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National Park

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Banff

What We Heard:

Summary of Public and Indigenous Comments

on

Site Guidelines for Development and Use
Sunshine Village Ski Resort

December 14, 2018



Parks
Canada

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Context

Parks Canada's mandate is to protect and present nationally significant examples of Canada's natural and cultural heritage while fostering public understanding, appreciation and enjoyment in ways that ensure their ecological and commemorative integrity are preserved for present and future generations.

To fulfill its mandate, Parks Canada team members work at sites in every corner of Canada and collaborate with Indigenous peoples, communities, businesses, and nongovernmental organizations. As a federal government agency, reporting to the Minister of Environment and Climate Change, Parks Canada is accountable to all Canadians and responsible for the delivery of programs related to national parks, national historic sites and national marine conservation areas across the country.

The mountain national parks of Banff, Jasper, Kootenay, Yoho, Waterton Lakes, Mount Revelstoke and Glacier are part of Canada's most pristine natural landscapes, with 23,000 square kilometers of protected wilderness. Dotted into this wilderness are the five communities, and various commercial operators including the four mountain park ski areas of Skiing Louise, Sunshine Village, Mount Norquay and Marmot Basin.

Limits to development in the mountain national parks were established in the late 1990's and early 2000's as a result of extensive analysis and public involvement. The process was completed for communities and outlying commercial accommodations, so that commercial development would only occur within clearly prescribed limits and conditions.

Ski areas are among the largest commercial leaseholders in national parks and as a result of their operations and development, they can have significant impacts on the local and regional park ecology. They also contribute significantly to visitor experience and the regional and national economy. Application of limits to development to ski areas, similar to those applied in communities and outlying commercial accommodations, commenced in 2000 with the *Ski Area Management Guidelines*, which were revised in 2006.

Under the framework provided by Parks Canada's *Ski Area Management Guidelines*, all national park ski areas are required to develop site guidelines for approval by the Parks Canada Chief Executive Officer (CEO). Site Guidelines are resort specific development limits and direction that ensure ecological integrity, contribute to visitor experience and support sustainable business planning. They are the responsibility of Parks Canada to develop in collaboration with the ski resort operator. Once approved, the site guidelines provide ongoing policy direction for any decisions associated with the management of that ski area and provide direction for the development of long range plans.



The site guidelines process has been completed for Mount Norquay, Marmot Basin and Lake Louise, leading to a net increase in designated wilderness in Banff and

Jasper national parks and planned development at these areas to improve visitor experience while accomplishing ecological gains. Sunshine Village is the last remaining ski area to complete the site guidelines process and have their leasehold boundaries identified through Schedule 5 of the *Canada National Parks Act*.

The site guidelines were developed by Parks Canada using the same criteria as applied to other national park ski areas, in consultation with the ski resort operator as well as internal and external specialists, who provided expert advice on visitor experience, visitor safety, environmental impacts and ski industry standards.

The Site Guidelines Review Process

In the interest of openness and transparency, draft site guidelines are made available to the public for review and comment. Indigenous groups are engaged prior to approving the guidelines. Public review and Indigenous engagement on land use and development is fundamental to Parks Canada in order to ensure the final site guidelines are clear, consider different perspectives, and address gaps, areas of concern or ambiguity.

Parks Canada shared the draft site guidelines for the Sunshine Village Ski Resort with the public and simultaneously conducted Indigenous engagement, from June 21 to August 19, 2018. The 60-day review period was longer than the site guidelines review process for any of the other mountain national park ski resorts.

During the review period, comments were received via:

- An online platform managed by Parks Canada;
- An online platform managed by the ski area operator;
- An open house held in Banff on July 31, 2018;
- Individual letters and emails to Parks Canada; and
- In-person meetings, as requested.

All comments received through the public review and Indigenous engagement program were documented and carefully considered by Parks Canada specialists and in some cases, analysed by external experts.

Indigenous Participation

Parks Canada notified local and regional Indigenous communities of the site guidelines review process, providing key background information and the opportunity for in-person meetings. Three Indigenous groups expressed an interest in learning more about the site guidelines, and two groups met directly with the project team to ask questions, share ideas and provide feedback and/or concerns.

Through the engagement process, Parks Canada became aware of the interests of the Indigenous communities, which were to ensure:

- Indigenous historical presence and perspective on the land is presented to skiers in promotions and educational activities;
- engagement by the operator with Indigenous communities as future development and land use proposals are advanced through long range planning; and

- access for Indigenous peoples to their traditional territories for traditional use purposes such as harvesting of medicinal plants and conducting ceremonies.

Public Participation

By the end of the 60-day review period, Parks Canada received over 4,000 public comments. The level of response was high compared to other engagement programs, and higher than all previous site guidelines engagement programs.

Public interest in the draft site guidelines was strong, with comments coming in from local Bow Valley residents quite familiar with the ski resort, as well as from individuals from across Canada, the United States and Europe. Skiers were well represented in the feedback received, as virtually all respondents referred to themselves as skiers.

The tourism and ski industries provided comments in support of ecologically-sound visitor experiences and sustainable business planning. Environmental advocacy groups indicated support for the continuation of downhill skiing in national parks, but that growth and further development of existing resorts were unacceptable and conflicted with the priorities and mandate of Parks Canada. They felt strongly that environmental protection must take precedence as the first priority of the Agency, and that Parks Canada should not allow any development outside of the ski resort lease boundary.

Following is a summary of the major themes identified in the comments received regarding the draft Site Guidelines for the Sunshine Village Ski Resort throughout the review period.

Transportation and Parking Solutions

Parks Canada received a range of diverse comments on this topic from support for developing national park land outside of the lease boundary for parking; to support for addressing parking within the current leasehold and focusing on transit.

Feedback received that was supportive of providing additional off lease parking space or structures within the current leasehold, indicated that the current parking supply was not adequate to meet existing demand and that park visitors should be provided with a place to park. Participants felt that additional parking would result in a more positive experience and improved safety. Some expressed the view that mass transit was not suitable for skiers.

Participants who did not support additional parking typically noted that the site guidelines understated the potential of transit, passenger rail and other transportation strategies to reduce parking demand in ways that did not involve development of additional parking space or structures. Some people stated that providing additional parking space was only a temporary solution at best and would not respond to increasing demand in the long

run. Some participants shared concerns about the cost and the appearance of a parking structure in a national park setting.

Some participants raised concerns with the concept of using undisturbed park lands for the benefit of a single commercial operator as this was unfair to other business operators who are not provided the same opportunity and inconsistent with Parks Canada's mandate and accountability to Canadians.

Growth and Development

Parks Canada received diverse comments on this topic, ranging from support for growth and development without restriction, to those that thought that no growth at all should be allowed.

People who were supportive of growth and development at the ski resort frequently expressed the opinion that the proposed development was insignificant when looking at the bigger picture of all the land that comprises Banff National Park. Many supported additional development and growth as it would facilitate use and enjoyment of the national park by Canadians. Other supporters stated that existing crowding and poor conditions at the ski resort justified additional growth and new development.

Those who were not in support of the growth and development at the ski resort expressed the view that more development would add to current pressures on Banff National Park, and that the benefits of growth or new development did not outweigh the environmental costs.

Commercial Space

Most comments on this subject were from those who thought that commercial space at the ski resort should be increased to balance and meet the needs of skiers. Many supported the industry standard allowance of 1.4 square meters per skier and noted that adequate administrative, operations and maintenance space should also be provided.

Those who were not supportive of increasing commercial space felt that the park is already under considerable pressure or 'too crowded'. Some noted that development in response to demand is short-sighted, and only fosters an endless cycle of additional development to meet additional demand.

Secondary Access Lift and Summer Use

Parks Canada received comments strongly supporting a new tram from the base area to the top of Goat's Eye Mountain as a new year-round attraction to comments that did not support any additional development or summer use.

Supporters stated that a secondary access lift from the base area was imperative, and better both environmentally and for the visitor experience, as it would provide quicker access to skiing and new and improved winter and summer experiences.

Participants who were not supportive indicated that more development is inconsistent with Parks Canada's objectives and mandate regarding the consideration of ecological integrity as the first priority in all decision-making. Some participants insisted that access to the Sunshine Meadows area should be controlled and limited and this special area protected from any future development.

Lease Reductions/Substantial Environmental Gains

Participants indicated a desire to improve the ecological integrity of the ski resort and surrounding area, and virtually all respondents were supportive of any environmental initiative or benefit.

Some participants questioned whether there was real practical or ecological value in some of the lease reductions; while others observed that the concept of reducing the size of the ski resort while increasing the design capacity was somewhat contradictory.

Some people expressed the view that it was unfair that the ski area operator be forced to shrink the existing ski resort boundary at the expense of numerous proposed or planned ski lifts and runs that would improve the overall ski resort operation and experience.

Ski Run and Lift Development

Those who were in support of more lifts and runs stated that all the new lifts and trails identified by the ski area operator should be permitted within the existing ski resort boundary as proposed by the ski area operator, specifically in the areas of Goat's Eye II, Wildside or Goat's Eye III, Hayes Hill, Bye Bye Bowl, Meadow Park and Lookout. They felt that this would be consistent with what was allowed at other resorts and would result in an improved experience for skiers.

Some participants however, stated that the Sunshine Meadows area should be protected from any future development such as the Bye Bye Bowl lift proposed by the ski area operator, and that additional development in general was unacceptable and contradictory to Parks Canada's objectives and mandate.

Process and Fairness

Many of those who submitted comments elected to share their views of the process and the perceived relationship between the ski area operator and Parks Canada.

Some participants clearly stated that Parks Canada must be true to and deliver on its mandate by proceeding with the site guidelines without changes. In a similar vein, others expressed the idea that Parks Canada should hold all national park commercial operators to the same high standards and that the operator had already been given too much latitude and granted too many exceptions throughout the years.

Conversely, other participants felt that Parks Canada was unreasonable in its approach and had failed to work collaboratively with the ski area operator. They expressed the view that Parks Canada was far too restrictive in the draft site guidelines, and the ski area operator should be given the latitude to pursue all of its proposals without "government interference". Some people stated that the public review period was not long enough, and/or it was held at an inopportune time for skiers and failed to provide a public voice for the ski area operator.

Next Steps

The next step in the planning process for the Sunshine Village Ski Resort is the preparation of a long range plan. Long range plans are to describe the major proposals and requirements outlined in site guidelines such as a summer use plan, parking and transportation strategy, water management and snowmaking strategy, best management practices, environmental management and monitoring system, and a national parks interpretative and education strategy for winter and summer use.

After approval of the site guidelines, the process for developing a long range plan will commence. Long range plans outline specific projects consistent with the

direction provided in the site guidelines, and undergo Detailed Environmental Impact Analysis and public and Indigenous engagement. Parks Canada will continue to work with the operator throughout the long range planning process to ensure plans meet the requirements as identified in the approved site guidelines and its *Strategic Environmental Assessment*.

Following the completion of site guidelines, and in recognition that it will take time to prepare a long range plan, Parks Canada may consider additional projects if they are entirely within the existing developed area, do not have potential for significant cumulative environmental effects, are not linked to other projects or long range plan decisions, and do not result in incremental expansion.



In addition to what types of development and use are currently allowed under the *Ski Area Management Guidelines*, the site guidelines for the Sunshine Village Ski Resort note the following may also be considered in advance of a long range plan and subject to applicable development and environmental reviews and permitting:

- Fibre optic installation from the bottom of the Sunshine Village access road up to the resort;
- Goat's Eye Daylodge;
- Improvements to the existing wastewater treatment system;
- Improvements to parking efficiency or capacity within the existing base area parking lot footprint through relocating or reconfiguring existing facilities and parking space and skier pedestrian shuttle systems or people movers within the existing base area parking lot footprint;
- Continuation of the buffer, berming and re-vegetation initiative to provide some protection of Healy Creek adjacent to the parking lot;
- A multi-level parking structure(s) within the existing base area parking lot footprint; and
- Widening and reconfiguration of the Angel Ski-Way and ski-out and connecting egress runs using a combination of structural support and limited, site-specific terrain modification to improve track width, to address safety issues.

Conclusion

Parks Canada would like to thank all who participated in the review of the Site Guidelines for the Sunshine Village Ski Resort. With the support of external experts, all of the feedback received during the 60-day engagement period was carefully considered by Parks Canada. Your interest and input is appreciated and was invaluable in finalizing the guidelines and ensuring they set out the long-term

parameters for the future growth of the ski area in ways that address improvements to the environment, provide the best visitor experience possible and allow for a successful business operation.