thank you,

Jennifer Gagné

From: Heather Gibb [REDACTED]
Sent: May 9, 2022 12:23 PM
To: AEP Environmental Assessment
Subject: Stone Creek Resorts Silvertip Gondola project proposal

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

This email is to register my strong opposition to Stone Creek's proposed Silvertip gondola project. It is an unnecessary tourist gimmick that offers no benefit to the Town of Canmore or the Bow Valley. The proposed environmental impact assessment has many weaknesses and gaps, as follows:

1. Numerous recent studies have documented the rapid and serious deterioration in wildlife corridors in the Bow Valley. The proposed project will exacerbate this. The project will affect cougars, bears, ungulates (elk and deer), as well as the Rocky Mountain bighorn sheep that frequent the east side of Mount Lady MacDonald. Increased human traffic will deteriorate the very fragile physical environment at the proposed site.
2. The project proposes to create "an accessible Rocky Mountain alpine experience". The quality of alpine experience in that location is moot. In addition, there already exist opportunities in the Bow Valley for far more attractive, accessible experiences (Sunshine, Sulphur Mountain, Lake Louise). This project will simply create more noise, more crowding, and more degradation to the limited remaining wild lands.
3. Noise - this affects residents as well as wildlife. The proponent provides no information on the kind of motor the gondola will use, or noise levels. Sound travels very well from Mount Lady MacDonald to adjacent residential areas. The project proponent indicates a ridership of approximately 227,500 a year - aside from garbage, there will be substantial increase in noise affecting both wildlife and nearby human residents.
4. The proponent fails to address the cumulative impact of this project on wildlife already stressed by the considerable disturbance in the adjacent area resulting from Stone Creek's current round of construction (housing, and hotel construction in what was a wildlife corridor).
5. Waste - the proponent expects the Town of Canmore (ie: local taxpayers) to manage waste disposal (sanitary waste, various solid waste, and kitchen oil and grease during operation) generated at an inaccessible site. It makes no mention of how it will control garbage generated by 227,500 visitors a year in a fragile environment.
6. The impact assessment should include a detailed assessment of the impacts on local residents (a 2015 "pre-consultation" with residents revealed very strong opposition to a gondola), particularly in terms of noise, and a dramatic increase in traffic congestion at the base of the gondola. The access road in question, Palliser Trail, is a 2-lane road with a narrow feed to the TransCanada Highway. The area features several high density housing developments.
7. The impact assessment does not include a detailed wildlife inventory nor a study of how movement of wildlife will be affected. There is no indication of consultation with local Search and Rescue officials, who already perform an ever increasing number of rescues of ill-prepared hikers and climbers in the area. There is no assessment of the likely increase in risk of fires caused by the 277,500 anticipated visitors (smokers, for example) - the area is bone dry in summer.

Thank you for your consideration.

Heather Gibb



Canmore

From: Gian-Duri Giger [REDACTED]
Sent: June 9, 2022 5:42 PM
To: AEP Environmental Assessment
Subject: Gondola up to Lady Mac.

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Attention: Director Environmental Assessment, Regulatory Assurance, AB Environment and Parks

my 30 year Canmore resident's comment in response to this gondola proposal : Enough is Enough- do not " develop " our valley to death- PLEASE..

Gian-Duri Giger

From: Anthony Harckham [REDACTED]
Sent: June 12, 2022 12:12 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola EIA process

Expires: July 2, 2022 12:00 AM

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[REDACTED]
Canmore
AB T1W 1G3

12th June 2022

The Director
Environmental Assessment
Operations Division
Alberta Environment and Parks
2nd Floor, Petroleum Plaza, South Tower
9915 – 108 Street,
Edmonton
AB T5K 2G8

With respect to the Environmental Impact assessment for the proposed Silvertip Gondola

Dear Sir

This proposal would impact the Wildland Park in an area close to the Cougar Creek Debris retention structure which is still incomplete 10 years after the damage caused by the 2012 flood. This was subject to an Environmental Impact Assessment which concluded the work could go ahead. However the impact of this work has been far greater than that anticipated.

Its human impact has been much more prolonged with closures not only on the Lady MacDonald trail but also for the whole Cougar Creek watershed. The estimated work was not what is still being implemented and a number of changes to the plan are still arising so that completion is still tentatively a year away.

The animal impact has been very evident. This Spring there has been no evidence on the Grotto trails that I have seen for Bear activity, and there was minimal cougar activity in the past winter. Coyotes attempted to come back this spring after a brief cessation of work over the past winter. A few elk have been around on the lower slopes but mule deer and whitetail have been conspicuously absent.

This I believe had far more impact on the animals than was ever anticipated and I think the environmental impact of such work on animals has to be far more closely investigated than was done for the Cougar Creek work. There must be a major body of data available from monitoring in the past 5 years.

I believe that with all the development within the Bow valley we have significant possibilities of this area becoming an animal desert. The idea of the Wildland Parks as I understand it was to provide a resource which would be relatively lightly used and without trails or camping areas. A commercial development has no place in that context and with all the pressures we face, animals and humans, this change of purpose to an important asset should not be allowed to proceed, or what do we understand for the purpose of land allocations if they can be so diametrically opposed at will.

Yours sincerely

[REDACTED]
— Anthony E Harckham

Anthony Harckham



From: Jess Harding [REDACTED]
Sent: June 13, 2022 10:49 AM
To: AEP Environmental Assessment
Subject: I urge you to to ensure the environmental assessment for a proposed gondola in Canmore is done right the first time around.

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Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

RE: Environmental Assessment for proposed Silver Tip / Lady MacDonald gondola

I urge you to ensure the environmental assessment for a proposed gondola in Canmore is done right the first time around, for nature, and for current and future generations of Albertans.

I, like many Albertans, deeply value having a serene nature to escape to, and amazing recreation opportunities. The Bow Valley is a truly wonderful place with unique offerings which we value both for ourselves and for generations to come. As stewards for these natural spaces, let's make every effort to protect the landscapes that provide habitat and safe travel for wildlife, especially as they adapt to the impacts of a changing climate.

Let's ensure the Treaty 7 First Nations are provided the opportunity to engage throughout the process; that the cumulative impact of existing and future development plans and community standards are reflected in the assessment; that it makes use of the latest peer-reviewed science regarding wildlife corridors; and of course that it clearly defines how the project meets current laws, regional plans, strategies, and other guidelines.

This is a tall order, and is necessary to ensure the environmental assessment for a proposed gondola in Canmore is done right the first time around.

Jess Harding
Banff

From: Barbara Hardt [REDACTED]
Sent: June 10, 2022 11:02 AM
To: AEP Environmental Assessment
Subject: Lady MacDonald proposed gondola

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Dear Sir or Madam:

It looks as if you are proposing a human zoo in the Bow Valley corridor, where wild life is already being hemmed in by development. The structure would intrude on land designates as wildlife reserve. It would involve motorized structures and contribute to global warming. Tourists already have a gondola a few miles away at Sulfur Mountain, so even from a money-making point of view it does not make sense.

Please do not further damage the Bow Valley desecration. It is precious to the world in its wildest state.

Barbara Hardt

Sent from my iPhone

From: Jacob H [REDACTED]
Sent: June 13, 2022 9:25 AM
To: AEP Environmental Assessment
Subject: Re: Submission regarding draft EIA for Silvertip Gondola Project, Stone Creek Resorts
Attachments: Final version - Proposed Silvertip Gondola Project, Stone Creek Resorts, draft EIA (220613).pdf

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Good morning, I cleaned up my submission regarding the proponent's draft EIA for the Silvertip Gondola Project.

Please find the final version attached.

Please use this one (not the previous one from last night).

Thank you, Jacob Herrero

On Sun, 12 Jun 2022 at 21:30, Jacob H [REDACTED] wrote:

To whom it may concern:

My submission regarding the draft EIA is attached as a PDF.

I devoted considerable time this Sunday evening, as a concerned citizen, to prepare it.

I feel this is an important issue.

Please let me know if you have any questions.

Thank you,
Jacob Herrero

Attention: Director, Environmental Assessment, Regulatory Assurance, Alberta Environment and Parks
environmental.assessment@gov.ab.ca

Re: **Proposed Silvertip Gondola Project, Stone Creek Resorts, draft EIA**

Date: June 13, 2022

From: Jacob Herrero, MEDes., [REDACTED] Canmore, Alberta

To whom it may concern:

My roots in Bow Valley go back to the late 1960's. I estimate I've been up Lady MacDonald (and beyond) over a hundred times.

I am deeply disappointed that Alberta Environment and Parks is considering a proposal for a gondola up Lady Mac. I could find nothing in the Bow Valley Protected Areas Management Plan that supports such development.

Further Alberta Parks legislation and regulations don't support it.

"Wildland provincial parks are large, undeveloped natural landscapes that retain their primeval character."

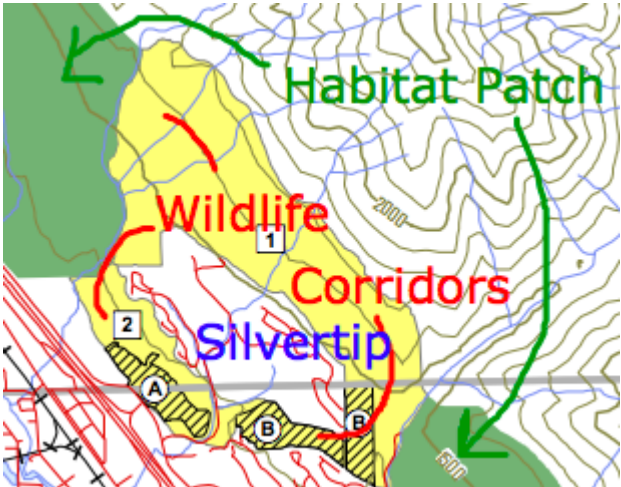
<https://www.albertaparks.ca/albertaparksca/management-land-use/legislation-regulations/>

Moreover, removing parts of Bow Valley Wildland Park, including a locally rare SE facing bighorn grazing meadow (there are only two of these on Lady Mac), to accommodate a gondola and its related infrastructure is morally reprehensible.

My expectation is that Alberta Environment and Parks works in accordance with the existing management plan and legislation and regulations, not look for loopholes for the benefit of a private commercial interest that weakens Alberta Parks.

I am also deeply disappointed with the proponent's extremely light-weight draft EIA. There are many flaws with the draft EIA but I will restrict my comments to a few areas.

Cumulative effects	<p>This needs a separate, standalone section in the EIA</p> <p>Cumulative impacts is the existential and core challenge for the Bow Valley and Canmore area. A comprehensive cumulative impact assessment must be done.</p> <p>A comprehensive environmental review has never been done for Silvertip, only narrowly-focussed wildlife (ungulate) studies, most over 25 years old; no proper third-party review has been done. Golf fairways were designated as wildlife corridors. This would be scientifically unacceptable today. Also, the project assessed 30 years ago is very different than what Silvertip now proposes.</p> <p>The Alberta Government stated in 1992 that "Phase 2" of Silvertip would "undoubtedly result" in a review by the NRCB (see bottom of this document), confirming the need for a NRCB or equivalent comprehensive environmental review.</p>
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	<p>1992 hansard excerpts about Silvertip (aka CADCO). Particularly, MLA Evans stating:</p> <p>"Only phase I of the project...has been approved..."</p> <p>"The balance of the project process will undoubtedly result in a review by the NRCB. The developer is well aware of that."</p> <p>http://www.assembly.ab.ca/ISYS/LADDAR_files%5Cdocs%5Chansards%5Chan%5Clegislature_22%5Csession_4%5C19920604_2000_01_han.pdf</p> <p>The cumulative effects of the gondola and its related infrastructure, and the existing and proposed Silvertip development, all in concert (ie., combined) with other existing and proposed developments in the Canmore region should be assessed in a comprehensive, cumulative manner.</p>
<p>Wildlife corridor effects</p>	<p>This needs a separate, standalone section in the EIA</p> <p>The gondola would cross a key provincially-designated wildlife corridor where human use is currently strictly prohibited.</p> 
<p>Recreation impact assessment</p>	<p>This needs a separate, standalone section in the EIA</p> <p>As one of the top three most popular hiking peaks in Kananaskis Country (Haling, Yamnuska, Lady Mac) there needs to be a standalone section of the EIA focussing on "recreation impact assessment", where impacts to existing, historical use (ie., the very popular trail up Lady Mac) is considered in both a qualitative and quantitative manner. Such existing non-motorized, recreational use is fully compatible with the Bow Valley Wildland Park management plan and Wildland Parks policy, unlike the proposed gondola, gift shop, restaurant, rope way, etc.</p> <p>The Lady MacDonald trail is one of the most popular trails in the Canmore area with a long history of use by hikers and other recreationalists. The site is one of only two designated paragliding / parasailing sites in Canmore.</p>
<p>Visual impact assessment</p>	<p>This needs a separate, standalone section in the EIA</p> <p>The gondola will dramatically alter the currently pristine mountain top vistas surrounding Canmore. Daytime and night time (ie., lights) visual impacts need to be modelled and assessed, from various viewpoints in Canmore and the surrounding area, including nearby trails and summits (eg., Haling) and the Canmore townsite, at various hours and seasons.</p>

Noise impact assessment	<p>This needs a separate, standalone section in the EIA</p> <p>Helicopter noise impacts - Many hundreds, perhaps thousands of trips by loud helicopters will be necessary to construct the towers, and the gondola terminus infrastructure (lodge, gift shops, restaurants, etc).</p> <p>Blasting - Lots of blasting will be necessary for gondola tower construction and the gondola terminus infrastructure. How will hikers and climbers transit the construction site through the lengthy construction phase? What about the effects on the local Bighorn herd? (more on this below)</p> <hr/> <p>Gondola noise The new gondola in Squamish, BC, can be heard from about 1 km away (pers comm B. Milko). Elsewhere in the world residents have been affected by gondola noise.</p> <p>Noise from the gondola operation will impact both residents and trail users. Noise impacts should be assessed in a quantitative manner.</p> <p>Clearly, the gondola is motorized and as such conflicts with the management intent of the surrounding Bow Valley Wildland Park.</p> <p>Bow Valley Protected Areas Management Plan regarding Motorized use (ie., gondola) states:</p> <p>Motorized recreation (ie., gondola) is contrary to the Bow Valley Protected Areas Management Plan</p> <p>4.0 Management intent and objectives (p 17) “Outdoor Recreation: to maintain or enhance opportunities for non-motorized recreational uses such as hiking, equestrian use, mountain biking, hunting and backcountry camping.”</p> <p>6.3 Outdoor Recreation (p 21) “The provision of a wide range of non-motorized outdoor recreation opportunities is an important management objective within the Wildland Park.” https://www.albertaparks.ca/media/123493/bowvalleymanagementplan.pdf</p>
Public safety concerns	<p>The gondola gives access to a high alpine environment. Users may or may not be prepared for dynamic conditions beyond the gondola terminus area. What additional demands will this place on search and rescue? This is missing from the proponent’s draft EIA. The climb up to the summit of Lady Mac is not easy, and it is much more risky than either Ha Ling or Yamnuska.</p>
Financial risk to the public	<p>The early 1990s commercial scheme to build a teahouse on Lady MacDonald went bankrupt and taxpayers ended up paying to remove the large concrete foundation and dilapidated structure. It is at this location where the gondola terminus with restaurant, etc. is proposed. How would Alberta taxpayers be protected from similar project-related and financial risks?</p>
Water and sewage	<p>Assess how this will be managed. It is not technically easy to do in high Alpine environments. What about the considerable associated infrastructure? These aspects should be assessed in detail.</p>

Impact on local Bighorn sheep herd; impact on Wildland Park values

This issue needs very careful study in the EIA. Silvertip proposes removing the bighorn meadow located just below the gondola terminus from the Bow Valley Wildland Park and including it in their leasehold. This is both ill considered and wrong.

Based on my field observations over many decades, the open, south-east facing grassy area immediately below the old teahouse site on Lady MacDonald, and the area around it, including travel routes to it, constitute important habitat to the bighorn sheep that use that area as part of their home range (I will refer to this area as the “teahouse meadow”). Bighorn tend to have comparatively small home range sizes: as small as 0.8 km² in mid-winter or as large as 5.9 km² in spring and fall (Geist 1971).

Mid and upper elevation open grassy slopes on Lady MacDonald are scarce. There are only two significant ones. I’ve marked both on the photo below in red. Such open grassy areas host desirable and nutritionally important seasonal forage (e.g., fescue), primarily in spring/summer but also winter, providing snow accumulation is modest. During their brief growing season, alpine plants have a high nutrient content due to their rapid growth and compressed phenological stages; this presents a nutritional opportunity for bighorn as suggested by several authors (Klein, 1965, 1970; Hebert, 1973; Oosenbrug and Theberge, 1980; Hamr, 1984).



As mentioned earlier, my roots in Bow Valley go back to the late 1960’s, and I estimate I’ve been up to the teahouse area (and beyond) over a hundred times. As an environmental scientist I keenly observe the environment around me, as I hike. I frequently use the normal trail up Lady MacDonald but I also use three alternative routes. Over the last five decades on many occasions I have observed bighorn in and around the “teahouse meadow”. In the “teahouse meadow” the bighorn typically graze (that’s where the good food is!). Overall, I have observed bighorn sheep more frequently here than at any other location along the several routes I use on Lady MacDonald (I have also spent many days exploring the seldom-visited backside (northside) of Lady MacDonald, following sheep trails---I have a good, “on the ground”, empirical

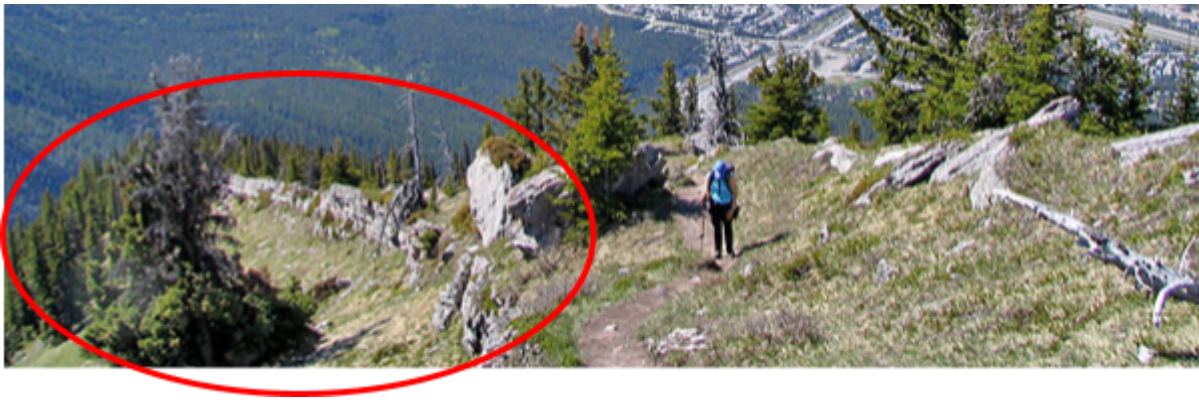
understanding of sheep habitat on Lady MacDonald). Further, when I lived in Cougar Creek I had a spotting scope in my house with which I watched bighorn on the Canmore-side of Lady MacDonald, especially in winter.



The bighorn also use the relatively open spruce forest in and around the "teahouse meadow" area (see below)..

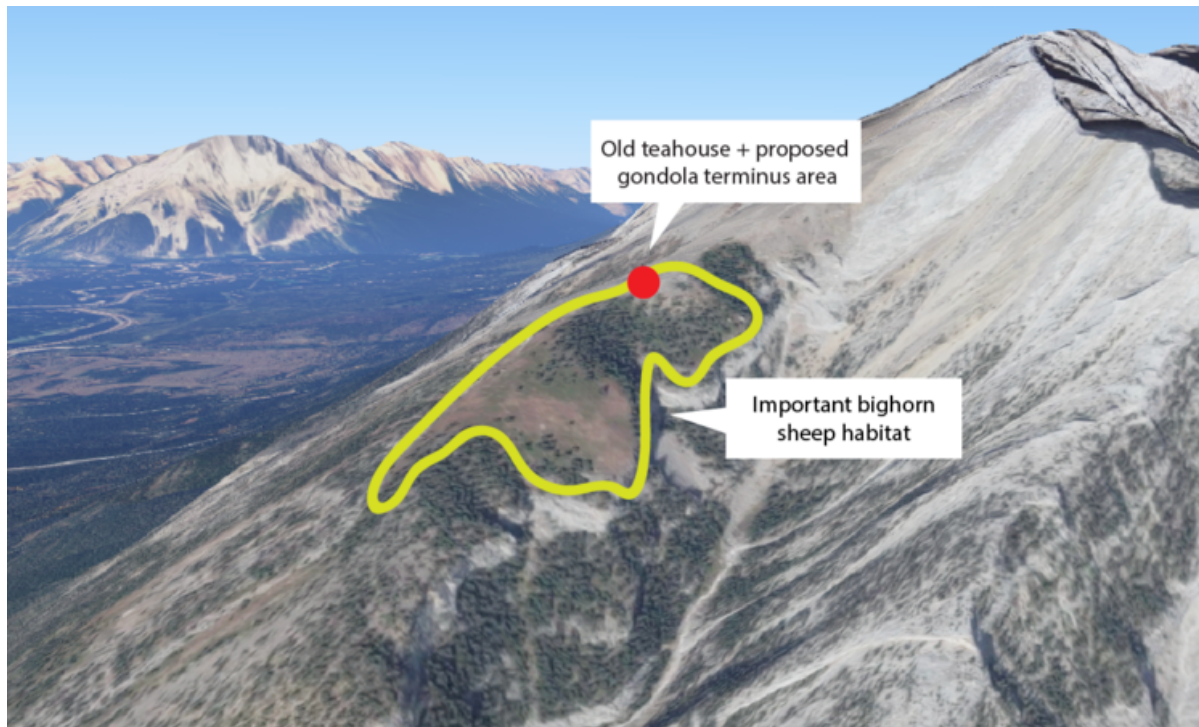


It is also important to note that the "teahouse meadow" area is very well protected from the strong winds that often sweep the southwest-facing side (ie., Canmore side) of Lady MacDonald. In contrast, in and around the "teahouse meadow" the bighorn find a very sheltered environment. Such sheltered areas are critical during storm events. The photo below shows a portion of the well-sheltered area, particularly below the limestone escarpment.



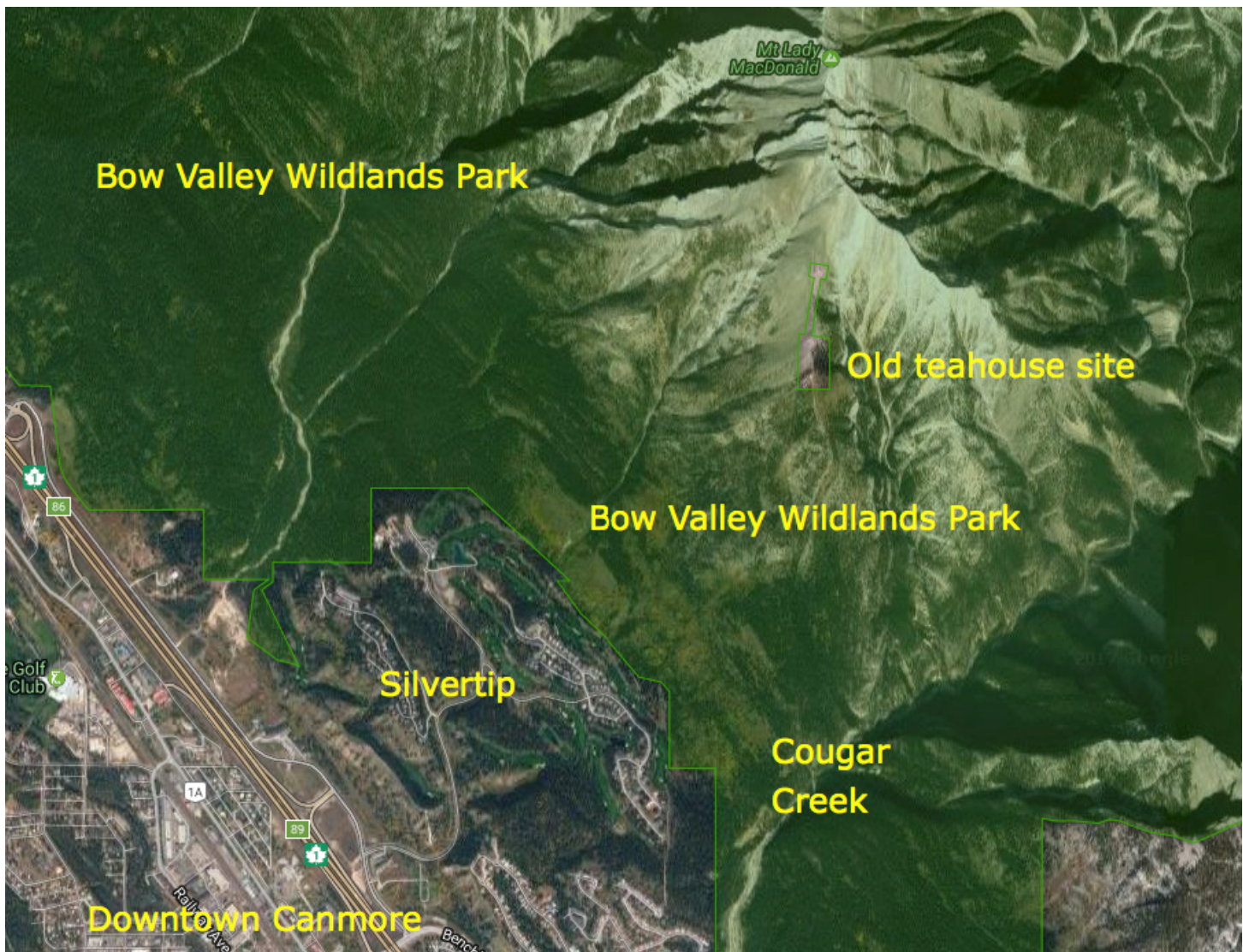
Whereas it might be the case that the “teahouse meadow” area is not regionally important bighorn sheep habitat (ie., it is not important to the overall health and survival of the aggregate bighorn sheep population in the Banff-Canmore-Kananaskis region), based on my observation over many decades it is important habitat to the bighorn sheep that use the “teahouse meadow” as part of their home range. Further, as mentioned earlier, open grassy slopes such as the “teahouse meadow” are rare on Lady MacDonald.

While a large number of non-structured field observations by a well-informed and knowledgeable local scientist, over many decades, does not paint the full picture, they should not be discounted. **At minimum, such observations highlight the need for systematic and rigorous year-round field studies, including radio collaring, before any decision-making occurs.**



Typical management actions to protect bighorn habitat include (Demarchi 2004):

- Minimize recreational activities in important bighorn sheep habitat, particularly between April and July and between October and November.
- Maintain appropriate forage species.
- Prevent or minimize disturbance.
- Maintain use and access to movement corridors and important habitats.



BOW VALLEY PROTECTED AREAS MANAGEMENT PLAN (2002)

<https://www.albertaparks.ca/media/123493/bowvalleymanagementplan.pdf>

4.0 MANAGEMENT INTENT AND OBJECTIVES

Management Intent

The **management intent** for the Bow Valley Wildland Park is:

"To preserve and protect natural and cultural heritage, while providing opportunities for outdoor recreation and experiencing nature in an undisturbed state".

Objectives

The **management objectives** for Bow Valley Wildland Park in order of priority are:

- #1 **Preservation:** to preserve or enhance subalpine, alpine, montane, riparian and aquatic habitats and linkages and ensure natural ecological processes and cultural resources are maintained.
- #2 **Heritage Appreciation:** to provide opportunities for visitors to experience, understand and appreciate the natural and historical resources of the Wildland Park. ★
- #3 **Outdoor Recreation:** to maintain or enhance opportunities for non-motorized recreational uses such as hiking, equestrian use, mountain biking, hunting and backcountry camping
- #4 **Heritage Tourism:** to provide opportunities for low-impact tourism so visitors may experience and enjoy the natural features of the park

From: Stephen Matthew Herrero [REDACTED]
Sent: June 13, 2022 4:12 PM
To: AEP Environmental Assessment
Subject: Mount Lady MacDonald Gondola EIA

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

TO: Director, Environmental Assessment, Regulatory Assurance Alberta Environment and Parks

Dear Team,

I write to ensure that you recognize that this issue is extremely important.

This location is critical wildlife habitat. A very thorough EIA / Environmental Impact Assessment, is absolutely essential.

Sincerely,

Stephen Herrero

From: [REDACTED]
Sent: June 14, 2022 12:00 AM
To: AEP Environmental Assessment
Subject: Silvertip Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Corinne Kristensen
Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

Ms. Kristensen,

I understand that this evening at midnight is the deadline for receipt of public input on the proposed terms of reference of the Environmental Impact Assessment report for Stone Creek Resorts' suggested Silvertip Gondola Project. I have read the report dated April 20, 2022. I wish to definitively state that this project must have a thorough and complete EIA independent of any done by the developer. At even a cursory conceptual level, if the construction of any project that is to require...

- a. Removing an area of trees at least 50 metres wide and 3,000 metres long over an elevation gain of 1,000 metres
- b. Crossing an active and essential wildlife corridor
- c. Passing through a Provincial Wildland Park
- d. Spanning multiple vegetation zones and
- e. Ending in a highly sensitive and fragile alpine ecosystem on the eastern slopes of the Canadian Rockies...

...it must be approached with the greatest degree of care and attention. Although the developer has stated that a proper EIA is "not mandatory" and indeed the government's categorizations may not include such a proposed idea, in my view and that of many other stakeholders in the Bow Valley and beyond, the scale, scope and environmental impact of this project demands it.

Therefore, to prudently meet the needs of the natural and human communities, landscape and ecosystems of the Bow Valley, as well as its millions of annual visitors and priceless global image and reputation, the EIA for the proposed gondola should:

1. Demonstrate how the project would be compliant with all rules and regulations for residential and commercial development and operations in a Provincial Wildland Park, The Town of Canmore, The MD of Bighorn and on the applicable public lands, as well as adherence to all applicable municipal, provincial and national legislation to include but not necessarily be limited to the South Saskatchewan Regional Plan, the Alberta Land Stewardship Act, the EPEA and all those relevant under the purview of the NRCB.
2. Evaluate the environmental impact of the removal of an area of thousands of trees (as stated above) 50 or more metres wide and 3,000m long over an elevation gain of 1,000 metres through multiple vegetation zones on all affected flora, fauna, herpetofauna, entomology, mycology, soil, surface and subsurface organisms and microorganisms, hydrology and drainage, as well as existing geological and hydrogeological formations to a depth of at least 150 metres to assure sufficient stability of the underlying inclined layers of limestone, shale, etc., as well as the preservation from contamination of any groundwater or natural water sources and courses affected beneath the wide and lengthy proposed path of the project.
3. Determine if a day lodge, trail network, viewing platforms, suspension bridge and any other project elements whether proposed or to be added at a later date, complete with proper solid and liquid human waste disposal

and litter management/removal/recycling at an altitude of 2,280m (where the former teahouse was located) and above are even environmentally feasible without creating permanent and irreparable damage to the landscape and all its inhabitants, human and wild in all forms.

4. Evaluate the cumulative environmental effects of thousands of visitors each year to a currently pristine and exceptionally delicate alpine environment, the proper containment of their movements and sufficient enforcement to assure environmental protection and conservation for years to come.
5. Consult Parks Canada and the operators of the Banff Gondola to determine environmental lessons learned and prices paid in the planning, constructing, operating and recent upgrading of Brewster/Pursuit's facilities and supporting infrastructure.
6. Assess the safety of all visitors and wildlife from the base station terminal through the mid-station, upper terminal and beyond, particularly to human slips, falls and other incidents on exposed rock surfaces, precipices and challenging navigational terrain and the impact of emergency helicopter and other forms of urgent rescue on the environment in terms of cost, noise, air and water pollution and distress to wildlife.
7. Assure substantial indigenous and non-indigenous consultation and engagement that ensures that the results of such consultation are taken seriously and that if deemed to be environmentally significant, result in real changes that substantially reduce or prevent damaging environmental effects.
8. Determine the acceptability of the project to local residents of the entire Bow Valley, not just those of the Town of Canmore.
9. Provide a detailed construction, conservation, protection and reclamation plan associated with the project that must be accepted by at least 51% of the residents of the town of Canmore as determined through a minimum of three public hearings and one plebiscite binding and enforceable to and on the developer and the Town.
10. Determine the impact of the project on all waterbodies and watercourses, whether surface or subsurface to a depth of at least 150 metres, including any adverse hydrological changes that could result from the project. These include changes in water quality that may exceed the *Surface Water Quality Guidelines for Use in Alberta* and the *Canadian Water Quality Guidelines for the Protection of Aquatic Life*, as well as any other relevant municipal, regional, provincial or national benchmark measures in place before, during or for a period of at least five years after project completion.
11. Provide more clarity around human and wildlife safety requirements throughout the entire 3 km length of the project from base to the upper terminal and surrounding area to a distance of 5 kms in all directions, including above to the actual summit of Mt. Lady MacDonald at 2,606m.
12. Be substantiated by recent and solid science that clearly quantifies historic, present and future effects of development on wildlife movement and of the project as a whole.
13. Determine the ongoing effects of the current climate emergency and calculate the quantity and effects of the GHG emissions generated from construction through project completion and gondola operation for at least 5 years afterwards.
14. Consider the impact of the project on pedestrian, pet and traffic flow and safety, road maintenance, parking, public transportation, restrooms, sewage treatment, waste management, noise, air and water quality and vehicle recharging at the base of the gondola.
15. Calculate the impacts of the additional utility load, wastewater treatment, solid waste removal, disposal and recycling of any materials associated with the construction and operation of the gondola from the base to top station and beyond for at least five years after operational start-up.
16. Determine how the entire construction and operation of the gondola can be 100% produced by green energy sources including but not necessarily limited to solar, wind, geothermal and other means.

Thank you for your careful consideration of this input and that of any others who may wish to add their voice to the goal that this EIA be done as thoroughly and carefully as possible. It is for the protection and betterment of all affected parties, whether human or naturally occurring in any form for many years to come.

Gratefully,

Alan Hobson
Canmore

22-year full-time resident

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From: [REDACTED]
Sent: June 10, 2022 10:48 PM
To: AEP Environmental Assessment
Subject: Canmore Gondola - Just say no

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

It is not appropriate to have a tourist Gondola right in a wildlife corridor

Please say NO to such new development

People can enjoy our wild areas by walking quietly through them, listening and watching for wildlife.
No need for another big Gondola and food service.

Derwyn Hughes
Calgary AB
[REDACTED]

From: Priscilla Janes [REDACTED]
Sent: June 7, 2022 8:59 PM
To: AEP Environmental Assessment
Cc: [REDACTED]
Subject: Proposed Gondola in Canmore

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Director, Environmental Assessment, Regulatory Assurance Alberta Environment and Parks:

We wish to express our deep and unequivocal objection to the proposed Silvertip gondola in Canmore, Alberta. This gondola has one purpose – to attract tourism to Canmore. We do not need increased tourism in Canmore as we are already suffering from an overwhelming number of tourists and undo pressure on our sensitive environment and existing wildlife. This gondola, which would encroach on an established wildlife corridor and sensitive physical environment, would increase pressure on the Bow Valley corridor and totally violates our fiduciary responsibility for the more-than-human world. There are tourist gondolas at Sunshine, Sulphur Mountain and Lake Louise which serve the public already. We do not need a gondola in Canmore which would bring about increased tourism in an already stressed environment. There is no positive public interest in this gondola in Canmore.

When do we stop the death by a thousand cuts? When do we cease the cumulative impacts on the Bow Valley? When do we realize that trivial tourist consumption, land based development and real estate sales are not the key to Canmore's future. Instead, we must now steward what remains and cease using public resources for private gain, while recognizing that addressing the ongoing climate trauma is the priority, not economic growth at the expense of the community and its irreplaceable wildness.

Please reject this proposal out of hand.

Robert and Priscilla Janes

[REDACTED]
Canmore, Alberta T1W 2N5

Keep a green tree in our heart and perhaps a singing bird will come.

Chinese proverb

From: Andrea Johancsik [REDACTED]
Sent: June 12, 2022 8:41 PM
To: AEP Environmental Assessment
Subject: Letter submission for EIA Silvertip Gondola
Attachments: 2022-06-12_SilvertipLetter.pdf

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Please see my letter attached.
Thank you,
Andrea

June 12, 2022

Director, Environmental Assessment, Regulatory Assurance

Alberta Environment and Parks

environmental.assessment@gov.ab.ca

I am writing to submit my comments and concerns regarding the Silvertip Gondola proposal in the Bow Valley.

This development must be considered in the context of cumulative effects. To my knowledge, there has been no cumulative effects assessment considering this project, and this must be done, to ensure cumulative environmental, social, and economic impacts across the Bow Valley region are sufficiently understood.

I'd also like to see Treaty 7 First Nations being provided the opportunity to engage fully in this development proposal, including robust consultation and engagement throughout the process.

I am concerned that this project also doesn't reflect the values of the Canmore community. I live in Calgary but work in Canmore, and as I've gotten to know the Canmore community, I notice that people have strong environmental values and a strong sense of community. People understand it's a tourist town, but also want to see wildlife persist and thrive into the future. I believe this project does not align with those values as currently proposed, and this needs to be assessed.

There are so many pressures on the Bow Valley, including the astounding and increasing number of people (and, therefore, vehicles); expanding residential development; expanding recreation impacts; and also climate change. All of these pressures put wildlife at risk, and this project threatens to exacerbate these pressures.

The core tenant and vision of this community is human-wildlife coexistence, and to preserve this, we have to make choices about where development can and cannot go. I urge you to fully and adequately assess the impacts this project will have now and into the future.

Sincerely,

Andrea Johancsik

████████████████████

From: Mark Johns [REDACTED]
Sent: June 11, 2022 9:10 PM
To: AEP Environmental Assessment
Subject: EIA scope input for Silvertip Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To: *Director, Environmental Assessment, Regulatory Assurance, Alberta Environment and Parks*

I am writing to provide input for consideration of the EIA for the proposed Silvertip Gondola Proposal.

The project will add impacts to the Bow Valley, which is a corridor for many species already heavily affected by human activities and infrastructure. The EIA must properly assess the project in the context of what already exists and is known to be planned.

The EIA for the proposed gondola should:

- Provide a cumulative look in detail at the intent and impacts from this project plus existing and future development across the Bow Valley
- Incorporate recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Include input from engagement with all Treaty 7 First Nations
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Provide more clarity around human safety requirements in this risky alpine environment
- Expand on a monitoring & mitigation plan for impacts to humans and wildlife

Thankyou for your consideration of my input.

Mark Johns
Canmore, Alberta

From: James Johnson [REDACTED]
Sent: June 9, 2022 5:28 PM
To: AEP Environmental Assessment
Subject: Tipping point in Canmore

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Hello,

Feel free to quote me.

I am writing to ask the government to consider not letting the proposed developments go through in Canmore. Too much is at stake.

Many people use the argument that the town was once very small and is now what it is; why can't others enjoy it as well? That isn't the issue; the issue is that it is now at a point that any more building will adversely affect animal populations. Please take note of that – this is the straw that will break the camel's back. The development leading up to this point is one thing, but to continue developing is not denying new people who want a chance to live there the opportunity to experience it. Rather, it is that a certain point will be reached where the effects will be detrimental to nature and wildlife. Easy concept, yet I don't know why the development is potentially going ahead anyway. Listen to your conscience, not money— it's why you got into government, isn't it?

Duncan Johnson
Calgary, AB

From: Timothy Johnson [REDACTED]
Sent: June 13, 2022 4:40 PM
To: AEP Environmental Assessment
Subject: Silvertip gondola project - feedback on draft terms of reference for EIA

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Corinne Kristensen, Director
Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

Dear Ms. Kristensen,

I submit the following comments for consideration on the draft terms of reference (TOR) for the Silvertip Gondola environmental impact assessment (EIA).

1. I wish to express my concern that the public notice on the proposed terms of reference, specifically the project proponent's stating the project as not being a 'mandatory activity' under provincial environmental assessment legislation, is highly misleading and omits any mention of the project not being an 'exempt activity', either. The public notice should have been transparent that the project would be considered neither mandatory nor exempt but in fact discretionary, despite their positing of a "voluntary election" to undertake an EIA.
2. The proposed TOR are far too generic for a project being proposed for a highly valuable region in terms of its provision of habitat and movement corridors for a wide range of terrestrial, aquatic and avian species, and a region that is also severely impacted by the cumulative effects of decades of increasing human activity including transportation corridors, development, and tourism and recreation visitation. These stressors on Canmore and the Bow Valley region have been identified for decades and recent research ([Towns and trails drive carnivore movement behaviour, resource selection, and connectivity, 2022](#)) shows the extent to which existing habitat and connectivity has already been severely compromised. This project therefore requires a much more robust TOR for an EIA that provides quantification based on the most current science-based data of the baseline environmental, economic and socio-cultural conditions and project impacts that clearly show how the project intersects with present and future human impacts. It is concerning that the terms "cumulative effects" or "cumulative impacts" do not appear anywhere in the draft TOR.
3. The TOR should provide a specific definition of the Regional Study Area impacted by the project.
3. The TOR should identify, as well as justify, how the project's requirement of amendments to land designations in order to permit what is currently not a permitted use will affect the management intent of existing Parks legislation (ie. re-classifying Bow Valley Wildland Provincial Park) and the South Saskatchewan Regional Plan (SSRP). Although the TOR acknowledges these changes are required, they fail to require the EIA to address the implications of these changes on other Wildland Provincial Parks and other aspects of legally binding regional plans.

4. The TOR should also identify a detailed analysis of all the ways in which the project meets and does not meet all applicable municipal and local guiding documents, including but not limited to:

- Bow Valley Protected Areas Management Plan
- Canmore's Regenerative Tourism Framework
- Tourism Canmore Kananaskis Strategy
- Human Use Management Project of the Bow Valley
- Projects defined by the Human-Wildlife Coexistence Technical Working Group for the Bow Valley
- Bow Corridor Ecosystem Advisory Group Wildlife Corridor and Habitat Patch Guidelines for the Bow Valley
- Town of Canmore Municipal Development Plan
- MD Bighorn Municipal Development Plan
- Town of Canmore Climate Emergency Declaration

5. The TOR have no mention of the project's GHG emissions. This is a significant omission for a project proposed in a community that has declared a climate emergency. The TOR should ensure that the EIA quantifies the carbon emissions expected from all phases of this project as well as outlining proposed mitigations to ensure no net positive GHG emissions.

6. The TOR wording around "the implications resulting from a delay in proceeding with the Project, or any phase of the Project; and the implications of not going ahead with the Project." - "implications" should include detailed positive and negative environmental, economic and social outcomes.

Thanks for your consideration of this feedback to ensure that the TOR for the EIA are as robust and comprehensive as possible to ensure that, should the project somehow proceed, it is done so in a manner that recognizes the unique attributes and current realities of the region, and advances positive outcomes to the benefit of wildlife and the community.

Regards,
Tim Johnson
Canmore, AB

From: Jane Keast [REDACTED]
Sent: June 10, 2022 10:19 AM
To: AEP Environmental Assessment
Subject: Proposed Gondola at Lady Macdonald mountain Canmore Alberta

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This proposed gondola is totally inappropriate on so many levels. Similar applications have been declined over past decades. The wildlife and environmental concerns have not decreased, in fact the reasons to decline this application are stronger now as we erode the habitat for wildlife more and more.

To best meet the needs of the communities of wildlife and people in the Bow Valley, the EIA for the proposed gondola should:

- Look in detail at how the intent and impacts from this project intersect with existing and future development across the Bow Valley
- Be backed up by recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Provide more clarity around human safety requirements in this risky alpine environment
- Expand on a monitoring and mitigation plan for impacts to humans and wildlife

Respectfully submitted,
J Keast
Canmore AB

From: Nel Keith [REDACTED]
Sent: May 26, 2022 7:36 AM
To: AEP Environmental Assessment
Cc: council@canmore.ca
Subject: Stone Creeks Resort Gondola Project - Canmore, AB

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Director

Environmental Assessment Regulatory Assurance

Alberta Environment and Parks

Dear Sir/Madam:

This letter is in relation to the Stone Creeks Resort Gondola Project, Canmore Alberta. Stone Creeks resort as per its Terms of Reference for this project is proposing to construct and operate the following:

- An aerial passenger ropeway system (gondola)
- A day lodge
- Trail networks
- Viewing platforms
- A suspension bridge
- Associated utility services infrastructure

My question is, why is this kind of project even a remote possibility? From reading the Terms of Reference, I see no mention of what a project like this could possibly do to be of benefit to the community of Canmore. Projects should put the community first. Just from the list above of what is entailed, this is not a small footprint development. The thought of all these encroaching structures on a local iconic mountain with the noise, crowds, unsightliness, and disruption of an environment that is already too busy for its wildlife and too expensive to house people needed to work here, is hard to fathom. Within a 50 kilometre radius, there are already 3 gondolas (Sulphur Mountain, Sunshine Ski Resort, and Lake Louise Ski Resort) so tourists have options if they really want this experience. We do not need to have our local vista disrupted and destroyed.

I have lived in Canmore for over 25 years and have seen many changes during this time but I continue to love it. However, I live here to enjoy the mountains, not to exploit them. When profit is put before community, nobody wins and as a community member I feel more and more that I have very little opportunity for input into what happens here. Old laws seem to rule even though there are new realities like impeded wildlife corridors, climate change and crowding in a valley that cannot handle all this disruption.

Please do not allow Stone Creeks Resort to go forward with the construction of a gondola.

Sincerely,

Nel Keith



From: [REDACTED]
Sent: June 12, 2022 10:21 PM
To: AEP Environmental Assessment
Subject: Canmore Development.

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I believe it is high time any further development in the Bow Corridor be stopped. Better still existing developments should be reversed and put back into as close a state of wilderness that they once were.

As an avid mountaineer and backpacker, and wilderness lover, I have watched sadly over the past 50 years, as an attractive wilderness corridor has been decimated from Canmore to the foothills. Nothing ruins a nice hike or climb more than to look down onto Canmore from neighboring heights. All you see is more of the city we all try to escape when we go to the mountains.

I have absolutely no idea why anyone would ride a gondola or any other conveyance up Lady McDonald, or for that matter any other peak in the Canmore area, only to look down on yet more unbridled and useless human development.

The corridor from Banff thru Canmore, and on into the foothills has grown into a hellhole, from the quaint towns and neighboring wilderness it once was. Keep this kind of development out of all mountain and wilderness areas. As a matter of note, K Country is fast on its way to becoming another one of these human disasters imposed on the mountains and wilderness.

People should unabashedly be ashamed of the mess they've created.

Lex Kerkovius

[REDACTED]
Calgary, AB
T3A 5E5

[REDACTED]
Sent from my Bell Samsung device over Canada's largest network.

From: karen kunelius [REDACTED]
Sent: June 13, 2022 3:34 PM
To: AEP Environmental Assessment
Subject: Gondola

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Good Morning

As a concerned citizen, my voice on proposed construction of gondola here in Canmore and the surrounding PROVINCIAL PARK!!

Along with all the other well spoken views against this development I wonder:

What do you propose for people when they arrive at their destination? They get off, tramp about the shoulder, maybe hike to the summit, buy a snack... Some will ride back down. Some will elect to hike the trail back to Cougar Ck. parking lot, rather like the Sulphur Mt. Trail in Banff.

Have you been on the Lady Mac trail in summer months? Right now it is already packed with hikers going both ways. Add to that the pressure of gondola riders, getting their exercise going one way - either up or down. Pressure on the whole mountain environment increases astronomically on an already heavily burdened trail.

This is the last thing we need in Canmore.
I vote most emphatically NO

Regards
Kairn kunelius

From: Diana Kurila [REDACTED]
Sent: June 12, 2022 12:09 PM
To: AEP Environmental Assessment
Subject: Please NO gondola to Lady Mac

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Dear Director of Regulatory Assurance, Alberta Environment and Parks:

I am emailing because I reject the proposed sightseeing gondola to Mount Lady MacDonald. I am an elementary teacher who lives in Calgary, Alberta, and have visited Canmore my whole life. I love coming to Canmore for the beautiful scenic nature and wildlife. I have hiked up the East End of Rundle, and hope to one day hike Lady MacDonald. I do not want this area ruined by a gondola. I want to experience Lady MacDonald in its natural state!

The Bow Valley is a major wildlife corridor, and one of the most important east-west connectors in all of the Yellowstone to Yukon region. In a valley that is already stressed, we should not be adding another barrier to wildlife movement.

When conducting the Environmental Impact Assessment, you need to ask yourselves: Is this the tipping point? Is this the project that will finally make it impossible for grizzly bears and other wildlife to survive here?

The environmental assessment needs to be done right for nature the first time around.

Please, protect this vital area for the future of wildlife survival, including the grizzly bears, wolves, cougars, elk, deer, and more.

Sincerely,

Diana Kurila

[REDACTED]
Calgary, Alberta, T3G 1W5

From: [REDACTED]
Sent: June 11, 2022 10:16 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola proposal opposition

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Dear Director;

I am writing to state that I am in opposition to this proposal to build a **gondola** from Silvertip Golf Course to the shoulder of Lady MacDonald Mountain. This proposed development intrudes into an area which is a designated and effective wildlife corridor and critical Bow Valley habitat for cougar, Rocky Mountain bighorn sheep, grizzly and black bear and within the Bow Valley Wildland Provincial Park.

I do not see such a gondola project being at all compatible with the values and goals of the Wildland Park or the wildlife corridor. Good research supports the need for these natural areas within the congested Bow Valley. This corridor area is immediately adjacent to Town of Canmore developments and neighbourhoods. The purpose of this corridor is to mitigate human wildlife conflict risks to residents of Canmore by giving large carnivores and ungulates room to travel the Bow Valley as part of their natural habitat while remaining outside of the human development area. Mitigation of human wildlife conflict management is extremely labour intensive, expensive and complex and is paramount to protect human life and safety in the wild land-urban interface areas. The more infrastructure and human use inside this corridor, such as certainly incurred by this proposed gondola intrusion and all the construction work entailed, will not preserve the intent and goals of the Wildland Park or the wildlife corridor and result in dangerous risk to both humans and wildlife.

I would hope that you reject this proposal immediately. It also results in land use change so an full environmental assessment is then required to address this proposal. Rocky Mountain bighorn sheep and grizzly bear both are especially vulnerable to decreasing and fragmented habitat area so excellent land management practices to preserve the habitat connectivity corridor in the Bow Valley around the urban areas is essential.

I sincerely recommend that you reject this proposal.

Karen Lassen
Canmore, AB

Sent with [Proton Mail](#) secure email.

From: Diana MacGibbon [REDACTED]
Sent: June 13, 2022 8:19 AM
To: AEP Environmental Assessment
Subject: Comments on the Draft Terms of Reference for the Proposed Silvertip Gondola Environmental Impact Assessment
Attachments: Letter re Environmental Impact Assessment - Silvertip Gondola Project.pdf

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Director, Environmental Assessment
Regulatory Assurance, Alberta Environment and Parks.
By E-mail: environmental.assessment@gov.ab.ca
Please see attached letter on the referenced topic.

Thank you.

Director, Environmental Assessment
Regulatory Assurance, Alberta Environment and Parks.
By E-mail: environmental.assessment@gov.ab.ca

Re: Comments on the Draft Terms of Reference for the proposed Silvertip Gondola Environmental Impact Assessment

Dear Director, Environmental Assessment:

I am writing to provide comments and feedback on the Draft Terms of Reference for the proposed Silvertip Gondola Environmental Impact Assessment.

If approved, this project would largely exist inside a Wildland Park, and accordingly it deserves an environmental impact assessment with the highest degree of rigour and that reflects the context in which the project would operate (i.e. a region that is already facing extreme pressure on wildlife corridors and habitat).

The Terms of Reference presented do not sufficiently reflect the challenges facing the Bow Valley. The Terms of Reference should include:

- An assessment of whether the project is consistent with the purpose and character of Wildland Parks, which are described on the Alberta Environment and Parks website as: "... a type of provincial park specifically established to preserve and protect natural heritage and provide opportunities for backcountry recreation" and "...large undeveloped natural landscapes that retain their primeval character"
- An analysis of the cumulative effects of the environmental, social and economic effects of this project, considering currently proposed and foreseeable projects and developments in the region (such as other gondola proposals, the proposed Calgary-Banff rail project, intercept parking, and other tourism, industrial and residential developments/projects)
- An analysis of the climate impacts of the project (e.g. the carbon emissions associated with both constructing and operating the project as well as the emissions associated with additional tourist activity including travel to and from the Bow Valley and vehicle idling etc.) and what measures would be put in place to mitigate such impacts
- Consideration of how the project will impact sightlines of Lady MacDonald, one of the Bow Valley's iconic mountains
- An in-depth assessment of the impacts on specific species (e.g. the bighorn sheep that reside on Lady MacDonald and the golden eagles that migrate through the area)
- An assessment of the project's impact on non-motorized recreation (Lady MacDonald is one of the more popular hikes in the Bow Valley)
- An evaluation of how the project would meet current Wildland Park guidelines, regulations, and directives and how it fits into other legislation, Plans, strategies and guiding documents such as:
 - The Alberta Land Stewardship Act
 - The South Saskatchewan Regional Plan
 - Bow Valley Protected Areas Management Plan
 - Tourism Canmore-Kananaskis' Regenerative Tourism Strategy
 - Human Use Management Project of the Bow Valley

- Projects defined by the Human-Wildlife Coexistence Technical Working Group for the Bow Valley
- Town of Canmore guiding documents (Municipal Development Plan, Land Use Bylaw) and Climate Action Plan
- Consideration of how Treaty 7 First Nations and other members of Bow Valley communities may wish to engage, as well as opportunities for such engagement
- An evaluation of how the project reflects the values and desires of Bow Valley communities
- An in-depth review of environmental impact monitoring plans for the project and what steps would be taken should the impacts be more adverse than anticipated

Thank you for considering my input on this matter.

Sincerely,

Diana MacGibbon
Canmore, AB

From: Patrick Mahaffey [REDACTED]
Sent: June 11, 2022 7:43 AM
To: AEP Environmental Assessment
Subject: Very Concerned about Proposed Gondola Lift on Mount Lady MacDonald

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Dear Sir or Madam,

I am very concerned about the proposed gondola lift on Mount Lady MacDonald at Canmore, and its likely negative impact on wildlife habitat and movements on the mountainside.

I want to be assured that the EIA to be done for this project is comprehensive and objective, and deals with cumulative impacts.

I would appreciate a reply to my concerns.

Yours sincerely,

Patrick Mahaffey
Calgary

From: Kaitlyn Mary Manninger [REDACTED]
Sent: June 8, 2022 7:06 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Proposal

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Whom it May Concern,

I am writing this email to comment on the Silvertip Gondola proposal.

I believe that this gondola is not in the public interest and this project should not be developed.

I would like to emphasize that 93% of the project footprint is within the Bow Valley Wildland Provincial Park. Currently, this park has regulations set in place that prioritize non-motorized recreation uses and the preservation and protection of natural areas - NOT tourism attractions such as a gondola, food and beverage and retail outlets.

The Bow Valley is a major wildlife corridor between the protected areas of Kananaskis Country and Banff National Park. Many different species including deer, elk, bighorn sheep, wolves, cougar, and grizzly bears call this area home. A development such as this would be detrimental to the wildlife corridor.

On top of this, many people reside in Canmore and are committed to coexisting with the wildlife that live in and move through this corridor. The gondola proposal goes against the communities' respect for the mountains, forests and rivers where we are fortunate enough to live, work and play. A tourist attraction such as this would permanently change the lifestyle of those who reside in Canmore.

20 years of wolf and grizzly bear movement data has concluded that the Bow Valley has already lost up to 85% of its best wildlife habitat. A gondola development would only further degrade what's left of wildlife habitat in the Valley.

I encourage you to read the article written by Y2Y Conservation Initiative (Yellowstone to Yukon) for further information as to why this development is NOT in the public interest and why this proposal deserves a thorough EIA that prioritizes wildlife and community in the Bow Valley. Link: <https://y2y.net/blog/preserving-an-iconic-mountains-values-in-the-face-of-a-bow-valley-gondola-proposal/>

Sincerely,

Kaitlyn Manninger

From: John E Marriott [REDACTED]
Sent: June 10, 2022 8:42 AM
To: AEP Environmental Assessment
Subject: Silvertip Gondola proposal in Canmore

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Hello,

I am writing to request that a full and comprehensive EIA be completed on this project. I am not in favour of adding a gondola to Canmore and the Bow Valley's already incredibly crowded wildlife corridors. Please consider the cumulative effects this project would have on wildlife and on recreation in the valley. I am a full time professional wildlife photographer and this would impact me professionally because it would have a direct impact on wildlife like bighorn sheep that have crucial habitat patches within the gondola's proposed area. I urge you to also consider the recreational impact this would have and to do a full recreational impact assessment along with a cumulative effects assessment including the impact this proposal will have on bighorn sheep and on cougar, wolf and grizzly bear movement with the wildlife corridor directly below the gondola.

Thank you for reading this, I am sincerely hoping that this project is properly assessed and that it is determined to not be in the public interest for it to proceed.

Sincerely,

John

--

John E. Marriott (JEM) Photography

CANON Ambassador

Co-Founder, EXPOSED Wildlife Conservancy

Associate Fellow, International League of Conservation Photographers

<http://www.wildernessprints.com>

<http://www.canwildphototours.com>

<http://www.exposedwildlifeconservancy.org>

[Facebook](#) || [Twitter](#) || [Instagram](#) || [YouTube](#)

From: Karen Mazurek [REDACTED]
Sent: June 9, 2022 8:30 PM
To: AEP Environmental Assessment
Subject: Proposed Silvertip Gondola - opposed

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Dear Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

I am writing in opposition to the proposed Silvertip Gondola. My concern is the impact of the gondola as proposed on the wildlife corridor and the impact on the mountain wildlife habitat. Development in the Bow Valley has already significantly impacted this sensitive corridor leading to shrinking habitat and human/wildlife conflict. Further encroachment will result in mortality of animals; large predators in particular.

What I value most about the beautiful province of Alberta and its' parks is the pristine natural environment and the diversity of animal life. I do not think I am alone in these views. Indeed I believe it is exactly that which draws tourists as we are one of the few places left in this world where that wonderful diversity and co-existence of wildlife and humans can be found. I am not against tourism but strongly believe new development needs to ensure the preservation of natural habitat and the corridors the animals depend upon.

I understand the proposed gondola would traverse a designated habitat patch and an important wildlife corridor, connecting the valley bottom to an upper terminal on the summit ridge of Mount Lady MacDonald, via a mid-station integrated with the existing Silvertip Golf Course resort area. I also understand the project proposal includes an area with food, beverage and retail outlets, hiking trails, a suspension bridge and viewing platforms to accommodate an anticipated 200,000 to 300,000 visitors per year. Due to the impact on wildlife habitat and corridors, such development is at odds with my values and the values of many others who love the Bow Valley. I ask that you carefully solicit and consider the views of Canmore and Bow Valley residents, Treaty 7 First Nations and the many Albertans who visit the Bow Valley on a regular basis.

Karen Mazurek
[REDACTED]

St Albert, AB

Sent from my iPhone

From: Merverine McCulloch [REDACTED]
Sent: June 11, 2022 1:57 PM
To: AEP Environmental Assessment
Subject: Proposed gondola on Lady MacDonald Canmore

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Director, Environmental Assessment, Regulatory Assurance Alberta Environment and Parks:

Wildlife is such a important part of life in Canmore and the Bow Valley. This assessment needs to be made to protect landscapes that provide habitat and movement for wildlife.

The gondola is proposed to go through/ over top of a wildlife “corridor “ which is a safe space for wildlife! Will this planned project make it even more difficult for them to move and live? I believe that it will. Wildlife corridors should be clear above animals too and all around them.

Please consider this project carefully from the point of view of wildlife.

Canmore is already overwhelmed by human activity causing increased pressure on wildlife. Please make a decision based on the overall cumulative effects on them knowing we CAN lose the very thing that makes this place so amazing.

Thank you

Merverine McCulloch
[REDACTED]
Canmore, AB
T1W1J8

From: Doreen McGillis [REDACTED]
Sent: June 11, 2022 8:22 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Dear Director:

I am writing to voice my strong opposition to the proposed gondola development from Silvertip to Mount Lady MacDonald near Canmore. I am surprised that the provincial government is even entertaining such a proposal in Bow Valley Wildland Provincial Park. This proposed gondola is not at all compatible with a wildland park. Wildlife in this valley are under tremendous stress and the Alberta government does not acknowledge the science of the effects of development on wildlife corridors. In fact, this government allowed the wildlife corridor on the west side of the valley to be narrowed to accommodate Three Sisters Mountain Village ASPs. And now I read that this proposed gondola doesn't trigger a mandatory environmental assessment -- !?!

If not outright rejected, as this project was in January 2021, it should (at a minimum) be subject to a full independent environmental assessment (by the developer). As stated in that decision, "The project as proposed is inconsistent with the current land management direction set forth under the Bow Valley Wildland Provincial Park protected area designation and the provisions of the South Saskatchewan Regional Plan."

This is not in the best interest of wildlife in the Bow Valley. The land should remain a wildland provincial park and fully protected. We have more than enough tourist attractions in the Bow Valley. This development would be an eyesore and not in the public interest, especially of the residents of Canmore. It's time to consider the wildlife and their needs. The Bow Valley is a critical wildlife corridor, not only locally but internationally - see studies done by Yellowstone to Yukon and provincial wildlife staff.

Just say no to this ridiculous proposal.

Sincerely,

Doreen McGillis
Canmore, Alberta

From: Laura McLean [REDACTED]
Sent: June 10, 2022 12:20 PM
To: AEP Environmental Assessment
Subject: Mount Lady MacDonald Gondola, concerns

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Director
Environmental Assessment
Regulatory Assurance Alberta Environment and Parks

10 June, 2022

To whom it may concern,

I am concerned with the proposed Mount Lady MacDonald Gondola, now entering into the environmental assessment phase, and I am hoping that the province will take current science on environmental/ wildlife impact into account when conducting the assessment.

I'm not entirely sure how this project is moving forward to this degree, given that a good proportion of the land in question falls within the Bow Valley Wildland Provincial Park boundaries. The current regulations associated with this provincial land designation prioritize non-motorized recreation as well as protection/ preservation of natural areas. Not something that can be sustained when you anticipate 200,000 to 300,000 visitors to the tourist attraction a year.

Does this project require an entirely new land designation?

If it goes ahead, please, I implore you, take science into account. This area cannot sustain that many tourists. We are in danger of irreparably changing this valley. The very things that draw these tourists every year -- grizzly bears, elk, wolves, mountain vistas -- will be the most impacted by this development.

Thank you,

Laura

--

Laura McLean
[REDACTED]

From: Laura McLean [REDACTED]
Sent: June 13, 2022 8:49 AM
To: AEP Environmental Assessment
Cc: Marie McLean
Subject: NO to the "Gondola Proposal from Palliser Trail"

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Dear Director - Environmental Assessment ,Regulatory Assurance,Alberta Environment and Parks,
I am a firm believer in following " The Science "no matter the issues.
I refer to an article by Mark Hebblewhite a wildlife biology professor- University of Montana, Calgary News may 9th/2022.
He states that " The challenge to National Parks , is that everybody wants to live there or close by "(as in Canmore).
"This can lead to it being LOVED TO DEATH ".
Is this project the tipping point where wildlife can no longer survive here ???
I believe that we are getting closer to that reality with respect to our wildlife.

We need some form of coordinated Federal / Provincial effort to preserve the existing Ecosystem and Wildlife.
The Bow Valley is a key corridor used by wildlife to move around the Rocky Mountains .
Experts on the issue state that the Bow Valley has already lost 80-85% of its best wildlife habitat.
Wildlife is struggling , avoiding towns and trails in the Valley when lots of people are around.
**That applies to the residents in the area as well when tourism peaks at certain times of the year.
One begins to feel trapped , there is a sense of chaos, a loss of tranquility.
We MUST ensure that we provide high quality habitat and minimal human disturbance in order to preserve this amazing legacy.
Researchers say it's getting to the point where animals won't be able to navigate through the Rocky Mountains if their habitat is further compromised.
It's not that we object to meaningful projects and progress, it is simply a matter of respect for what cannot be replaced, for what is sacred .
It is respecting this legacy for future generations rather than recklessly destroying it .

Sincerely ,
Marie McLean, a 73 yr old grandmother speaking for three generations living in Canmore, a YtoY donor.

From: Peter Scholz <peter.scholz@mdbighorn.ca>
Sent: June 13, 2022 2:19 PM
To: gturcotte@stonecreekresorts.com; AEP Environmental Assessment
Cc: Robert Ellis
Subject: FW: 2022-06-13 MDBighorn Letter to Stone Creek & AB Lands re NRCB ToR.pdf
Attachments: 2022-06-13 MDBighorn Letter to Stone Creek & AB Lands re NRCB ToR.pdf

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Whom it May Concern:

Please see the attached letter from the Municipal District of Bighorn regarding the environmental assessment for Stone Creek gondola.

Thank you.

Peter Scholz
Director of Planning Services
Municipal District of Bighorn #8
Tel: (403) 673-3611 (Ext: 222)
Cel: (403) 493-8987
peter.scholz@mdbighorn.ca



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Municipal District of Bighorn No. 8

No.2 Heart Mountain Drive, P.O. Box 310, Exshaw, Alberta T0L 2C0
Phone: (403) 673-3611 • Calgary Direct: (403) 233-7678
Fax: (403) 673-3895 • Email: bighorn@mdbighorn.ca
Website: www.mdbighorn.ca

June 13, 2022

File: 0100-11-03

Guy Turcotte, Chairman, President and CEO
Stone Creek Resorts Inc.
201, 1100 - 1 Street SE
Calgary AB T2G 1B1
gturcotte@stonecreekresorts.com

Lisa Sandownik, ADM, Lands Division
10th floor, South Petroleum Plaza
9915-108 Street
Edmonton AB T5K 2G8
environmental.assessment@gov.ab.ca

RE: Comments by the Municipal District of Bighorn No. 8 (MD of Bighorn) on the proposed Terms of Reference (ToR) for the Natural Resources Conservation Board (NRCB) Review of the Proposed Silvertip Gondola

Dear Mr. Turcotte and Ms. Sandownik,

Pursuant to a July 12, 2021 letter from Ms. Sandownik to Mr. Turcotte regarding the ToR for the environmental impact assessment (EIS) for the proposed Silvertip Gondola, MD of Bighorn wishes to make a number of comments and recommendations. The majority of the length of the ropeway for the proposed gondola and the entirety of the Summit Lodge Area will be within MD of Bighorn. The Summit Lodge Area is primarily excluded from the provincial park system, but is land owned by the Province. As such:

1. Existing documents issued by the developer indicate that this project is within three jurisdictions: Bow Valley Wildland Provincial Park, public land, and land within the Town of Canmore. This incorrectly excludes MD of Bighorn. This error should be rectified in all of your documentation, as well as ensuring the MD of Bighorn is included in all future correspondence.
2. The Summit Lodge Area should be reviewed by MD of Bighorn as any other private development within MD of Bighorn, with permits and amendments as appropriate to the Municipal Development Plan and the Land Use Bylaw. Consideration may also be given to preparation of an Area Structure Plan. We note that there are procedural and legal precedents: previous constructions and demolitions in the Summit Lodge Area have received MD of Bighorn permits. Particular details of some relevance:
 - a. Development Permit (DP) 9/01/88 was issued by MD of Bighorn in 1988 for the teahouse restaurant and observation lookout. A demolition permit was issued in 2013 by MD of Bighorn for the teahouse, gazebo, and landing structure. A refusal was issued in 1999 by MD of Bighorn for DP 43/98, an application for Commercial Outfitting and Guiding with Overnight Tent Accommodation.

- b. The proposed development is within the Forestry District, which permits some but not all of the component elements of the overall project, as either permitted or discretionary land uses. It may be expected that a rezoning process may be required.
3. The large majority of Mt. Lady Macdonald is within MD of Bighorn. The proposed gondola would have a considerable impact on the formal and informal trails on Mt. Lady Macdonald. It is reasonably foreseeable that:
 - a. Day-trippers will frequently use the existing paths to access the summit of Mt. Lady Macdonald from the top of the gondola;
 - b. Foot traffic both up and down the existing trail from Cougar Creek will increase; and
 - c. Informal trails will form underneath the gondola line for those wishing to use the gondola for only one direction.

Trail maintenance and signage needs, and search & rescue operation demands, can be expected to increase substantially. The MD of Bighorn should not be expected to provide any trail maintenance, signage, garbage collection, or water and wastewater service on behalf of the developer, Province or Town of Canmore.

Based on these considerations, MD of Bighorn encourages the developer and the Province to ensure fulsome involvement of MD of Bighorn in the NRCB's ToR.

Yours Truly,



Peter Scholz
Director of Planning Services
Municipal District of Bighorn #8
Tel: (403) 673-3611 (Ext: 222)
Cel: (403) 493-8987
peter.scholz@mdbighorn.ca

From: Warren Wilson [REDACTED]
Sent: June 12, 2022 7:34 PM
To: AEP Environmental Assessment
Subject: Environmental Assessment - Silvertip Gondola, Canmore, AB
Attachments: Environmental Assessment of Silvertip Gondola, Alberta Environment and Parks (June 2022).pdf

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Attn: Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

Attached please find a letter outlining our concerns about the proposed Silvertip Gondola in Canmore, Alberta.

Thank you,
Sarah Meredith & Warren Wilson

[REDACTED]
Canmore, AB T1W 3C7

Director
Environmental Assessment
Regulatory Assurance Alberta Environment and Parks

Dear Director,

We are writing to express our concern about the proposed Silvertip gondola on Mount Lady MacDonald. Our concerns are based on the potential detrimental impacts on the already threatened ecosystem of the Bow Valley, the apparent inconsistencies between the proposed gondola and existing land-use regulations, and the lack of meaningful engagement with both Treaty 7 First Nations and Bow Valley residents.

The proposed gondola would cross a designated habitat patch transporting up to 300,000 visitors per year into a sensitive wildlife corridor. As you are likely aware, the Bow Valley provides a critical east-west corridor for wolves, grizzly bears, elk, wolves, and bighorn sheep. Moreover, this corridor is already stressed by developments. Indeed, recent research indicates that 85% of the corridors used by wildlife have been detrimentally affected by human development, leaving wildlife with far too few viable corridors (Whittington et al. *Mov Ecol* 10:17 (2022). <https://doi.org/10.1186/s40462-022-00318-5>).

Moreover, our review of the Bow Valley Provincial Park mandate indicates that this project would violate the park regulations designed to protect the natural environment and forbidding such an attraction in the park.

As such, we request that the Environmental Impact Assessment meet the following criteria:

1. Ensure that it is informed by the state of the science concerning ecosystem integrity and wildlife corridors.
2. Provide explicit plans for the incorporation of the views of both First Nations, Bow Valley Residents, and the towns of Canmore and Banff.
3. Carefully consider this proposal in light of development throughout the Bow Valley.
4. Clearly lay out whether or not the proposed project is consistent with existing land use regulations.

We're supportive of environmentally-appropriate tourism and recreation initiatives but the proposed gondola does not meet this criterion. Rather, the gondola would compromise the natural environment, further threatening a stressed ecosystem and scarring the wilderness that is the primary draw for tourists to the valley.

Thank you,

[REDACTED]

Sarah J. Meredith

[REDACTED]

[REDACTED]

Warren M. Wilson

[REDACTED]

From: michael mezei [REDACTED]
Sent: June 9, 2022 9:14 PM
To: AEP Environmental Assessment
Subject: Stone Creek Resorts Inc. Silvertip Gondola Proposal Environmental Impact Assessment

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We are writing as a full-time residents of Canmore to voice our objection to the proposed Silvertip Gondola as being entirely inconsistent with environmental stewardship of Bow Valley Wildland Provincial Park and the designated wildlife corridor, and with the original Silvertip ASP which maintains wildlife corridors on the upper slopes above the golf course/residential area.

During walks and bike rides on Montane Trail and hikes up Lady Macdonald, the public is asked to stay on designated trails to respect the wildlife corridor. Each of us gladly doing our part to preserve the wildlands for wildlife and vegetation, and the aesthetics and undeveloped feel of the area for others who follow in our light footsteps.

Yet this project if approved would go a lot further than allowing a few boots on the ground in the wildlife corridor - it would allow bulldozers, backhoes, excavators, pile drivers and other heavy construction machinery needed to remove trees, grade land, push through construction and maintenance roads, build concrete footings, erect tall metal towers, haul construction materials for the mountain top building,..... among other initial and ongoing impacts- this literally and figuratively would **drive a truck through the wildlife corridor** and any notion of Bow Valley 'Wildland' Provincial Park. It would not only have significant impact on wildlife and vegetation, but totally change the experience of Canmore residents and visitors who love the tranquility of a hike up Lady Mac, or simply viewing a pristine Lady Macdonald from all parts of Canmore.

And for what end? There is no meaningful public or local benefit to justify its environmental impact and change of land use. The main benefits are purely economic for the developer, hardly justifying its negative environmental impact within a provincial park and wildlife corridor. Providing employee housing is laudable, but there are many other options for providing employee housing to support Silvertip's development in accordance with the original ASP short of a bottom to mountain top gondola.

Up to now, Silvertip has been tastefully developed, with space between homes, trees and natural space, roads and walkways that complement the landscape, ready connection to semi-wild and wild space, all fitting within the original ASP and Stone Creek's vision:

Blending into the environment is a rule of thumb for Stone Creek Resorts.

A gondola does not blend into the environment, it dominates it - there is no rational way to sugarcoat this project as a light environmental touch that blends into the environment.

We ask that you do your part to maintain the tranquility of Lady MacDonald for the benefit of Canmore residents and wildlife, and reject this proposal as being inconsistent with prudent environmental stewardship. Thank you

Michael Mezei and Andrea Hopps
[REDACTED]
Canmore, AB

T1W 3A8

From: Haley Milko [REDACTED]
Sent: June 5, 2022 12:10 PM
To: AEP Environmental Assessment
Subject: comment on Stone Creek Resorts Inc. draft terms of reference

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Attention:

Director of Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

I write to provide comment on the draft Terms of Reference (TOR) for the Gondola Project proposed by Stone Creek Resorts Inc. in Canmore, Alberta.

I am concerned to see that the draft Terms of Reference does not include a requirement for the environmental assessment to consider the cumulative effects of the project on each of the components to be assessed, nor do the Terms of Reference require an assessment of the project's greenhouse gas emissions, and thus the project's impact to the Town of Canmore and Government of Canada's ability to meet their climate action commitments.

This project is being proposed in an environment that is at its threshold in terms of development pressure. Just last month, yet another scientific report was published documenting the fragile state of wildlife connectivity in the Bow Valley <https://www.cbc.ca/news/canada/calgary/bears-grizzly-study-wolves-banff-towns-1.6446423>. Construction and operation of a gondola would affect bears, cougars, coyotes, ungulates, and other wildlife that still traverse the Montane area on Mount Lady MacDonald and winter nearby. Bighorn sheep frequent the eastern slope of Mount Lady Macdonald. The already very fragile physical environment around the summit cannot sustain the project proponents' estimated 227,500 visitors a year. In fact, it is not clear from the project description available on the proponent's website where on earth people will go, once they reach the top of the gondola. I have been up this mountain many times, and there is no space.

The proposed impact assessment as described in the draft TOR does not include a detailed assessment of the impacts on local residents – a pre-consultation about five years ago with residents showed very strong opposition to a gondola – in terms of noise, and a dramatic increase in traffic congestion at the base of the gondola. The access road in question, Palliser Trail, is a two-lane road with a narrow feed off onto the Trans-Canada Highway. The area includes several high-density housing developments and is slated for more affordable housing units in future. It will also house Canmore's new fire hall – a quarter of a million gondola tourists arriving by car will create additional traffic congestion affecting both the fire hall and local residents.

It is my opinion that this project should be rejected outright. However, at this stage in the process, I write to register these concerns with the limited scope of the impact assessment, as described in the draft TOR.

Regards,

Haley Milko

Canmore, Alberta

From: Bob Milko [REDACTED]
Sent: May 13, 2022 10:12 AM
To: AEP Environmental Assessment
Subject: Silvertip gondola proposal

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This should be a non-starter.

- 1) the proposal would significantly affect the health and well being of residents from noise and traffic congestion. It would be the only gondola in Canada that goes over, in part, a already developed residential area.
 - 2) The area is also a wildland park home to a significant and eroding wildlife corridor in the Bow Valley.
- It is incomprehensible that this proposal should even have been considered.

Robert Milko
MSc
--
Bob

From: Katharine Mills [REDACTED]
Sent: June 13, 2022 3:57 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola in Canmore, Alberta

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When we heard about the idea of building and placing a gondola to go up Mount Lady Macdonald, we were utterly incredulous...how could one conceive of such a thing, in such a beautiful and pristine place?

From start to finish, this is an incredibly bad idea. This community is already struggling with overcrowding, overrun by tourists on the weekends and in summer, causing more traffic and pollution in addition to these aforementioned items. Canmore is already in a climate emergency, and is working hard to help our population use their cars less. This idea will only bring more of what we are trying to have less of.

A gondola will be a blight, an eyesore, on the pristine landscape, and besides, there are already gondolas in two areas of Banff (just down the highway) at Sulphur Mountain and Sunshine Village, and indeed a bit further west in Lake Louise. We do not need, nor do we want, more building into the mountainsides.

Equally important is the negative impact this will have on wildlife, who need these corridors to live, and move about freely in the Bow Valley, and not be disturbed by the inevitable crowding and noise this project will bring....to residents of the area as well.

Please, reject this proposal in its entirety, and not turn this beautiful mountain town into simply another Disneyworld.

Katharine Mills
[REDACTED]
Canmore,

From: katja Mogensen [REDACTED]
Sent: June 11, 2022 10:06 AM
To: AEP Environmental Assessment
Subject: Bow Valley Gondola

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Director, Environmental Assessment, Regulatory Assurance

I'm a long time resident of Canmore and am very concerned with the proposal of a gondola towards Lady MacDonald. There is no necessity for it as there is a beautiful trail to use to wonder up slowly towards the platform. We have wildlife to protect, a corridor to preserve and there is already one in Banff for the tourists enjoyment. I am in total agreement with the statement of Y2Y on the subject and I do hope you will come to the conclusion that for the futur of this valley, we need to be very conservative and to adhere to our values.

*Sincerely,
Katja Mogensen*

From: Chrissy Nickerson Kaech [REDACTED]
Sent: June 10, 2022 3:39 PM
To: AEP Environmental Assessment
Subject: Lady MacDonald Gondola Proposal

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Whom It May Concern;

I am opposed to a gondola to the top of Lady MacDonald for many reasons. Environmental, Residential, Traffic Flow just to name a few.

For environmental reasons, we should not allow a gondola with multiple posts, two landing stations to be built on this mountain for it will disrupt biking, hiking flow and habitat. The building of such a structure will put the mountainside at a higher risk of invasive species, as well.

In terms of the local people that live in this valley, we cannot accommodate further parking for the tourist, even if it is at the Silvertip Golf Course. I am very disappointed in the amount of paradise that gets paved over for more parking lots. A project like this should come after a pedestrian train has been built from Calgary, through our valley all the way to Jasper. The eye soar of the car and man built infrastructure within this valley and National park really ruin the experience for many people.

The lands atop Lady MacDonald should be expropriated from private hands and returned to protected lands. This valley needs to maintain space for people to experience nature as it was intended. If someone is unable to hike and wants the mountain top experience they can go to Banff.

Please help the residence of Canmore, Alberta, to stop the over development of our valley where we live, play and try to sustain balance of tourism and wild life.

Sincerely,

Chrissy Nickerson Kaech
Major in Environmental Planning, Dal Tech University.

[REDACTED]
[REDACTED] Canmore, Alberta T1W1R3

From: Meg Nicks [REDACTED]
Sent: June 10, 2022 6:02 PM
To: AEP Environmental Assessment; actionalert@y2y.net
Subject: Proposed gondola Lady Mac

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Good Day;

I am writing to add my voice to those opposed to the gondola up to the Lady MacDonald ridge.

I have all the concerns about its disruption to wildlife as well as to people (AKA hikers) who want to enjoy a calming & healthful experience in nature.

I also tend to think that the whole plan is rather lunatic from a business perspective. I have to wonder if the folks proposing this project have ever actually hiked up to that point. Do they realize how small the space on that little shoulder is? Do they realize the narrow knife-edge nature of the ridge to the summit? What kind of liability do they face for encouraging people to walk (or even crawl) up a narrow trail with 2 steep and unsurvivable drop-offs on either side?

This proposal is untenable, unrealistic and very importantly, adds to the degradation of our valley. Please turn it down.

Yours sincerely

Meg Nicks

From: Judy Otton [REDACTED]
Sent: June 12, 2022 5:17 PM
To: AEP Environmental Assessment
Subject: EIA for proposed Silvertip gondola to Mt Lady Macdonald, Canmore

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Thank you for the opportunity to comment on this proposal. I would like to state my opposition to the proposed gondola on Mt Lady Macdonald, for several reasons, and provide a bit of historical perspective on the establishment of Bow Valley Wildland Provincial Park since the great majority of the lands traversed by the proposed gondola lie within the Wildland Provincial Park.

Uses such as a gondola and associated infrastructure are not consistent with nor are they permitted within a Wildland Provincial Park. In 2000, I was the lead Recreation representative on the provincially led and supported Bow Valley Special Places initiative that led to the creation of the Bow Valley Wildland Provincial Park and other protected areas on public lands around the Town of Canmore. The purpose of this process was to have individuals or communities around Alberta identify special places that they felt warranted protection. Committees composed of a wide range of local interests were established and supported by the provincial government to examine each proposal, come to consensus, and make recommendations to the Alberta government regarding the future of these special places. In the Bow Valley, the main purpose of the Special Places proposal and subsequent protected area designations was to eliminate the possibility of development encroaching on important wildlife habitat and movement corridors on public lands surrounding the town of Canmore, especially given the development pressures within town boundaries. The recommendations of the Bow Valley committee were approved and supported in full by the Provincial Government of the day, and formal protected area designations such as the Bow Valley Wildland Provincial Park followed soon after.

The Bow Valley Special Places Committee agreed that the south facing benches and mountains, including Mt Lady Macdonald, warranted Wildland Provincial Park status because of their high value as wildlife habitat and as a critical wildlife movement corridor, as well as for compatible non motorized recreation. The Wildland Park designation resulted from much research, discussion and finally consensus among a vast array of valley interests, including developers, wildlife biologists, recreationalists, and the rock industry.

This designation should not be open for discussion or change to allow this non-conforming project. The developments included in this proposal are completely incompatible with a Wildland Park and wildlife protection, as are the levels and types of visitation that would occur on Mt Lady Macdonald. They are also incompatible with the types of dispersed, managed non-motorized recreation that currently takes place in the area (hiking, mountain biking, rock climbing, mountaineering). The visual impact on Canmore's surrounding natural mountainscapes also needs to be considered and would be unacceptable to me and I suspect many residents and visitors.

I am confident that the EIA for the Lake Macdonald gondola will confirm that the project would have unacceptable impacts on wildlife and other values. I believe the scientific basis for the decisions made following Special Places 2000 is even stronger today, and that this new proposal must be assessed in the context of all the other development in the Bow Valley. Some historical perspective on the protected area is essential. Uses and developments that are not compatible with the Bow Valley Wildland Provincial Park should not be given even token consideration.

Sincerely,
Judy Otton
[REDACTED]
Canmore, AB
T1W 1S2

From: Louise Pajot-Phipps [REDACTED]
Sent: May 17, 2022 5:13 PM
To: AEP Environmental Assessment
Subject: Fwd: Silvertip Gondola

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Sent from my iPad

Begin forwarded message:

From: Louise Pajot-Phipps [REDACTED]
Date: May 17, 2022 at 5:09:27 PM MDT
To: environmental-assessment@gov.ab.ca
Subject: Silvertip Gondola

Hello:

Thank you for considering the public's input in this decision.

We are opposed to this development as there are several existing gondola tourist attractions already in the Bow valley . This is a well used hiking area and this development is not compatible with existing use.

The Canmore community is already under significant development pressure why add to that ?

Regards,

Louise Pajot-Phipps
Mark Phipps

Sent from my iPad

From: Mary Paston [REDACTED]
Sent: June 10, 2022 4:27 PM
To: AEP Environmental Assessment
Cc: Brenda Davison
Subject: Gondola for Canmore!!!

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Please God no!!!

As I was walking to the grocery store this morning, I was moved almost to tears, yet again, by the sheer majesty of the landscape here. The air was cool, fresh and scented by the pine, spruce poplar and aspen. The birds busy with nest building and song. The creek is filling up now with the warmer weather loosening the snow up in the alpine. My eyes lifted up to that alpine and there, nestled above a pair of gorgeous spring green poplar trees, was Mount Lady McDonald, as mighty as ever.

My heart grew heavy then, as I remembered that there might be a GONDOLA heading up that lovely mountain. A GONDOLA....with its noise, it's degradation of the mountainside, the summit and the valley floor too. A GONDOLA causing further encroachment on an already seriously threatened wildlife corridor. A GONDOLA diminishes the very reason that most tourists come here. They don't come for entertainment, they come for the beauty, the solace, the majesty of these mountains. And I live here for those same reasons. And, as an elder, I feel it is my duty to lend my voice against this kind of "development".

Please please PLEASE do your best to protect what we still have here.

Joni Mitchell said it well, "You don't know what you've got till it's gone".

Thanks for reading this.

Sincerely,

Mary Paston

[REDACTED]
Canmore, Ab
T1W 2G6

From: Galen Pearce [REDACTED]
Sent: June 13, 2022 5:52 PM
To: AEP Environmental Assessment
Subject: Opposition to the Silvertip Gondola Project

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Alberta Environment and Parks,

I am writing to state my opposition to the Silvertip Gondola Project proposed by Stone Creek Resorts. My main concerns are environmental/ecological disturbance, traffic and parking issues, and town values.

1. The Bow Valley is one of the few East-West wildlife corridors for large wildlife in North America, connecting the foothills of Alberta to the interior Canadian Rockies. The proposed Environmental Impact Assessment comes from a generic, default template that does not account for the unique ecological significance of this valley nor the challenges that threaten wildlife trying to move through it. 85% of wildlife habitat in the Bow Valley has already been lost (1), and the TSMV public hearing in 2021 has shown that the people of Canmore highly value the well-being of our wildlife. Since this project crosses a designated wildlife corridor and could be the breaking point for many wildlife species, I would like to see a more comprehensive environmental impact assessment. Such an assessment would include research that clearly quantifies the impacts of development on wildlife movement, define how the project meets current laws, outline how all Treaty 7 First Nations will be provided with an opportunity to engage fully, and clarify their monitoring & mitigation plan for impacts to humans and wildlife.
2. The gondola and associated structures are predicted to accommodate 200,000 to 300,000 people per year. The proposal states that a lower gondola connecting the Palliser area to Silvertip Village Resort will "allow visitors, staff, and residents to make the journey to the Silvertip Village Resort without an automobile which will reduce emissions, benefit the environment, alleviate traffic congestion, and provide convenience for users." What this proposal fails to address is the increased vehicle traffic and emissions that will result from the increase in visitation for this gondola within the town. Canmore already has major parking and traffic issues, where will this project accommodate an extra 300,000 people?
3. As we saw from the TSMV public hearing in 2021, the people who reside in Canmore do not want to see our town become another Whistler or Vail. Adding a gondola will not improve our commitment to a healthy coexistence with wildlife and goes against why people from around the world come to visit Canmore. Tourists visit Canmore to enjoy healthy, wild landscapes while enjoying the comforts of modern living, not to visit a Town that has built over every inch of land possible.

Thank you for your time.

Regards,
Galen Pearce
[REDACTED] Canmore, Alberta
T1W 1S5

References:

1. Whittington, J., Hebblewhite, M., Baron, R.W. et al. Towns and trails drive carnivore movement behaviour, resource selection, and connectivity. *Mov Ecol* 10, 17 (2022). <https://doi.org/10.1186/s40462-022-00318-5>

From: Carol Poland [REDACTED]
Sent: June 13, 2022 1:37 PM
To: AEP Environmental Assessment
Cc: Canmore Council
Subject: NO to the Silvertip gondola Proposal ,

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To Whom it may Concern (All Albertans should be Concerned!)
Director Environmental Assessment, Alberta Environment and Parks
Canmore Council

Please register my name as OPPOSED to the proposed Silvertip Gondola.

Carol Poland
[REDACTED] Canmore AB T1W 2R8

As a resident of Canmore for more than a decade and small business tourism based owner operator of a B&B , I am strongly OPPOSED to this proposed Gondola.

My reasons for opposition include the following:

1. The Bow Valley has a fragile ecosystem and includes a vital wildlife corridor which is unique in the world. Each and every new project must be critically evaluated in terms of impact on wildlife and will it increase human activity and negative human wildlife interactions.
2. The proposed EIA should be FAR more comprehensive and appropriate for this alpine and wildlife conservation area. The proposed EIA is weak and meaningless as it currently does not provide monitoring & mitigation plans nor does it define who it meets current scientific studies regarding wildlife movements.
3. This proposal is not aligned with our Town's social community values of environmental sustainability and ecological capacity and authentic mountain lifestyle.

Please, PROTECT the environment, wildlife and community , say NO to the Gondola!
Unnecessary project and inadequate study assessment proposed currently.

Sincerely
Carol Poland BSc, DVM , MSc
[REDACTED] Canmore AB T1W 2R8
www.grandviewchalet.com

From: John Price [REDACTED]
Sent: June 12, 2022 8:27 AM
To: AEP Environmental Assessment
Subject: Lady Macdonald gondola

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I feel there are quite enough mechanical intrusions onto the landscape of this area and would be appalled and saddened to see them extended.

This gondola would only be in use a short time every year.

I urge you to ensure that the established purpose of this park is retained, and not succumb to the endless pressures in the name of tourism.

John Price

[REDACTED]
Calgary, Ab. T3E6A5.
[REDACTED]

From: Valerie Pruegger [REDACTED]
Sent: June 10, 2022 10:33 AM
To: AEP Environmental Assessment
Subject: proposed gondola in the Bow Valley

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We have protested this project year after year, but it keeps popping up regardless. It does not fit with the permitted uses for good reason. The impact on wildlife has been shown over and over, and how have Indigenous communities been involved? The science is clear, we have already seen the impact on caribou from opening up for development in their habitat.

Let us learn from the tragic examples. We do not need more gondolas and development in our ever shrinking wild spaces. We are already losing this special place as people crowd out animals. Canmore has exploded in population already stressing the land and the Bow Valley. We need to stop putting people over the rights of other animals, rivers, and nature. We have to look at the bigger picture, not human 'wants'. This is just an effort to make money. Once we go down this road, there is no recovery from yet another economic vs nature decision. Our provincial government is not concerned with environmental preservation over economics so we look to your committee to be more objective and considerate of climate change, the need to conserve more natural areas, and the imperative to ensure more species do not go extinct or at risk due to human hubris.

Sincerely,

Dr. Valerie Pruegger

From: Bonnie Rawlyck [REDACTED]
Sent: June 11, 2022 2:26 PM
To: AEP Environmental Assessment
Subject: Silvertip gondola proposal, Canmore, AB

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 [AEP response - Silver Tip gondola.docx](#)

Dear Director,

Please see the attached letter regarding our response to the Silvertip gondola proposal.

Thank you,

Bonnie Rawlyck

[REDACTED]
Canmore, AB T1W 1A6
[REDACTED]

*Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks
E-mail: environmental.assessment@gov.ab.ca*

June 11, 2022

Dear Director,

Re: Silvertip gondola proposal

We live in the residential district of Silvertip in Canmore, Alberta and our home is adjacent to the proposed route of the gondola on Mount Lady Macdonald.

We have been long time supporters of the Yellowstone to Yukon initiative and believe they will highlight the many negative impacts of this proposal on the wildlife and environment.

On a personal note, we have hiked to the proposed gondola terminal area on numerous occasions. Because of its configuration we believe this mountain would be highly dangerous for use as a viewing, dining or walking area. The upper terminal area has a very small footprint and extremely steep vertical drops on the north and east sides. Other gondolas in the area, Sulphur Mountain, Lake Louise and Sunshine, transport passengers to far safer and larger areas for recreation. In addition, none of these gondolas are operating in residential areas.

For the above reasons we are opposed to the proposed Lady Macdonald gondola and do not support any amendments to the Bow Valley Wildland Provincial Park to permit tourism attractions such as a gondola.

Thank you for your consideration,

Jack and Bonnie Rawlyck

Canmore, Alberta

From: Hal Retzer [REDACTED]
Sent: June 13, 2022 3:38 PM
To: AEP Environmental Assessment
Cc: Tracey
Subject: Silvertip Gondola - Concerns with the Proposed Terms of Reference for EIA

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To: Director, Environmental Assessment
Regulatory Assurance
Alberta Environment and Parks

We have lived in Canmore for over 20 years. We have read the terms of reference (TOR) for the EIA for the Silvertip Gondola Project in Canmore, Alberta.

We have concerns with the TOR as it relates to impacts to wildlife, to the environment and to the existing people that live in the Bow Valley because we do not see that Stone Creek Resorts is required to include the cumulative impacts of other proposed and existing activities in the Bow Valley.

I have worked in the natural gas industry for 35 years and for at least the last 15 years, proponents of projects have been required to include their impacts plus the impacts of adjacent operators in their environmental reviews. I have also worked extensively with the rock industry in the Bow Valley and the three major operators east of Canmore also include each other's impacts in their environmental reviews. Why should Stone Creek Resorts be any different? As such, we ask that the EIA include the impacts (wildlife, environmental, air, traffic, noise, social, economic, etc.) of not only Stone Creek's operations, but also of the following:

1. All existing and future town of Canmore operations - e.g. tourism, traffic, affordability;
2. Other major proposed developments - e.g. Three Sisters Mountain Village (TSMV), Smith Creek (TSMV), 800 Canmore, and other developments will have an impact on wildlife movements in the valley;
3. All existing and future recreational impacts – e.g. the trail to the old tea house (where the proposed gondola terminus is proposed) is a very popular hike and this impacts wildlife, the existing Silvertip golf course already impacts wildlife movements as do the Montane biking and hiking trails;
4. The TransCanada highway;
5. The railway;
6. The rock mining industry;
7. Other.

We also do not see in the TOR any analysis as to the possible cumulative social impacts to the existing town folks. The people that live in Canmore have overwhelmingly been concerned with development in this valley (refer to the TSMV public hearings). It is the people that live here that are most affected; as such, we should have a significant, or perhaps the most influence on what development is allowed. The proposed gondola, along with other proposed developments will continue to put pressure on the things we value. We are concerned about risking the functionality of wildlife corridors; we are concerned about traffic, air emissions and less affordability; and we are concerned that a few property developers are singlehandedly going to change the character of our town to something that we do not want. The EIA must allow for more local involvement to effect changes in the project to address local people's concerns and allow for more decision making by locally affected people and their elected representatives. This must be addressed in the EIA.

I would also add that the TOR does not include any sort of greenhouse gas emission analysis. This is unacceptable in today's world that must address climate change.

Please address these shortcomings in the EIA.

Sincerely,

Hal Retzer and Tracey Henderson
Canmore, AB

From: Jim Ridley [REDACTED]
Sent: June 12, 2022 5:18 PM
To: AEP Environmental Assessment
Cc: Ridley Jim; Melanie Daneluk
Subject: Comments re Environmental Assessment ToR for Stone Creek Properties

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Three points I would like to make:

- 1) Adequate Staff Housing for those employed with this venture including all support facilities (ie. restaurants, trail maintenance crews, operational and marketing staff) must be provided as part of any consideration of this project.
- 2) Vehicle parking at the base should be restricted to bus traffic only including tour buses and public transit. There should be direct support for Canmore public transit via Roam Transit subsidies and/or passenger rail to and from Calgary. Utilizing large tracts of public and/or private lands in the valley bottom adjacent to the base is a poor use of limited land base. This would serve as a disincentive to travel to the mid-station by day visitors by private vehicle, thereby assessing wildlife movements on nearby lands.
- 3) The construction and maintenance of trails on steep slopes of Lady MacDonald MUST ensure that braided trail establishment adjacent to switch back trails is not possible; even going so far as to utilize fencing where necessary. This has become a huge problem creating erosion of the landscape at for instance Sulphur Mountain public trail. The establishment and maintenance of trails on the mountainside should be the sole responsibility of Stone Creek Properties in consultation with Alberta Parks, including the provision for public transit back to the gondola base from the Cougar Creek trailhead off of Lady MacDonald.

Happy to elaborate on any of these thoughts at your convenience.

Cheers, Jim Ridley
[REDACTED]

From: Bart Robinson [REDACTED]
Sent: June 13, 2022 6:17 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Proposal, Canmore

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To: Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks

June 12, 2022

Re: Silvertip Gondola Proposal

Dear Director:

Please add my name and the following letter to those you have already received regarding the proposed Silvertip Gondola proposal.

As a long-time resident of Canmore, I object to the proposal on the following grounds.

1. The proposal, by attracting yet more tourists to the valley at Canmore, will add additional pressure to the landscape's already-stressed natural systems. As you undoubtedly already know, the valley is a critical wildlife corridor for animals moving both east and west and north and south through the Rockies. As a narrow mountain corridor, the full function and health of its life-sustaining ecological systems are already jeopardized by the highways and rail tracks that comprise our national transportation corridor, the footprint of a population of 16,000 outdoor-active residents, and scores of thousands of annual tourists. Recent research (Hebblewhite, et. al.) has concluded that the Bow Valley has by this time lost close to 85 percent of its historic prime wildlife habitat. Another recent report, a cumulative effects study using grizzly bears as a focal species (ALCES), paints a death-of-a-thousand-cuts scenario for the corridor. The same conclusion was essentially reached as long ago as 1996 by the Banff-Bow Valley Study, which considered both the state of the environment and the values of the residents.
2. The current proposal for the gondola was only recently declared inconsistent with the land management directives for both the Wildland Provincial Park and the South Saskatchewan Regional Plan. It is an embarrassment that the proponents should think the overall context for the proposal has somehow changed over the last two years.
3. The proposal runs contrary to the values expressed time and again by the people who know the valley best – it's residents. Having lived in Canmore for over five decades, I can attest that throughout all those years the community has universally prized, respected and defended the valley's spectacular mountain setting, it's clean air and water, its wildlife, and that, at least until recently, it provided plenty of elbow-room for those who chose to live here.
4. The proposal, in the context of the environmental crises we currently face – and especially so the biodiversity calamity – constitutes a scientific affront and a moral failing. As is becoming increasingly evident, it is well past time that our development demonstrates an understanding of, and a respect for, the natural world and our non-human kin. If we are to survive, let alone thrive in the coming decades, we will need to exercise wisdom and restraint in our thinking, our activities, and our pursuits. Unfortunately, the Silvertip Gondola proposal evidences no understanding, no respect, and no restraint.

Thank you for your consideration,

Bart Robinson



Canmore, Alberta T1W 1V4

From: Dana Roman [REDACTED]
Sent: June 11, 2022 9:50 AM
To: AEP Environmental Assessment
Subject: No Gondola in Canmore please

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Please stop the Gondola proposal in Canmore! People can walk up there! It will ruin Canmore.
Thank you
Dana Roman

From: Claudia Rustenburg [REDACTED]
Sent: June 13, 2022 5:30 PM
To: AEP Environmental Assessment
Subject: Bow Valley gondola proposal

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Hello,

This is not an acceptable development for a number of reasons, including:

- 85% of Bow Valley's best wildlife habitat has already been lost
- This developer will never be content and would gladly take the remaining 15%. They will take the money and buy themselves a big fancy house in Canmore but our iconic wildlife will be exterminated. If they cared at all about wildlife they would not be asking for what they are, just like TSMVL
- Three Sisters decision was made with outdated information from 1992, a devastating outcome for wildlife, and now the Alberta government is ignoring the latest science again by entertaining this application

C. Rustenburg

From: Jim Sangster [REDACTED]
Sent: June 11, 2022 5:59 AM
To: AEP Environmental Assessment
Subject: Silvertip gondola at Canmore

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Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks,

I write to share my concerns about the Silvertip Gondola proposal within the Canmore area and the Bow Valley Wildland Provincial Park.

Having lived and recreated in the Bow Valley since 1975 I have witnessed the intractable pace of development turn our beloved valley from a place where wildlife and people truly coexisted to the present condition where residents must continually fight against those who would profit at the expense of wildlife and residents quality of life.

From the top of Mt Lady MacDonald the visible scars of human encroachment clearly illustrate my point. The grizzly, wolf, elk and bison whose ancestors have travelled ancient pathways from north to south since the last ice age now see these paths blocked by human shortsightedness and greed. Bow Valley locals have clearly demonstrated our desire to nurture and protect the very special relationship we have with wildlife. Canmore town planning documents clearly reflect these values of acknowledging and working within the limits of geography and ecological capacity.

Current Terms of Reference for the Silvertip EIA come from a standardized government template. This generic approach does not address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation and industry.

Climate adaptation is requiring huge changes to the business-as-usual approach for valley residents of all species. As stewards of the land this generation has an obligation to preserve and protect for future generations.

The Silvertip Gondola is a project in direct contrast to the values necessary for the long term conservation of the Bow Valley as a wildlife corridor.

Jim Sangster

From: Meghan Sharp [REDACTED]
Sent: June 12, 2022 5:49 PM
To: AEP Environmental Assessment
Subject: Comments on Proposed Silvertip Gondola

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Dear Director of Environmental Assessment,

As a resident of Canmore, I am writing to express my comments and concerns about the proposed Silvertip Gondola project.

I would like to see the Terms of Reference for the project's EIA specifically address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation and industry.

I agree with Yellowstone to Yukon's suggestions that "to best meet the needs of the communities of wildlife and people in the Bow Valley, the EIA for the proposed gondola should:

- Look in detail at how the intent and impacts from this project intersect with existing and future development across the Bow Valley
- Be backed up by recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Provide more clarity around human safety requirements in this risky alpine environment
- Expand on a monitoring & mitigation plan for impacts to humans and wildlife"

Thank-you for your time. I hope that the co-existence of humans and wildlife in my home town of Canmore will be at the forefront of this decision.

Meghan Sharp, MSc.



Glaciology | waterSHED lab
Department of Geoscience
University of Calgary
web: [REDACTED]
e-mail: [REDACTED]

I respectfully acknowledge that the University of Calgary is situated in the traditional territories of the people of the Treaty 7 region in Southern Alberta, which includes the Blackfoot Confederacy (comprising the Siksika, Piikani, and Kainai First Nations), as well as the Tsuut'ina First Nation, and the Stoney Nakoda (including the Chiniki, Bearspaw, and Wesley First Nations). The City of Calgary is also home to Métis Nation of Alberta, Region III.

From: Aaron Smith [REDACTED]
Sent: June 8, 2022 10:13 PM
To: AEP Environmental Assessment
Subject: Lady MacDonald gondola proposal

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Hello,

This email is to express my concerns with the proposed gondola at Lady MacDonald.

There are many issues with this proposal, which have already been studied in the past. The Bow Valley Wildland Provincial Park was intrinsically designed to prevent such a huge impediment on wildlife and the local ecology. The gondola proposal contradicts the very purpose of the Wildland Provincial Park.

With the recent approval of Three Sisters Mountain Village, local wildlife cannot afford to lose yet another crucial part of the Yellowstone to Yukon corridor.

It is our duty as mountain citizens to protect and respect the wildlife for years to come. This proposal ultimately does not satisfy the needs of the animals that use the area as a corridor.

Thank you for your consideration.

From: Matthew Stokes [REDACTED]
Sent: May 20, 2022 10:46 AM
To: AEP Environmental Assessment
Subject: Public comment on Silvertip Gondola...

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Hello,

Matt Stokes writing to you from Canmore. I am a long time Canmore resident.

I am opposed to the Silvertip Gondola in the strongest possible terms!!!!

What possible public good does this project serve? The project proposes to take a pristine mountain situated within protected wildlife corridors and install many many tons of concrete, steel and arial cars through it. The CO2 impact of the concrete alone is shocking, should not be approved, and is directly contrary to the Town of Canmore declaration of a climate emergency.

Mount Lady MacDonald is a pristine mountain environment with one hiking trail up it. If the public wants to visit the top of this mountain, they need to put on hiking shoes and enjoy the walk through nature. Members of the public unable to do this can view the mountain from the Town of Canmore, or can visit the top of Sulfur Mountain in Banff on the existing gondola.

Again, what public utility does this project serve? None. It is a profit making endeavour by a property developer. If approved, we will have to look at an aerial tramway, steel and concrete in the mountains instead of a pristine mountain landscape. Animals in the wildlife corridor will be further displaced and stressed. The environmental impact of the installation of an unnecessary gondola is completely counter to policies of the Town of Canmore, the intent of the wildlife corridor, existing environmental legislation and good stewardship of public lands.

THIS PROJECT CANNOT BE APPROVED AND I WILL DO EVERYTHING WITHIN MY POWER TO OPPOSE IT.

Matt Stokes
[REDACTED]

From: Hannah McIntyre <Hannah.McIntyre@mnp.ca>
Sent: June 13, 2022 3:56 PM
To: AEP Environmental Assessment
Cc: Shauna McGarvey; Germaine Conacher; bills; cathya; Brooke Barrett; lorddoug@raeandcompany.com
Subject: Stoney Nakoda Nation Comments on the Stone Creek Silvertip Gondola TOR
Attachments: 2022_06_13_SNN_Stone Creek Gondola ToR Comments.docx

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Good afternoon,

Please see Stoney Nakoda Nations' comments on the Stone Creek Silvertip Gondola ToR attached.

If you have any questions or concerns please do not hesitate to reach out.

Sincerely,

Hannah McIntyre

CELL 587.433.3301
DIRECT 587.702.5957
1500, 640 - 5th Avenue SW
Calgary, AB
T2P 3G4
mnp.ca



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STONEY TRIBAL ADMINISTRATION

Director, Environmental Assessment
Regulatory Assurance
Alberta Environment and Parks
environmental.assessment@gov.ab.ca

June 13, 2022

To whom it may concern,

Re: Stoney Nakoda Nations Comments on the Stone Creek Silvertip Gondola Project Terms of Reference

The Stoney Tribal Administration represents the three distinct Stoney Nakoda Nations (“Stoney Nakoda” or “fyârhe Nakoda”): Wesley First Nation, Bearspaw First Nation and Chiniki First Nation. The Chiefs and Councils of the Stoney Nakoda have the authority to protect the collective rights and interests of the Stoney Nakoda as recognized by Treaty 7 and the *Natural Resources Transfer Act, 1930* (“*NRTA*”) and protected by Section 35 of the Constitution Act, 1982 (collectively known as “Section 35 Rights”). Stoney Nakoda’s Section 35 Rights include hunting as laid out in Treaty 7, and the right to hunt, trap and fish as detailed in the *NRTA*. As well as rights including land, water and resource rights, the right to self-govern, the right to practice Stoney Nakoda culture, the right to speak the Nakoda language, and any right flowing from these aspects (e.g., passing on knowledge to the next generation).

As stated within the Natural Resources Conservation Board (“NRCB”) documentation, the NRCB is a quasi-judicial board designated to conduct the public interest review of the proposed Terms of Reference (pTOR) for the Stone Creek Resorts Inc. (“Stone Creek”) Silvertip Gondola Project (the “Project”). It is legislated by the *Natural Resources Conservation Board Act* which provides for “...an impartial process to review projects that will or may affect the natural resources of Alberta in order to determine whether, in the Board’s opinion, the projects are in the public interest, having regard to the social and economic effects of the projects and the effect of the projects on the environment.”¹ The NRCB states that an NRCB review would “trigger the Government of Alberta’s duty to consult when the government has knowledge of Aboriginal or treaty rights that may be adversely affect by an NRCB public interest decision.”²

The Project is located within the heart of the fyârhe Nakoda Makochi³. Stoney Nakoda have extensively documented the historic and current exercise of their rights in the area of the Project including hunting, fishing, medicinal plant, and berry picking, camping, and other cultural activities flowing from these rights. Nation members hold this area to be highly significant culturally and

¹ *Natural Resources Conservation Board Act*

² <https://www.nrcb.ca/natural-resource-projects/indigenous-engagement> accessed June 12, 2022.

³ Rev., Dr., Chief Snow described SNN fyârhe Nakoda Makochi (Stoney Nakoda territory) as extending from beyond the Brazeau River area in the north, south into Montana, east beyond the Cypress Hills of Saskatchewan, and west well into the British Columbia Interior (2005)

ceremonially. Stoney Nakoda occupied this area prior to settler occupation and continued to travel, live, harvest, and care for the area in the proceeding decades. The Project area is where many Nation members prefer to practice ceremonies, visit sacred sites, teach Stoney Nakoda youth, and share stories about their land and history. The Stoney Nakoda traditional place name for Canmore is Chuwapchipchiyan Kudi Bi, translated in Stoney as “shooting at the willows”. The Stoney Nakoda traditional place name for Bald Eagle Peak, which neighbours Mount Lady MacDonald, is Anû Kathâ Îpa. Additionally, Indian Flats, east of the Town of Canmore, is a traditional camping area for the Stoney Nakoda known as Tinda Mimon.

As part of the Project’s Environmental Impact Assessment (“EIA”) process, Stoney Nakoda provides the attached comments on the pTOR to advocate for the proper assessment of Stoney Nakoda’s Section 35 rights and interest in the EIA. Overall, Stoney Nakoda finds the pTOR is not designed to facilitate the NRCB’s commitment that “Indigenous people who participate in the NRCB review process can expect ...an assessment of impacts to Aboriginal or treaty rights”. There are significant gaps and inconsistencies in the pTOR that must be addressed before the TOR is finalized. Stoney Nakoda’s attached comments discuss three key issues that must be considered:

- 1) The pTOR seems to conflate Traditional Ecological Knowledge with Traditional Land use and fails to mention or distinguish Indigenous Section 35 rights. The regulatory review process must account for an assessment of potential Project-related impacts to Section 35 rights. As noted by the Supreme Court of Canada in *Clyde River (Hamlet) v. Petroleum Geo-Services Inc.*, [2017] 1 SCR 1069, 2017 SCC 40, biophysical components cannot be used as proxies to assess impacts to Aboriginal and Treaty rights. As such, the proponent’s wording surrounding “traditional species” or “issues expressed by Indigenous communities and groups” is insufficient to capture or identify potential impacts to Section 35 rights, and subsequently identify reasonable accommodation measures for impacts to these rights.
- 2) In order to properly contextualize Stoney Nakoda’s Section 35 rights in the Project’s EIA, the assessment must include consideration for valued components (VCs) specific to Stoney Nakoda. These must be determined in consultation with Stoney Nakoda, and may include, but are not limited to: Harvesting, Access, Governance, Culture and Cultural Transmission, and Ceremony. Appropriate baselines must be determined for these VCs, and potential impact pathways must be identified in order to properly address impacts to Section 35 rights resulting from Project-related change.
- 3) The pTOR makes no mention of a cumulative effects assessment. While the *Environmental Protection and Enhancement Act* provides minimal wording surrounding the assessment of cumulative effects in EIA, the recent *Yahey v. British Columbia (2021 BCSC 1287)* decision clearly demonstrates the urgency and necessity for processes that assess and manage cumulative effects. Cumulative effects, and the Project’s potential contribution to these effects, will further impact the ability of Stoney Nakoda to meaningfully exercise their Section 35 rights. Consequently, it is essential that the proponent properly contextualize and identify potential impacts to Stoney Nakoda’s Section 35 rights, including any potential cumulative effects resulting from the Project, in order to properly mitigate or accommodate these impacts. It is the expectation of the Stoney Nakoda that a thorough cumulative effects assessment be carried out with consideration for the Project’s potential to contribute to incremental and synergistic change to the biophysical and social environments, as well as to Stoney Nakoda’s Section 35 rights.

Further, the pTOR did not address other key issues of significance for Stoney Nakoda including:

- 1) The incorporation and consideration of the *United Nation Declaration on the Rights of Indigenous Peoples* (“*UNRIP*”), specifically Articles 25 and 26, relating to the right of Indigenous peoples to maintain and strengthen spiritual relationships with traditionally owned lands and territories, and the right to the lands, territories, and resources which they traditionally occupied. An additional article of considerable importance is Article 11, which relates to free, prior, and informed consent.
- 2) The inclusion of the Truth and Reconciliation Commission Call to Action #92, which calls for the corporate sector of Canada to adopt *UNDRIP* as a reconciliation framework and apply it to corporate policies. This includes commitments to meaningful engagement and ensuring that Indigenous peoples have access to equitable jobs, training, and education opportunities. Has the proponent incorporated any such measures into their own policies?
- 3) Related to the previous point, Stoney Nakoda has received no information regarding an Indigenous inclusion plan, or where there are employment and training opportunities for Stoney Nakoda members. It is important to Stoney Nakoda to understand how the Project can potentially benefit the local community.
- 4) The identification Stoney Nakoda’s key cultural concerns relating to wildlife movement and connectivity. There must be a clear mitigation process developed that addresses the connections between wildlife connectivity and Stoney Nakoda’s hunting rights. The Canmore area is a wildlife corridor, and the proponent must provide an assessment of the Project’s potential impacts to wildlife and wildlife connectivity. Stoney Nakoda also suggests the implementation of wildlife committee to monitor potential impacts to wildlife as a result of the Project, and to monitor the effectiveness of any proposed mitigation measures.

Conclusion

Based on the above identified themes, we expect the NRCB to consider this information in their review of the pTOR. As currently framed, Stoney Nakoda is not confident the EIA will adequately consider potential impacts to Stoney Nakoda Section 35 rights and afford appropriate accommodation. As reconciliation should be a key driver of the regulatory framework in Canada, what is in Stoney Nakoda Nation’s interest should too be in Canada’s interest. The NRCB and Stoney Nakoda should work together to ensure the Project adequately assesses, mitigates and accommodates Stoney Nakoda Section 35 rights, should it proceed.

Sincerely,



William Snow

Acting Director of Consultation
Stoney Tribal Administration

Cc: Doug Rae, Rae and Company

		Section	Comment
1.	Purpose of the Terms of Reference	The purpose of this document is to identify for Stone Creek Resorts Inc. (Stone Creek), Indigenous communities and appropriate stakeholders, the information required by government agencies for an Environmental Impact Assessment (EIA) report prepared under the <i>Environmental Protection and Enhancement Act</i> (EPEA) for the Gondola Project (the Project).	Stoney Nakoda prefers the use of the term Nation rather than community as the Stoney Nakoda, as Indigenous peoples of Canada, are a recognized Nation with the right to self determination. While some aspects of this governance have been impaired through imposition of colonial structures, the Stoney Nakoda have a democratically elected governance structure.
2.	1. Public Engagement and Indigenous Consultation	...[B] Document the Indigenous consultation program implemented for the Project including: d) a list of all meetings and the specific comments or issues raised at the meetings; ...	Stone Creek must also provide an explanation for how Indigenous peoples were identified for consultation and the level of consultation to be undertaken throughout the Project's EIA. The pTOR should also list all Indigenous Nations the proponent has been directed to engage with.
3.	1. Public Engagement and Indigenous Consultation	...[B] Document the Indigenous consultation program implemented for the Project including: e) a description and documentation of concerns and issues expressed by Indigenous communities and groups, Stone Creek's analysis of those concerns and issues, and the actions taken to address those concerns and issues; f) how Indigenous input was incorporated into the Project development, impact mitigation and monitoring; and g) the consultation undertaken with Indigenous communities and groups with respect to traditional ecological knowledge and traditional use of land.	Stoney Nakoda notes the pTOR makes no mention of Section 35 rights. As noted by the NRCB, the regulatory review process "includes an assessment of impacts to Aboriginal or treaty rights". While Biophysical, Traditional Ecological Knowledge and Land Use and Socio-Economic VCs include references to "traditional species" or Indigenous communities the Supreme Court of Canada found in <i>Clyde River (Hamlet) v. Petroleum Geo-Services Inc.</i> , [2017] 1 SCR 1069, 2017 SCC 40, biophysical proxies are insufficient assess impacts to Aboriginal and Treaty rights. The consideration of Aboriginal and Treaty rights central to the activities of hunting, gathering, fishing, trapping and other cultural practices must be an explicit component of impact assessment. Further, engagement activities alone will not assess potential project impacts on Indigenous rights and interests. The description and documentation of "issues expressed by Indigenous communities and groups" does not meet the threshold of the identification of impacts to Section 35 rights and interests as required by in <i>Clyde River</i> . Further, once impacts to Section 35 rights are identified, the Supreme Court of Canada also in <i>Clyde River</i> , stated that the accommodation measures for the identified impacts must give the Indigenous Nation reasonable assurance that its constitutionally protected rights were considered and accommodated as rights.

			The EIA should include an assessment of potential positive and negative effects on Stoney Nakoda's constitutionally protected Section 35 rights and interests.
4.	1. Public Engagement and Indigenous Consultation	[C] Describe plans to maintain the public engagement and Indigenous consultation process following completion of the EIA report to ensure that the public and Indigenous peoples will have an appropriate forum for expressing their views on the ongoing development, operation and reclamation of the Project.	<p>Indigenous Nation participation in the EIA process and the post-EIA process should include, at minimum:</p> <ul style="list-style-type: none"> a) Ongoing work with Stoney Nakoda to contextualize Section 35 rights leading to the identification and incorporation of Indigenous Nation-specific VCs. b) The collection of baseline data in relation to identified Indigenous Nation-specific VCs. In establishing baselines for each VC, the proponent should work with Indigenous Nations, and specifically the Stoney Nakoda to determine when baseline is appropriately set. For example, for a Harvesting VC, baseline should not be set for the present, rather, baseline should be set to the period in which harvesting was not impeded by development. c) The evaluation of Project Impact pathways for each Indigenous Nation VC as well as all VC's identified in the pTOR for potential impacts to Section 35 rights.
5.	2. Project Description	2.1(E) Discuss the alternatives for the Project and reasons for not selecting any identified alternatives.	<p>Alternatives for a Project must distinctly include alternatives <i>to</i> the Project and alternatives <i>means</i> of carrying out the Project. This can be reflected by changing the language in the ToR to state:</p> <p>Discuss alternatives to the Project and alternative means of carrying out the Project, and reasons for not selecting any identified alternatives.</p> <p>This language is more reflective of the requirements for an EIA as outlined in Sections 49(b) and 49(h) of the <i>Environmental Protection and Enhancement Act</i>.</p>
6.	2.5 Conservation and Reclamation	[A] Provide a conceptual Conservation and Reclamation Plan for the Project.	This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge.

7.	<p>3.1. Air Quality and Noise</p> <p>3.1.1 Baseline Information</p> <p>3.1.2 Impact Assessment</p>	All	<p>Under Baseline Information, the proponent notes they will identify residences and other facilities that could be affected by noise and air quality; however, the proponent does not identify a study area in relation to the collection of baseline information. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area.</p> <p>Indigenous receptors, such as harvesters, ceremonial practitioners, ceremonial sites, and traditional ecological knowledge sites should also be identified in consultation with Indigenous Nations, specifically the Stoney Nakoda. Such receptors may be “affected by construction noise and vibration or dust from construction or operation.”</p> <p>In identifying and mitigating impacts to noise and air quality, the proponent should consult with Indigenous Nations, specifically the Stoney Nakoda, and incorporate Indigenous Knowledge into their understanding of potential impacts. Stoney Nakoda Section 35 rights must be understood within the context of this VC, as potential impacts to Stoney Nakoda species of value, harvesting sites, harvesters, ceremonial sites, and ceremonial practitioners may result from impacts via air quality and noise.</p>
8.	<p>3.3. Hydrology and Water Quality</p> <p>3.3.1 Baseline Information</p> <p>3.3.2 Impact Assessment</p>	All	<p>Under Baseline Information, the proponent notes they will describe and map the surface hydrology in the “Project area”. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area.</p> <p>In identifying and mitigating impacts to hydrology and water quality, the proponent should consult with Indigenous Nations, specifically the Stoney Nakoda, and incorporate Indigenous Knowledge into their understanding of potential impacts. Further, as asserted and currently before the Alberta Court of Queen’s Bench Action No. 0301-19586, the Stoney Nakoda have special rights in relation to water navigation and management that are not typically accounted for in EIA and in generic understandings of Section 35 rights.</p> <p>Also noteworthy, section 3.1.2 states it will describe how impacts to noise and air quality “will be mitigated”; section 3.4.2</p>

			<p>states it will “discuss the design, construction and operational factors... that will be incorporated into the Project to minimize impacts to fish and fish habitat and protect aquatic species”; and, section 3.6.2 states it will include “a strategy and mitigation plan to avoid or minimize impacts of the Project on ... wildlife populations and wildlife habitats” and “identify opportunities for habitat creation or enhancement”.</p> <p>A section that considers how impacts to hydrology and water quality will be minimized is missing from 3.3.2.</p>
9.	<p>3.4 Aquatic Ecology</p> <p>3.4.1 Baseline Information</p>	<p>[A] Describe the existing fish and other aquatic resources (e.g., aquatic and benthic invertebrates) potentially affected by the Project. Also identify any species that are:</p> <p>d) ...traditionally used species</p> <p>[B] Describe and map, as appropriate, the fish habitat and aquatic resources of impacted water bodies and identify:</p> <p>e) ... current and potential use of the fish resources by Indigenous, sport or commercial fisheries.</p>	<p>Under Baseline Information the proponent notes they will describe aquatic resources “potentially affected by the Project” and describe and map “fish habitat and aquatic resources of impacted water bodies”; however, the proponent does not identify a study area in relation to the collection of baseline information. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area.</p> <p>Further, the proponent notes they will identify “traditionally used species” and the current and potential use of fish resources by “Indigenous, sport, or commercial fisheries”. This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. Preferred fish species, habitats, and uses by Indigenous harvesters may differ from the species, habitats, and uses identified through typical EIA methods.</p> <p>Language should be changed from “traditionally used species” to “traditional use species” as per Section 3.5. The term traditionally used species antiquates both contemporary Indigenous harvesting rights and species of value. Traditional use species, connects species of value and use to the past, while reaffirming their current and future importance.</p>
10.	<p>3.4 Aquatic Ecology</p> <p>3.4.2 Impact Assessment</p>	<p>[A] Describe and assess the potential impacts to fish, fish habitat, and other aquatic resources (e.g., instream flow needs, stream alterations and changes to substrate conditions, water quality and quantity).</p>	<p>This section should be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. An understanding of the Stoney Nakoda Section 35 right to fish must be understood within the context of this VC, as potential impacts to fish and fish habitat have the potential to impact the Section 35 right to fish other aquatic resources.</p>

			Impacts to the right to fish may also have impacts to other potential Stoney Nakoda VCs including Access, Governance, Culture and Cultural Transmission, and Ceremony.
11.	3.5 Vegetation 3.5.1 Baseline Information	[A] Describe and map vegetation communities for each ecosite phase. Identify the occurrence, relative abundance and distribution and also identify any species that are: h) ...traditional use species	Under Baseline Information the proponent notes they will describe and map vegetation resources for each ecosite phase. The proponent does not identify a study area in relation to the collection of baseline information. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area. Further, the proponent notes they will identify traditional use species. Unlike in section 3.4, the proponent makes no mention of the “current and potential use” of vegetation resources by “Indigenous” harvesters. This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. Preferred vegetation, ecological communities and uses by Indigenous harvesters may differ from the species, habitats, and uses identified through typical EIA methods.
12.	3.5 Vegetation 3.5.2 Impact Assessment	[A] Describe and assess the potential impacts of the Project on vegetation communities...	This section should be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. An understanding of the Stoney Nakoda Section 35 right to harvest vegetation must be understood within the context of this VC, as potential impacts to vegetation have the potential to impact the Section 35 rights. Impacts to the right to harvest vegetation may also have impacts to other potential Stoney Nakoda VCs including Access, Governance, Culture and Cultural Transmission, and Ceremony. Also noteworthy, section 3.1.2 states it will describe how impacts to noise and air quality “will be mitigated”; section 3.4.2 states it will “discuss the design, construction and operational factors... that will be incorporated into the Project to minimize impacts to fish and fish habitat and protect aquatic species”; and, section 3.6.2 states it will include “a strategy and mitigation plan to avoid or minimize impacts of the Project on ... wildlife populations and wildlife habitats” and “identify opportunities for habitat creation or enhancement”.

			A section that considers how impacts to vegetation will be minimized is missing from 3.5.2.
13.	3.6 Wildlife 3.6.1 Baseline Information	<p>[A] Describe and map existing wildlife resources (amphibians, reptiles, birds and terrestrial and aquatic mammals) and their use and potential use of habitats.</p> <p>[B] Identify key indicator species and discuss the rationale for their selection. Identify composition, distribution, relative abundance, seasonal movements, movement corridors, habitat requirements, key habitat areas (including sandbars and alkaline shorelines on the shores of streams and water bodies, and the native prairie), and general life history. Address those species: d) ...traditionally used species</p> <p>[C] Describe, quantify and map all existing habitat disturbance.</p>	<p>Under Baseline Information the proponent notes they will describe and map “existing wildlife resources” and “their use and potential use of habitats”. The proponent does not identify a study area in relation to the collection of baseline information. This is insufficient. The proponent is required to define the area where project effects are likely to occur outside of the project footprint which is in the Local Study Area.</p> <p>Additionally, it is unclear what the proponent means in this section when it refers to “their use and potential use of habitats”. Please clarify.</p> <p>As noted in section 3.4, please change “traditionally used species” to “traditional use species.” Input from Indigenous Nations in identifying “key indicator species” is essential.</p> <p>Further, unlike in section 3.4, the proponent makes no mention of the “current and potential use” of wildlife resources by Indigenous harvesters. This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. Preferred wildlife resources, and habitats, and uses by Indigenous harvesters may differ from the species, habitats, and uses identified through typical EIA methods.</p>
14.	3.6 Wildlife 3.6.2 Impact Assessment	<p>[A] Describe Project components and activities that may negatively or positively affect wildlife and wildlife habitat.</p> <p>[B] Describe and assess the potential impacts of the Project on key indicator species and relate those impacts to wildlife populations and wildlife habitats, addressing:...</p> <p>[C] Provide a strategy and mitigation plan to avoid or minimize impacts on wildlife and wildlife habitat for all stages of the Project considering:...</p>	<p>Stoney Nakoda notes the inconsistent framing of the Impact Assessment subsection throughout all VCs. For example, for the Wildlife VC (3.6) the proponent commits to describing “project components and activities that may negatively or positively affect wildlife”. In section 3.5 (Vegetation) the proponent states it will “describe and assess the potential impacts of the Project on vegetation communities” and in section 3.1 (Air Quality) the proponent states it will “Identify construction and operational components of the Project that have the potential to increase noise levels or affect air quality.”</p> <p>Additionally, section 3.6.2 also lays out a more detailed assessment methodology than any of the other sections. Stoney Nakoda is concerned that this inconsistency in language is reflective of inconsistencies in the methodology that will lead to</p>

			<p>an incomplete assessment process. Sections 3.1-3.5, 3.7-3.8, and 5, 6, 7 should align better with the more involved assessment approach laid out in section 3.6.</p> <p>Further, this section should be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. An understanding of the Stoney Nakoda Section 35 right to harvest wildlife must be understood within the context of this VC, as potential impacts to wildlife have the potential to impact the Section 35 rights.</p> <p>Impacts to the right to harvest wildlife may also have impacts to other potential Stoney Nakoda VCs including Access, Governance, Culture and Cultural Transmission, and Ceremony.</p>
15.	<p>4 Historic Resources</p> <p>4.1 Baseline Information</p>	<p>[B] Provide a brief overview of the regional historical resources setting including a discussion of the relevant archaeological, historic and paleontological records.</p> <p>[C] Describe and map known historic resources sites in the Project Area, considering:</p> <ul style="list-style-type: none"> c) site type and assigned Historic Resources Values; and⁴ d) existing site-specific <i>Historical Resources Act</i> requirements.... <p>[E] Identify locations within the Project Area that are likely to contain previously unrecorded historic resources. Describe the methods used to identify these areas.</p>	<p>Under Baseline Information, the proponent notes they will provide a brief overview of the regional historical resources, and map known historic resources in the “Project area”. This is insufficient. The proponent is required to define the area where project effects are likely to occur outside of the project footprint which is in the Local Study Area.</p> <p>This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. “Historic Resources” may include sites of continued use for harvesting, ceremonial, and cultural activities.</p>
16.	<p>4 Historic Resources</p> <p>4.2 Impact Assessment</p>	<p>...[B] Describe all project components and activities, including all ancillary activities that have the potential to affect historic resources at all stages of the Project.</p> <p>[C] Describe the nature and magnitude of the potential project impacts on historical resources, considering:</p> <ul style="list-style-type: none"> a) effects on historic resource site integrity; 	<p>This section should be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. Impacts to heritage resources may also have impacts to other potential Stoney Nakoda VCs including Access, Harvesting, Governance, Culture and Cultural Transmission, and Ceremony.</p>

⁴ Stoney Nakoda observes that the bulleted lists are inconsistently and confusingly numbered. For the purpose of this review Stoney Nakoda has maintained the bulleted lists in the original.

		<ul style="list-style-type: none"> b) implications for the interpretation of the archaeological, historic and paleontological records; and c) provide management recommendations for all historic resources that may be impacted by the Project. 	<p>A section that considers how impacts to historic resource will be minimized is missing from 4.2.</p>
17.	5. Traditional Ecological Knowledge and Land Use	<p>[A] Provide:</p> <ul style="list-style-type: none"> a) a map and description of traditional land use areas including fishing, hunting, trapping and nutritional, medicinal or cultural plant harvesting by affected Indigenous peoples (if the Indigenous community or group is willing to have these locations disclosed); b) a map of cabin sites, spiritual sites, cultural sites, graves and other traditional use sites considered historic resources under the Historical Resources Act (if the Indigenous community or group is willing to have these locations disclosed), as well as traditional trails and resource activity patterns; and 	<p>Unlike sections 3-4 and 7, the VC of Traditional Ecological Knowledge and Land Use does not include references to establishing or collecting “Baseline Information”. Air Quality and Noise, Hydrogeology, Hydrology and Water Quality, Aquatic Ecology, Vegetation, Wildlife, Terrain and Soils, Land Use and Management, Historic Resources, and Socio-economic Assessment all include sub-sections for the inclusion of baseline information. Further, not only does the proponent not commit to providing a baseline, but it also fails to identify the geographical extent of the maps and descriptions of traditional ecological knowledge and land use. This is insufficient. The proponent is required to define the area where project effects are likely to occur outside of the project footprint which is in the Local Study Area. In addition to identifying the spatial extent to which the proponent will collect baseline information for the VC, the proponent should also include a spatial extent for the baseline collection of information in relation to Section 35 rights (see below).</p> <p>This section does not include references to Section 35 rights. By omission, the proponent narrows the consideration of rights to traditional ecological knowledge and land use. While traditional ecological knowledge and use of land and resources for traditional purposes is a component of rights, specifically the exercise of harvesting rights, it does not encompass the entirety of rights that may be impacted by this project. Rights and interests must be added as a component of the assessment and baseline information must be described.</p> <p>It is recommended that the section be changed to Indigenous Nation Section 35 Rights, or a new section, so titled, be added to the pTOR. It is recommended that the proponent continue to engage with Indigenous Nations, and specifically the Stoney Nakoda to understand Section 35 rights and interests.</p>

			<p>This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge.</p> <p>Traditional ecological knowledge and land use information availability is often directly proportional to the availability of capacity funding for Indigenous Nations to gather and share that information with the proponent. Stoney Nakoda will require sufficient capacity to gather and provide information on Indigenous Knowledge to Stoney Creek, if the Nation determines it is comfortable providing this information.</p>
18.	5. Traditional Ecological Knowledge and Land Use	<p>c) a discussion of:</p> <ul style="list-style-type: none"> i. the availability of vegetation, fish and wildlife species for food, traditional, medicinal and cultural purposes in the identified traditional land use areas considering all project related impacts, and ii. access to traditional lands in the Project Area during all stages of the Project. 	<p>Unlike Sections 3-4 and 7, Section 5 a does not include a subsection entitled “Impact Assessment” and does not commit to “Identify the potential impact of the Project” on traditional ecological knowledge and land use like it commits to identifying impacts to other VCs. A “discussion of” available resources in the “traditional land use areas considering all project related impacts” is insufficient. Stoney Nakoda finds this omission troubling as it suggests that the proponent does not understand its obligation to identify and accommodate impacts to Section 35 rights. Further, impacts to traditional ecological knowledge and land use are only one component of understanding Project related impacts to the exercise of Section 35 rights. Like the collection of baseline information in relation to Section 35 rights noted above, the proponent must commit to the assessment of potential impacts to Section 35 rights.</p>
19.	6. Public Health and Safety 6.1 Public Health	<p>Public Health</p> <p>[A] Describe aspects of the Project that may have implications for public health and provide a quantitative estimate of those impacts to public health.</p> <p>[B] Document any health concerns regarding the Project raised by stakeholders during consultation.</p> <p>[C] Document any health concerns identified by Indigenous communities or groups regarding the Project, specifically on their traditional lifestyle. Include an Indigenous receptor type in the assessment.</p>	<p>Similar to Section 5 (Traditional Ecological Knowledge and Land Use), Section 6 Public Health and Safety, does not include references to establishing or collecting “Baseline Information” nor conducting an Impact Assessment on to identify potential Project Impacts. It is recommended the Proponent clearly state what baseline information will be collected.</p> <p>Further, not only does the proponent not commit to providing a baseline or conducting an Impact Assessment, but it fails to identify the geographical extent of the information it will describe. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area.</p>

			<p>This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. The Proponent must work with Indigenous Nations, specifically the Stoney Nakoda to identify Indigenous receptors.</p>
20.	<p>6. Public Health and Safety 6.2 Public Safety</p>	<p>Public Safety</p> <p>[A] Describe aspects of the Project that may have implications for public safety. Specifically:</p> <ul style="list-style-type: none"> a) describe the emergency response plan including public notification protocol and safety procedures to minimize adverse environmental effects; b) document any safety concerns raised by stakeholders during consultation on the Project; c) describe how local residents will be contacted during an emergency and the type of information that will be communicated to them; and d) describe the potential safety impacts resulting from higher regional traffic volumes. 	<p>Similar to section 5 (Traditional Ecological Knowledge and Land Use), section 6 Public Health and Safety, does not include references to establishing or collecting “Baseline Information” nor conducting an “Impact Assessment” on to identify potential Project Impacts. Further, the Proponent does not identify the spatial extent of their data collection and analysis as is required in EIA methodology. Please address as above.</p> <p>This section must be informed by consultation with Indigenous Nations, specifically the Stoney Nakoda, and the incorporation of Indigenous Knowledge. Public safety is a critical concern of the Stoney Nakoda. Stoney Nakoda notes the Proponent has only chosen to describe how “local residents will be contacted in an emergency”. Stoney Nakoda notes that in the event of an emergency, Nation members may be in the area exercising their Section 35 rights. Residential receptors are insufficient proxies for Indigenous people who may be mobile or temporary occupiers the area. The Proponent must work with Indigenous Nations, specifically the Stoney Nakoda, to identify Indigenous receptors.</p>
21.	<p>7. Socio-Economic Assessment 7.1 Baseline Information 7.2 Impact Assessment</p>	<p>All</p>	<p>Under Baseline Information the proponent notes they will describe the “existing socio-economic conditions in the region and in the communities in the region.” The proponent does not identify a study area in relation to the collection of baseline information. This is insufficient. The proponent is required to define the area where project effects are likely to occur off footprint which is in the Local Study Area</p> <p>This section also makes no mention of Indigenous Nations, nor does it reflect the understanding that the project could impact Section 35 rights and interests as a part of broader socio-economic impacts; Indigenous Nation-specific socio-economic indicators, including indicators specific to Stoney Nakoda should be included in this section. This can be completed through consideration of the Stoney Nakoda-specific criteria and</p>

			consultation with Indigenous Nations, specifically the Stoney Nakoda.
22.	9. Residual Impacts	[A] Describe the residual impacts of the Project following implementation of Stone Creek's mitigation measures and Stone Creek's plans to manage those residual impacts.	This section should be updated to reflect the extent to which the Project area already includes disturbance that continues to impact Stoney Nakoda's Section 35 rights.
23.	9. Residual Impacts	All	<p>The pTOR does not include a section for assessing cumulative impacts, or the contribution of the Project's residual impacts to cumulative effects in the region. This is an integral part of an EIA that cannot be excluded. The <i>Environmental Protection and Enhancement Act</i> provides minimal wording surrounding the assessment of cumulative effects in EIA in Section 49(d):</p> <p>(d) a description of potential positive and negative environmental, social, economic, and cultural impacts of the proposed activity, including cumulative, regional, temporal, and spatial considerations.</p> <p>However, given the implications of the recent <i>Yahey v. British Columbia</i> (2021 BCSC 1287) decision, it is the expectation of the Stoney Nakoda that a thorough cumulative effects assessment be carried out with consideration for the Project's potential to contribute to incremental and synergistic change to the biophysical and social environments, as well as to Stoney Nakoda's Section 35 rights.</p>

From: Jessica Stow [REDACTED]
Sent: May 24, 2022 10:35 AM
To: AEP Environmental Assessment
Subject: Canmore/Silvertip Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To whom it may concern,

My name is Jess. I was born and raised here in Canmore. I have lived here for over 20 years now, and I have watched the town become what it is today. I have witnessed the town grow and become financially inaccessible to so many locals who have lived here in this town, including myself. This is due to the massive boom in tourism in the valley that has hiked the price of living in this valley astronomically.

It is my belief that this project will further hike the price of living in this town and drive many long term locals and short term workers away from the area due to how unaffordable it will become. Many businesses in town have a large seasonal staff turnover rate, and this is largely attributed to the high cost of living in this town. It was recently reported (on Dec 23, 2021 and May 17, 2022) that there are staff shortages in this town due to the high cost of living. This project is not going to solve that, only make it worse. Yes there is a staff housing development planned for within this project, but the simple fact is that it is already too expensive to live here as it is. A massive conference centre, hotel, and gondola in the town will make it even more desirable (and expensive) for people visiting this town, which inevitably will hike the price of living even more as businesses try to profit off of tourism more by increasing their prices.

On top of that, many locals likely will not use the gondola. There will be some that use it maybe once, but as we can see with sulphur mountain, locals don't use it because it's too expensive to use. This project does not have locals in mind at all, which is hugely inconsiderate. On the website for this project it stated that "Stone Creek is committed to engaging with stakeholders, Indigenous Groups, and members of Government...", but not locals. This company and this project does not care about locals. It is only when you read the fine print at the bottom of the website that you are directed to read the notice of project, and at the end of that document is the email to provide feedback for the project. Providing feedback for the project is not easily accessible, which could be argued that it makes it more difficult for locals like myself who want to share their opinion on this proposed gondola. Not to mention, will this project hike already ridiculously expensive property taxes, utility bills, and other taxes/expenses for property owners/renters in the valley? Because I can tell you now, many locals cannot afford it. We're here trying to live off of less-than-living wage and can't afford to pay more in taxes to maintain Silvertip's gondola. Hopefully that won't happen if this project goes through, as this is a Silvertip project and not a Town of Canmore project, but it's still a very valid concern for many people just trying to live in the valley.

Not only does this project affect the cost and quality of life for locals in Canmore, but it will inevitably affect the environment on Lady MacDonald. Gondolas themselves do have a low long term environmental impact on an area, leaving a smaller overall footprint than cars, a bus, or a helicopter. However, constructing the gondolas, the proposed day lodge on the mountain, the foot paths, suspension bridge, and maintenance of facilities will have an impact on the existing environment on the mountain. The large number of pedestrians and tourists on the mountain will likely drive wildlife from their homes and displace them further into the valley to be affected by human life down here, as if that already isn't an issue in the valley today. It's stated in the project description that there will be wildlife education opportunities on the mountain, but we all know tourists don't listen to those as they are offered in the valley and in the parks, and tourists still continue to do stupid things around animals, causing the animals to be put in danger or killed. A

fed bear/animal is a dead bear/animal is the saying of Wild Smart here in Canmore. This won't cease because Silvertip decides to offer "a variety of education and commercial services for guests".

To sum it up, I believe that this project Silvertip is planning is a bad idea, if you haven't gotten that idea from my email already. It will have a negative impact on locals and the cost and quality of living in this town, and it will have a negative long term impact on the wildlife that calls the mountain their home and drive them further into the valley to get inevitably killed.

Jess S.

From: Lauren Miller <lauren.miller@canmore.ca>
Sent: June 15, 2022 4:14 PM
To: AEP Environmental Assessment
Cc: Alaric Fish; Adam Driedzic
Subject: INFO: pToR Stone Creek Resorts Inc. Gondola Project - Town of Canmore Comments
Attachments: Stone Creek Resorts Inc Gondola Project-Town of Canmore Cover Letter.pdf; Stone Creek Resorts Inc Gondola Project-Town of Canmore pTor Changes.docx

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Good Afternoon,

Please see the attached documents for the Town of Canmore's comments on the Proposed Terms of Reference for the Stone Creek Resorts Inc. Gondola Project. Please confirm receipt of these comments.

We hope these comments will be considered prior to finalizing the Terms of Reference for this project and are happy to field any questions regarding our comments and/or proposed changes.

Kind Regards,

Lauren Miller, RPP, MCIP, AICP
Manager, Planning & Development
Town of Canmore | 902 7th Avenue | T1W 3K1
P: 403.679.5003
E: lauren.miller@canmore.ca | www.canmore.ca



Attn: Director, Environmental Assessment Alberta Environment
4999 – 98 Avenue NW
Edmonton, Alberta T6B 2X3

June 15, 2022

Dear Sir/Madam,

**Re: Silvertip Gondola Project
Proposed Terms of Reference for Environmental Impact Assessment**

The Town of Canmore is uniquely affected by the proposed project due to the Town's role as the local land use regulator and public service provider. Municipal functions that may be impacted by this project include planning and development, public utilities, emergency response, regional transportation, parks and trail management, affordable housing, and weed control. The outcome of the NRCB review for this project could have a significant impact on municipal planning and development, and the Town anticipates participating at all stages of the provincial review process.

After reviewing the *Guide to Providing Comments on Proposed Terms of Reference*, we have attached a "Track Changes" version of the proposed Terms of Reference (pToR), to reflect the revisions we feel are fundamental to achieving a comprehensive EIA process. Several of the Town's proposed additions to the TOR are items that we understand are included in the Ministry's standardized terms of reference for other industries and which we submit are relevant to a Recreation and Tourism Project. Our specific comments and/or rationale for our proposed changes to key sections are summarized below. The section number references below correspond to the track changed version we have submitted as an attachment to this letter:

1. PUBLIC ENGAGEMENT

The pToR outlines Indigenous consultation processes without touching on who will be consulted, and how the proponent will ensure that consultation is meaningful. Meaningful consultation protocols must be determined in collaboration with Treaty 7 Nations, and considerations might include that consultation occurs early, based on the Nation's timelines/desired format, and with adequate capacity supports.

2. PROJECT DESCRIPTION

We have specific concerns about the vague reference to the spatial area in the pToR. Although the pToR indicates that the Proponent will refer to the *Guide to Preparing Environmental Impact Assessment Reports in Alberta* published by AEP, there is no information in the pToR that outlines the scope of the assessment specific to the project, such as local and regional study area boundaries and temporal boundaries.

2.1 [C] requires maps and drawings, but doesn't specifically ask for context of existing site conditions, constraints and construction methodology. Any required maps should show the surrounding environmental features that may be impacted within the regional study area. Defining these areas is important to ensure that the assessment is reflective of local environmentally sensitive features and regional conditions that may be affected by the project.

3. ENVIRONMENTAL ASSESSMENT

The Town notes that if this project proceeds, the Town's current policies would require the applicant to submit an Environmental Impact Statement, as part of municipal planning applications.

3.3.2 [B] - This assessment should include current and predicted impacts from both the construction and operation phases on hydrologic regimes, including an analysis of:

- in stream discharge dynamics and changes in channel morphology
- in water level or bank formation in lakes and wetlands
- to natural erosion and landslide patterns, especially those stemming from the altered environment on the Mt. Lady McDonald ridge
- to surface runoff quantity and seasonal timing (i.e., does snow melt occur early due to construction on the ridge?)
- to quantity or timing of water discharge from sewage and effluent treatment municipal plants and at remote locations
- flood dynamics

3.3.2 [C] - This assessment should include current and predicted impacts from both the construction and operation phases on water quality, including an analysis of:

- seasonal dynamics of basic water quality parameters and common urban-area effluents within the impacted watershed,
- water temperature of surface water in streams, rivers, lakes and wetlands within the impacted watershed,
- changes in albedo (proportion of light/radiation reflected). at the ridge (which may alter the timing of snow melt),
- changes in noxious weeds and algal blooms in surface waters.

3.4 - Very little guidance is given in the pToR regarding monitoring for impacts to aquatic resources. This is concerning from the perspective of watershed management because smaller streams (e.g., Cougar Creek) could receive relatively greater impact from the project and could also represent suitable habitat for aquatic species.

3.5.1 - There is no mention of describing and mapping wetland types and existing disturbances. It is recommended that Stone Creek Resorts describe and map ecosite phases, wetland types, and existing disturbances in the project area

3.6. - Overall, the pToR clauses for assessing impacts on wildlife are general and do not capture Canmore specific wildlife concerns such as managing increasing human use of conservation and protected areas, conserving wildlife corridor functionality and ecological integrity.

3.6.1 [B] - Importance may also need to be determined based on ecological concern. For example, bighorn sheep are not a species at risk, but the proposed project could impact bighorn sheep habitat. Wildlife species that we recommend be considered as VCs based on the local Canmore context include wolf, cougar, elk, bighorn sheep, migratory birds and bears. We note that black bears, not just grizzly bears, should be considered in the assessment as black bears are often involved in human-wildlife conflicts in Canmore. Furthermore, given the concerns and significance of wildlife corridors in the Silvertip area, project impacts on the functionality of the regional corridor network should be included as a VC in the assessment.

3.6.1 [C] - As the project description describes the development of trail networks associated with the day lodge and viewing platforms, it will be important to understand how the increase in linear features will influence 1) wildlife habitat use, 2) human access to the area and 3) human-wildlife interactions.

3.6.2 [B] - The Town of Canmore's Municipal Development Plan (MDP) requires development located within or adjacent to high wildfire hazard areas to undertake FireSmart prevention measures if warranted. If that is the case with the proposed project, the assessment should consider how these measures influence wildlife habitat.

5. TRADITIONAL ECOLOGICAL KNOWLEDGE AND LAND USE

The pToR is lacking in assessment of project impacts related to a loss of connection with the land or the experience of pursuing traditional activities in light of the project. Please consider including...

8. MITIGATION MEASURES

Details are lacking in the Mitigation section of the pToR. The plans to identify, mitigate and monitor impacts (Sections 8, 9, 10) stemming from the project needs to explicitly outline plans for both the construction phase and operations phase.

9. RESIDUAL IMPACTS

It is important that Stone Creek Resorts consider and describe the level of certainty associated with any proposed mitigation and their confidence in their predicted impacts.

10. MONITORING

A follow-up program verifies the accuracy of the effects assessment and evaluates the effectiveness of mitigation measures. The information obtained through the follow-up program can be used to determine whether additional actions are needed to address unanticipated outcomes. The duration of a follow up program must be as long as necessary to allow for adequate data collection to verify the accuracy of predicted project impacts and mitigation effectiveness.

11. HUMAN USE ASSESSMENT

The pToR does not address how the proposed project will change existing patterns of human use within the project area, which will add to the current stressors on those environmental and social resources. For many wildlife corridors in the Bow Valley, human use is higher than wildlife use based on camera studies and mitigations such as trail closures, are often implemented to reduce those impacts on wildlife. However, although human use in wildlife corridors is only permitted on designated trails, undesignated trails are a current management issue and often are more common than designated trails. Enforcement efforts for non-compliant behaviors are already limited due to insufficient resourcing and differences in legislation amongst jurisdictions.

Furthermore, the existing Mount Lady Macdonald trail is a popular trail, and it is likely that the visitors or residents could travel by a combination of both the gondola and existing hiking trails. The assessment should consider how the increase in human use may affect existing trail use and trail management.

12. CUMULATIVE EFFECTS ASSESSMENT

The Bow Valley represents important habitat, and movement corridors, for several large mammals such as grizzly bears, wolves, bighorn sheep, and elk, yet this area has seen significant development and increases in human activity. This development pattern has led to serious concerns regarding the functionality of wildlife corridors in the Bow Valley and whether the area is becoming a sink for some wildlife species.

We would recommend that Stone Creek Resorts directly assess cumulative effects, in particular, on wildlife and the functionality of corridors as part of their assessment.

13. VISUAL IMPACT ASSESSMENT

Based on guidance in the Canmore Municipal Development Plan (2016), a visual impact assessment may be required for project area structure plan applications and major development proposals.



Planning & Development Department

Town of Canmore
902 - 7th Avenue
Canmore, AB, T1W 3K1
403.678.1500
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14. CLIMATE CHANGE

The pToR does not address how the project will influence greenhouse gas (GHG) emissions or climate change.

We respectfully ask that the Town's comments on the pToR be considered in the finalization of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lauren Miller".

Lauren Miller, MCIP, RPP, AICP
Manager of Planning & Development

Attachment: Stone Creek Resorts Inc Gondola Project-Town of Canmore-specific wording.docx

**PROPOSED TERMS OF REFERENCE
ENVIRONMENTAL IMPACT ASSESSMENT REPORT
FOR STONE CREEK RESORTS INC. PROPOSED
SILVERTIP GONDOLA PROJECT**

Located within the Town of Canmore, Alberta

ISSUED BY: Stone Creek Resorts Inc.

DATE: April 20, 2022

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PURPOSE OF THE TERMS OF REFERENCE

The purpose of this document is to identify for Stone Creek Resorts Inc. (Stone Creek), Indigenous communities and appropriate stakeholders, the information required by government agencies for an Environmental Impact Assessment (EIA) report prepared under the *Environmental Protection and Enhancement Act* (EPEA) for the Gondola Project (the Project).

Stone Creek Resorts Inc. is proposing to construct and operate an aerial passenger ropeway system (gondola) along with a day lodge, trail networks, viewing platforms, suspension bridge and associated utility services infrastructure (the Project) as part of the Silvertip Integrated Village Resort. The proposed passenger aerial gondola will connect the base area of the Silvertip Resort to an upper terminal on the summit ridge of Mount Lady MacDonald, via a mid-station integrated with the Silvertip Resort Village. The Project spans lands administered by three jurisdictions: Bow Valley Wildland Provincial Park, Public Land, and land within the Town of Canmore. The total proposed development area is approximately 14.9 hectares (ha), with 13.9 ha of that on Bow Valley Wildland Provincial Park and 1 ha on public land.

SCOPE OF THE EIA REPORT

Stone Creek shall prepare and submit an EIA report that examines the environmental and socio-economic effects of the Project.

The EIA report shall be prepared considering all applicable provincial and federal legislation, codes of practice, guidelines, standards, policies and directives and the South Saskatchewan Regional Plan.

The EIA report shall be prepared in accordance with these Terms of Reference and the environmental information requirements prescribed under EPEA and associated regulations. The EIA report will form part of Stone Creek's application to the Natural Resource Conservation Board (NRCB). An EIA report summary will also be included as part of the NRCB Application.

Stone Creek Resorts Inc. shall refer to the *Guide to Preparing Environmental Impact Assessment Reports in Alberta* published by Alberta Environment and Parks (the Guide), and these Terms of Reference when preparing the Environmental Impact Assessment report. In any case where there is a difference in requirements between the Guide and these Terms of Reference, the Terms of Reference shall take precedence.

CONTENT OF THE EIA REPORT

1 PUBLIC ENGAGEMENT AND INDIGENOUS CONSULTATION

[A] Document the public engagement program implemented for the Project including:
a list of all meetings and the specific comments or issues raised at the meetings;
a description and documentation of concerns and issues expressed by the public, the Stone Creek analysis of those concerns and issues, and the actions taken to address those concerns and issues;
and

how public input was incorporated into the Project development, impact mitigation and monitoring.

- [B] Document the Indigenous consultation program implemented for the Project including:
- i. a list of all meetings and the specific comments or issues raised at the meetings;
 - ii. a description and documentation of concerns and issues expressed by Indigenous communities and groups, Stone Creek's analysis of those concerns and issues, and the actions taken to address those concerns and issues;
 - iii. how Indigenous input was incorporated into the Project development, impact mitigation and monitoring; and
 - iv. the consultation undertaken with Indigenous communities and groups with respect to traditional ecological knowledge and traditional use of land.
- [C] Describe plans to maintain the public engagement and Indigenous consultation process following completion of the EIA report to ensure that the public and Indigenous peoples will have an appropriate forum for expressing their views on the ongoing development, operation and reclamation of the Project.

2 PROJECT DESCRIPTION

2.1 Overview

- [A] Identify and provide background information on the legal entity that will develop, design and construct the Project; and the legal entity that will manage and operate the completed Project and hold the operating approvals.
- [B] Describe the purpose and rationale for the Project including the current need for the Project. Include the overall economic, environmental and social impacts of the Project in comparison to its economic, environmental and social benefits. As part of the comparison on environmental impacts and benefits of the Project, discuss how the Project will influence the ecological integrity of the existing wildlife corridors in the Project area.
- [C] Describe and provide maps and/or drawings of all components of the Project. Include information about the conceptual layout and details on how the site will be managed during operations:
- i. Existing infrastructure and leases;
 - ii. Describe any existing legislation that contradicts development, detail the process required to change it, identify justification to change legislation, and discuss implications of changing these laws/regulations (i.e. are there implications for other Wildland Provincial Parks if regulations change)
 - iii. Locations of visitor parking for gondola use;
 - iv. day lodge operational schedule and expected maximum capacity;
 - v. how materials will be transported;
 - vi. water sources;
 - vii. disposal methods and procedures (e.g., will waste be removed via helicopter or gondola; how will liquid wastes from kitchen and sewage be removed and transported from the ridge?);
 - viii. spill cleanup, fire retardants, fuels and oil for both the gondola, kitchen and human use area; and

~~i~~ix. how erosion will be measured on trails and around the gondola.

[D] Provide generalized Project phasing and a construction schedule. Provide a discussion as to whether the Project will operate year-round or follow other timing schedules.

~~[C]~~[E] Discuss how the Project will influence human use in the area and contribute to the management of human use relative to wildlife habitat management objectives.

~~[D]~~[F] Discuss the alternatives for the Project and reasons for not selecting any identified alternatives.

[G] Discuss the implications resulting from a delay in proceeding with the Project, or any phase of the Project; and the implications and benefits (ecosystem services preserved) of not going ahead with the Project.

[H] Describe the benefits of the Project, including jobs created, local training, employment and business opportunities to the local and regional communities, including Indigenous communities.

~~[E]~~[I] Provide the adaptive management approach that will be implemented throughout the life of the Project. Include how monitoring, mitigation and evaluation were incorporated.

2.2 Constraints

[A] Identify any hazards, ecological sensitivities, and constraints resulting from existing site conditions that may affect the Project. Evaluate whether the development can be accommodated given any identified hazards, ecological sensitivities or constraints. This must include specific reference to flooding and steep creek hazards.

~~[A]~~[B] Discuss the process and criteria used to identify constraints to development and how the project was designed so that it meets the objectives and goals of:

~~i.~~ any applicable *Alberta Land Stewardship Act* Regional Plan, sub-regional plan or watershed plan; and protected area plans such as the Bow Valley Protected Areas Management Plan (2002);

~~ii.~~

the environmental setting;

~~iii.~~ cumulative environmental impacts in the region;

~~iv.~~ cumulative social impacts in the region;~~and~~

~~v.~~

applicable Municipal Plans (i.e. Municipal Development Plan, 2023-2026 Strategic Plan, Canmore's Regenerative Tourism Framework, FireSmart Mitigation Strategy, Climate Action Plan, and Land Use Bylaw); and-

~~vi.~~

consider other applicable guidelines including:

- Bow Valley Human-Wildlife Coexistence Technical Working Group (2018). Human-Wildlife Coexistence – Recommendations for Improving Human-Wildlife Coexistence in the Bow Valley.
- Bow Corridor Ecosystem Advisory Group (BCEAG) (1999 and 2012). Wildlife Corridor and Habitat Patch Guidelines for the Bow Valley.
- BCEAG 2001. Wildlife and Human Use Monitoring Recommendations for the Bow Valley (Banff National Park to Seebe).

Commented [AF1]: See proposed new Section 9 at end of this document.

- [BCEAG et al. \(1999\). Guidelines for Human Use within Wildlife Corridors and Habitat Patches in the Bow Valley \(Banff National Park to Seebe\).](#)

~~[B]~~[C] Describe the process and criteria used to select sites for Project infrastructure and identify any existing infrastructure that may be affected by the Project.

2.3 Regional and Cooperative Initiatives

[A] Discuss Stone Creek's involvement in regional and cooperative efforts to address environmental and socio-economic issues associated with regional development.

[B] Describe opportunities for sharing infrastructure (e.g., access roads, utility corridors, water infrastructure) with other resource development stakeholders. Provide rationale where these opportunities will not be implemented.

2.4 Transportation Infrastructure

[A] Prepare a Traffic Impact Assessment as per Alberta Transportation's *Traffic Impact Assessment Guideline* (<http://www.transportation.alberta.ca/613.htm>).

- Describe background traffic and consider the cumulative effects of traffic impacts due to other existing and planned developments using the same highways and accesses.
- Discuss anticipated changes to highway traffic (e.g., type, volume) due to the Project.
- Assess potential traffic impacts for all stages of the Project (e.g., construction, operation, maintenance, expansion, shutdown).
- Determine any necessary improvements and methods to mitigate traffic impacts.

[B] Describe and map the locations of any new road or intersection construction, or any improvements to existing roads or intersections, related to the development of the Project, from the boundary of the Project Area up to and including the highway access points, and:

- discuss the alternatives and the rationale for selection for the preferred alternative;
- discuss compatibility of the preferred alternative to Alberta Transportation's immediate and future plans;
- describe the impacts to local communities of the changes in transportation and infrastructure; and
- provide a proposed schedule for the work.

[C] Describe any infrastructure or activity that could have a potential impact on existing roads (e.g., pipelines or utilities crossing provincial highways, any facilities in close proximity of the highways, any smoke, dust, noise, light or precipitation generated by the Project that could impact the highway and road users).

[D] Provide a summary of any discussions with Alberta Transportation in regards to the Project and its traffic impacts.

2.5 Water Management

2.5.1 Water Supply

[A] Describe the water supply requirements for the Project, including:
— the criteria used, options considered and rationale for selection of water supply;

-

- the expected water balance during all stages of the Project. Discuss assumptions made or methods chosen to arrive at the water balances;
- ii. — the water requirements and sources for construction and normal and emergency operating situations. Identify the volume of water to be withdrawn from each source, considering plans for wastewater reuse;
- iii. — the location of sources/intakes and associated infrastructure (e.g., pipelines for water supply);
- iv. — the variability in the amount of water required on an annual and seasonal basis as the Project is implemented;
- v. — the expected cumulative effects on water losses/gains resulting from the Project operations;
- vi. — potable water treatment systems for all stages of the Project;
- vii. — type and quantity of any potable water treatment chemicals used; and
- viii. — measures for ensuring efficient use of water including alternatives to reduce the consumption of non-saline water such as water use minimization, recycling, conservation, and technological improvements.

2.42.6 Waste and Wastewater Management

- [A] Describe the systems that will be put into place to handle all waste and wastewater resulting from the Project.

2.52.7 Conservation and Reclamation

- [A] Provide a conceptual Conservation and Reclamation Plan for the Project that includes:-
- i. current ecosites and wetlands in the Project area,
 - ii. anticipated timeframes for completion of reclamation stages, including key milestone dates for reclamation and how progress to achieve these milestones will be measured,
 - iii. constraints to reclamation, such as timing of activities, availability of reclamation materials, and influence of natural processes.
- [B] Provide a conceptual re-vegetation plan for the ecosite phases and wetland types temporarily disturbed for the Project. State what re-vegetation techniques will be employed (e.g., planting, seeding) to re-establish plant species removed by the Project. Provide a list of plant species to be re-established within each ecosite phase and wetland type to be re-established in the reclaimed landscape.
- [C] If the FireSmart program will be initiated during Project operations, describe the implications of the FireSmart vegetation management program, e.g., reduction or removal of fire fuels, change in forest species composition, on re-vegetation efforts and species composition of ecosite phases and wetland types in the Project area.
- [D] Provide a plan to monitor reclamation performance and success. Include a discussion of the use of measures of diversity for each ecosite phase and wetland type, and targets of

similarity in species composition of pre-disturbance and post-reclamation ecosite phases and wetland types that define reclamation success.

~~[A]~~[E] Discuss uncertainties related to the conceptual reclamation plan.

3 ENVIRONMENTAL ASSESSMENT

3.1 Air Quality, Climate and Noise

3.1.1 Baseline Information

[A] Identify residences or other ~~facilities~~ potentially susceptible receptors that could be affected by ~~construction noise, and vibration, or dust~~ and other criteria air contaminants, and odours, resulting from the Project's construction or operation. Describe the existing noise levels and air quality conditions in the vicinity of the Project.

3.1.2 Impact Assessment

[A] Identify construction and operational components of the Project that have the potential to increase noise levels ~~or affect air quality~~ air contaminants and odours.

[B] Discuss the nature, severity, extent and duration of activities likely to produce noise, vibration, ~~and dust,~~ other criteria are contaminants, and odours, that could affect residences or other ~~facilities~~ identified receptors.

~~[C]~~ Describe how air quality, odours and noise impacts resulting from the Project will be mitigated including noise management, monitoring plans and complaint resolution, if applicable.

~~[C]~~[D] Compare the predicted Project air quality and noise impacts with applicable municipal, provincial, and federal standards and guidelines.

3.2 Hydrogeology

3.2.1 Baseline Information

[A] Provide an overview of the existing geologic and hydrogeologic setting for the Project. The geologic and hydrogeologic description should include a map with current physical features at the site and a cross section showing surficial geology/hydrogeology below the proposed site development.

3.2.2 Impact Assessment

[A] Describe Project components and activities that have the potential to affect groundwater resource quantity and quality at all stages of the Project.

[B] Describe the nature and significance of the potential impacts from the Project on groundwater. Groundwater monitoring should be required if the assessment identifies Project specific impacts to groundwater quality or quantity (to be included in Monitoring program described in Section 10).

3.3 Hydrology and Water Quality

3.3.1 Baseline Information

[A] Describe and map the surface hydrology in the Project area.

[B] Provide surface flow baseline data, including:

- i. seasonal variation, low, average and peak flows for watercourses; and
- ii. low, average and peak levels for waterbodies.

- [C] Identify any surface water users who have existing approvals, permits or licenses.
- [D] Describe the baseline water quality of watercourses and waterbodies and their seasonal variations. Consider appropriate water quality parameters.

3.3.2 Impact Assessment

- [A] Discuss changes to watersheds, including surface and near-surface drainage conditions, potential flow impediment, natural runoff captured in the system and potential changes in open-water surface areas caused by the Project.
- [B] Describe the extent of hydrological changes that will result from the Project (including any hydraulic changes lower in the watershed (i.e., changes to snowpack characteristics), especially those that lead to changes in wildlife habitat and flood risk.
- [C] Describe impacts on other surface water users resulting from the Project. Identify any potential water use conflicts.
- [D] Describe the potential impacts of the Project on surface water quality, including:
 - ~~i.~~ changes in water quality that may exceed the *Surface Water Quality Guidelines for Use in Alberta* or the *Canadian Water Quality Guidelines for the Protection of Aquatic Life*; and
 - ~~ii.~~ seasonal variation.

3.4 Aquatic Ecology

3.4.1 Baseline Information

- [A] Describe the existing fish and other aquatic resources (e.g., aquatic and benthic invertebrates) potentially affected by the Project. Also identify any species that are:
 - ~~i.~~ listed as “at Risk, May be at Risk and Sensitive” in the *General Status of Alberta Wild Species* (Alberta Environment and Parks);
 - ~~ii.~~ listed in the federal *Species at Risk Act*;
 - ~~iii.~~ listed by COSEWIC; and
 - ~~iv.~~ traditionally used species
- [B] Describe and map, as appropriate, the fish habitat and aquatic resources of impacted water bodies and identify:
 - ~~i.~~ key indicator species and provide the rationale and selection criteria used;
 - ~~ii.~~ all areas used by fish, whether seasonally or year-round, including critical or sensitive areas such as spawning, rearing, and over-wintering habitats;
 - ~~iii.~~ water quality parameters in water bodies and water courses that may affect suitability for fish; and
 - ~~iv.~~ current and potential use of the fish resources by Indigenous, sport or commercial fisheries.

3.4.2 Impact Assessment

[A] Describe and assess the potential impacts to fish, fish habitat, and other aquatic resources (e.g., instream flow needs, stream alterations and changes to substrate conditions, water quality and quantity).

[B] Discuss the design, construction and operational factors including specific diversion and reservoir operations that will be incorporated into the Project to minimize impacts to fish and fish habitat and protect aquatic resources.

~~[B]~~[C] Provide details on proposed aquatic monitoring for the Project, including how changes to aquatic fish and invertebrates will be measured and quantified during construction and operations.

3.5 Vegetation

3.5.1 Baseline Information

[A] Describe and map vegetation communities for each ecosite phase. Identify the occurrence, relative abundance and distribution and also identify any species that are:

listed as “at Risk, May be at Risk and Sensitive” in the *General Status of Alberta Wild Species* (Alberta Environment and Parks);

- i. listed in the federal *Species at Risk Act*;
- ii. listed by COSEWIC; and
- iii. traditional use species.

[B] Describe the regional relevance of landscape units that are identified as rare.

[C] Quantify the amount of each ecosite phase and wetland type to be disturbed by the Project, distinguishing between temporary and permanent disturbances.

[D] Describe the potential impacts of the Project on rare or endangered plant species.

[E] Describe the regional impact of any ecosite phase or wetland type to be removed by the Project.

[F] Discuss the expected timelines for the establishment and recovery of plant communities to be temporarily disturbed and the expected differences in the resulting species composition of each ecosite phase and wetland type.

[G] Describe how weeds and non-native invasive species will be controlled in all stages of the Project.

~~[B]~~[H] Discuss whether the FireSmart program will be initiated during Project operations and if so, describe the implications of the FireSmart vegetation management program, e.g., reduction or removal of fine fuels, change in forest species composition, on ecosite phases and wetland types in the Project area.

3.5.2 Impact Assessment

[A] Describe and assess the potential impacts of the Project on vegetation communities, considering:

- i. both temporary (include timeframe) and permanent impacts;
- ii. the potential for introduction and colonization of weeds and non-native invasive species;
- iii. potential increased fragmentation; and

- iv. implications of vegetation changes for other environmental resources (e.g., terrestrial and aquatic habitat diversity and quantity, water quality and quantity, erosion potential).

3.6 Wildlife

3.6.1 Baseline Information

[A] Describe and map existing wildlife resources (amphibians, reptiles, birds, bats and terrestrial and aquatic mammals) and their use and potential use of habitats across seasons, providing quantitative information, where possible.

i. Conduct a literature review and integrate that knowledge into the description of existing wildlife resources including environmental effects studies, research studies, government databases, current monitoring programs and Indigenous Knowledge;

ii. Describe current knowledge about baseline functionality of the Upper and Lower Silvertip Wildlife Corridors.

iii. Conduct field programs within appropriate survey timing windows where data gaps exist in the baseline conditions;

iv. Discuss effects from existing developments, including the effectiveness of current mitigation measures at minimizing impacts on wildlife;

i-v. Assess existing human use pressures for the Project area, including within corridors adjacent to the Project.

[B] Identify key indicator species or areas and discuss the rationale for their selection. Identify composition, distribution, relative abundance, seasonal movements, movement corridors, habitat requirements, key habitat areas (including sandbars and alkaline shorelines on the shores of streams and water bodies, and the native prairie), and general life history. Address those species:

- i. listed as “at Risk, May be at Risk and Sensitive” in the *General Status of Alberta Wild Species* (Alberta Environment and Parks);
- ii. listed in the federal *Species at Risk Act*;
- iii. listed by COSEWIC; ~~and~~
- iv. traditionally used species;
- v. species of other ecological or human importance identified through consultation; and
- iv-vi. ecologically significant areas that support ecological integrity of the study area.

[C] Describe, quantify and map all existing habitat disturbance, including formal and informal trails, and use appropriate Zone of Influence to evaluate disturbance.

i. Calculate proposed increases to linear density associated with the Project and compare to existing habitat disturbances;

ii. Discuss how increases in human use trails will affect wildlife habitat use, intensity of human use in the area and human-wildlife interactions;

iii. Discuss how trail management guidelines will be incorporated into the design of the Project; specifically, discussion on the impact on areas beyond the top of the gondola regarding human impacts on ecologically sensitive alpine areas, potential development of new trails or prevention of new trails; and

iv. Discuss mitigation strategies for gondola right-of-way rehabilitation.

~~[C]~~[D] Describe and demonstrate the validation of any habitat models used to map wildlife resources. If collected field data are insufficient, additional surveys should be completed or alternative, external sources of data should be used to provide a quantitative validation of the habitat models developed for the proposed Project.

3.6.2 Impact Assessment

[A] Describe Project components and activities that may negatively or positively affect wildlife and wildlife habitat.

~~[A]~~[B] Identify and discuss how wildfire mitigation strategies that may be required for development will affect wildlife and wildlife habitat in the Project area.

~~[B]~~[C] Describe and assess quantitatively, where possible, the potential impacts of the Project on key indicator species and areas and relate those impacts to wildlife populations and wildlife habitats, addressing:

~~i.~~ — how the Project will affect wildlife relative abundance, movement patterns, distribution and recruitment into regional populations for all stages of the Project;

~~i.~~ —

~~i.~~ — how improved or altered access may affect wildlife including potential obstruction of daily and seasonal movements, increased vehicle-wildlife collisions, and increased ~~hunting pressures~~human-wildlife conflicts;

~~ii.~~ —

~~ii.~~ — how increased habitat fragmentation may affect wildlife considering edge effects, the availability of core habitat, and the influence of linear features and infrastructure on wildlife movements and other population parameters;

~~iii.~~ —

~~iii.~~ — the spatial and temporal changes to habitat availability and habitat effectiveness (types, quality, quantity, diversity and distribution), including indirect effects such as displacement from increases in sensory disturbance (i.e., noise, artificial light, vibrations) during construction and operational phases; ~~and~~

~~iv.~~ —

~~iv.~~ — the resilience and recovery capabilities of wildlife populations and habitats to disturbance;

~~v.~~ —

~~v.~~ — Assess Project effects on existing wildlife corridor movement patterns related to changes in habitat use and increased human use; and

~~vi.~~ —

~~vi.~~ Address human-use impacts on wildlife populations (e.g., corridor functionality, vehicle collisions), as well as the potential effects from human-wildlife conflicts.

~~[C]~~[D] Provide a strategy and mitigation plan to avoid or minimize impacts on wildlife and wildlife habitat for all stages of the Project considering:

i. consistency of the plan with applicable regional, provincial and federal wildlife habitat objectives and policies;

ii. a schedule for the return of habitat ~~capability~~functionality to areas temporarily affected by the Project;

- iii. the use of setbacks to protect riparian habitats and habitats for species at risk, interconnectivity of such habitat and the unimpeded movement by wildlife species using that habitat;
- iv. anticipated access controls or other management strategies to protect wildlife during construction and operation;
- v. measures to prevent habituation of wildlife to minimize the potential for human-wildlife encounters and consequent destruction of wildlife, [including review of relevant sections of Human-Wildlife Coexistence – Recommendations for Improving Human-Wildlife Coexistence in the Bow Valley](#); and
- vi. [habitat fragmentation and habitat connectivity resulting from linear features \(e.g., above ground canals, roads, trails, etc.\) and other Project infrastructure and activities;](#) and
- vii. [mitigation plans for proposed new trail networks for the Project will consider existing guidance on human use trail management such as, but not limited to:](#)
 - [BCEAG guideline documents including:](#)
 - [Guidelines for Human Use within Wildlife Corridors and Habitat Patches in the Bow Valley \(1999\); and](#)
 - [Bow Valley Trails Plan: Updates to the Recommendations of the Recreational Opportunities Working Group \(Revised October 2008\).](#)
 - [TERA Environmental Consultants \(2012\). Recommendations for Trails and Management of Recreational Use for The Town of Canmore: South Canmore and West Palliser.](#)

~~[D]~~[E] Identify any opportunities for habitat creation or enhancement which may occur as a result of the Project.

3.7 Terrain and Soils

3.7.1 Baseline Information

[A] Provide descriptions and maps of the terrain and soil resources in the Project Area, including:

- i. surficial geology and topography;

soil types and their distribution;

soils that could be affected by the Project; and

specific locations of erosion sensitive and saline-sodic soils;

3.7.2 Impact Assessment

[A] Describe Project activities and other related issues that could affect soil quality. Outline:

[A] —

- ~~i.~~ the amount (ha) of surface disturbance from the Project;

~~i.~~

- ~~i.~~ the impact of the Project on soil types and reclamation suitability and the approximate volume of soil materials for reclamation;

~~ii.~~

- ~~ii.~~ changes to the potential for soil erosion; and

~~iii.~~

- ~~iv.~~ potential changes to slope instability, wind erosion and other geohazards.

[B] Discuss any constraints or limitations to achieving reclamation success based on anticipated soil conditions (e.g., compaction, contaminants, salinity, soil moisture, nutrient depletion, erosion, etc.); and

[C] Describe potential sources of soil contamination.

3.8 Land Use and Management

3.8.1 Baseline Information

[A] Identify and map the ownership status of the subject lands in the Project Area, including lands owned by the Crown and local municipalities. Include formal and informal existing land uses within the Project Area and adjacent areas.

[B] Identify and map unique sites or special features such as Parks and Protected Areas, Heritage Rivers, Historic Sites, Environmentally Significant Areas, culturally significant sites and other designations (World Heritage Sites, Ramsar Sites, Internationally Important Bird Areas, ~~eteetc.~~).

[C] Identify any land use policies and resource management initiatives that pertain to the Project, and discuss how the Project will be consistent with the intent of these initiatives.

3.8.2 Impact Assessment

[A] Identify the potential impact of the Project on land uses, including:

i. ~~—~~ impacts to unique sites or special features such as Parks and Protected Areas. Where impacts are predicted, provide the results of the assessments and clearly identify the impacts to the special protected area; and

i. ~~—~~

ii. ~~—~~ impacts caused by changes in public access arising from linear development, including secondary effects related to increased hunter, angler and other recreational access, decreased access to traditional use sites and facilitated predator movement; impacts caused by changes in the intensity of use I the Parks and protected areas, including public safety and visitor experiences.

ii. ~~—~~

4 HISTORIC RESOURCES

4.1 Baseline Information

[A] Provide a brief overview of the regional historical resources setting including a discussion of the relevant archaeological, historic and paleontological records.

[B] Describe and map known historic resources sites in the Project Area, considering:

iii. site type and assigned Historic Resources Values; and

iv. existing site specific *Historical Resources Act* requirements.

[C] Provide an overview of previous Historical Resources Impact Assessments that have been conducted within the Project Area, including:

i. a description of the spatial extent of previous assessment relative to the Project Area, noting any assessment gap areas; and

- ii. a summary of *Historical Resources Act* requirements and/or clearances that have been issued for the Project to date.

[D] Identify locations within the Project Area that are likely to contain previously unrecorded historic resources. Describe the methods used to identify these areas.

[E] Describe how Indigenous groups will be notified of findings of historical resources.

~~[D]~~[F] Present contingency plans and field interventions that will be applied should heritage resources be discovered during construction and operation.

4.2 Impact Assessment

[A] A Historic Resources Impact Assessment or a Statement of Justification is required for the Project and a summary of the results of the Historic Resources Impact Assessment or Statement of Justification must be included.

[B] Describe all project components and activities, including all ancillary activities that have the potential to affect historic resources at all stages of the Project.

[C] Describe the nature and magnitude of the potential project impacts on historical resources, considering:

- a) effects on historic resource site integrity;
- b) implications for the interpretation of the archaeological, historic and paleontological records; and
- c) provide management recommendations for all historic resources that may be impacted by the Project.

5 TRADITIONAL ECOLOGICAL KNOWLEDGE AND LAND USE

[A] Provide:

i. a plan and timeline of how Traditional Ecological Knowledge will be acquired, including how capacity supports will be provided to Indigenous Communities and/or Peoples who provide this knowledge;

~~ii.~~ a map and description of traditional land use areas including fishing, hunting, trapping and nutritional, medicinal or cultural plant harvesting by affected Indigenous peoples (if the Indigenous community or group is willing to have these locations disclosed);

~~iii.~~ a map of cabin sites, spiritual sites, cultural sites, graves and other traditional use sites considered historic resources under the *Historical Resources Act* (if the Indigenous community or group is willing to have these locations disclosed), as well as traditional trails and resource activity patterns; and

~~iv.~~ a discussion of:

- i) the availability of vegetation, fish and wildlife species for food, traditional, medicinal and cultural purposes in the identified traditional land use areas considering all project related impacts, and
- ii) access to traditional lands in the Project Area during all stages of the Project.

[B] Determine the impacts of the Project on traditional, medicinal and cultural purposes and identify possible mitigation strategies.

a) Discuss impacts of the Project to the cultural value, spirituality or importance attached to the physical and cultural heritage of the area.

a)b) Discuss changes to experiences of being on the land (e.g., increase in artificial light, visual aesthetics).

6 PUBLIC HEALTH AND SAFETY

6.1 Public Health

[A] Describe aspects of the Project that may have implications for public health and provide a quantitative estimate of those impacts to public health.

[B] Document any health concerns regarding the Project raised by stakeholders during consultation.

[C] Document any health concerns identified by Indigenous communities or groups regarding the Project, specifically on their traditional lifestyle. Include an Indigenous receptor type in the assessment.

[D] Describe implications to the municipal Fire Rescue Department and Alberta Health Services, including:

i. who will be responsible for providing Fire, Rescue, and Medical services during construction and once operational;

ii. any training that will be required/provided for the municipal Fire Rescue Department both throughout the project construction and once operational; and

iii. how will access be granted to municipal fire rescue and other first responding agencies to the gondola route and towers both during project construction and once operational.

6.2 Public Safety

[A] Describe aspects of the Project that may have implications for public safety. Specifically:

i. describe the emergency response plan including public notification protocol, emergency temporary accommodation plan for staff/visitors/contractors and safety procedures to minimize adverse environmental effects;

ii. document any safety concerns raised by stakeholders during consultation on the Project and the actions taken to address those concerns;

iii. describe how local residents will be contacted during an emergency and the type of information that will be communicated to them; ~~and~~

iv. describe the existing agreements with area municipalities or industry groups such as safety cooperatives, emergency response associations, regional mutual aid programs and municipal emergency response agencies or other industry partner emergency response/spill response agreements;

v. describe the potential safety impacts resulting from higher regional traffic volumes; and

vi. describe the wildfire mitigation strategies that will be used during construction (including any “hot work”) and increased risk during operation from people traveling through and above the landscape.

7 SOCIO-ECONOMIC ASSESSMENT

7.1 Baseline Information

- [A] Describe the existing socio-economic conditions in the region and in the communities in the region.
- [B] Describe factors that may affect existing socio-economic conditions including:
- i. population changes, including demographic changes, employment income, household income, living wage considerations, average cost of housing, adjacent neighbourhood impact;
 - ii. workforce requirements for all stages of the Project, including a description of when peak activity periods will occur;
 - iii. impact on workforce housing in Canmore and the Bow Valley, strategies to mitigate that impact, and rationale for their selection;
 - iv. the Proponent's policies and programs regarding the use of local, regional and Alberta goods and services
 - ~~ii~~-v. training, employment and business benefits specifically accruing to aboriginal communities in the Study Area where possible; and
 - ~~iii~~-vi. the project schedule and the overall engineering and contracting plan for the Project.

7.2 Impact Assessment

- [A] Describe the effects of construction and operation of the Project on:

- ~~i.~~ housing;
- ~~i.~~
- ii. availability and quality of health care services;
- iii. local and regional economies;
- iv. local and regional infrastructure community services;
- v. employee transportation;
- ~~ii~~-vi. any anticipated increase in immigration (e.g. temporary foreign workers);
- ~~iii~~-vii. tourism and recreational activities; and
- ~~iv~~-viii. hunting, fishing, trapping and gathering.

- [B] Provide the estimated total project cost, including a breakdown for engineering and project management, relocation of infrastructure, acquisition of land, maintenance, equipment and materials, and labour for both construction and operation stages. Indicate the percentage of expenditures expected to occur in the region, Alberta, Canada outside of Alberta, and outside of Canada.

8 MITIGATION MEASURES

- [A] Summarize the avoidance, environmental protection, mitigation and enhancement measures to minimize or eliminate the potential impacts for all stages to be incorporated into the project. Describe mitigation strategies where baseline impacts are identified.
- [B] Discuss effectiveness of current mitigations and enhancement measures in mitigating impacts to VCs.
- [C] Provide summary tables of all commitments related to mitigation, compensation, studies, and monitoring. If proposed mitigations will be a joint effort between multiple

jurisdictions, identify the key responsible authority responsible for mitigation implementation and monitoring.

9 RESIDUAL IMPACTS

[A] Describe the residual impacts of the Project following implementation of Stone Creek's mitigation measures and Stone Creek's plans to manage those residual impacts.

- i. Identify and describe the uncertainty of the data, models, mitigation and projected effects, and hence the confidence in the predictions of residual impacts; and
- ii. Identify how uncertainty has been managed in the Environmental Impact Assessment.

[B] Provide specific recommendations on how the proponent will contribute to the mitigation of long-term human use effects given the land use concerns about ecologically sensitive areas and species within the proposed Project area.

10 MONITORING

[A] Describe ~~the~~ Stone Creek's current and proposed monitoring programs, including:

- i. how the monitoring programs will assess any project impacts and measure the effectiveness of mitigation plans. Discuss how the Proponent will address any project impacts identified through the monitoring program;
- ii. how the Proponent will contribute to current and proposed regional monitoring programs;
- iii. monitoring performed in conjunction with other stakeholders, including Indigenous communities and groups;
- iv. new monitoring initiatives that may be required as a result of the Project;
- v. regional monitoring that will be undertaken to assist in managing environmental effects and improve environmental protection ~~strategies;~~ strategies;

[B] Describe the monitoring programs proposed that will verify the accuracy of the environmental assessment to assess any Project impacts and to measure the effectiveness of mitigation plans including providing an outline of the monitoring plan objectives, proposed parameters to be measured and methods to be employed. The discussion must consider potential thresholds for triggering adaptive management with consideration of existing guidelines (e.g., air quality objectives) and identify gaps in knowledge regarding thresholds for certain ~~VCS;~~ VCS.

[C] Discuss:

- i. ~~Stone Creek's plans for addressing and mitigating any environmental impacts identified in the monitoring program;~~
- i. how monitoring data will be disseminated to the public, Indigenous communities or other interested parties including the potential response mechanisms in the event of unanticipated environmental impacts; and
- ii.

iii. how the results of monitoring programs and publicly available monitoring information will be integrated with Stone Creek's environmental management system.

[D] To accompany the description of the follow-up program, present a table showing the main characteristics for each of the recommended follow-up programs (residual effect, objectives, parameters, timelines, and targets). If thresholds will be developed in the future, a clear outline of who will be involved in that development and how those thresholds will be developed should be discussed in the assessment

[E] Describe the adaptive management plans that will minimize the impact of the Project including describing the flexibility built into the Project to accommodate future modifications as necessary.

11 HUMAN USE ASSESSMENT

11.1 Baseline Information

[A] Describe the existing human use within the Project Area and adjacent trail networks. Include use on designated and undesignated trails, recent increases in use (including night and winter use) and non-compliant behavior (e.g. off-leash dog walking, new trail construction).

11.2 Impact Assessment

[A] Discuss how the Project will provide destination services and enable travel by a combination of both gondola and existing hiking trails and how any increase in human use may affect existing trail use and trail management.

12 CUMULATIVE EFFECTS ASSESSMENT

[A] Assess the cumulative effects for each VC for which the proponent anticipates residual effects from the Project, as well as those identified as being of concern by the public or Indigenous communities. At a minimum the CEA should assess:

- a) the effects of past and future projects and physical activities in combination with the residual effects of the Project, including how the effects may interact; and
- b) the analysis of the effects of future projects and physical activities may include a comparison of possible future scenarios with and without the Project but must reflect the full range of cumulative effects and not just the Project's contribution.

[B] The CEA should assess increased effects on wildlife movement corridors, increased human-wildlife interactions and increased vehicle traffic on wildlife. This should include regional impacts of the project itself, as well as impacts of the increased numbers of people drawn to Canmore due to its presence.

[C] The cumulative effects assessment will take into account the results of relevant regional studies.

[D] Describe mitigation measures proposed for cumulative effects on the environment including:

Commented [LM2]: There are a number of areas where the Town of Canmore feels assessment is required. The additional sections noted below could be included as new sections following Section 7 and before current Section 8 (Mitigation Measures)

- a) discussion of the effectiveness of those measures at mitigating cumulative effects; and
- b) in cases where the mitigation measures for these effects are beyond the proponent's control, identify all parties, their role and responsibility with implementing and maintaining mitigation measures.

13 VISUAL IMPACT ASSESSMENT

- [A] Provide a Visual Impact Assessment that anticipates potential visual and aesthetic impacts from the proposed Project, including a discussion of measures to lessen these impacts. The existing Silvertip Area Structure Plan provides additional information on objectives including policies to have structures blend with the surrounds through use of natural materials, earth tone colours, and non-reflective materials where possible.

14 CLIMATE CHANGE

- [A] Describe whether the Project will negatively or positively contribute to greenhouse gas (GHG) emissions.
- [B] Provide estimates of the net greenhouse gas (GHG) emissions for construction and operation of the Project and describe the Project's main GHG emission sources.
- [C] Describe any mitigations that can be implemented in Project design, construction or operations that will reduce GHG emissions.
- [D] Discuss the potential effects of climate change, including variation in weather such as extreme precipitation, drought, or wildfire, on the Project and on VCs.

From: Carol and Peter Tracey [REDACTED]
Sent: June 10, 2022 11:30 AM
To: AEP Environmental Assessment
Subject: PROPOSED GONDOLA

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Good morning Director of Environmental Assessment

We are writing to express our opposition to the proposed Gondola that, ultimately, will negatively affect the already beleaguered wildlife

Please explain how this project will be consistent with current laws, regional plans, and other guidelines that are in place specifically for the purpose of managing development in the Bow Valley

It appears that business and tourism-related interests continue to override concerns for the wildlife and critical habitat

Reports that human-wildlife conflicts will continue to rise must be duly considered to fully understand the overall cumulative effects

Please do **not** allow this Gondola project to proceed; consider that THREE (mountain) Gondolas are already in existence for tourists to access and enjoy

Carol and Peter Tracey

From: Karl Wahl [REDACTED]
Sent: June 10, 2022 10:59 AM
To: AEP Environmental Assessment
Subject: Bow Valley Gondola

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I do not favour a gondola in the Bow Valley on Lady MacDonald. It would be no good for our wildlife habitat.

Karl. N. Wahl [REDACTED]
Canmore, Alberta
T1W 2S2

From: karen wallace [REDACTED]
Sent: June 10, 2022 12:04 PM
To: AEP Environmental Assessment
Subject: Mount Lady Macdonald gondola project

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I strongly oppose the development of Mount Lady Macdonald for tourism. The wildlife need the space to continue to thrive, and if people want to go up there, they can don hiking boots and get up there without adding anymore machinery and equipment.

Please ensure that nature is protected as a priority in the Canmore area.

Karen Wallace,
[REDACTED]

From: Walsh, Bryan @ Calgary [REDACTED]
Sent: June 11, 2022 12:55 PM
To: AEP Environmental Assessment
Subject: Silvertip Gondola

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As a full time resident of Silvertip, I support the gondola as its benefits far outweigh risk to habitat. The gondola would travel well above the corridor, not through it. The pollutants reduced by its displacing vehicular trips will be huge

Get [Outlook for Android](#)

From: kathryn walton [REDACTED]
Sent: June 12, 2022 2:50 PM
To: AEP Environmental Assessment
Subject: Gondola

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The citizens of Canmore are getting tired of fighting to preserve what's left of our beautiful Bow Valley. The animals are being squeezed into ever shrinking wildlife corridors and they are already having difficulty going about their lives without running into people and dogs. We do not need a gondola, whose sole purpose is obviously to attract tourists and we certainly don't need more tourists. When will this stop? It needs to be now, while there's still a chance. I say an emphatic "no" to the gondola.

Kathryn Walton

Sent from my iPad

From: Doug Watson [REDACTED]
Sent: June 10, 2022 10:16 AM
To: AEP Environmental Assessment
Subject: Gondola

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

The proposed gondola up Mount Lady MacDonald should be rejected. It is unnecessary, does not reflect local community standards and would be harmful to resident and migrating animals. Please decline permission to the proposal. Doug Watson

From: Heidi Widmer [REDACTED]
Sent: June 10, 2022 8:25 AM
To: AEP Environmental Assessment
Subject: Silvertip Gondola Project Requires Broader EIA

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

To Whom It May Concern,

Re: Silvertip Gondola Proposal

As it appears on [Stone Creek Resorts website](#) the Silvertip Gondola Project proposes the construction and operation of a gondola along with a day lodge, trail networks, viewing platforms, suspension bridge and associated utility services infrastructure as part of the Silvertip Integrated Village Resort within what are currently Town of Canmore, public and Bow Valley Wildland Provincial Park lands. The Environmental Impact Assessment for this proposed development is too narrow in scope and I request a larger consideration as is recommended below.

I wish to acknowledge my privilege in writing this; I was born and raised in Banff to a settler European-Canadian family and continue to benefit greatly from the intergenerational wealth and opportunities this position affords me. My fortunate upbringing brings a great responsibility to ensure future generations of tourists and residents are able to enjoy the vitality of this place.

You are also in a privileged position as a government employee within a system implemented by settler Canadians. With respect, I urge you to act from this position in a responsible way that considers the future where all human and nonhuman lives in Alberta may thrive.

As published by the [Yellowstone to Yukon Conservation Initiative](#) (2022, June 8), a science-informed non-profit advocating for sustainable wildlife-human coexistence, I urge you to **broaden the embarrassingly narrow scope of the current mandatory Environmental Impact Assessment to:**

- Look in detail at how the intent and impacts from this project intersect with existing and future development across the Bow Valley
- Be backed up by recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Provide more clarity around human safety requirements in this risky alpine environment
- Expand on a monitoring & mitigation plan for impacts to humans and wildlife

Your continued hard work, respect and commitment to sustainable park development in Alberta is imperative for healthy communities today and for generations to come. I strongly recommend act from a place of responsibility for future generations of Albertans and tourists alike act from a place of respect and responsibility that seek to live in right relations with Alberta lands.

Your continued hard work and commitment to sustainable park development in Alberta is imperative for healthy communities today and for generations to come.

Sincerely,

Heidi Widmer



Candidate - MA Environmental Education and Communication

Châ Ûpchîchîyen Kudebi (Canmore, Alberta)

I reside on Treaty 7 territory within the Métis Nation of Alberta Region 3. I acknowledge the diversity of human and more-than-human stories and experiences that have been and continue to be of this place.

From: Linda Wiggins [REDACTED]
Sent: June 13, 2022 4:06 PM
To: AEP Environmental Assessment
Subject: Mount Lady MacDonald Gondola EIA

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

TO: Director, Environmental Assessment, Regulatory Assurance Alberta Environment and Parks

Dear Team,

I write to ensure that you recognize that this issue is extremely important.

This location is critical wildlife habitat. A very thorough EIA / Environmental Impact Assessment, is absolutely essential.

Sincerely,
Linda Wiggins

From: Keith Robinson <keith@wildlifedistillery.ca>
Sent: June 10, 2022 10:50 AM
To: AEP Environmental Assessment
Subject: Re: silvertip Gondola

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Hello,

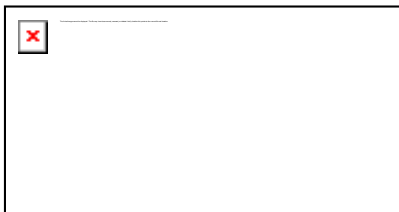
I am writing today to ask you to investigate further into the extremely narrow scope of the current environmental impact assessment for the silver tip Gondola project.

Having grown up in Canmore I have had the privilege of hiking the many mountains around Canmore throughout the years and the thought of having a Gondola passing through a sensitive wildlife corridor and 300,000 visitors on top of Lady Mac is very worrisome. I do not believe this project fits within the land management direction set forth under the Wildland Provincial Park protected area designation, as well as the provisions of the South Saskatchewan Regional Plan.

I beg you to consider this message and the many others who are concerned about this proposed project.

Sincerely,

*& Keith Robinson
Owner/Operators
Wild Life Distillery Inc.*



Tel.

Keith: [REDACTED]

From: graeme williams [REDACTED]
Sent: June 4, 2022 5:14 PM
To: AEP Environmental Assessment; sean.krausert@canmore.ca; jeff.mah@canmore.ca; wade.graham@canmore.ca; municipal.clerk@canmore.ca; Hilary Young
Subject: Objection to Silvertip Gondola Project

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Dear Sir/Madam

I wish to express our strong objection to the Silvertip Gondola proposal.

As long-term Canmore residents, witnessing the gradual decimation of the Valley's wild spaces by rampant, unchecked development across the Valley - this is an unwanted, unnecessary addition.

it serves no purpose beyond enriching already wealthy developers.

Canmore is choking to death under increased tourism, horrendous traffic issues & the blatant disregard for our wild spaces from locals, visitors & Real Estate profiteers & at some point, someone needs to stand up & say enough is enough.

I have full trust that the project will be refused & that the surrounding lands that would be disturbed & destroyed by this construction remain fully intact.

Many Thanks

Graeme Williams

[REDACTED]
Canmore

From: [REDACTED]
Sent: June 11, 2022 9:57 AM
To: AEP Environmental Assessment
Subject: Environmental impact for the proposed gondola Lady MacDonald

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Good morning,

Regarding the proposed gondola in my community, below, are three considerations for adequate environmental impact assessment.

I have reproduced the very cogent arguments presented by Y2Y and endorse them fully.

The route would cross a designated habitat patch and an important wildlife corridor. It includes an area at the top with food, beverage and retail outlets, hiking trails, a suspension bridge and viewing platforms for up to 300,000 visitors a year.

Ninety-three per cent of the project footprint is within the Bow Valley Wildland Provincial Park, which does not permit tourism attractions such as a gondola. The current regulations associated with this provincial land designation prioritize non-motorized recreation uses and the preservation and protection of natural areas.

1. The Bow Valley is already pressured by human activity

The Bow Valley's ecosystems and wildlife have long been at a crossroads. As far back as 1996, the Banff-Bow Valley Study concluded that the region was on a path that would erode the very values for which it was known and loved by residents and visitors alike.

Fast-forward to 2022, when researchers [published a study](#) based on 20 years of wolf and grizzly bear movement data and concluded that the Bow Valley has already lost up to 85 per cent of its best wildlife habitat.

Adding to that research is a soon to be released report from Y2Y and the ALCES Group on a cumulative effects modeling project for the Bow Valley. This unique work looked at past, present and future human impacts on grizzly bears. The report clearly shows how grizzly bear movement paths have already been dramatically altered. Carefully-planned development and well-managed recreation are critical to mitigate further habitat reduction and the risk of human-wildlife conflict.

For decades, every time a new development proposal comes along, we again ask: *Is this the tipping point? Is this the project that will finally make it impossible for grizzly bears and other wildlife to survive here?*

With so many pressures on the Bow Valley, every planning decision must be made with an understanding of overall cumulative effects. Otherwise, we risk losing what makes this area so special in the first place: the wild animals that have always been here.



A photo taken from an area near the top of Mount Lady MacDonald, where a proposed gondola could be built (Credit: Tim Johnson)

2. This is our shot to get the environmental impact assessment right for nature

It is of critical importance that the environmental assessment for a proposed gondola in Canmore is done right — for nature — the first time around.

The current Terms of Reference, or scope, for the project's EIA come from a standardized government template. This generic approach does not address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation and industry.

To best meet the needs of the communities of wildlife and people in the Bow Valley, the EIA for the proposed gondola should:

- Look in detail at how the intent and impacts from this project intersect with existing and future development across the Bow Valley

- Be backed up by recent science that clearly quantifies historic, present and future impacts of development on wildlife movement
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully
- Define how the project meets current laws, regional plans, strategies, and other guidelines
- Provide more clarity around human safety requirements in this risky alpine environment
- Expand on a monitoring & mitigation plan for impacts to humans and wildlife

3. The project should acknowledge community values

People who live in Canmore and the Bow Valley are committed to coexisting with the wildlife that live in and move through this corridor. This aligns with the communities' respect for the mountains, forests and rivers where we are fortunate to live, work and play.

Time and time again, people in the community have spoken out for development plans that prioritize and ensure the health of this mountain landscape. Town planning documents clearly reflect these values of acknowledging and working within the limits of geography and ecological capacity.

Wildlife and mountain landscapes are also a primary reason that visitors come to Canmore and the Rockies. The Tourism Canmore-Kananaskis strategic plan highlights the region as one with a respect for the environment and celebrating an authentic mountain lifestyle. Environmental sustainability was cited as the number one priority during public engagement in developing the tourism strategy.

As we think about projects like the Silvertip Gondola proposal, we need to ensure that any socio-economic components of an EIA process are structured to reflect the values of the community.

Kind regards,

Genevieve Wright
35-year resident of Canmore, mother, citizen of Earth

From: Josh Welsh <Josh@y2y.net>
Sent: June 13, 2022 12:15 PM
To: AEP Environmental Assessment
Cc: Hilary Young
Subject: Y2Y's comments to the proposed Terms of Reference for EIA Report for Stone Creek Resorts Inc. Silvertip Gondola Project
Attachments: Y2Y Response to Silvertip Gondola EIA ToR.pdf

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Director Kristensen,

Thank you for the opportunity to review and comment on the proposed Terms of Reference for EIA Report for Stone Creek Resorts Inc. Silvertip Gondola Project. Enclosed is our submission for your review.

Regards.

Josh Welsh

he/him/his

Alberta Program Manager

Yellowstone to Yukon Conservation Initiative (Y2Y)

Treaty 7 Territory

403.609.2666 ext. 148 | josh@y2y.net



Corinne Kristensen
Director, Environmental Assessment, Regulatory Assurance
Alberta Environment and Parks
environmental.assessment@gov.ab.ca

June 13, 2022

Subject: Proposed Terms of Reference for EIA Report for Stone Creek Resorts Inc. Silvertip Gondola Project

Dear Director Kristensen,


The Yellowstone to Yukon Conservation Initiative (Y2Y)'s mission is to connect and protect habitat throughout the 3,400 km-long mountain region from the greater Yellowstone area north to the Yukon, so that people and nature can thrive. Y2Y works to ensure that wildlife populations can adapt and move in response to changing climates and landscapes. Our focus is on the protection of headwaters and intact forests and extends to supporting sustainable nature-positive tourism and recreation and the traditional cultural values and Rights of Indigenous Nations. The Bow Valley is one of the four most important east-west valleys for wildlife movement in the Yellowstone to Yukon region. Any development proposed for the Bow Valley deserves rigorous and comprehensive environmental assessments that reflect the best available Western science and Traditional Ecological Knowledge.


It is through the lens of our mission, the present and future human impacts on the Bow Valley region, and the current crises of climate change and biodiversity loss, that we provide the following comments on the proposed Terms of Reference for the Silvertip Gondola project Environmental Impact Assessment.

To best meet the needs of the communities of wildlife and people in Canmore and the Bow Valley, the EIA for the proposed gondola should:

- Provide a detailed cumulative effects analysis of the project through a detailed examination of how the intent and impacts from this project intersect with existing and future development across the Bow Valley;
- Be backed by recent science that clearly quantifies historic, present, and future impacts of development on wildlife movement;
- Define how the project meets current laws, regional plans, strategies, and other guidelines;
- Expand on a monitoring and mitigation plan for impacts to humans and wildlife;
- Provide more clarity around human safety requirements in a risky alpine environment; and
- Outline how all Treaty 7 First Nations will be provided the opportunity to engage fully.


Phone: 403.609.2666
Fax: 403.609.2667
Toll-free: 1.800.966.7920


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Canmore, AB T1W 1P4
Canada


P.O. Box 157
Bozeman, MT 59771-0157
USA

www.y2y.net
info@y2y.net



We elaborate on a number of these considerations below.

The draft Terms of Reference as presented utilizes a generic format provided by the province and is not tailored to the unique needs and challenges of the place in which the project is proposed. This approach fails to address the current realities of the Bow Valley as a continentally-significant wildlife corridor already challenged by significant human-induced pressures from development, tourism, recreation, and industry.

Cumulative effects: long recognized as a problem, yet not mentioned

A key concern with the proposed Terms of Reference is the lack of any reference to "cumulative impacts" or "cumulative effects". Yet, we have known for thirty years that this is one of the most critical considerations facing Canmore and the Bow Valley.

For decades, researchers have recognized the cumulative impacts caused by a growing human footprint in the Bow Valley. A report from 1993 cited in the *Banff-Bow Valley Study* identified how “outside the park, in the Canmore portion of the Bow Valley, rapid residential development along the valley floor and along the sides of the valley has resulted in the alienation of many of the movement corridors between Banff National Park, Wind Valley and the lower Bow Valley”; the *Banff-Bow Valley Study* from 1996 concluded that the region was on a path that would erode the very values for which it was known and loved by residents and visitors alike; the [*Towns and trails drive carnivore movement behaviour, resource selection, and connectivity*](#) (Whittington et al. 2022) paper analyzed 20 years of wolf and grizzly bear movement data and concluded that the Bow Valley has already lost up to 85 per cent of its best wildlife habitat; and the [*Grizzly Bear Movement and Conflict Risk in the Bow Valley: A Cumulative Effects Model*](#) (Y2Y and ALCES Group 2022) looked at past, present and future human impacts on grizzly bears, and clearly demonstrates how grizzly bear movement paths have already been dramatically altered, and requires carefully-planned development and well-managed recreation to mitigate further habitat reduction and the risk of human-wildlife conflict.

Incompatibility with land-use designations and local guidelines not adequately addressed

As a project that is inconsistent with the current land management direction set forth under the Wildland Provincial Park protected area designation, as well as the provisions of the South Saskatchewan Regional Plan, the EIA must demonstrate how the project will not compromise the protections afforded under existing legislation.

The proposed gondola would traverse a designated habitat patch and an important wildlife corridor (the Upper Silvertip Wildlife Corridor) as defined in the 1999 (revised 2012) Bow Corridor Ecosystem Advisory Group (BCEAG) *Wildlife Corridor and Habitat Patch Guidelines for the Bow Valley*. These Terms of Reference make no mention of these guidelines – created in collaboration between the Town of Canmore, the Town of Banff, the Municipal District of Bighorn, Banff National Park, and the Government of Alberta – which are relevant to these lands as stipulated by the Town of Canmore’s Municipal Development Plan. The BCEAG guidelines should be incorporated into the Terms of Reference.

Community values and Treaty First Nations’ Rights not considered

Canmore and the Bow Valley is internationally-recognized as a community that has been a leader in advancing initiatives that support human-wildlife coexistence and adhere to deeply rooted values that prioritize the health of this mountain landscape. Town planning documents clearly reflect these values of acknowledging and working within the limits of geography and ecological capacity. It is therefore imperative that any socio-economic components of the EIA truly reflect the values of the Canmore community as well those of Treaty 7 First Nations.

We have included detailed comments and recommendations relating to the specific wording of the draft Terms of Reference in Appendix A below.

We appreciate the opportunity to provide feedback on the Terms of Reference for the Environmental Impact Assessment of this project, and urge the Department of Regulatory Assurance to ensure that the Terms of Reference explicitly considers the greater ecological and social context of the Bow Valley. The Bow Valley is at a pivotal point when it comes to determining what future development is appropriate. In order to sustain what makes this valley an international tourism destination, environmental protection, habitat restoration, and reconciliation with Indigenous peoples must be given equal weight to – or more weight than – potential economic benefits. Indeed, future development should, according to the G7 Nature Compact, be *nature positive*. We look forward to future opportunities to provide input on this proposed project.

Sincerely,

A handwritten signature in black ink that reads "H Young". The signature is written in a cursive, flowing style.

Hilary Young, PhD
Alberta Program Director

APPENDIX A

General Comments

- The words "cumulative", "cumulative impacts", or "cumulative effects" do not appear at all in the Terms of Reference, yet cumulative impacts are the core problem for the Bow Valley.
- Terms of Reference is missing any mention of anything related to climate change, including the project's contributions to GHG emissions (e.g. carbon associated with the concrete required for this project), as well as any efforts to mitigate them or quantifying how emissions, will be reduced if the gondola is used as a transportation mechanism to get staff, residents, or visitors from the valley bottom to the existing Silvertip Resort Area/golf course (incidentally, this consideration would not require a gondola to the mountain top).
- The section describing the monitoring plan and protocols should be strengthened. The Terms of Reference should define:
 - the intent of monitoring, what will be monitored (thresholds and indicators), and require that a plan be developed to define what will happen if thresholds are breached;
 - the monitoring plan's roles and responsibilities, noting who is addressing the different monitoring activities: the town, the proponent, the province, etc.; and
 - how the human use patterns will be addressed by the monitoring plan, including any subsequent management action.
- The Terms of Reference discusses identifying baseline data and impacts for ecological features, but does not talk about avoidance or mitigation of impacts. Despite there not being any current requirement for mitigations to be identified in the EIA except when it comes to wildlife, given the context of this proposal, mitigations should be defined for all identified impacts.

Section 1. Public Engagement & Indigenous Consultation

- There is no mention of investigating how First Nations want to be engaged. The level of engagement and consultation should include both the legal requirements as stipulated by the Aboriginal Consultation Office as well as efforts towards right relations, including requests from the Nations' consultation offices.
- This section should include requirements for an Indigenous engagement plan that includes site visits for Nations who request it and cultural monitoring programs.
- This section should define what will happen if Indigenous views conflict with project objectives and other information.

Item 1.B

- This section should provide further clarity how Indigenous consultation will include all First Nations and Indigenous peoples with traditional claims to this region.

Section 2. Project Description

Item 2.1.B

- This section should define the socio-economic need for a gondola, including a demand analysis.

Item 2.1.F

- Any discussion on “implications resulting from a delay in proceeding with the Project, or any phase of the Project; and the implications of not going ahead with the Project” should also quantify the natural assets and Valued Ecosystem Components preserved by not proceeding with the project.

Item 2.2.A

- The constraints sections should be broadened to define how the project meets the objectives and goals of:
 - The Alberta Land Stewardship Act
 - The South Saskatchewan Regional Plan
 - Bow Valley Protected Areas Management Plan
 - Canmore’s Regenerative Tourism Framework
 - Human Use Management Project of the Bow Valley
 - Projects defined by the Human-Wildlife Coexistence Technical Working Group for the Bow Valley
 - Bow Corridor Ecosystem Advisory Group *Wildlife Corridor and Habitat Patch Guidelines for the Bow Valley*
 - Town of Canmore Municipal Development Plan and Land Use Bylaw
 - MD Bighorn Municipal Development Plan
- This section should also include a description of any existing legislation that prohibits or restricts development, the detail the process required to change it, the justification to change legislation, and the implications of changing these laws/regulations on similarly designated regions in favour of a private companies’ development interests.

Item 2.3.A

- This section should ensure that any “regional and cooperative efforts to address environmental and socio-economic issues associated with regional development” describe how they provide substantive benefit to understanding the potential effects of this project.

Section 3. Environmental Assessment

- This section should consider construction AND operation for each attribute assessed.
- Add a section that quantifies the projected GHG emissions from the construction and operation of the project as well as any efforts to mitigate GHG emissions.

Item 3.1.1.A

- The baseline information used to define entities affected by Air Quality and Noise impacts should include specifying relevant ecosystems and associated wildlife.

Item 3.6

- This section should specifically mention the impacts to sheep habitat as this area contains critical habitat for them, notably the meadow just south the existing Teahouse Helipad.

Item 3.6.1.A

- This section should ensure there is clarity around how terrestrial species with a wide range will be mapped, and by mapping their wide range, how cumulative impacts from increased numbers of people due to the project will be considered throughout their range. The EIA should therefore define the regional study and/or

catchment areas. NOTE: Recent studies for this region have defined the study area to encompass the Bow Valley from Castle Mountain Junction to Seebe.

Item 3.6.1.B

- This section should ensure there is clarity around how the EIA not only describes the impacts of the project itself, but the impacts to the regional study area from the increased numbers of people drawn to Canmore due to the project's presence.

Item 3.6.1.C

- This section should ensure the measurement of "existing habitat disturbance" includes all trails, sanctioned and unsanctioned. Measurement should also include a Zone of Influence buffer around all existing habitat disturbance.

Item 3.6.2.A

- This section should include a full cumulative effects (CE) assessment approach.
- Increased noise from the gondola operations and its impact on wildlife habitat use should be included in the CE assessment or under section 3.1.

Item 3.6.2.B.b

- This section should ensure there is an assessment of how the proposed base station location (Palliser Trail) and associated structures, traffic, etc. affects wildlife movement, including in the adjacent Lower Silvertip Wildlife Corridor and the Harvie Heights Regional Habitat Patch.

Item 3.6.2.B.c

- Regarding "how increased habitat fragmentation may affect wildlife", this section should incorporate the most recently available data about the baseline functionality of the Upper and Lower Silvertip Wildlife Corridors and include a comprehensive data collection program if there is inadequate data.
- This section should also include impacts to connectivity, not only from infrastructure, but from increased human use in these corridors due to the presence of this tourism attraction.

Item 3.6.2.C

- Regarding the approach to "avoid or minimize impacts," a report entitled [Grizzly Bear Movement and Conflict Risk in the Bow Valley: A Cumulative Effects Model](#) (Y2Y and ALCES Group 2022), and the paper by Whittington et al. (2022) ("[Towns and trails drive carnivore movement behaviour, resource selection, and connectivity](#)") conclusively show that any new development in this area of town would have detrimental effects on wildlife movement. In this context, this section should provide clarity on how the project as proposed will improve the current situation and not contribute to further negative impacts on wildlife.

Item 3.6.2.C.a

- This section should also demonstrate how the project will meet objectives and recommendations from the 2018 [Human Wildlife Coexistence report & working group recommendations](#).

Item 3.6.2.C.b

- This section should clarify what “habitat capability” means; “capability” could fall at the tail end of a spectrum for “functionality” and may not be sustainable. Functionality should also be understood in comparison to pre-disturbed ideal habitat conditions.

Item 3.6.2.C.e

- It is unclear if “measures to prevent habituation of wildlife to minimize the potential for human wildlife encounters and consequent destruction of wildlife” will be applied throughout the project’s existence. This section should parse out the two main areas that need to be measured: the installation of new infrastructure and the new volume of people that will have access to and be traveling through the wildlife corridor (gondola up, hike down). The latter is currently not included in the Terms of Reference.

Item 3.8

- This section should provide a description of current human use patterns, trail conditions, and trail density in the area should also be included in the baseline description
- It is not clear if a road will be required for construction. If there is, this section should include measures of the impact of road construction and decommissioning on wildlife and habitat use.
- This section should include a description of temporal impacts with operating hours of the gondola.

Item 3.8.1.B

- As part of identifying and mapping “unique sites or special features”, Key Biodiversity Areas should be included in this section.

Item 3.8.2.A.b

- Impacts from changes in public access should include an assessment of the project's impact on existing recreation on the slopes of this mountain (e.g., Mount Lady Macdonald trail, Montane Traverse trail, Eagle Heights Conservation Area trails, Silvertip Golf Course, etc.) in conjunction with the relativity of these impacts on the specified Valued Ecosystem Components.

Section 5. Traditional Ecological Knowledge and Land Use

Item 5

- The elements required in this section would largely be unavailable without TEK or TLU assessments for the Bow Valley. Since none currently exist, any work should wait until such assessments are obtained. Furthermore, they should come from the Treaty 7 Nations interested in engaging with this work, and they should not identify specific locations.
- Current land uses should also be included in this assessment, not just traditional use. Site visits should be required as part of the consultation process, especially for the Stoney Nakoda Nation since they are the closest geographically, but also should be a part of what is offered to all Treaty 7 Nations as well as other non-Treaty 7 nations with historical claims to the region.

Section 6. Public Health and Safety

Item 6.2

- This section should provide additional clarity around the mitigations required to ensure the safety of the high volume of visitors (estimated at 200,000 to 300,000 annually) entering a dangerous alpine environment who are not physically or mentally attuned to its risks.

Item 6.2.A

- This section should include a requirement to engage with Kananaskis Public Safety and local EMS units for input.

Item 6.2.A.d

- This section should include consideration of increased wildfire risk from higher numbers of people traveling over and through montane ecosystem (e.g., flammables tossed from a gondola or by people hiking/walking).

Section 7. Socio-Economic Assessment

Item 7.1.A

- This section should contain clear subsections, as it encompasses a very broad category.
- Describing “the existing socio-economic conditions in the region and in the communities in the region” should include considerations for cumulative effects, Town planning goals, Town and regional (Tourism Canmore Kananaskis, Travel Alberta) regenerative tourism goals, community’s vision for development, past community feedback on previously-proposed iterations of the project, etc.

Item 7.1.B.c

- According to the Provincial guidelines, “the project schedule and the overall engineering and contracting plan for the Project” is meant to “to identify training, employment and business benefits specifically accruing to aboriginal communities in the Study Area where possible.” This section should ensure aboriginal communities are mentioned and should be rewritten to describe the original intent set by the province.

Item 7.2

- This section should also provide a viewshed study and the impact on existing viewsapes, as well as an assessment of the existing natural vs. proposed developed aesthetic of this prominent alpine feature.
- This section should also describe the impacts on community identity and culture (NOTE This is also relevant to a demand management assessment).

Item 7.2.A.a

- The impact on “local and regional economies” should also include an assessment of the additional burdens on municipal infrastructure and related tax implications for residents from increased visitation associated with the project.