

Date: 28 August 2020

To: Tracy Woitenko (Senior Planner and file manager)
Silvertip Block 10 Subdivision application

CC: Lori Rissling Wynn (EARC liaison)
EARC Committee Members (Dominique Lagloire-Galipeau, Julie Ulan, Ralph Walicki,
Karena Thieme, Sari Ohsada, Rick Daniels)

Subject: EARC EIS Review of Silvertip Block 10 Subdivision

On Wednesday August 19th, 2020, the EARC committee completed a review of the EIS for Silvertip's Block 10 Subdivision application.

The meeting included an opportunity to ask clarifying questions, evaluation of the EIS and the Third Party Review (MSES), and an opportunity for the Committee to offer additional comment.

The results of the review are outlined in the attached table. Substantively, EARC found the EIS meets the requirements for an EIS as set out in Silvertip's Area Structure Plan (2007).

The review also included additional comments detailed in the table attached – these are suggested considerations for the Applicant.

If you have any questions regarding EARC's assessment of the Block 10 Subdivision EIS, I can be reached at (403) 921-6007.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Raina', with a long horizontal flourish extending to the right.

Mr. Bob Raina
Chair, Environmental Advisory Review Committee

EARC EIS Evaluation for: Silvertip Block 10 Subdivision Application

An Environmental Impact Statement shall be required when development is proposed adjacent to the wildlife corridor in Block 10, or the northern and western edges of the resort village area. The EIS shall be limited to **vegetation, wildlife and associated habitat concerns** and shall consider:

ASP Requirements (from Silvertip 2007 ASP)	EARC Assessment of EIS (met or not met)	Comments (can add section reference)
<p>A description of:</p> <ul style="list-style-type: none"> - existing environmental conditions, - proposed development, - and the significance of potential short and long-term environmental impacts, including impacts of construction and operating activities; 	<p>Yes Yes Yes</p>	<p>The EIS described existing environmental conditions in “Section 5. Baseline Conditions”.</p> <p>The EIS described the proposed development in “Section 2. Project Details”. However, EARC members noted that the level of detail and the amount of information provided in the description could have been enhanced.</p> <p>The EIS captures potential short- and long-term impacts for example in Section 6. Environmental Effects Assessment.</p> <p>EARC noted concerns related to the quality and comprehensiveness of the EIS.</p> <p>EARC noted that the summary statement that the “Project appears to be achievable without significant adverse residual effects after implementation of mitigation measures and BMPs” may not be appropriate in light of noted concerns about the quality and limitation of the EIS. Likewise, the statement that “Overall, the environmental consequence of the habitat loss will be low” appears equally subjective, especially when residual effects to the habitat in all cases is irreversible for both construction and maintenance/operation phases.</p> <p>See also comments in the sections below as well as items captured under “additional comments”.</p>
<p>Past environmental studies</p>	<p>Yes</p>	<p>The EIS considers past environment studies as per “Section 4.3 Desktop Review”, which lists previous local and regional studies.</p> <p>EARC members noted that the section cites relevant, recent EIS related studies from the area, however, a significant number of primary research studies cited in the document are more than ten years old. Data and environmental factors could have significantly changed since then as well as associated knowledge concerning impacts.</p>

Status reports and recommendations	Yes	<p>The EIS lists several recommendation reports under “Section 4.3 Desktop Review” and refers to status “documents” throughout the document.</p> <p>EARC noted concerns about the comprehensiveness of the use and evaluation of the historical status reports and recommendations, specifically concerning more recent status reports such as reports from wildlife studies the developer had agreed to complete as part of earlier developments.</p>
Wildlife corridor functionality	Yes	<p>The EIS “Section 6.8 Functionality of Wildlife Corridors and Patches” addresses the question of wildlife corridor functionality.</p> <p>EARC noted concerns with the quality of the investigation, primarily concerning the age and comprehensiveness of the studies cited. Specifically,</p> <ul style="list-style-type: none"> - Data sources related to wildlife habitat and movement are older (e.g., black bear monitoring was performed 1992-2005) - Studies on human use of WLC is over ten years old (2008) and would not include the impacts of the population growth in general and the developments in the area in specific <p>The lack of more recent data would be a concern, as the assessment would not account for any cumulative effects of this development on top of recent developments in the area.</p> <p>Also, some data seems inconsistent or non-conclusive/contradictory e.g., impact on cougars, presence of black bears due to geographical ‘trap’ irrespective of habitat quality, etc.</p>
Current scientific knowledge on wildlife corridors and movements	Yes	<p>The EIS includes various citations related to the current scientific knowledge on wildlife corridors and movements in Section 6 as well as Section 5 - each sensitive animal traffic & maps.</p> <p>EARC noted similar concerns as outlined about the wildlife functionality as well as the limited consideration of more recent knowledge in the development of recommendations and mitigation strategies.</p> <p>EARC noted the opportunity to revisit the knowledge/data collection concerning WLCs in general, in alignment and collaboration with the Town of Canmore.</p>

The ongoing monitoring program	Yes	<p>The EIS addresses the on-going monitoring requirement (i.e., three-year wildlife monitoring plan as listed in Table 75. Summary of Potential Effects, Subheading “Mitigation and Monitoring” as well as the ongoing monitoring of water quality post-construction for one year).</p> <p>EARC noted the opportunity to improve requirements related to the comprehensiveness, quality, and analysis of monitoring programs performed by the developer.</p> <p>EARC noted the opportunity to further define responsibilities and accountabilities for potential future mitigation activities stemming from results of on-going monitoring activities e.g., those noted in Table 75 “Wildlife Population”.</p>
Identification of appropriate and feasible mitigation measures including land planning, project design, construction techniques, and operational practices to reduce or eliminate potential adverse effects on the environment.	Yes	<p>The EIS lists several mitigation measures as listed in Table 75. Summary of Potential Effects, Subheading “Mitigation and Monitoring”.</p> <p>EARC noted concerns regarding the comprehensiveness and quality of the cumulative effects assessment. Specifically,</p> <ul style="list-style-type: none"> - The assessment of mitigation measures appeared mostly qualitative rather than data-driven, resulting in several cases where a cumulative effects assessment was not triggered. - The age of the data/information disabled the consideration of effects from more recent developments. For example, the status reports and latest monitoring results (e.g., human-wildlife interactions) were not considered during the development of recommendations and mitigation strategies. <p>EARC noted concern that the age of the area structure plan (2007) could have justified a review and – if required – revision of the TORs for new subdivisions.</p> <p>EARC noted the opportunity to establish a common definition/understanding of the term “heavy machinery” recommendation to suspend their use between December 1 and June 15 to reduce noise/disturbance impacts on wildlife.</p>
Other Relevant ASP Policies		
At the time of subdivision application for Block 10, consideration shall be given to establishing the rear yard setbacks and the provision of fencing along the wildlife		<p>The EIS states the commitment of the development of a nine-meter setback for properties adjacent to the LSWC as well as a 1.5-meter post-and-rail fence along the upper LSWC boundary adjacent to development (see Table 76. Table of Mitigation Commitments and Assurances - Sections 6.3.a, 6.a.3 and 6.a.7).</p>

<p>corridor boundary. The setbacks and fencing will be consistent with adjacent development and will be done so as to mitigate the possible effects of development on the adjacent wildlife corridor.</p>		<p>EARC noted concerns with the effectiveness of the post-and-rail fence to mitigate human-wildlife encounters and the opportunity to revisit and adapt TOR requirements and execution of mitigation strategies in alignment with most recent knowledge concerning WLC.</p> <p>EARC noted that the EIS could have included the review of alternative fencing solutions based on the TOR requirement that “setbacks and fencing [...] will be done so as to mitigate the possible effects of development on the adjacent wildlife corridor” (e.g., enhancement of signage).</p>
<p>Where residential lots within Block 10 are proposed adjacent to the wildlife corridor, lots shall be designed to increase the buffering effect. Dedications of municipal reserves increased setbacks or restrictive covenants may be used to ensure that no less than 9.0metres of undisturbed lands exist between a building envelope and the wildlife corridor boundary, subject to any mitigation recommendations that may result from [the EIS].</p>		<p>The EIS indicates that proposed residential lots within Block 10 adjacent to the wildlife corridor will be designed to increase the buffering effect.</p> <p>EARC noted concern that the developer will rely on municipal resources/reserves to meet the requirements.</p> <p>EARC notes the opportunity to consider the impact of vacant lots on wildlife occurrence, human use and the associated likelihood of human-wildlife interactions.</p> <p>Please also refer to EARC comments related to the limited application of up-to-date knowledge related to human-wildlife interaction and effective mitigation measures.</p>
<p>Where residential lots within Block 10 are proposed adjacent to the wildlife corridor, a post and rail fence shall be constructed on all property boundaries that are shared with the wildlife corridor or municipal reserve parcels to delineate the corridor, subject to any mitigation recommendations that may result from [the EIS].</p>		<p>Please see the comments above.</p>

Additional Comments		<p>EARC noted the opportunity for the Town of Canmore to review the potential impacts of and mitigation measures for</p> <ul style="list-style-type: none">- Off-leash dogs; and,- Undesignated trail use <p>and how these measures should inform TORs (current or future). (note: relevant to this EIS concerning planned development features of subdivision 9)</p> <p>EARC noted the limited availability and/or evaluation of socio-economic data/information, which impacts the comprehensiveness and objectivity of the revenue impacts for the Town of Canmore (e.g., potential costs the Town of Canmore might incur due to additional wildlife management requirements).</p> <p>EARC noted the opportunity to integrate the Town of Canmore’s climate policies in the future (and current) TORs. For example, the EIS makes broad statements concerning the developer’s commitment to supporting a “zero-carbon” balance, without providing specific detail on how they will achieve this.</p>
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