

Summary of Comments and Responses

Terms of Reference for the Lake Louise Ski Area Long Range Plan Detailed Impact Analysis

Parks Canada received input on the Draft Terms of Reference for the Detailed Impact Analysis for the LLSA Long Range Plan. Three submissions were received. Below is a summary of those submissions. Detailed comments and responses to each were provided to those who commented.

Ski Area Management Guidelines: One comment called for the revisiting of the determination of substantial environmental gains outlined in the Lake Louise Ski Area Site Guidelines for Development and Use. Comments were also received about the level of public input for the development of the Long Range Plan. *Parks Canada response:* 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: Respondents were concerned that the EA process is proponent-led and that Parks Canada's roles and commitments to ecological integrity were unclear. *Parks Canada response:* 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 is responsible for making determinations of significance.

Indigenous Consultation: Some comments raised concern that Indigenous consultation on the DIA should not be completely separate and that there could be an opportunity for some stakeholders to work directly with Indigenous communities. *Parks Canada response:* 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: Stakeholders noted that the regional landscape should be considered and that the DIA should account for Banff National Park's status as part of a World Heritage Site. There were also concerns that some {wildlife?} species were not listed, and that climate change was not included. *Parks Canada response:* The revised Terms of Reference include these additional elements where appropriate.

Design, Mitigation and Environmental Management/Follow-up and Monitoring: Some respondents stressed the importance of incorporating any lessons learned or monitoring from project implementation into future project planning to improve environmental mitigations. *Parks Canada response:* 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.