



THE LAKE LOUISE SKI AREA LTD.

**LONG-RANGE PLAN ENGAGEMENT
REPORT**



July 2019

LAKE LOUISE SKI AREA LONG-RANGE PLAN INDIGENOUS AND STAKEHOLDER ENGAGEMENT PROGRAM

The Lake Louise Ski Area (Lake Louise, LLSA), as we know it today, was founded in the late 1950s – created by combining two already operating ski companies. It covers a large portion of Mounts Lipalian and Whitehorn, as well as Richardson’s Ridge, providing a comprehensive lift system that provides skiers and snowboarders access to a broad range of terrain. Lake Louise’s unique location within Banff National Park has helped the ski area to become internationally recognized. It is the foundation of Banff’s winter tourism economy, attracting skiers and summer visitors from around the world. Due to its location in a national park, all facility development and operations must meet the strict ecosystem protection requirements of the National Parks Act and all plans must be approved by the Minister of Environment and Climate Change who bears the Federal Government’s responsibility for the Parks Canada Agency.

In 2006, Parks Canada released an update to the *Ski Area Management Guidelines* that outlines Parks Canada’s process and principles for managing new development at the four mountain park ski areas. In 2015, Parks Canada issued the *Lake Louise Ski Area Site Guidelines for Development and Use*. These site guidelines, developed in association with Lake Louise, provide direction for the nature and scope of development that will be considered by Parks Canada at the Lake Louise Ski Area. In order to undertake any proposed new developments, outside of regular maintenance or projects that fall within the *2006 Ski Area Management Guidelines*, Lake Louise is required to seek approval from Parks Canada of a Long-Range Plan.

The Lake Louise Ski Area has developed a Long-Range Plan (LRP) to guide environmental, guest experience and educational initiatives at the ski area for the next 10 to 12 years. The Lake Louise Ski Area is committed to early, ongoing and transparent engagement with Indigenous communities and stakeholders interested in operations and development plans at the Ski Area. In support of this commitment, in the Spring of 2018, the Lake Louise Ski Area, in association with Parks Canada, began early engagement on the first draft of the LRP with Indigenous communities and key stakeholder groups. On April 15, 2019, a subsequent draft of the LRP and the associated Detailed Impact Analysis (DIA) were released for public review and comment. The public comment period on the LRP and DIA ended on June 15, 2019.

The following engagement report provides an overview of engagement activities undertaken on the LRP and DIA and feedback received by the Lake Louise Ski Area and Parks Canada. It also outlines the ski area’s responses and highlights action taken by the ski area to integrate public input in the LRP and DIA.

Items to Note in Reviewing This Document

1. The scope of engagement was required to adhere very specifically to the directions of the *Lake Louise Ski Area Site Guidelines for Development and Use*, which in turn are underpinned by the *Ski Area Management Guidelines*. Feedback that broadly seeks to revisit those underpinning policies is thus not within the scope of this engagement process and cannot be considered by LLSA.
2. In cases where multiple similar comments were received, LLSA has included the comment only once in the summary table of this report. Similarly, many of the comments received were submitted on behalf of groups. As such, the feedback tables in this report are intended to

provide a summary of all topics raised and are not reflective of the overall weight of positive and negative comments.

3. In keeping with LLSA's commitment to transparency throughout the engagement program, all comments received by Lake Louise we provided, verbatim, to Parks Canada for consideration in their decision-making.
4. LLSA is pleased by the ratio of broadly positive comments received, relative to negative comments.

INDIGENOUS ENGAGEMENT PROGRAM

Indigenous Engagement Program Objective and Principles

The Lake Louise Ski Area recognizes the unique relationship that Indigenous peoples in Canada have to the land and natural resources and therefore understands that Indigenous communities would likely have unique interests and considerations relating to the LLSA's proposed Long-Range Plan. To that end, LLSA is committed to seeking feedback from Indigenous communities through inclusive and ongoing engagement opportunities.

The following principles were used to design the LLSA's Indigenous engagement program.

Respectful: The Lake Louise Ski Area respects the constitutional rights, unique cultural diversity, languages and traditions of Indigenous peoples in Canada. Lake Louise Ski Area will engage Indigenous communities in a way that is respectful of Indigenous community values and traditional knowledge.

Early and Ongoing Outreach: Early and ongoing outreach to Indigenous communities will help inform the design of the Indigenous engagement program and will ensure that sufficient time to provide input has been given to Indigenous communities potentially impacted by the proposed LRP.

Meaningful Engagement: Lake Louise Ski Area will provide opportunities for meaningful engagement with Indigenous communities. This includes ensuring sufficient time for review and comment on Project plans as well as multiple opportunities for dialogue.

Transparent and Accountable: Lake Louise Ski Area is committed to ensuring that all relevant feedback received during the Indigenous engagement program is meaningfully considered. LLSA will report back to Indigenous communities on how their feedback was considered and/or incorporated into the proposed LRP.

Indigenous Communities Engaged

The following Indigenous communities were identified for engagement on the Lake Louise Ski Area LRP through discussions with Parks Canada Agency.

- ?Akisq'nuk First Nation
- ?aq'am (St. Mary's Band)
- Bearspaw First Nation
- Blackfoot Confederacy
- Blood Tribe/Kainai
- Chiniki First Nation
- Ktunaxa Nation Council
- Métis Nation of Alberta, Region 3
- Piikani Nation
- Shuswap Indian Band
- Siksika Nation
- Stoney Nakoda Nation
- Tobacco Plains Indian Band
- Tsuut'ina Nation
- Tsuut'ina Tribal Council
- Wesley First Nation
- Yaqaan nu?kiy (Lower Kootenay Band)

Indigenous Engagement Activities

The Indigenous engagement program was divided into three phases:

Phase 1: Initial Outreach and Indigenous Engagement on the DIA Terms of Reference

April-August 2018

Parks Canada led the first phase of Indigenous engagement. It consisted of initial outreach via letter to identified Indigenous groups to notify about the Long-Range Plan and to seek input into the Terms of Reference for the DIA.

On April 18, 2018, Parks Canada Agency issued outreach letters to Indigenous communities potentially affected by the proposed project. Following the issuance of those letters, two Indigenous communities responded to Parks Canada: the Métis Nation of Alberta, Region 3 and the Shuswap Indian Band. Parks Canada and LLSA attended introductory meetings with those communities.

Phase 2: Initial Outreach by Proponent and Early Engagement on LRP

September 2018-March 2019

Following the completion of engagement on the DIA ToR, LLSA conducted initial outreach to Indigenous groups to initiate early engagement on the Long-Range Plan in advance of the release of the LRP and DIA for public review and feedback, as well as to seek input on how these groups would like to be engaged going forward.

On September 21, 2018, LLSA issued an introductory letter to potentially interested Indigenous groups to introduce the Project and to invite them to participate in an introductory discussion regarding the Long-Range Plan. Follow-up phone calls were conducted between October 1 and November 30, 2018.

Phase 3: Engagement on Draft DIA and LRP

April-June 2019

On April 8, 2019, Lake Louise Ski Area issued copies of the draft LRP and DIA to all identified Indigenous communities for review and comment and offered to meet with interested Indigenous groups to discuss the plans. Follow-up phone calls to Indigenous communities were made between April 8 and June 15 2019.

Two communities, the Métis Nation of Alberta, Region 3 and the Tsuut'ina Nation, each requested face-to-face meetings with Lake Louise Ski Area. Parks Canada participated in these meetings. At the meetings, the following topics were discussed:

- The LRP and DIA
- Environmental management and monitoring programs
- Water usage and licence/restrictions
- Protection of cultural findings during project development
- Incorporation of cultural knowledge in interpretive centre

Conversations with both communities are ongoing.

Further engagement activities will be developed on the basis of feedback received from Indigenous communities, but activities could include:

- Detailed review meetings with technical experts
- Site visits and ceremonial visits
- Educational youth visits

STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder Engagement Program Objective and Principles

Lake Louise Ski Area is committed to early and ongoing engagement with stakeholders. To that end, LLSA developed the following objective and principles to guide the development and execution of the LRP engagement program.

Objective:

- To obtain meaningful stakeholder input into Lake Louise Ski Area's Long-Range Plan through open, transparent and accessible stakeholder and public engagement programs.

The following principles were used to design the stakeholder engagement program and helped ensure that it met the objective outlined above.

Early Outreach: Early and ongoing outreach to key stakeholders will help inform the design of the public engagement program and will ensure that sufficient time to provide input has been given to stakeholders most impacted by the proposed LRP.

Accessible: In recognition of the fact that the Lake Louise Ski Area and Banff National Park have national interest, the engagement program will be designed to be accessible to a broad a range of stakeholders. In order to achieve this, a mixture of in-person and online engagement opportunities will be made available.

Transparent and Accountable: Lake Louise is committed to ensuring that all relevant feedback received during the engagement program is meaningfully considered. Lake Louise will report back to participants on how feedback was considered and/or incorporated into the proposed LRP.

Respectful: Lake Louise will engage stakeholders in a way that is respectful of individual values and the input that is being provided.

Stakeholder Groups Engaged

The following types of stakeholders were identified for engagement on the LLSA LRP. Stakeholders were identified through an environmental scan exercise that included identifying parties who expressed an interest during the Site Guidelines engagement program as well as experience with other major projects in the Banff National Park Area. Groups that were targeted for engagement on the LLSA LRP include:

- Federal, Provincial and Municipal Governments
- Environmental Non-Governmental Organizations
- Tourism Organizations
- Community organizations in the Bow Valley Corridor
- Amateur and professional alpine sport organizations
- Individuals who expressed an interest through the 2015 Site Guidelines process
- General public in Bow Valley, Calgary and across Alberta and Canada

Stakeholder Engagement Activities

As with Indigenous engagement, the Stakeholder Engagement program was divided into three phases:

Phase 1: Stakeholder Engagement on the DIA ToR

April-August 2018

On April 30, 2018, Parks Canada released the draft DIA Terms of Reference (ToR) on its website for public and stakeholder review and comment. Parks Canada provided interested parties with 30 days to review and provide comment. Interested stakeholders were asked to provide feedback in writing directly to Parks Canada. Parks Canada issued written notification of the release of the draft DIA ToR to key stakeholders who expressed an interest in continuing to be informed following the completion of the 2015 Site Guidelines Process. LLSA completed phone calls and emails notifying key stakeholders of the LRP Project and the release of the draft DIA ToR for consultation.

Following the close of engagement on the Terms of Reference, Parks Canada released a final Terms of Reference for the DIA, along with a summary of comments received, on August 1, 2018 and directed LLSA to proceed to prepare a DIA.

Phase 2: Initial Outreach by Proponent and Early Stakeholder Engagement:

May 2018-March 2019

Due to the anticipated level of interest and feedback from key stakeholder groups, Lake Louise Ski Area engaged these groups early in the process. Groups that were targeted for early engagement included environmental non-governmental organizations who have an interest in environmental protection of Canada's mountain national parks. These groups were identified based on their expressed interest during the Site Guidelines process as well as knowledge of organizations with an interest in Banff National Park and surrounding area.

Lake Louise Ski Area reached out to these groups with an introductory phone call followed by a project introduction email and an offer to meet to discuss the Long-Range Plan further. LLSA conducted introductory meetings with key stakeholders to provide information on the LRP Project and to seek input into how parties would like to be engaged going forward.

On September 10, 2018, LLSA conducted a one-day meeting with key stakeholders to provide information and seek early feedback on the approach to the LRP and DIA. On September 27, 2018, LLSA conducted a summer program tour for two interested environmental organizations to provide more context for the existing and planned summer use program at the hill.

LLSA provided two interested environmental organizations with copies of the first draft of the LRP for preliminary review and feedback.

Phase 3: Public Engagement on LRP and DIA:

April-June 2019

On April 15, 2019, Parks Canada Agency and Lake Louise Ski Area made the DIA and LRP available for public review and comment for a period of two months. In support of the public review and comment period, the following engagement activities were conducted:

- A general project information email and 1-800 phone line were made available so interested public could seek information from and provide feedback to LLSA
- Draft DIA and LRP were made available to public on LLSA and Parks Canada websites
- LLSA hosted an online engagement platform for members of the public to provide feedback or ask questions on the draft LRP and DIA
- Parks Canada provided an email address so interested parties could provide comments on the LRP and DIA directly to Parks Canada
- LLSA and Parks Canada hosted three open houses, April 23-25, 2019, in Lake Louise, Banff and Calgary to answer questions and receive feedback from the public on the DIA and LRP

INDIGENOUS ENGAGEMENT OUTCOMES

Over the course of the Indigenous engagement program, LLSA has notified 17 Indigenous groups about the LRP project. Engagement activities were directed by the interests of the communities. Three Indigenous groups expressed interest in further engagement and provided input into the project.

At all stages of the engagement program, Indigenous groups were offered the opportunity to provide feedback to either LLSA or directly to Parks Canada. All feedback received by LLSA has been provided verbatim to Parks Canada for consideration in their determination on the LRP. Parks Canada representatives were also present at the face-to-face meetings held with Indigenous communities and had the opportunity to hear firsthand from those communities.

The following table provides a summary of the feedback LLSA and PARKS CANADA received from Indigenous groups.

Indigenous Community Feedback and Responses

Topic	Description	Response/Outcome
Consultation Process	The timeline for consultation on the DIA Terms of Reference was tight.	Parks Canada and LLSA are committed to early and ongoing engagement with Indigenous communities on the DIA and LRP. To that end, Parks Canada and LLSA have reached out well in advance of the release of the draft documents to initiate dialogue and support interested Indigenous communities in their review. LLSA offered to meet with groups in advance of the release of the documents to provide an overview of the contents to aid with review. Parties will have eight weeks to review the draft DIA and LRP and provide comment once it is made available for consultation.
Indigenous Interpretive Content	It is good that Indigenous peoples activity and history in the area has been acknowledged. It would be nice to see it highlighted as part of the interpretive content.	One of LLSA's goals for Indigenous engagement is building a better understanding of traditional knowledge and Indigenous history. LLSA welcomes the opportunity to learn more about Indigenous and Métis history in the Project area. LLSA is interested in understanding how to tell the story of Indigenous and Métis fur trade in the area and has offered to engage further to learn more.

Topic	Description	Response/Outcome
	It would be good to see opportunities for sharing culture and stories in areas of high tourist density.	One of LLSA's goals in engagement is to build a better understanding of traditional knowledge and Indigenous history. LLSA welcomes the opportunity to learn more and to identify opportunities to highlight culture and heritage at LLSA.
	Some resorts fly the flags of local First Nations. It would be nice to see this at LLSA.	LLSA will continue to communicate with interested Indigenous Communities to find appropriate ways to best promote In Indigenous values and history in the area.
Indigenous Land Use	Ceremonial and archaeological history is important. Pre-contact history is orally-based.	No archaeological evidence of Indigenous use of the ski area has ever been found to date; however, LLSA is interested in building an understanding of traditional knowledge and indigenous history in the area. LLSA has offered further discussions with interested Indigenous groups on how best to incorporate oral traditional knowledge in interpretation programs at LLSA.
	Concerned that not all government agencies will forward "chance findings" to Indigenous communities. Will LLSA have a protocol for how it handles "chance findings"?	The LLSA has forwarded this concern to Parks Canada and is currently developing an operating protocol to address this concern. Currently, Parks Canada is immediately notified and work is halted if any archaeological resources are found during ski area construction or operations. Parks Canada will include archaeology protocols in development permits.
	Would LLSA be open to an access agreement to ensure access for traditional and ceremonial purposes?	LLSA is currently reviewing the potential of an access agreement, and will allow Parks Canada to confirm policy for such events. In principle, the Ski Area will encourage ongoing engagement with Indigenous groups.
Indigenous Relationships	LLSA could host opportunities for recreation and nature-based education for Indigenous youth, including summer program field trips.	LLSA indicated that they are happy to host youth groups for both summer and winter recreation opportunities and has followed up with the Indigenous community that made this request to book a field trip.
LLSA Boundary Changes	LLSA received questions about the proposed lease area changes, particularly to do with the new licence of occupation.	LLSA committed to a follow-up meeting to present maps and more information regarding the proposed ski area lease and license of occupation lease area changes. LLSA continues to reach out to offer a follow-up meeting.
Water usage and licence/restrictions	Clarification was sought on the size of the reservoir, where the water came from	LLSA uses water primarily for snowmaking and firefighting and therefore plans to build and fill reservoirs when the Pipestone

Topic	Description	Response/Outcome
	(drainage path), how water is used in LLSA operations, and if LLSA usage would impact availability of water in the overall area.	<p>River is high. Environmental gains would include withdrawal from the River only when it is high, which in turn would reduce any potential effects on fish habitat.</p> <p>LLSA has not historically used its full licence capacity and are not anticipating any changes to that; the only change would be the means and timing of withdrawals. The volume of water that will be stored in proposed reservoirs will be determined when ongoing water supply studies have been completed.</p>
Environmental management and monitoring programs	LLSA received positive feedback on the potential of returning a portion of the current LLSA licenced lands back to wilderness status.	N/A
Forest and vegetation management	Have there been any impacts due to forest fires or Mountain Pine Beetles in the LLSA?	<p>There was one recent forest fire on the back side of the resort, but nothing within the lease holdings.</p> <p>To date, the impact of the recent spread of Mountain Pine Beetles in the Canadian Rocky Mountains has not been significant in the Lake Louise area. Within the ski area, only a small number of trees have been impacted.</p>
Site Assessment	Has anyone done a cultural assessment? We understand the timelines you are looking at and could aim for June for this.	<p>LLSA is open to this happening as soon as possible and has suggested bringing a group to the Temple Lodge area.</p> <p>Interested Indigenous group indicated that they would review LRP and DIA documents; specifically looking at sections related to animal studies. If no concerns are identified, the usual course of action would be for them to provide a “no concerns letter”; pending a site visit. Discussions are ongoing with the interested Indigenous group to arrange a suitable time for a site visit.</p>

PUBLIC AND STAKEHOLDER ENGAGEMENT OUTCOMES

Feedback received throughout the various stages of the stakeholder engagement program is included in the tables below. At all stages of the engagement program, stakeholders were offered the opportunity to provide feedback to either LLSA or directly to Parks Canada. All feedback received by LLSA has been provided verbatim to Parks Canada for consideration in its determination on the LRP and DIA.

Phase 1: Terms of Reference Engagement

Parks Canada received three submissions containing input on the Draft Terms of Reference for the DIA. The following table provides a summary of the feedback provided to Parks Canada and how it was considered and addressed in the final Terms of Reference.

Summary of Feedback Received Regarding the Terms of Reference for the Detailed Impact Assessment

Topic	Description	Parks Canada Response/Outcome
Ski Area Management Guidelines	The definition of substantial environmental gains outlined in the Lake Louise Ski Area Site Guidelines for Development and Use should be revisited.	The criteria for determining substantial environmental gains are found in the Parks Canada Ski Area Management Guidelines (2006) and will not be revisited.
Roles and Responsibilities/Canadian Environmental Assessment Act Requirements	The Environmental Assessment process is proponent-led and Parks Canada's roles and commitments to ecological integrity are unclear.	The revised Terms of Reference confirm that ecological integrity remains Parks Canada's first priority when making decisions. Parks Canada specialists carefully review all submissions and Parks Canada is responsible for making determinations of significance.
Indigenous Consultation	Indigenous consultation on the DIA should not be completely separate. There could be an opportunity for some stakeholders to work directly with Indigenous communities.	As a representative of the federal Crown, Parks Canada has a responsibility to engage in separate consultations with Indigenous groups. Parks Canada will share results where possible and appropriate.
Scope of Assessment/Impact Analysis	The regional landscape should be considered and the DIA should account for Banff National Park's status as part of a World Heritage Site. Some species were not listed and climate change was not included.	The revised Terms of Reference include these additional elements where appropriate.

Topic	Description	Parks Canada Response/Outcome
Design, Mitigation and Environmental Management/Follow-Up and Monitoring	It will be important to incorporate any lessons learned or monitoring from project implementation into future project planning to improve environmental mitigations.	The revised Terms of Reference affirm that if significant impacts cannot be avoided or mitigated, the project will not be permitted to occur. Language was also improved to clarify the expectation of an adaptive approach to development, where lessons from previous work inform both the acceptability and quality of subsequent projects.

Phase 2: Early Stakeholder Engagement

Following LLSA's early notification of key stakeholder groups, two groups requested further engagement and provided feedback to LLSA.

The following table provides a summary of the feedback submitted to LLSA regarding the draft LRP during this phase of the LRP engagement program.

Summary of Feedback Received from Stakeholder Groups

Topic	Description	LLSA Response/Outcome
Capacity & Usage	It would be helpful to know how LLSA calculates projections for usage and the impacts on skier safety and the environment of increased visitors at the hill.	LLSA has more than 50 years of visitor attendance figures and reviews all visitor safety incidents with its planning and operations team. These data and experiences have been applied to LRP proposals by the ski area planners at Brent Harley Associates Ltd. The design of ski runs, and selection of lifts and day lodge services are intended to ensure that the Comfortable Carrying Capacity that is selected ensures a balance between the need for and supply of services, and that safe visits are assured.
Consultation Process	There are no details about the proposed projects so it is difficult to provide feedback.	LLSA responded to this feedback by setting up a workshop and site visit with specific stakeholders to provide an overview of the proposed projects.

Topic	Description	LLSA Response/Outcome
	<p>If the LRP is already close to complete, there isn't room for input from stakeholders. The consultation process might be more like information-sharing rather than true consultation.</p>	<p>LLSA is committed to early and ongoing engagement throughout the LRP Project and welcomes feedback from ENGOs and other stakeholders into the draft LRP and DIA. LLSA reached out to key stakeholders in advance of the completion of the first draft of the LRP and DIA documents to allow enough time for consideration of feedback. LLSA has continued to incorporate feedback and adjust the plans based on comments received throughout the engagement program.</p>
DIA	<p>The Strategic Environmental Impact Assessment was a desktop exercise and did not include any field assessment. The DIA needs to be a more robust document.</p>	<p>LLSA is committed to a thorough and robust assessment of the potential environmental effects associated with the LRP. Parks Canada has set out its expectations for the DIA in a detailed Terms of Reference. LLSA encourages stakeholders to review the draft ToR and provide feedback to Parks Canada on any elements they feel are missing. The DIA is also based on the results of two years of additional field research and study to document and address issues relating to the protection of ecological integrity.</p>
Environmental Gains	<p>It is not clear that a net environmental gain has been made. The details of the LRP need to be incorporated into the assessment of net environmental gain.</p>	<p>The return of Purple and Wolverine Bowls to wilderness status under Parks Canada control was addressed by Parks Canada in the 2015 Site Guidelines for the Development and Use of the LLSA. Purple and Wolverine Bowls represented very high-quality potential ski terrain, and the loss of these areas from the LLSA lease represents a significant impact on the future development and operations of the ski area. This loss has been partially compensated by the addition of West Bowl and Hidden Bowl for seasonal use, but the ski area has still been reduced in area by a net 30 per cent.</p> <p>Other areas of environmental benefit included in the LRP are the relocation of the summer program to the high upper alpine to avoid grizzly bear habitat at mid-mountain where the program is currently located and the water management plans designed to reduce reliance on the Pipestone River for snowmaking.</p>

Topic	Description	LLSA Response/Outcome
Hidden Bowl	In many areas of Hidden Bowl there is a lack of long-term baseline data, making it difficult to undertake an effects assessment. It also seems like the ski hill would be spreading out too much.	LLSA recognizes this concern and agrees that additional field study is required to determine how Hidden Bowl can be developed for alpine skiing while ensuring environmental protection. For this reason, no development of skiing in Hidden Bowl is proposed in this first Long-Range Plan, and a long-term course of studies and monitoring has been determined in consultation with Parks Canada.
LLSA Footprint	Further development at the hill and expansion out of the existing footprint is a concern.	<p>The lease boundary changes, which the Operators of the LLSA have agreed to, reduce the lease area of the LLSA by 50 per cent. The addition of seasonal use Licenses of Occupation for West Bowl and Hidden Bowl reduce the net area loss to 30 per cent.</p> <p>LLSA's primary goal for the first LRP is not further expansion of the ski hill, but to improve visitor experience, facilities, services and infrastructure to realize contemporary standards and environmental targets. The Lake Louise Ski Area has not seen any significant facility upgrades for 30 years. Complementing this initiative are projects to realize the 'substantial environmental gains' established by Parks Canada in the 2015 Site Guidelines (such as the relocation of the Summer Program); and realizing the skiing potential of areas such as Richardson's Ridge that were in the original lease and were previously approved for downhill skiing.</p> <p>All projects in the proposed LRP are consistent with the provisions of the 2015 Site Guidelines and the SEA¹. The LLSA intends to respect these provisions as it moves forward.</p>

Topic	Description	LLSA Response/Outcome
	<p>The lease area changes are not sufficient to meet the net environmental gain test. At one time, a License of Occupation (LOC) was considered as having a lighter commitment than a lease but there have been enough LOCs bought and sold within Banff that it now carries the same weight in effect.</p>	<p>The return of Purple and Wolverine Bowls to wilderness status under Parks Canada control was addressed by Parks Canada in the 2015 Site Guidelines for the Development and Use of the Lake Louise Ski Area.</p> <p>The LOCs that have been granted to the LLSA are strictly seasonal in nature and include restrictions on the range of activities and developments that can be considered.</p>
	<p>The proposed land swap will require changes to the defined wilderness boundaries. There will be implications should other ski areas wish to redefine their wilderness boundaries.</p>	<p>Ski area boundaries are determined at the Site Guidelines stage, and so are not within the scope of this LRP and DIA. Parks Canada has issued Site Guidelines for all four ski areas in the mountain national parks.</p>
LRP Scope & Cumulative Impacts	<p>Having smaller, incremental LRPs would allow for a better feedback loop and the use of impact monitoring to help inform further development. It is important to look at the cumulative impacts of the whole.</p>	<p>Pursuing a Long-Range Plan of any complexity is a lengthy, and costly venture. This first LRP is substantial, having to address both those projects required to bring existing facilities into balance, and those required to support an increased daily winter visitor capacity. There has been no Long-Range Plan approved for the LLSA for more than 30 years. A major task for this this LRP will be to bring the resort's facilities into balance while providing for forward-looking development. The LLSA intends that the first LRP will be comprehensive, capturing a balanced segment of the developments outlined in the 2015 Site Guidelines. A goal of the first LRP is to ensure that the Public has clarity around the ski hill's long-term plans to build-out.</p>
Parks Canada's Mandate	<p>Ecological Integrity should be the priority for parks development plans. Parks Canada has moved away from this mandate. Visitor experience is important, but needs to be done in a way that balances ecological integrity.</p>	<p>Parks Canada will address this comment in its final decision document.</p>

Topic	Description	LLSA Response/Outcome
Transportation	<p>LLSA should consider additional transportation, including more frequent busses, to ensure vehicle traffic is minimized.</p>	<p>Our Regional Transportation Strategy confirms that LLSA will make further investments, in collaboration with regional government partners, to increase bus usage. The LLSA will also develop strategies to increase average passenger car loading to meet the North American average.</p> <p>We will continue to work with partners in the Bow Valley to identify all options for reducing car traffic at the hill and in the park.</p> <p>When improvements to visitor parking are completed, parking on the access road outside of the leasehold boundary will no longer be permitted to improve the effectiveness of the Whitehorn Wildlife Corridor. This change is one element of the 2015 Site Guidelines.</p>
	<p>Vehicle traffic in Banff National Park is a big concern. It is hard to get people to take mass transit within the park.</p>	<p>LLSA is actively engaged with industry and government partners to find the best ways to reduce passenger car use in Banff National Park. We are actively considering new mass transit initiatives in the Bow Valley to reduce traffic on the highway in the Lake Louise Area in the summer.</p> <p>LLSA is open to any creative ideas around transportation. The ski area already pays for bussing from Banff to the hill and within the village of Lake Louise.</p>

Topic	Description	LLSA Response/Outcome
Water	<p>Water is a major concern. While snowmaking has made a big difference at the hill, there will be snowmaking issues at Richardson’s Ridge.</p>	<p>The LLSA completed a Snowmaking Master Plan as one component of required management studies. That plan specifies the area for which snowmaking coverage is required, and proposes the core components of the snowmaking systems (water intake, water storage, pumps, water distribution system, and snowmaking guns). The Snowmaking Master Plan identifies the volume of water required for snowmaking, and proposes methods of improving snowmaking effectiveness, timing and efficiency (water conservation). The LLSA will not require any change to the water volume conditions of existing water licenses.</p> <p>The LRP also includes a comprehensive Water Management Strategy to address ways to reduce the impact of water withdrawals on the Pipestone River during the low-flow winter months.</p> <p>The ski area will develop water reservoirs that capture water during run-off and periods of ample water flow and is carrying out studies to determine the possible use of groundwater to support snowmaking.</p>

Topic	Description	LLSA Response/Outcome
Whitebark Pine	LLSA's past treatment of Whitebark Pine is disappointing.	LLSA is also very disappointed and has initiated several studies and other planning initiatives to document and better understand the ways that the ski area can operate while allowing Whitebark Pine to prosper as they have in the past. Whitebark pine conservation is a key priority. LLSA has augmented staff training and familiarization to prevent a similar incident from happening in the future and hired a trained ecologist as its on-hill Environmental Management Director, whose priorities include overseeing comprehensive environmental training programs and manuals to ensure that all staff and relevant third parties have appropriate training and direction. LLSA has also joined the Whitebark Pine Ecosystem Foundation as a Whitebark Pine Friendly Ski Area, attended conferences about the species and has worked the species into educational outreach programs.

Phase 3: Public Engagement

Open Houses

LLSA held three public open houses in April 2019. The open houses ran from 5:00 p.m. to 8:00 p.m., and were conducted in a drop-in format in the following locations:

- April 23, 2019: Lake Louise Inn
- April 24, 2019: Banff Centre
- April 25, 2019: WinSport Calgary

Poster boards and maps displayed around the room provided information about the proposed LRP and DIA. Staff from LLSA, Parks Canada, and Golder Associates were present to answer questions and accept feedback. The three open houses drew a combined total of 209 attendees, of whom 63 submitted feedback forms to LLSA.

Online Engagement

LLSA hosted an online engagement platform that was open from April 15 through June 15, 2019. On the website, visitors could:

- Read summaries of the information and projects included in the LRP and DIA
- Download the full LRP and DIA documents, appendices, supporting documents, and large-format maps
- Ask questions to LLSA or email LLSA directly
- Find information for contacting Parks Canada directly
- Find information about LLSA's long range planning process
- Find information about the public open houses held in April
- Provide feedback regarding the LRP and DIA for LLSA to post

Over the course of the online engagement window, LLSA's online engagement platform drew a total of 7,206 site visits. 66 participants registered to participate on the site and 35 stories, comments and questions were submitted. 5,040 documents were downloaded from the site.

The following table reflects feedback submitted to LLSA and Parks Canada regarding the proposed LRP and DIA during the public engagement phase of the LRP engagement program.

Summary of Public Feedback and Responses

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Architecture and Design	LLSA should ensure the design of the new buildings is consistent with the existing log buildings.	LLSA intends to carry the look and feel of the base area and Temple Lodge (architectural motif and materials) into the design of the new and expanded facilities. For Eagle Ridge Lodge, building design and siting will be carefully blended with the landscape and ridgeline to minimize visual impact. Where applicable, the use of durable, low-maintenance materials will be emphasized in keeping with the national park aesthetic and sense of place.	This is consistent with the Site Guidelines. Parks Canada will review development and building permit applications and this will include review of design elements and architectural motif.
Avalanche Control	Even though the current LRP does not include development in Hidden Bowl, goats and other species can be impacted by activities such as avalanche control. Avalanche control needs to be more thoroughly addressed in the LRP and DIA.	Existing and any proposed future measures for ensuring public safety through avalanche control are (will be) based on collaboration with Parks Canada and avalanche safety experts. The LRP addresses the impacts of avalanche control measures on vegetation, including Whitebark Pine. The ski area's priority moving forward is to establish an effective program of avalanche control for West Bowl, and to undertake baseline studies of snow safety issues that will have to be addressed in Hidden Bowl when it is brought forward for	The DIA identifies the potential for sensory disturbance to wildlife related to avalanche control. Recommended mitigations include developing avalanche control protocols to be used when wildlife are within or near affected areas. Parks Canada will work with the ski area to develop these protocols based on the best available information, including, for example, results of ongoing research into mountain goat habitat use in the Slate Range. These protocols will also follow guidance in the Strategic Environmental Assessment of the Site Guidelines that recommends the ski

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>alpine skiing development in a subsequent LRP.</p>	<p>area mitigate disturbance by employing “low-noise or passive avalanche control measures to limit the need for explosives, to the extent feasible in accordance with industry standards.”</p>
<p>Backcountry Access</p>	<p>Purple Bowl, even once returned to Parks Canada, will remain ski boot-accessible from the top of Larch chair and will continue to see significant skier activity, reducing the environmental gain of returning it to wilderness status.</p>	<p>Parks Canada does not prohibit backcountry skiers from crossing the ski area boundary to access backcountry areas, whether or not they are paying customers of the Ski Area.</p> <p>As a condition of the new lease, LLSA will be required to use industry standard methods of discouraging skiers from crossing the ski area boundary and entering the backcountry.</p> <p>The ski area’s primary concern is for visitor safety. LLSA informs skiers by providing current avalanche forecast information, encouraging skiers entering backcountry areas to be properly equipped for travel in avalanche country, and cooperating with Parks Canada to install industry-standard safety and activity restriction signs and fencing.</p>	<p>Parks Canada supports the use of the backcountry for wilderness recreation, including ski touring. However, Parks Canada may implement area restrictions or closures if required for ecological or visitor safety purposes.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p>Boundary changes and new lifts may cause wildlife disturbances that extend further than the ski area boundary. With the formal inclusion of West Bowl in the ski area and proposed new glading, skier traffic will shift closer to Semi Circular Bowl, Pipestone Bowl, and the National Geos ski touring areas, all of which are outside the lease area and license of occupation. With avalanche control in West Bowl and more skier traffic, powder opportunities in West Bowl will diminish quickly. It is inevitable that powder seeking skiers will move further into these areas.</p>	<p>The focus for the LRP and DIA has been on the effects of ski area development and operations on the ski area and on adjacent wilderness areas. For each of the “planning areas” identified in the 2015 Site Guidelines, the potential for downhill ski use to migrate beyond the ski area boundaries was addressed by the design team throughout the process and in the DIA. Adventurous skiers will continue to seek to cross the ski area’s posted and boundary line in search of powder skiing.</p> <p>LLSA will use industry standard methods to discourage skiers from crossing the ski area boundary and entering the backcountry.</p>	<p>Refer to the foregoing comment.</p> <p>The Strategic Environmental Assessment of the Site Guidelines recognises this potential, and recommends that the ski area use boundary fencing, signage and other appropriate media to educate riders on protection of Mountain Goats and other out of bounds wildlife.</p>
	<p>The LRP and DIA underestimate the number of skiers who will gain access to areas outside the boundary and potentially to new avalanche terrain.</p>	<p>During the course of the LRP, action was taken to keep ski lifts on Prunepicker Hill from close proximity to the boundary to reduce ease of access for backcountry skiers to Wolverine Bowl. Throughout, the LLSA will use industry standard methods of discouraging skiers from crossing the ski area boundary and entering the backcountry.</p>	<p>Parks Canada supports the use of the backcountry for wilderness recreation, including ski touring. However, Parks Canada may implement area restrictions or closures if required for ecological or visitor safety purposes.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Balance	The proposed LRP has achieved a good balance of environmental gains and improved visitor experience.	LLSA notes receipt of this feedback.	N/A
Built Space	More than doubling the amount of on-mountain built space will impact sensitive species.	The amount of commercial and service space, and the location and function of day lodges and warming huts, presented in the LRP, is consistent with the provisions of the 2015 Site Guidelines. Concerns for impacts to vegetation and wildlife have been addressed in detail in the Vegetation (Ski Run) Management Strategy, the Wildlife Protection Strategy, and the Detailed Impact Analysis (DIA).	The Strategic Environmental Assessment (SEA) for the 2015 Site Guidelines, and the LLSA's detailed impact analysis have assessed this and concluded that, with the application of mitigation measures, the ecological management parameters of the SEA intended to ensure the maintenance of ecological integrity will be attained.
Capacity – Banff National Park	Banff National Park is near capacity for visitation and commercialization. Priority should be on returning the LLSA leased land to Parks Canada.	This concern will be forwarded to Parks Canada.	The LRP is consistent with the 2015 Site Guidelines and the accompanying Strategic Environmental Assessment.
Capacity –Day Lodges	The existing lodges have become too crowded for guests and ski teams. The expanded facilities in the LRP are essential.	LLSA notes receipt of this feedback.	N/A
Capacity - Resort	Increasing the capacity of the resort will put increased pressures on ecosystems.	The effects of increased skier capacity have been thoroughly studied and documented in both	The SEA identifies the parameters to be met to ensure the maintenance of ecological integrity. The DIA confirms

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>the Strategic Environmental Assessment (SEA) and the Detailed Impact Analysis (DIA). A simple focus on the number of visitors is not an effective measure of pressure on ecosystems. More importantly, the geographic 'size' of the ski area has been reduced by 30 per cent, specifically to allow Parks Canada to return lands rated as having high ecological value to be assigned 'wilderness' status under the National Parks Act. Within the ski area, the location and design of ski lifts, ski runs, day lodges and other infrastructure emphasizes measures to protect, and even enhance ecosystem integrity.</p>	<p>that this LRP can be achieved within those parameters.</p>
	<p>As the resort has become busier in recent years, more people are choosing to ski out of bounds or in the back country, rather than using the facilities at Lake Louise. Increasing the capacity of the resort will reduce the number of people who choose to ski out of bounds, and will therefore reduce the number of people venturing into surrounding wildlife habitat.</p>	<p>LLSA notes receipt of this feedback.</p>	<p>N/A</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Climate Change	Recent years have been warmer, which has impacted snow quality below Whitehorn Lodge. As these changes continue, the base will become less desirable ski terrain and the intermediate onloading / offloading of frontside lifts will become more important.	This observation has been noted by Dr. Michael Pidwirny in the Climate Change Impact Analysis that he conducted for the LRP. However, the pace of change is gradual, and will ensure that the ski area has the accurate climate forecast information and time to adjust facilities and services as projected lower-elevation warming occurs. Fortunately, the LLSA has several facilities and lifts at much higher elevation than at the Whiskey Jack base area, including at Temple Lodge which is not as susceptible to the effects of direct sunlight exposure.	N/A
Competitive Skiing	LLSA's terrain has been important for local skiers to learn and become competitive at the world level.	LLSA notes receipt of this feedback.	N/A
	Young athletes will benefit from the new terrain and Eagle replacement proposed in the LRP.	LLSA notes receipt of this feedback.	N/A
Consultation Process	The engagement opportunities on the website are limited considering the scope of the LRP and DIA.	The current engagement window is part of a multi-year planning process that has culminated in this proposed Long-Range Plan. In 2014-2015, Parks Canada	Parks Canada provided a 30-day period of consultation on the Terms of Reference for the DIA, and a 60-day period of consultation on the DIA, in association with the Ski Area's 60-day

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>conducted a public and Indigenous consultation program seeking feedback on the draft Lake Louise Ski Area Site Guidelines for Development and Use. These were finalized and approved in 2015.</p> <p>In 2018, Parks Canada and the Lake Louise Ski Area conducted public and indigenous consultation regarding the Terms of Reference for the Detailed Impact Analysis that accompanies the Long-Range Plan and provides information to assist Parks Canada in its evaluation. The proposed LRP includes feedback received in both these previous windows of consultation.</p> <p>In this latest phase of engagement, Lake Louise collected written and oral comments through a dedicated email address, in-person open houses, a dedicated phone line and direct one-on-one meetings. All comments received have been reviewed by both LLSA and Parks Canada for incorporation into the final LRP and DIA submitted to Parks Canada later this year, as well as into Parks Canada's recommendation to the</p>	<p>consultation on the LRP. As noted in the LLSA response at left, there were numerous opportunities for public feedback.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		Minister of the Environment and Climate Change.	
Cumulative Effects	The DIA does not include any cumulative impact assessment. Proposed development must be assessed alongside potential future development on the surrounding landscape, including maximum buildout of the Site Guidelines.	<p>Cumulative effects are addressed in the DIA. Methods used to assess cumulative effects are provided in Section 6.5 including a list of reasonably foreseeable projects that were included in the assessment of cumulative effects.</p> <p>The list of reasonably foreseeable projects was developed with and agreed to by Parks Canada. The assessment of all valued ecosystem components contributing to ecological integrity included an assessment of cumulative effects where the effects of the proposed Long-Range Plan components predicted residual impacts (i.e., after mitigations are applied) that were greater than negligible. For example, the cumulative effects of reasonably foreseeable projects were assessed for wildlife including grizzly bears, Mountain Goats and the Whitehorn Wildlife Corridor in Section 7.2.5 and those for vegetation including Whitebark Pine are presented in 7.1.7.</p>	<p>The <i>Lake Louise Ski Area Site Guidelines Strategic Environmental Assessment</i> (2015) was primarily focussed on assessment of cumulative impacts due to reasonably foreseeable projects in the local area, and the long-range plan impact analysis includes an additional assessment of cumulative impacts due to anticipated projects around Lake Louise.</p> <p>Parks Canada agrees with the LLSA response at left. Cumulative effects related to reasonable, foreseeable developments were assessed for all areas where LRP effects are predicted to be more than negligible.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p>The LRP and DIA do not adequately consider impacts outside of the ski boundary that may result from the LRP projects. Expanding the ski area to a new elevation and altering boundaries makes new adjacent terrain accessible, causing ecological, safety, visual, and noise impacts in these adjacent areas.</p> <p>Access to adjacent side country areas may eventually lead to pressure to incorporate even more new areas into the ski area for safety or popularity reasons, leading to incremental expansion beyond the original proposal.</p>	<p>As noted in an earlier response, Parks Canada addressed the concern that increasing the ski area’s visitor capacity will result in increasing access to adjacent backcountry areas in the Strategic Environmental Assessment.</p> <p>During the course of preparing the LRP, action was taken to distance ski lifts on Prunepicker Hill from the boundary to reduce ease of access to Wolverine Bowl. The ski area does not have the authority to prevent park visitors from crossing its boundary into adjacent backcountry zones. This authority rests solely with the Parks Canada.</p> <p>We acknowledge that all alpine developments do create a visual and activity footprint; however, the design of all ski area facilities fully considers these potential impacts, and will reduce their effects as much as possible. The ski area has proposed strengthened Best Management Practices to limit the effects of lighting and noise on wildlife and other park visitors.</p>	<p>Parks Canada supports the use of the backcountry for wilderness recreation, including ski touring. However, Parks Canada may implement area restrictions or closures if required for ecological or visitor safety purposes. The Strategic Environmental Assessment of the Site Guidelines recognises this potential and recommends that the ski area use boundary fencing, signage and other appropriate media to educate riders on protection of wildlife.</p> <p>The 2015 Site Guidelines describe the permanent growth limits for the Lake Louise Ski Area. Park land outside of these limits will not be considered for future use as commercial ski areas.</p>
	<p>IUCN guidelines have not been fully addressed with respect to cumulative impacts and looking</p>	<p>The LRP and DIA process has been very rigorous in addressing those environmental and visitor</p>	<p>The DIA examined the elements of the World Heritage Site’s Outstanding Universal Value (OUV) that could</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	for alternatives to the proposed development.	education / enjoyment issues which are of core concern for Banff National Park's World Heritage status. The LRP applied the UNESCO World Heritage criteria to identify key issues for assessment and has addressed those issues throughout the draft plan, including identifying alternatives where practical.	potentially be affected by the LRP. This assessment found that the LRP is not expected to affect the OUVs negatively. The DIA methodology, supported by Parks Canada, requires cumulative effects related to other reasonably foreseeable future developments to be examined only where the LRP is predicted to have effects that are more than negligible. Since no negative effects on the OUVs are anticipated, no cumulative effects analysis was completed for the World Heritage Site component. The DIA does consider alternatives for each of the major developments proposed in the LRP (section 4), although it notes that in some cases alternatives are limited by specifics contained in the approved Site Guidelines.
Daycare Facility	The expanded daycare facility will be important for the community and for guests.	LLSA notes receipt of this feedback.	N/A
Eagle Lift	The Eagle lift is much needed.	LLSA notes receipt of this feedback.	N/A
	A new lift on Eagle Ridge might make a busy area even busier. This lift should not be developed.	LLSA understands the concern about overcrowding on the steeper slopes below Eagle Ridge. However, much of this area has become overgrown since glades	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>were initially cleared in the 1930s and 1940s. By restoring these glades and improving snowmaking, LLSA intends to optimize ski terrain capacity in this area. The Eagle Chairlift is also urgently required as a transportation lift from Whitehorn Lodge and the mid-mountain to Eagle Ridge and the Eagle Ridge Day Lodge.</p>	
Eagle Ridge Day Lodge	<p>The Lodge on Eagle Ridge should not be visible from the base area.</p>	<p>The Lodge on Eagle Ridge will be carefully designed to blend in with the landscapes and ridgelines and also use materials in keeping with the national park aesthetic and sense of place.</p>	<p>The Site Guidelines permit the development of this lodge, subject to the building being situated and designed so that it blends with the profile of Eagle Ridge from key vantage points in the Lake Louise area. The Strategic Environmental Assessment of the Site Guidelines examined views and visitor perceptions and concluded that proposed developments would “not result in substantial changes to the ways that visitors experience or perceive the visual and sensory characteristics” of the ski area.</p>
	<p>Having a Day Lodge at the top of the gondola will be a good addition.</p>	<p>LLSA notes receipt of this feedback.</p>	<p>N/A</p>
	<p>The Lodge might be difficult to service with utilities.</p>	<p>The proposed Eagle Ridge Day Lodge would be a year-round</p>	<p>N/A</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>facility, along with the Juniper Warming Hut, whose infrastructure will include buried water and wastewater pipelines, and electrical power service.</p>	
	<p>An electric fence around the Eagle Ridge Day Lodge is not necessary as it is not in summer grizzly bear habitat.</p>	<p>While the Eagle Ridge Day Lodge site is not within high value grizzly bear habitat, it is still within an area that may see occasional visits by grizzly bears. It is in the best interest of both visitors and bears that we practice caution to minimize the risk of bear-human encounters.</p> <p>The ski area will use innovative architectural designs to ensure that the Grizzly Bears and other park wildlife cannot gain access to any part of the Eagle Day Lodge visitor facilities. The interpretive trails in the immediate vicinity of the Eagle Ridge, including trails suited to visitors with impaired mobility will be fenced (perhaps using electric wire) to ensure visitor safety. Longer trails will be managed in the same way as all national park trails, with visitors well informed about how to travel safely in bear country.</p>	<p>The DIA addressed this comment by recommending that other mitigation measures be applied first such as good food and waste storage, and building design that discourages wildlife intrusion. If these are not fully effective, then the DIA recommends installing an electric fence. Reducing human-wildlife conflict is an important objective for Banff National Park. Using an electric fence around human facilities is a common approach to minimise bear encounters, and has been successfully used by the Lake Louise Ski Area and is supported by Parks Canada.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	The Eagle Ridge Day Lodge should be designed so that animals cannot access visitor decks.	Please refer to the previous response.	N/A
Eagle Ridge Trails	Other attractions in the Lake Louise area become overcrowded during the summer. The new trails around the Eagle Ridge Day Lodge will be a nice alternative.	LLSA notes receipt of this feedback.	N/A
	There is a need for more short, easy trails in the area.	LLSA notes receipt of this feedback.	N/A
Economy and Tourism	LLSA is a key attraction in the area, which contributes to the local and Canadian economy. Ensuring the resort remains viable in the years to come will be a benefit to Parks Canada in protecting Banff National Park.	LLSA notes receipt of this feedback.	N/A
	Tourism provides important jobs in Canada and LLSA is an important tourist destination.	LLSA notes receipt of this feedback.	N/A
	LLSA hosts World Cup ski events that draw attention world-wide.	LLSA notes receipt of this feedback.	N/A
Environmental Gains	The concept of significant environmental gain is not supported by the evidence in the DIA. Evidence to support	This comment uses the expression "Significant Environmental Gain". The 2015 Site Guidelines use the term "Substantial Environmental	The 2006 Ski Area Management Guidelines outline the parameters for establishing permanent growth limits for ski areas through the Site

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p>this claim should be presented before any development is approved.</p>	<p>Gain” in identifying four key environmental goals which are a condition of the ‘exceptions’ that are granted to the scope of projects that the ski area could undertake in this and subsequent Long-Range Plans. This first LRP ensures that all four of these goals are fully met during the course of its implementation.</p> <p>The first goal, a 50 per cent reduction in leasehold area and, with the addition of seasonal use of Hidden and West Bowls, a net 30 per cent reduction in the ski area’s total land area available for commercial skiing is a pre-requisite for LRP approval. Finalization of these changes requires Parliamentary approval, a process which the Government has initiated. A new lease and Licenses of Occupation, confirming this new ski area boundary are presently being finalized.</p> <p>The LRP and DIA have been completed after a lengthy process of study, including the preparation of long-term strategies for</p>	<p>Guidelines process. In developing Site Guidelines the Ski Area Management Guidelines state that new development outside of the existing developed areas can be considered if there is a substantial environmental gain within or adjacent to the leasehold. Leasehold reduction or reconfiguration that results in better protection of sensitive areas in exchange for development in less sensitive areas is an example of such a gain. These substantial environmental gains are determined as part of the Site Guidelines process, completed for LLSA in 2015.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>protecting and managing Wildlife, Vegetation, and Water and Aquatic Resources. These documents have required the ski area to engage leading regional scientists in gathering and assessing historic and current data and field conditions to enable effective ski area projects designs; and to enable Golder Associates to undertake a comprehensive DIA. We believe that we have vigorously responded to the challenges put forward by Parks Canada in the 2015 Site Guidelines and that the avoidance strategies, design mitigations, and operational conditions presented in the LRP confirm this position.</p>	
Fish Creek Access Road	<p>The new alignment of the Fish Creek Access Road might encourage downhill skiers to use the Fish Creek parking lot, which would reduce space available to backcountry skiers, for whom the lot is intended. Measures such as education, monitoring, signage, and fencing could help discourage use by downhill skiers.</p>	<p>The decision to close the lower portion of existing Fish Creek Access road was made by Parks Canada to strengthen the effectiveness of wildlife protection in the Whitehorn Wildlife Corridor. The decision that the new access road would be created through the ski area's lease (specifically through Parking Lot #1) was made by Parks Canada, and communicated to the</p>	<p>Parks Canada agrees that the Fish Creek parking lot needs to remain available for backcountry users. Parks Canada will work with the ski area to implement measures to maintain this access.</p>

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		<p>ski area in the final text of the 2015 Site Guidelines. LLSA will comply by identifying proposed alignments for the new road.</p> <p>The public Fish Creek parking lot itself will not be affected by the revised alignment, and a barrier fence will be built by LLSA adjacent to the Fish Creek parking lot to restrict its use by ski area customers. Signage at the entrance to the new Fish Creek access road will also emphasize that the Fish Creek parking lot provides year-round trailhead access for hikers, skiers, and mountaineers heading up Corral Creek to backcountry destinations.</p> <p>When the Fish Creek parking lot is full, the LLSA will continue to allow the public to park in the ski area's main parking lots.</p>	
	The closure and rerouting of the lower Fish Creek Road is positive.	LLSA notes receipt of this feedback.	N/A
Gondola	The gondola needs refurbishment.	A multi-year program of refurbishment is already underway.	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p>There should be a trail underneath the gondola so that summer visitors have the choice of hiking up rather than taking the gondola. This would be less impact on grizzly bear habitat than the gondola itself.</p>	<p>Although we recognize that this is an attractive idea from a strict visitor perspective, pedestrian access to the Eagle Ridge Day Lodge will not be permitted. The reason for the costly relocation of the summer program to a site on Eagle Ridge is to reduce human disturbance of vital grizzly bear habitat that has evolved in the mid-mountain area, adjacent to Whitehorn Lodge. This decision reflects a primary concern for the security of grizzly bears, but is also important to ensure the safety of our visitors.</p>	<p>Parks Canada discourages use of the frontside of Whitehorn Mountain below Whitehorn Lodge during summer to reduce disturbance in high quality grizzly bear habitat and to reduce the potential for human-wildlife conflict. This approach will continue for the front side below the new Eagle Ridge lodge.</p>
Hidden Bowl	<p>LLSA received inquiries about plans for development of Hidden Bowl.</p>	<p>No development in Hidden Bowl is being advanced in this first LRP.</p>	N/A
	<p>LLSA should develop more advanced ski terrain on the backside in Hidden Bowl.</p>	<p>No development in Hidden Bowl is being advanced in this first LRP.</p> <p>The Lake Louise Ski Area recognizes that there is some potentially excellent ski terrain in Hidden Bowl, but we are unable to bring forward development proposals for Hidden Bowl in this LRP because we need additional time to collect accurate, science-based information about the use of</p>	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p data-bbox="554 342 949 440">Hidden Bowl should be removed from the Site Guidelines and should never be developed.</p>	<p data-bbox="974 237 1400 302">Hidden Bowl by Mountain Goats and other key wildlife species.</p> <p data-bbox="974 342 1400 659">Hidden Bowl and West Bowl were identified as key elements in an agreement between the LLSA and Parks Canada to allow the return of Wolverine and Purple Bowls to Parks Canada administration. West Bowl and Hidden Bowl are to be made available to the ski area only on a seasonal-use basis.</p> <p data-bbox="974 699 1400 935">The 2015 Site Guidelines specify that West and Hidden Bowls will be managed for 'side-country' skiing, with minimal ski run clearing, snow grooming, and other disturbance. Avalanche safety operations will be allowed.</p> <p data-bbox="974 976 1400 1227">Currently, long-term studies are being conducted in and around Hidden Bowl by the ski area, to determine the best way in which alpine skiing can be introduced while ensuring a high standard of ecosystem protection.</p>	<p data-bbox="1425 342 1881 513">The inclusion of Hidden Bowl in the Site Guidelines was approved in 2015. Decisions made in the Site Guidelines are not being revisited and are not within the scope of the LRP and DIA.</p>
Hidden Bowl Egress Trail	<p data-bbox="554 1271 949 1369">The LRP includes cutting an egress trail from Hidden Bowl. This should not be included.</p>	<p data-bbox="974 1271 1400 1336">The name of this trail has been changed to more precisely read:</p>	<p data-bbox="1425 1271 1881 1401">The Richardson's egress trail will terminate at the ski area lease boundary, and will not extend into the Hidden Bowl area.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		“Richardson’s Ridge Egress Trail (Ski Out).	
Juniper Lift – Lower	The Lower Juniper Lift, along with the new runs associated with it, will spread the beginner/intermediate traffic presently limited to the runs below Glacier Chair that, on busy days, can be highly congested with a mix of users from beginner to expert.	The adult learning terrain that has been proposed for the Lower Juniper slopes is largely created by establishing new ski runs in an area that is presently heavily forested, and feathering them into existing runs, while being fully cognizant that skiers will still be skiing down Juniper Jungle to reach the Whiskey Jack base area.	N/A
	This will be a good addition, but it would be better as a gondola to provide downloading during low-snow conditions and to make it safer for kids and beginners.	This suggestion has considerable merit. The final selection of the type of lift will be made when the project is brought forward for development. The Lower Juniper lift and the Juniper Adult Learning area have been identified for development during the first phase of LRP implementation.	N/A
	It is a good idea to have the Juniper Lift split in two sections.	LLSA notes receipt of this feedback.	N/A
Juniper Lift – Upper	The Upper Juniper lift should end lower than indicated in the LRP to ensure that inexperienced skiers do not end up in terrain that is too advanced for them.	The planning team considered the option of placing the terminal of the proposed Upper Juniper Lift on Sunset Flats; however, the decision to place it instead on the ridge near the Top of the World unload	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>terminal will allow skiers who ski the front face of Summit or West Bowl to travel directly to that ski terrain, and to return via the proposed upper Juniper chairlift. without having to descend all the way to the Whisky Jack Base Area.</p> <p>To ensure safety for beginner skiers, the Sunset Terrace Ski-way will be improved to a standard that will allow maintenance by Snow Cat, ensuring that it will be well-suited to enable beginner skiers to return to the Sunset Flats area and Upper Juniper ski run.</p> <p>The proposed terminal unload location will also provide the added benefit of allowing those riding the lift to use the proposed Juniper Warming Hut to further avoid the need to drop into the Whiskey Jack Base Area.</p>	
	<p>The offloading location and the Sunset Terrace run will become too congested and unsafe. This lift should end near the top of Charlie's Choice ski run instead.</p>	<p>Refer to the response provided for the preceding comment.</p> <p>The safe capacity of the Sunset Terrace ski way will be significantly increased by the widening program already underway for completion in summer 2020.</p>	<p>N/A</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	The offloading location of this lift will make it too visible on the Whitehorn skyline.	The installation of upper chairlift terminals high enough on the Mt. Whitehorn ridgeline to allow skiers to access trails on both the front and back bowl sides of the ridge does result in limited visibility from the Bow Valley floor. The visibility of the upper terminal of the proposed Upper Juniper Chairlift will be equivalent to that of the existing Top-of-the-World Chairlift. Careful design to select a final site and enclosed lift structure will reduce visibility impacts.	N/A
	This lift will bring a lot of skiers to the saddle area. More grooming will be needed to deal with the increase in skiers.	LLSA agrees. Work is ongoing to improve both the Home Run and Sunset Terrace skiways to allow improved snowmaking and grooming by Snow Cat.	N/A
Juniper Warming Hut	This is a positive addition and will be well used. Washrooms are needed in this area.	LLSA notes receipt of this feedback.	N/A
	A new warming hut should not be constructed. It will be in a congested area and will be highly visible.	The proposed Juniper Warming Hut is a facility endorsed by Parks Canada in the 2015 Site Guidelines. It is an important component of the ski area's skier safety plan, and will be used, in a limited commercial manner for the	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		summer season as well. Its location allows access on a key trail and lift axis on Mt. Whitehorn Ridge. It will be designed and constructed to minimize visibility from in and across the valley.	
Larch Glades	The Larch Glades will be a nice addition.	LLSA notes receipt of this feedback.	N/A
Learning Areas and Beginner Terrain	The new learning areas and additional beginner terrain are much needed improvements.	LLSA notes receipt of this feedback.	N/A
Lease Area Changes	The Ski Area should not have to give up part of its existing lease area.	LLSA is confident that the proposed lease area changes will be mutually beneficial for both the Lake Louise Ski Area and Parks Canada. The changes will allow LLSA to make better use of a smaller footprint for operational activities that will allow LLSA to realize modest, balanced growth in visitation over the next 10 to 15 years in exchange for significant environmental gains.	Lease and license boundaries were determined in the 2015 Site Guidelines. They are not within the scope of the LRP and DIA.
	The proposed lease area changes look like a significant environmental benefit.	LLSA notes receipt of this feedback.	N/A
	The proposed changes are not an environmental benefit as the land being returned to Parks	Purple and Wolverine Bowls were the original destination for alpine skiing at Lake Louise. They were	The changes to lease and license boundaries were determined in the 2015 Site Guidelines. The removal of

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	Canada is not currently used anyway.	proposed for eventual development from the time the lease was granted, and were the ski area's primary ski expansion goal entering the Site Guidelines negotiation process.	these lands from the ski area's lease provides land use certainty that these ecologically important lands will receive a high degree of protection.
	Any expansion into undisturbed habitat is ecologically unjustifiable and does not align with Parks Canada's mandate to protect ecological integrity.	The provisions of the LRP for Expanded Use and Capacity adhere strictly to the provisions of the approved 2015 Site Guidelines for the Development & Use of the LLSA.	The 2015 Site Guidelines and Strategic Environmental Assessment provide the ecological conditions that must be maintained as a long-range plan is developed and implemented and include parameters for ski area development and the maintenance of ecological integrity. This LRP is consistent with that guidance.
	LLSA should be required to return 50 per cent of the existing lease site to Parks Canada, without any increase to the site boundaries.	The provisions of the LRP for Expanded Use and Capacity adhere strictly to the provisions of the approved 2015 Site Guidelines for the Development & Use of the LLSA.	Lease and license boundaries were determined in the 2015 Site Guidelines. The reduced lease area, in combination with the addition of winter-only licenses of occupation, provide long-term land use certainty for the lands returned to Parks Canada's protected zones and represent a substantial environmental gain as described in the Ski Area Management Guidelines.
Lift Ticket Prices	The LRP projects might make ticket prices even higher.	The Lake Louise Ski Resort is committed to keeping skiing as affordable as possible. If the Long-Range Plan is approved, LLSA will	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>continue to offer affordable ski and snowboard options. Many factors go into pricing. It's inevitable that prices rise, but LLSA will work hard to ensure that less expensive options are available, like Season Passes, the discount cards, discounted packages, and discounted ticket options. Finding ways to make the winter, and summer, experience at Lake Louise competitive and affordable is in everyone's best interest.</p>	
	<p>Without expansion, skiing at Lake Louise could become prohibitively expensive for locals and families. Expansion will ensure there is room for locals and visitors.</p>	<p>LLSA notes receipt of this comment.</p>	<p>N/A</p>
<p>LRP Timeframe</p>	<p>There should be a sunset clause on any portions of the LRP that are not advanced within a reasonable time. This would ensure that development cannot occur after the assessment of impacts has become outdated.</p>	<p>Refer to the response to the following topic. While there is no provision for a sunset clause in Parks Canada's policy direction, all parties recognize that the dynamic nature of ecological resources requires that assumptions be revisited to ensure that LRP projects are executed in manner that respects conservation values. As LRP projects are implemented, the ski area will use the best</p>	<p>Parks Canada supports an adaptive management approach. The ski area is undertaking several monitoring programs to inform future developments. Data from these sources along with any other new relevant information will be considered in the design and implementation of future projects. Parks Canada expects the LLSA to do the same.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>available information, and any relevant new information will be considered in final design and execution of LRP projects.</p> <p>The ski area has provided an implementation strategy which outlines the relative phasing of LRP projects, assuming that visitor expectations remain stable, and that the domestic and international ski markets maintain current trends.</p>	
	<p>The LRP should be reviewed every five years, possibly in conjunction with the park management plan, to ensure development proposals are still consistent with the latest scientific evidence.</p>	<p>The ski area supports the recommendation that data involving dynamic resources (that are constantly evolving) such as wildlife, vegetation, water and aquatic resources, and climate change be periodically updated to ensure that they are relevant at the time that projects are brought forward for development. This principle is reinforced in the LRP with respect to the following 'living' documents:</p> <ul style="list-style-type: none"> • The Wildlife Protection Strategy • The Vegetation (Ski Run) Protection and Management Strategy 	<p>Refer to the foregoing comment.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<ul style="list-style-type: none"> • The Rare Plant Protection and Whitebark Pine Best Management Practice Manuals • The Water and Aquatic Resources Protection and Management Strategy • The Climate Change Plan. <p>Based on further discussions with Parks Canada and regional scientists, the scope and timing of such updates will be determined. We welcome the engagement of key stakeholders in those discussions.</p>	
Meadowlark Lift and Area	This lift will put too much capacity on the front side where the skiing is poor during most of the season. The Meadowlark run is steep, icy, and off-camber. This area should not be developed.	Improvements are proposed to ski terrain in the upper portion of the existing Meadowlark ski run. That same design care will be brought to the proposed parallel Meadowlark ski runs. By improving the finished quality of all ski surfaces, restricting tree clearing to glading on the steepest pitches, and by improving snowmaking, the Meadowlark ski pod offers excellent potential terrain for advanced and	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		intermediate skiers, and we will ensure that a variety of terrain is developed. The Meadowlark lift will also be popular with season pass holders as a means to access the steeper frontside terrain below Eagle Ridge, and to gain access via the proposed new Eagle Lift to Eagle Ridge and the new day lodge.	
	The unloading location should be moved away from the congested base area closer to parking lot one.	Alternative sites for the lower terminal have been included in the final version of the LRP.	N/A
	The offloading location of this lift will cause too much congestion. It should be moved to the southeast side of the Eagle Meadows run.	The final site for the Meadowlark unload terminal will be determined at the Project Development (PD) stage. This input will be considered at that time.	N/A
	There should be a midpoint on this chair.	Midpoint unloads are very costly, and on this alignment, such an unload is required to ensure a balance of uphill and downhill carrying capacity.	N/A
Other Mountain Activities	Cat-skiing and mountain biking should be included in the LRP.	Proposed additional terrain is to be lift accessed, and mountain biking is not a permitted activity at LLSA.	The 2015 Site Guidelines do not permit cat-skiing or mountain biking at LLSA.
Paradise and Ptarmigan Lifts	The LRP should include upgrades to the existing Paradise and Ptarmigan lifts.	Per the Ski Area Management Guidelines, existing chairlifts can be replaced outside of Long-Range Plans, hence Paradise and	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		Ptarmigan lift upgrades are not specifically addressed in this Long-Range Plan. LLSA recognizes that some upgrades to lifts are desirable and upgrades will occur, as needed, to ensure ongoing guest satisfaction and ski area balance.	
	The Ptarmigan Lift should be replaced with a gondola that provides more direct access to Temple Lodge. This would reduce the need for the access road to the bottom of Larch and would provide beginners with a way to get to the backside.	It is more challenging to develop a new ski lift alignment in this location than to simply upgrade the existing lift design to one of higher capacity.	N/A
	Bathroom facilities at the base of the Paradise Chair would be helpful.	This is a very challenging location for the installation of infrastructure required to support bathrooms. The installation of the proposed new Eagle Ridge Day Lodge, and the Richardson's Ridge / Prunepickers lifts will allow skiers increased opportunity to use nearby day lodge facilities.	N/A
Parking Lot - Buses	There should be plug ins for buses so that they do not need to idle in the parking lot.	As we strive to reduce environmental impacts throughout the operation, we will be looking at increasing buses and will consider this suggestion.	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Parking Lot Expansion	<p>The proposed P3 and P4 are far to walk to the base area.</p> <p>There should be a lift and/or ticket office closer to the further parking lots to spread out the crowds and shorten the walk from those parking areas.</p>	<p>The outer dimensions of the existing parking lots have not been adjusted in this first LRP.</p> <p>To improve our guests' quality of experience, an improved parking lot shuttle service will be offered, and a people mover lift system will be considered from parking lots P3 and P4 to the skier service lodges. (A potential Telecord winter-season people-mover lift has been included in this LRP. Such a system could provide a convenient way for guests to access the ski lifts and skier service lodges from all parking stalls in Parking Lots P3 and P4).</p> <p>At the beginning of the day, skiers from Parking Lots P3 and P4 will also be able to choose walking across a proposed new pedestrian bridge, put on their skis and then slide down to the new Lower Juniper Chair or the existing Glacier Express to stage up the mountain. At the end of the day, guests parked in Lots P3 and P4 can ski down the Lower Juniper slopes to the pedestrian bridge, take off their skis and have only a short walk to their vehicles.</p>	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	The people mover is not a good idea.	The ski area has taken note of this opinion. The expansion of Parking Lot #4 requires that visitors be provided the opportunity to access the base area lodges without a long walk carrying their ski gear.	N/A
	Parking lots should not be expanded or added. Private car use should be discouraged by limiting parking.	The proposed redevelopment of the existing ski area parking lots, and the proposed parking footprint are fully consistent with the provisions of the 2015 Site Guidelines. The Regional Transportation Study details the ski area's program and financial commitment to expand skiers' use of regional bus services, and to enhance car-pooling.	The Site Guidelines allow for the redevelopment of existing parking lots to expand capacity within the same footprint. An expansion of parking beyond the existing footprint can be considered if maximum efficiency has been achieved within the existing footprint and wildlife movement routes through the ski area are maintained. The LRP is consistent with this guidance, as it includes one small potential parking expansion outside of the existing footprint that will only be developed if needed after redevelopment of the existing lots.
Parks Experience	Facilities such as LLSA help locals, families, and tourists experience and gain a respect for Banff National Park and to learn about the importance of stewardship in our mountain parks.	LLSA notes receipt of this feedback.	N/A
	Ensuring there is good capacity for visitors at LLSA is a good way	LLSA notes receipt of this feedback.	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	to concentrate visitors in one area of the Park where use can be controlled and monitored.		
	National parks are for the enjoyment and education of everyone, and skiing is a wonderful way for people to connect with and enjoy the mountains. It is a good way for families to introduce children to outdoor activities.	LLSA notes receipt of this feedback.	N/A
Parks Canada Assessment	Parks Canada's requirements of LLSA and other ski areas are unreasonable and are causing Alberta ski resorts to lose a competitive edge against B.C. resorts.	We agree that this LRP is long overdue. However, we remain committed to working with Parks Canada to ensure that the final product will confirm the suitability of the Lake Louise Ski Area for regional skiers and visitors from other parts of Canada and from other countries.	Parks Canada is obligated to ensure the highest level of protection within Banff National Park and to ensure, as a first priority, the maintenance or restoration of ecological integrity. National Parks ski areas are the cornerstone of winter tourism in Alberta and provide exceptional and unique visitor experience opportunities in a protected area setting that is unparalleled.
Prunepicker Lift	This new lift will cause the 65 Pika run to become congested. It would be better to have a small terrain pod here, possibly instead of the Meadowlark pod.	LLSA understands the concern raised and will consider future run improvements when the proposed new Prunepicker Lift has been in service for a year or two. Adjustments such as those suggested can be made outside the requirements of an LRP under the	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		terms of the 2006 Parks Canada Ski Area Guidelines.	
Richardson's Ridge	This area will be a great addition for intermediate and beginner skiers. LLSA needs more of this kind of terrain.	LLSA notes receipt of this feedback.	N/A
	This area should be a priority.	LLSA notes receipt of this feedback,	N/A
	Development in this area might make it too easy for skiers to access avalanche-prone slopes on Corral Chutes and Snowboard Bowl.	We note this feedback, and will factor it in when the final siting is made for the Richardson's Ridge upper terminal. Skiers will be discouraged by boundary signage from leaving the ski area boundary and any who do will have to be equipped for backcountry travel.	N/A
Richardson's Ridge Lift	The Richardson's Ridge Lift would be an intrusion into the ridge's wild state and would impact habitat and the areas unique alpine scenery.	<p>The proposed downhill skiing facilities on Richardson's Ridge are consistent with direction provided in the 2015 Site Guidelines and the accompanying SEA document. This plan was originally approved in 1980/81, but not developed by the ski area due to more-urgently required day lodge improvements.</p> <p>The design and location of the selected lift alignment will result in minimal visual intrusion and the NE-facing slopes will be gladed with</p>	The Site Guidelines allow the development of a lift and ski terrain on Richardson's Ridge subject to a number of conditions intended to protect Whitebark Pine, and aquatic ecosystems in Corral Creek. The Strategic Environmental Assessment (SEA) of the Site Guidelines contains a suite of ecological management parameters that must be met so that ecological integrity is maintained. The SEA also concluded that development of ski runs and gladed terrain on Richardson's Ridge is expected to

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		no cleared ski runs visible to backcountry users descending from Ptarmigan Lake.	improve habitat conditions for grizzly bears. The SEA requires glading on the ridge to mimic historic avalanche paths to minimise potential negative visual effects and support ecological management parameters for wildlife.
	The new Richardson Ridge Lift will permit easier access to Hidden Bowl, regardless of whether it is part of the ski area. Without lifts, skier egress from Hidden Bowl requires traversing the Corral Creek slide path, which is outside the ski area and not controlled. This could eventually create additional pressure to approve a lift in Hidden Bowl, so that skiers are not forced to traverse this hazard.	<p>Most skiers wishing to access the portion of Richardson’s Ridge above Hidden Bowl from within the ski area do so by traversing the upper portion of Pika Bowl on skins. The upper terminal of the proposed Richardson’s Ridge Chairlift will reduce this effort, but will still require a considerable uphill ski, with skins, to reach prime backcountry ski terrain. Signage will discourage skiers from leaving the boundary and reinforce the need to be equipped for backcountry travel.</p> <p>The ski area will not provide avalanche control or snow safety service in Hidden Bowl, requiring that all skiers crossing from the ski area be prepared for backcountry travel.</p>	The installation of a return lift in Hidden Bowl is consistent with the Site Guidelines but may only be proposed in a new long range plan and with evidence that the ecological management parameters in the Site Guidelines and Strategic Environmental Assessment will be met.
Riparian Habitat	No loss of riparian habitat should be permitted.	The DIA identifies those areas of riparian habitat that would be subject to disturbance unless	The Site Guidelines and Strategic Environmental Assessment include ecological management parameters for

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		<p>effective design and operating measures are not taken to avoid or mitigate potential impacts.</p> <p>The Water and Aquatic Resources Management Strategy confirms that the ski area's focus on protecting riparian areas during all construction and operational activities has resulted in no loss of riparian area quality in more than 50 years of ski area operations.</p>	<p>the protection of riparian habitat. These focus on maintaining natural seasonal water flow patterns and riparian vegetation structure that support aquatic invertebrates, fish, and aquatic ecosystem processes. The DIA predicts the loss or alteration of approximately 0.8% of the riparian habitat in the LLSA. With the application of mitigation measures and restoration of existing disturbed riparian habitat, the LRP is expected to have only a minor residual effect on riparian areas.</p>
Ski Experience	Without some upgrades and expansion, LLSA will not be able to maintain the high level of quality ski experience that locals and visitors enjoy.	The approval of the LRP, as submitted to Parks Canada, will allow the LLSA to provide high-quality visitor experiences in both winter and summer seasons.	N/A
Summer Interpretive Programs	The new education lodge and expansion of the summer interpretive program will be a great benefit.	LLSA notes receipt of this feedback.	N/A
	Grizzly bear viewing should not be advertised as part of LLSA's summer activities. Encouraging this activity could lead to unsafe interactions.	Since 1994, the ski area has operated its long-standing summer visitor program emphasizing the important role that national parks play in protecting natural heritage, with a focus on grizzly bears which	The existing summer program at the LLSA provides an opportunity for visitors to learn about grizzly bears and the measures that both Parks Canada and the LLSA are taking to manage the landscape for bears and people. Parks Canada considers this a good

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>has enormous public interest and support.</p> <p>As required by the provisions of the 2015 Site Guidelines, a substantial environmental gain will be realized in this LRP by the relocation of the summer program to a new day lodge to be situated on Eagle Ridge, an area of considerably lower value to grizzly bears. The development of year-round exhibits and facilities will allow the ski area to dramatically boost its contribution to Parks Canada interpretation and education goals for Banff National Park.</p>	<p>opportunity to raise public awareness about how to avoid human-wildlife conflict, and to connect people to nature.</p>
Summit Lift	<p>The Summit lift is a much-needed upgrade from the existing platter. It would connect the area to the rest of the mountain much better.</p>	<p>LLSA notes receipt of this feedback.</p>	<p>N/A</p>
	<p>The proposed alignment of the Summit Lift will be out of the wind and a much nicer experience than the existing platter.</p>	<p>LLSA notes receipt of this feedback.</p>	<p>N/A</p>
	<p>The existing platter gives a sense of accomplishment that a new lift would not provide.</p>	<p>The Summit Platter dates back to 1977. It is still a favourite for some of our most loyal guests.</p>	<p>N/A</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>Anticipating the current Summit Platter's end-of-life, a replacement and realignment is proposed. Challenges to address include the age of the lift, guest comfort on the ascent and a difficult to maintain track. LLSA has been told that it is hard to balance on a 40-year old platter and navigate the track to reach the peak. LLSA hears this from snowboarders and youth/smaller users, especially. Some guests do not enjoy the track up, especially Headwall. Safety considerations are a key driver of the proposed replacement of Summit Platter with a chairlift. Given the above, and with current and future advances in lift technologies, replacing the platter with another platter is impractical.</p>	
	<p>The proposed Summit Lift will be exposed to high winds and be too visible from the Bow Valley.</p>	<p>The proposed summit lift will actually be quite sheltered from winds. Importantly, the proposed new lift alignment would substantially benefit the national park aesthetic. Maintaining pristine and natural viewscapes is a goal of the <i>Lake Louise Ski Area Site Guidelines</i>, reaffirmed in the <i>Terms of Reference for the Detailed Impact Assessment</i>, and important</p>	<p>N/A</p>

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		to LLSA's vision and the Banff National Park 'sense-of-place,' which is wild and pristine.	
	<p>This lift will make the ridgeline congested and unsafe for skiers who will have to go past two unloading stations as they descend before coming into a loading area.</p> <p>There will be too many skiers crossing over and going in different directions through this area.</p>	<p>The installation of the new Summit Chairlift on an improved alignment will allow the ski area to remove the existing Summit Poma, and rehabilitate the existing alignment. Skiers wishing to return to the Summit Chairlift will be able to bypass the Juniper Warming Hut and the upper terminals of the existing Top-of-the-World Chairlift and the Upper Juniper Chairlift (when built).</p> <p>Only two groups of skiers will use the portion of the Saddleback ski run descending toward the back bowl from the Whitehorn Ridge area – those heading to the Summit Chairlift lower terminal and those heading downhill toward Pika Bowl. The analysis conducted by BHA indicates that this trail has adequate capacity to safely meet this demand.</p>	N/A
	This lift will bring inexperienced skiers into terrain that is too advanced for them.	On an ongoing basis, we would use signage and staff at the bottom to ensure that only guests with appropriate abilities for the terrain	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>served are the ones riding the lift. At the top, signage would highlight Skyline, an existing blue run, and as the easiest way down.</p> <p>The new lift would also serve much more terrain than it does now. No new development is proposed for West Bowl (no new lifts or snowmaking, and no grooming). However, the new ski terrain, along with associated minor glading and safety improvements, would create a fantastic experience. The frontside of Summit without the platter in the way, as it is now, would be another new and excellent experience. There would be more than enough new terrain to accommodate any increased ridership.</p> <p>For experts who enjoy summit laps, the way back up would be quick and easy. The new proposed top terminal would mean backside skiers could directly access Boomerang and associated runs. After riding back up Paradise chairlift, it would be faster to the top on the new lift. Frontside laps would be just as efficient.</p>	

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	<p>The existing platter lift limits the number of people that ski in this area, which is one of the reasons many people like it. The new lift would make this area too busy.</p>	<p>The terrain appeals to all who love a high-alpine, adrenaline-inducing, natural experience. A great deal of thought has gone into, and will continue to go into, the Summit experience so it can remain unspoiled and enjoyable.</p> <p>The new lift is not suggested as a means to accommodate a lot of new skiers. Summit will still be a low-density experience. The uphill capacity would be carefully executed to ensure the downhill capacity remains balanced — not much different than now. The current situation is that on some days, the lift doesn't run at capacity and on many days, there are larger line-ups — out of place at the Lake Louise Ski Area. An uncrowded, national park experience is one we are keen to preserve and improve upon. To ensure a safe and low-density ski experience remains, we would carefully choose the type of lift at the project level.</p>	N/A
	<p>It would be better to have a chairlift run up the backside rather than along the ridge. This</p>	<p>The 2015 Site Guidelines allow the ski area to consider installing a return lift (Brownshirt) in the upper portion of Pika Bowl. The ski area</p>	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	would provide access to Boomerang.	<p>has not chosen to pursue this option at the present time, because we feel that the installation of a newly aligned Summit Chairlift, will meet current needs.</p> <p>LLSA's proposal to re-align the platter to a less exposed alignment, and to increase its capacity is a 'best-of-both-worlds' that addresses a variety of planning issues. We also plan to raise the elevation of the upper terminal of the new lift to provide improved access to the Boomerang ski run.</p>	
Summit Platter	The existing platter should be kept in addition to a new lift.	Analysis done by ski area planners indicates that the new lift will be sufficient. The existing platter is also nearing its end of life.	N/A
Sunset Flats and Skiway	The Sunset Terrace ski way will be unsafe with the increased number of skiers coming from the proposed Upper Juniper lift.	To ensure safety for beginner skiers, the Sunset Terrace Ski Way is being improved to a standard that will allow snowmaking and maintenance by full-sized snowcats. It will be well-suited to enable beginner skiers to return to the Sunset Flats area and Upper Juniper ski run.	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Supporting Studies	<p>Initial concerns about impacts to goat populations, availability of adequate water supply for increased snowmaking, impacts to Whitebark Pine, impacts to wildlife from increased summer traffic on Whitehorn Road, and impacts on surrounding wilderness areas were not addressed in the Strategic Environmental Assessment and Lake Louise Site Guidelines. These studies must be completed prior to approval of any developments proposed in the LRP.</p>	<p>The LRP encompasses more than 25 support documents – all prepared by regional leaders in their respective fields – to confirm that there are sufficient data for the projects that are proposed in the LRP. Where data are not sufficient, such as for the potential effects of skiing development and use of Hidden Bowl, no developments are proposed.</p> <p>LLSA agrees with the requirement that all required environmental impact assessment be completed prior to project approval. In the case of this LRP, we believe that sufficient design information has been submitted, for each proposed project, to meet the challenge of Parks Canada’s environmental assessment requirement for the conduct of a DIA. Final design and ground-truthing must subsequently be conducted at the Project Development Stage, as outlined in the 2006 Parks Canada Ski Area Management Guidelines.</p>	<p>Parks Canada supports the response of the Lake Louise Ski Area to this comment. Additionally, Parks Canada requires that a number of stringent ecological management parameters must be met and met in the design and implementation of the long-range plan in order to maintain ecological integrity. These include a number of measures for each of the valued components considered in the Strategic Environmental Assessment.</p>

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Traffic Congestion	Traffic backs up at the Lake Louise highway access. It needs to be redesigned.	Chapter 8 of the LRP illustrates proposals to alter the configuration of traffic lanes on the main access road, as well as in the parking lots within the ski area to reduce congestion during both arrival and departure periods.	Parks Canada is currently undertaking numerous improvements to address traffic management concerns in Lake Louise. These efforts will continue.
	There is no evidence provided that the enhanced summer operation at LLSA will help reduce congestion in Banff and Lake Louise. There is a possibility that it would have the opposite effect.	<p>Neither the LRP nor the DIA include such a statement. The Lake Louise Summer Gondola is not a primary reason for park visitors to choose to travel to the Lake Louise area. The iconic Lake Louise itself, and its adjoining Chateau, as well as Moraine Lake are the principal visitor attractions to Lake Louise.</p> <p>For those visitors choosing to prolong their stay in the Lake Louise area by paying to visit the Lake Louise Ski Area's summer gondola, paid tickets allow free parking, and access to a shuttle bus to the Village (Samson) and the Chateau Lake Louise.</p>	N/A
Transportation and Parking in the Greater Lake Louise Area	There should be upgrades and changes made to parking and transportation options between the village and the resort and in the greater Lake Louise area as a whole.	Our LRP is focused on projects inside the Lake Louise Ski Area leasehold only. The potential for traffic and parking solutions in the Lake Louise village and at other nearby tourist destinations extends	Parks Canada is currently undertaking numerous improvements to address traffic management concerns in Lake Louise. These efforts will continue.

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		beyond our leasehold involving many more parties than just LLSA, and is thus outside of the scope of this LRP.	
	LLSA should work with Parks Canada to develop a system that would allow tourists to use the ski area parking as summer overflow and then shuttle to other attractions in the area.	Noted. We have limited the focus of this LRP to projects included within the 2015 Site Guidelines. We are, however, involved in all discussions concerning regional transportation systems, and we recognize that resolving Lake Louise parking issues is a priority for Parks Canada that will be addressed in the upcoming review of the Banff National Park Management Plan.	This is not within the scope of the LRP and DIA.
	Supporting documents reference an aerial tram running between the village and the LLSA. This should be removed as it is not included in the Site Guidelines.	All reference to ideas not included in the 2015 Site Guidelines has been removed. The only exception is for long-range planning design provisions for the Whiskey Jack Base Area, where the juxtaposition of facilities has included consideration of transportation innovations that have enjoyed public media expression. This does not imply any level of prior approval, and Parks Canada has been consistent in requiring that the ski area restrict its primary	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		planning focus to developments listed in the 2015 Site Guidelines.	
	The LRP documents refer to “maximizing the opportunity for visitors to use mass transit, including ongoing collaboration with Parks Canada and community partners”. A mass transit hub at LLSA would result in massive increases in traffic, with associated negative impacts on wildlife. If this is a possibility, it should be included in the LRP and DIA.	This reference has been included for long-range planning design provisions for the Whiskey Jack Base Area, where the juxtaposition of facilities has included consideration of transportation innovations that have enjoyed public media expression. This does not imply any level of prior approval, and Parks Canada has been consistent in requiring that the ski area restrict its primary planning focus to developments listed in the 2015 Site Guidelines.	This concept is not included in the Site Guidelines and therefore is not within the scope of the LRP and DIA.
	There should be more opportunities for visitors to use buses.	LLSA is very supportive of regional mass transit options. LLSA and the other two Banff ski areas invest heavily in regional busing. In fact, the Banff/Lake Louise ski destinations are the only ski destinations in North America where the public transit options to the ski areas are funded 100 per cent by the ski areas with no funding contributions by municipalities or other businesses. As part of this regional busing, Lake Louise offers busses at no charge from Banff and Lake Louise hotels	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		<p>for all of its visitors and the ski area funds this 100 per cent. The Lake Louise Ski Area also offers busing at no charge to its staff.</p> <p>Another initiative by the Lake Louise Ski Area is summer busing around the village of Lake Louise. The ski area offers visitors complementary bus service from the Lake Louise Ski Area to the village of Lake Louise and the Lake itself.</p> <p>Winter bus options from Calgary and Edmonton also exist and are supported by the ski area. The Calgary Ski Bus and the Magic Bus from Edmonton offer well-priced fares from these cities that include lift tickets.</p> <p>The new ROAM public transit bus system between Canmore, Banff and Lake Louise is also welcomed by the LLSA. LLSA is working with Parks Canada to determine whether a ROAM stop at the ski area is possible.</p> <p>LLSA is a strong proponent of regional transit and busing.</p>	

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
Visual Impact of New Structures	LLSA has done a good job of keeping the surrounding viewscales relatively pristine. The proposed lifts and buildings should not negatively impact viewscales.	Maintaining pristine and natural viewscales is a goal of the Lake Louise Ski Area Site Guidelines, reaffirmed in the Terms of Reference <i>for the</i> Detailed Impact Assessment, and important to LLSA's vision and the Banff National Park 'sense-of-place,' which is wild and pristine.	The Site Guidelines include several provisions for maintaining viewscales. For example, the proposed Eagle Ridge Lodge must be situated and designed so that it blends with the profile of Eagle Ridge from key vantage points in the Lake Louise area; alpine ski-way structures must be designed so they are visually unobtrusive from points outside the ski area; and glading of ski runs on Richardson's Ridge must mimic historic avalanche patterns.
Waste Management and Sustainability	Interest in whether LLSA would be implementing reusable plates and cutlery.	<p>LLSA uses reusable glasses and paper straws in our food and beverage outlets and where reusable cutlery is not an option, wooden cutlery has replaced plastic and various outlets use reusable baskets. These are just parts of an ongoing process to reduce, reuse and recycle.</p> <p>LLSA has also partially implemented reusable dishes at specific times in the cafeteria. However, LLSA has limited kitchen space that does not allow full implementation of reusable cutlery and dishes. LLSA lacks space for extra dishwashers that were not contemplated decades ago when these spaces were built. Without</p>	Parks Canada supports the efforts of the Lake Louise Ski Area to reduce reliance on single use plastics. As required by the Site Guidelines, the LRP contains an Environmental Management Strategy that addresses waste reduction and management. This includes an objective to reduce plastic waste by restricting disposable items.

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
		approval of the proposed LRP, LLSA cannot build additional space to allow for washing more reusables, but it will be among the first projects of the LRP.	
Water Pipes	LLSA should run its water pipe from the 4-2 wells underground rather than above ground through the town.	<p>With the approval of Parks Canada, the ski area is investigating the potential use of groundwater, taken from wells located at the 4-2 Site as a potential long-term source of water.</p> <p>Should this prove feasible, and subject to the approval by Parks Canada, the ski area will propose to install a buried pipeline to move this water to the Pumphouse at the former Gondola-Base site.</p>	The proposal to use groundwater from the 4-2 wells site is being evaluated through a separate DIA.
Water Reservoirs	The proposed water reservoirs will be an important addition for snowmaking and to protect the aquatic environment.	LLSA notes receipt of this feedback.	N/A
	The proposed water reservoirs are large and will disturb habitat.	The purpose, location and dimensions of proposed water storage reservoirs are consistent with the provisions of the 2015 Site Guidelines and their design provisions have been reviewed in the DIA. An alternative location has been identified for the main water	This Site Guidelines include the provision for two water reservoirs to reduce the need for on-demand water withdrawal during periods of low flow in order to protect aquatic ecosystems. The DIA considered the area of disturbance required for the reservoir together with other disturbances from

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		reservoir, and its size and function will be determined by the result of ongoing tests of groundwater resources as an alternative to using the Pipestone River and Corral Creek.	the LRP and concluded that with the application of mitigation measures during implementation and operation, the ecological management parameters of the Site Guidelines and Strategic Environmental Assessment should be attained.
	The water reservoir should not be located on the floodplain of the Pipestone River.	Although an alternate site, outside the confines of the Pipestone River floodplain, has been identified in the LRP, the site specified in the 2015 Site Guidelines remains the preferred location. The LRP recognizes that the final design of any reservoir located adjacent to the ski area's Pipestone River water intake and pumphouse will require effective protection from risks associated with flooding and ice damming.	In response to this comment, the DIA was amended to include an alternatives assessment for an additional reservoir site near the base area called the Whisky Jack Reservoir. Potential effects and mitigation of this option are discussed and compared to the original proposed location. This assessment found the Whisky Jack option has the potential to affect riparian and wetland habitat and fish habitat in Fish Creek.
Water Use and Snowmaking	Water withdrawals should be reduced at all times of year, not just during periods of low flow.	The long-term water management provisions of the ski area are detailed in the Water and Aquatic Resources Management Strategy, and adhere to the provisions of the 2015 Site Guidelines. It is not realistic to fail to meet visitors' expectations for potable water, and to provide a full range of appropriate services including	The Site Guidelines and Strategic Environmental Assessment contain ecological management parameters that must be met. These focus on maintaining natural seasonal flow conditions and variability, and ensuring minimum in-stream flows required for the protection of aquatic species, in particular Bull Trout and Westslope Cutthroat Trout.

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	<p>Expanding snowmaking capacity will place significant demand on water supply and has the potential to alter the amount and timing of spring snow melt.</p> <p>It needs to be confirmed that there is sufficient water for the extra snowmaking requirements.</p>	<p>restaurants. The largest use of water is for snowmaking.</p> <p>The Snowmaking Master Plan respects the provisions of the 2015 Site Guidelines. Extending snowmaking to all major ski runs will require the use of additional water. However, overall system improvements, and improvements to ski surface quality will improve snowmaking efficiency. The ski area's water use will not exceed the provisions of the existing water license.</p>	<p>See above response. The ecological management parameters must be met in relation to any increase in snowmaking.</p>
West Bowl	LLSA received inquiries about plans for development of West Bowl.	No cleared ski runs, or snowmaking development will be permitted in West Bowl. The terms of a seasonal License of Occupation will allow LLSA to conduct avalanche control and to ensure safe skier egress from the area.	N/A
	West Bowl will be prone to bad snow conditions due to sun, wind and rocky areas. There are better places to expand terrain.	For this LRP, we are pleased to be able to open skiing in West Bowl for our higher-skill skiers and riders. There has been a considerable demand for access to West Bowl, and we are pleased to be able to provide access with full regard to safety issues.	N/A

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	<p>New lifts will increase skier access to the side country in West Bowl, which should be included in the assessment of cumulative impacts.</p>	<p>For many years, the principal risk associated with West Bowl is that visitors unfamiliar with the terrain (and especially snowboarders), will descend below a line allowing downhill egress (return) to the ski area. Many visitors have had to endure overnight stays before ski area and Parks Canada safety teams could conduct a rescue operation.</p> <p>Skiers entering the new West Bowl ski pod from the ski area slopes above, will have to pass through an entrance 'structure' that will provide a complete ski safety message and maps that clearly illustrate how skiers can access the West Bowl ski out.</p> <p>West Bowl will offer considerable steep, sometimes gladed or otherwise tree skiing and riding for expert skiers and riders. The western boundary will be fenced (rope and flags) and signed to ensure that all West Bowl visitors know where access to the ski out ends, and the dangers associated with descending beyond that point. We will monitor the area and conduct daily end-of-day safety</p>	<p>Parks Canada supports the use of the backcountry for wilderness recreation, including ski touring. However, Parks Canada may implement area restrictions or closures if required for ecological or visitor safety purposes</p>

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		sweeps to ensure that responsible visitors can safely enjoy West Bowl terrain. We do not agree that the number of visitors who choose to go beyond ski area safety fences and signs represents an additional risk that has not already been accounted for in the DIA.	
Whitebark Pine	Lake Louise’s past treatment of Whitebark Pine is concerning. In addition to mapping and monitoring Whitebark Pine located within LLSA, staff must be educated and training to recognize it so that there is not further damage.	<p>Lake Louise is committed to being responsible environmental stewards and a world-leading centre for natural and cultural education and interpretation.</p> <p>LLSA is also very disappointed and has initiated several studies and other planning initiatives to document and better understand the ways that the ski area can operate while allowing Whitebark Pine to prosper as they have in the past. Whitebark pine conservation is a key priority. LLSA has augmented staff training and familiarization to prevent a similar incident from happening in the future and hired a trained ecologist as its on-hill Environmental Management Director, whose priorities include overseeing comprehensive environmental training programs and manuals to</p>	Parks Canada believes that the DIA will ensure Whitebark Pine conservation and will likely result in slightly improved Whitebark Pine population and habitat within the LLSA lease area. Parks Canada intends to meet all responsibilities for this species under the Species at Risk Act and is working closely with the LLSA on this issue.

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		<p>ensure that all staff and relevant third parties have appropriate training and direction. LLSA has also joined the Whitebark Pine Ecosystem Foundation as a Whitebark Pine Friendly Ski Area, attended conferences about the species and has worked the species into educational outreach programs.</p>	
	<p>The DIA inadequately addresses the issue of skiing impacts on Whitebark Pine, including the mowing of Whitebark Pine seedlings on existing runs, and the pressures on seedlings in gladed areas.</p> <p>The glading of areas to improve Whitebark Pine habitat may be positive, but it is not enough to offset or mitigate other pressures. Increased Whitebark Pine seedlings in gladed areas may not translate to a healthy population of Whitebark Pine if the seedlings are damaged by skiing or maintenance before they mature. There is not sufficient evidence that glading will result in enhanced Whitebark Pine viability.</p>	<p>We recognize and appreciate the concern expressed by CPAWS / BVN for the future protection of Whitebark Pine. Clearly, the ski area has gone to considerable efforts to address the protection of sensitive vegetation species, as well as effective operations procedures and management to protect and enhance their habitat.</p> <p>The Best Management Practices proposed by the ski area for Whitebark Pine Protection follows a structure used by Parks Canada and the Mountain National Park ski areas to develop and apply best ski area construction and operational practices. Its contents are ALL drawn from the Vegetation Management Strategy. The focus of the strategy is on ski area practices</p>	<p>See the foregoing response.</p> <p>The DIA indicates that a follow-up monitoring program will be implemented to ensure the goals of the DIA are met for Whitebark Pine. This will include an assessment of the vegetation management activities such as brushing, glading and thinning and how successful they, along with other identified mitigation measures, have been at maintaining and enhancing Whitebark Pine populations and habitats within the LLSA.</p> <p>The DIA also outlines specific measures to ensure that Whitebark Pine in any gladed areas are not removed. Some individuals may be removed from maintained ski runs, however a transplantation protocol will be</p>

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		<p>for vegetation protection and management on ski runs (which require brushing or mowing for their continued safe operation) and in areas which are gladed, whether simply for skiing or for a combined strategy of vegetation management and skiing.</p> <p>In general, Whitebark Pine abundance at the ski area is tied to several factors including fire history, which Dr. Cliff White considers to be a prime factor. Tree removal associated with a century of skiing on Mounts Whitehorn and Lipalian has contributed to the local abundance of Whitebark Pine, but specific studies to quantify this effect have not been conducted. Since the Species-at-Risk Act (SARA) designation of Whitebark Pine, and the posting of the Federal Government's Proposed Recovery Strategy, the ski area has undertaken a comprehensive inventory of all known Whitebark Pine shrubs, trees and clumps of trees. That inventory included observations by vegetation specialist, ski area staff and</p>	<p>developed to save as many of these individuals as possible.</p>

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		<p>volunteers of evidence of Blister Rust infection, and physical damage (by skiers).</p> <p>In many areas, Whitebark Pine have grown in previously gladed terrain which has subsequently attracted other tree species, notably Subalpine Fir and Engelmann Spruce. Recognizing that approval to brush or mow ski runs in Whitebark Pine habitat does require compensation, the ski area has proposed that these former glades be re-established with the advantage given to Whitebark Pine recruitment by removing competitive species. The BMP clarifies that future maintenance of gladed areas will be carried out in a manner which avoids the removal of Whitebark Pine. Glading provides the challenging ski terrain sought by expert skiers and riders, without the need to clear wide-open ski runs. It allows the ski area to decrease the use of more destructive practices such as</p>	

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		<p>mowing, and to reduce reliance on snowmaking.</p> <p>In addition to re-glading areas previously cleared, the LRP proposes glading in Whitebark Pine habitat such as West Bowl, where the closed character of the existing forest has severely limited the natural recruitment of Whitebark Pine. Only the open upper ridge line of West Bowl ridge has allowed Whitebark Pine recruitment. Certainly, the resulting glades will be attractive to skiers, but again, no cleared ski runs, ski run maintenance or snowmaking will be developed in West Bowl - as required by the 2015 Site Guidelines. Regular avalanche control will provide required safety for skiers, while reducing the risk of larger-scale releases which result in increased wide-open ski terrain.</p> <p>Using well-designed glading and thinning on new and existing ski runs on the SW-facing slopes of Mount Whitehorn will reduce the 'sharp-edge' appearance of front-side ski runs, reduce the risk of</p>	

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		canopy-spread fires, and provide habitat diversity for vegetation species and small mammals and birds.	
	The Best Management Practices for Whitebark Pine and Management Strategy on Ski Runs and in Glades has no author or references. This should have been written by an expert and peer reviewed. The document contains erroneous statements.	<p>LLSA's team of scientists who developed the Vegetation (Ski Run) Management Strategy include Dr. David Walker, Dr. Cliff A. White, Randy Moody (B.C.-based Whitebark Pine restoration specialist, co-founder of the Whitebark Pine Foundation of Canada, and who developed the Draft Federal Whitebark Pine Recovery Strategy), and Dana Bush, a regional rare plant specialist. Credits for the contributions of these specialists will be added to the Whitebark Pine Best Management Practice (BMP), when it has been finalized after discussion with Parks Canada.</p> <p>The ski area agrees that this Best Management Practice must be of the highest standard, and is not averse to submitting it for further peer review.</p>	N/A
	The Whitebark Pine recovery strategy has not yet been finalized and it is not clear how	Other than the 2015 Site Guidelines, and the DIA Terms of Reference, Parks Canada has	Parks Canada intends to meet all responsibilities for this species under

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	critical habitat will eventually be defined. No glading or thinning should be done in the vicinity of Whitebark Pine stands, particularly in the Whitebark Pine-rich West Bowl.	provided no further direction to the ski area's planning team to guide the preparation of the ski area's strategy for long-term protection and management of Whitebark Pine within the ski area's boundary. The ski area recognizes that the implementation of any measures that affect Whitebark Pine trees or habitat is subject to the issuance of permits by Parks Canada.	the <i>Species at Risk Act</i> and is working closely with the LLSA on this issue. The DIA also outlines specific measures to ensure that Whitebark Pine in any gladed areas are not removed.
Whitehorn Lodge	Whitehorn Lodge should be closed permanently, not just for the summer months.	As noted in the 2015 Site Guidelines, Whitehorn Lodge poses no environmental challenges in the winter season. It is an important and very popular guest facility which offers excellent views of the Bow Valley from a sun-rich location. It provides important skier services in winter (such as bathrooms) and minimizes the need for skiers to use base area facilities and services on busy days.	The Lake Louise Ski Area Site Guidelines for Development and Use do not require the winter closure of Whitehorn Lodge.
Wildlife and Wildlife Habitat	There is no evidence provided that glading will improve wildlife habitat.	Within the ski area boundary, there is no proposal to carry out glading specifically to improve wildlife habitat.	

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		<p>The DIA and in particular the grizzly bear habitat suitability modelling (DIA Appendix 7A) assess the relative importance of gladed runs to grizzly bears. The habitat suitability modelling demonstrates that ski runs, both open and gladed, are selected for by grizzly bears over closed forest with dense canopy cover. There is discussion regarding grizzly bear habitat selection and predicted changes to grizzly bear habitat as a result of the LRP including the effects of runs, both open and gladed, and high canopy cover; runs are preferred and dense canopy cover is avoided by grizzly bears.</p> <p>The ski area is also aware that glading has the potential to increase ungulate habitat, and thereby impact the Government of Canada's Mountain Caribou Recovery Strategy and this must be addressed in the final glade design and assessment process.</p>	
Wildlife and Wildlife Habitat – Goats	There needs to be more detailed understanding of the impact of the proposed developments on goat populations, particularly in	LLSA has collaborated with Parks Canada in supporting leading-edge research to gain current, and more comprehensive information about the conditions that determine the	The DIA provided an assessment of effects of the proposed LRP projects on goats and goat habitat. The LRP projects were anticipated to have minimal adverse habitat-related

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	<p>Hidden Bowl and in the Richardson's area.</p>	<p>success of the 'Slate Range' herd of Mountain goats.</p> <p>Concerns for Mountain Goats, and the potential effects of LRP developments on Mountain Goats and their habitat, with particular reference to Hidden Bowl, was addressed on Page 2 of this Response Framework.</p> <p>Readers are reminded that no development for downhill skiing in Hidden Bowl is proposed in this LRP, other than conducting further studies about the Slate Range Mountain Goat herd, and assessing avalanche risk for skiers within Hidden Bowl. During the course of these studies, the risks to Mountain Goats posed by all potential long-range development of downhill skiing in Hidden Bowl, including avalanche control, will be assessed.</p> <p>When the LLSA proposes to develop the downhill skiing potential of Hidden Bowl (as provided in the 2015 Site Guidelines), it must bring forward a second Long-Range Plan which, like this first LRP, will be subject to</p>	<p>effects on Mountain Goats because most proposed activities will occur primarily at lower elevations outside of suitable Mountain Goat habitat.</p> <p>Parks Canada is currently conducting research on the Slate Range goat population. Research results will be considered when evaluating future projects at the ski area.</p>

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		environmental assessment at the DIA level, including a full opportunity for public review and consultation.	
Wildlife and Wildlife Habitat – Grizzly Bears	Moving summer activities away from grizzly bear habitat in the Whitehorn area is positive.	LLSA notes receipt of this feedback.	N/A
	Moving the skiable area to West and Hidden Bowls from Purple and Wolverine Bowls could create more favourable habitat, drawing grizzly bears into the new ski runs. It is not clear that a substantial environmental gain will be achieved.	Permitted developments in West Bowl are specified in the 2015 Site Guidelines. Cleared ski runs will not be developed, preventing a recurrence of the favourable grizzly bear habitat that was created by ski run development adjacent to and below Whitehorn Lodge. Glading has been proposed in West Bowl where required for skier safety, and where advantageous for Whitebark Pine regeneration.	The Site Guidelines do not permit cleared ski runs within Hidden or West Bowls (with the exception of West Bowl egress).
	There needs to be more detailed assessment done of the potential impacts to grizzly bears from the entirety of the LRP, including the increase in summer activity at the base and the increase in traffic on Whitehorn Road.	The ski area has 25 years of continuous experience operating a summer visitor program during a period when several grizzly bears are attracted to the vegetation and adjacent cover offered by ski runs in a mid-mountain zone centered on Whitehorn Lodge. The Whiskey Jack Base Area is surrounded by an effective electric fence that has	The DIA defined the assessment endpoint for Grizzly bears as no loss of high-quality grizzly bear habitat and no food conditioned grizzly bears as a result of LRP projects. The DIA concluded that these goals would be achieved. In particular, there would be a minimal change in the amount of moderate to high quality habitat across all seasons, with the

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		<p>proven to be a successful way to avoid contact between national park visitors and park wildlife. This same prevention applies on the gondola ride and in the fencing provided around visitor areas and interpretive trails at Whitehorn Lodge.</p> <p>The facilities in the base area, including parking, are designed to accommodate as many as 6,000 skiers at one time, making their capacity well beyond any projections for summer program visitation. No changes are required to the wildlife protection and visitor safety provisions at the base area to accommodate projected increases in summer visitation. Provisions for wildlife protection and visitor safety are addressed in detail in Chapters 5 and 8 of the LRP, and they have been thoroughly assessed in the DIA. Additional monitoring will be undertaken via the ski area's new Environmental Management System which features periodic</p>	<p>biggest change being an increase of 374.5 ha of high-quality spring bear habitat, resulting in an overall slight increase in high quality habitat.</p> <p>The DIA includes a number of mitigation measures and design parameters to prevent bears becoming food-conditioned.</p> <p>The DIA concludes that with the implementation of the mitigation measures, the LRP projects are unlikely to result in any measurable changes to the Grizzly Bear population in the LLSA, or Banff National Park as a whole.</p>

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		reporting that will be available to the public.	
Wildlife Management – Whitehorn Road	There often are no animals visible around Whitehorn Road so a wildlife crossing structure may not be a good use of funds.	<p>Studies for our Detailed Impact Assessment show that the Whitehorn Wildlife Corridor is one of two primary wildlife movement corridors running north-south along the Bow River in the Lake Louise area. Wildlife use of the corridor has been well documented through several snow-tracking studies. The corridor is used by both carnivores and ungulates, although large wildlife tend to avoid the Lake Louise Base Area in the winter months.</p> <p>Daily vehicle counts on Whitehorn Road show that with increased traffic, crossings by both carnivores and ungulates decrease. As with many wildlife corridors, use by most carnivores is often at its highest during the early morning and evening hours, when all visitors and most staff are at the hill. A wildlife crossing provides both predators and their prey an opportunity to cross at any time when circumstances warrant or necessitate.</p>	Parks Canada wildlife data confirm that this area is an important movement corridor for wildlife. Additional data being collected by the LLSA and Golder Associates will be used in the design of any future crossing structure.

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		<p>Parks Canada’s 2015 Lake Louise Ski Area Site Guidelines for Development and Use states that “To ensure substantive improvements to the Whitehorn Wildlife Corridor, the Site Guidelines require the ski area to construct a wildlife crossing structure for Whitehorn Road and relocate the Fish Creek Road and trailhead parking area” if the LLSA is to implement extended summer hours, such as at the Eagle Ridge Lodge.</p> <p>We support these protective measures for the Whitehorn Wildlife Corridor. We are collaborating with Parks Canada in further studies to determine a final design and location for the Whitehorn Drive wildlife crossing and the LRP illustrates the proposed re-alignment of the Fish Creek access road within the Ski Area’s lease.</p> <p>The final decision on the location and design of these upgrades will be made by Parks Canada.</p>	
	The plan to restrict parking on the Whitehorn access road is	LLSA notes receipt of this feedback.	N/A

Topic	Description	LLSA Response/Outcomes	Parks Canada Response
	positive for the Whitehorn Wildlife Corridor.		
	Parks Canada should apply a science-based vehicle use threshold that would trigger the need for a wildlife overpass or underpass to be built by the ski area. The need for such a structure should not be dependent only on whether or not LLSA extends its operating hours.	LLSA notes receipt of this feedback. Final decisions on vehicle use on Whitehorn Drive will be made by Parks Canada. The ski area is currently providing supplementary wildlife photography to assist Parks Canada to make a science-based decision on the design and location of the proposed wildlife crossing.	Parks Canada will use the best available scientific data when making management decisions about the Whitehorn Road.
	<p>The impact of increased summer use on the Whitehorn wildlife corridor has not been sufficiently assessed in the DIA. The DIA does not address the fact the enhanced summer operation at LLSA will generate more traffic than the thresholds at which bears and wolves become reluctant to cross roads.</p> <p>There should be a cap on summer use at LLSA until the impacts of increased traffic on the Whitehorn access road are fully understood and there is certainty that this will not significantly impact wildlife.</p>	At the direction of wildlife specialist Martin Jalkotzy (Golder Associates), LLSA has contributed additional cameras and effort to assist Parks Canada in determining the location and design of a proposed wildlife crossing on the ski area's access road, Whitehorn Drive. Although not located on the ski area's lease, LLSA is required to pay the costs of any such installation, which is linked to extending summer operating hours. Parks Canada will make the final determination about this wildlife crossing which is an	The Site Guidelines and Strategic Environmental Assessment include ecological management parameters that must be met, including providing predictable patterns of visitor use, avoiding displacement of wildlife from established movement pathways, maintaining daily and seasonal periods of low disturbance so that wildlife can move through the corridor, and maintaining long-term corridor permeability for all species. The DIA identifies the relocation of the summer program to Eagle Ridge as a benefit for wildlife use of the corridor, and suggests that wildlife passage rates across Whitehorn Road will be maintained or improved with the construction of a wildlife underpass.

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		important mitigation for existing and future ski area use.	Remote wildlife camera data are being collected within the corridor to provide additional information on wildlife use and movement, and Parks Canada collects traffic data that will be used to monitor the availability of low-disturbance periods along Whitehorn Road.