

TOWN OF CANMORE
MINUTES
Environmental Advisory Review Committee
Zoom online
5pm Monday October 5th, 2020

COMMITTEE MEMBERS PRESENT

Bob Raina	Chair
Karena Thieme	Vice Chair
Sari Ohsada	Public Member
Ralph Walicki	Public Member
Richard Daniel	Public Member
John Borrowman	Council Representative, Mayor

COMMITTEE MEMBERS ABSENT

Julie Ulan	Public Member
Dominique Lagloire-Galipeau	Public Member
Councillor Esme Comfort	Council Representative (on leave)

ADMINISTRATION PRESENT

Lori Rissling Wynn	Town of Canmore Liaison, Sustainability Coordinator
Joshua Welsh	Planning and Development, Town of Canmore

MEMBERS OF THE PUBLIC PRESENT

Jessica Karpat	Quantum Place Development
Dr. Kyle Knopff	Golder and Associates
Dr. Brian Kopach	MSES

Action items in red.

1. **CALL TO ORDER and APPROVAL OF AGENDA**
CARRIED UNANIMOUSLY
2. **EIS evaluation – Three Sisters Village Area Structure Plan EIS**
 - a) **Clarifying questions to the Applicant regarding the application** (answers available in the livestream recording)
 - Why black bears were excluded?
 - What about other species, specifically coyotes?
 - Fence – seems poorly defined, with tie ins not defined. Please elaborate on the fence design.
 - How will vehicles gain access to development while preventing wildlife from getting in?
 - Why were GHG emissions not included as part of the analysis?

- Age of wildlife movement data – why is there no newer data? Hurdles to new data?
- Please confirm that enhancements could be made on cumulative effects assessment with additional data?
- What is the town’s expectations to move onto this next step in the process?

Motion to leave the public meeting to protect from disclosure information related to recommendations and analyses developed for Council in accordance with section 24(1)(a) of the Freedom of Information and Protection of Privacy Act. **5:37pm**

b) Evaluation discussion (in camera) **CARRIED UNANIMOUSLY**

3. Motion to return to public meeting 7:13pm **CARRIED UNANIMOUSLY**

4. Acceptance of the evaluation as discussed 7:14pm **CARRIED UNANIMOUSLY**

5. ADJOURNMENT 7:15pm **CARRIED UNANIMOUSLY**

Date: 8 October 2020

To: Joshua Welsh (Development Planner and file manager)
Three Sisters Village Area Structure Plan

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

Subject: EARC EIS Review of Three Sisters Village Area Structure Plan

On Monday October 5th, 2020, the EARC committee completed a review of the EIS for Three Sisters Village Area Structure Plan.

The meeting included an opportunity to ask clarifying questions to the representatives of the Applicant and third party reviewer, 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 the EIS as set out in the Terms of Reference (2018).

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

If you have any questions regarding EARC's assessment, 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:
Three Sisters Village Area Structure Plan
5 October 2020**

TOR Requirements	EIS Section(s)	EARC Assessment (met/not met)	Additional comments
4.1 Proposal Overview a. Describe the development context for the Project, including previous approvals and ASPs. b. Map the Project in relation to existing conditions within the Project, Local and Regional Study Areas. c. Provide an overview of the Canmore municipal planning policy context.	Sec. 1 Figures 11,12,13 Sec.1.1 I-X, Figures 1, 2, p.4-5, 7	Y Y Y	Comment related to c): EARC noted that the Municipal planning context should have included a reference to the Town’s 2018 <i>Climate Action Plan</i> , which had been under development at the time of the development of the TOR (and the execution of the EIS). Specifically, the CAP, approved for planning purposes by Town Council in December 2018, states: <ul style="list-style-type: none"> - “Climate mitigation should be considered in future land use and development decisions;” - “Strategic plans (e.g. the Municipal Development Plan, Land Use Bylaw, Engineering Design Guidelines) and neighborhood scale plans should consider potential future climate change mitigation; and” - “Decisions related to the design, maintenance, and upgrading of long-life infrastructural assets and facilities should likewise consider energy consumption, greenhouse gas emissions and their impacts” Action: EARC will provide Council with recommendations on opportunities to amend the EIS policy to more strongly integrate the 2018 <i>Climate Action Plan</i> into the development of TORs (future, potentially current – if feasible)
4.2 Description of the Project a. Summarize details of the proposed Project from the ASP. Describe conceptual layout,	I-X, maps		EARC noted that the EIS acknowledges climate change and energy efficiency standards contemplated in the new ASP. While the new ASP is said to incentivize more energy

<p>development nodes, densities and units and temporal development phasing so that the EIS can present a robust and complete analysis of the direct and indirect effects from the proposed ASP. Include a detailed description of the infrastructure associated with the Project, including road systems and utilities including municipal water, storm water, waste water (e.g., sanitary water) and waste management.</p> <p>b. Qualitatively compare the differences in the infrastructure, people and traffic and mitigation between the approved 2004 Resort Centre ASP, and the proposed Three Sisters Village ASP.</p> <p>c. Provide a land use map that includes and accounts for density of people, buildings, and infrastructure in the Project Area.</p> <p>d. To account for the specific and separate set of impacts associated with the construction phase and build-out phases of the project, estimate the maximum number of people and traffic for each phase.</p>	<p>Fig.E4</p> <p>Fig 7,</p> <p>Sec. 3.0</p> <p>Sec. 3.3</p> <p>Sec. 3.5</p> <p>Sec. 3.5;p.47-49,</p> <p>Fig 3,6,7,8</p> <p>Table 7</p> <p>Fig 7 Tab 7 p.46 traffic add'n</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>efficient buildings, this did not get reflected in a revision of the TORs and was therefore not addressed in the EIS.</p>
<p>4.3 Public Consultation and Approach Used to Address Concerns Raised</p> <p>a. Identify the approach used to consult with the public to identify their concerns about the Project, how the issues have been addressed, and where information to address the concerns is presented in the EIS.</p>	<p>Sec. 1.4 p.11-18</p>	<p>Y</p>	<p>No further comments.</p>
<p>4.4 Spatial and Temporal Boundaries of Study Areas</p> <p>a. Three spatial study areas will be addressed in the EIS:</p> <p>i. <u>Project Study Area</u> boundary should include all the residential, resort and supporting commercial structures, and recreational uses and infrastructure within the ASP.</p> <p>ii. <u>Local Study Area</u> should include the proposed Three Sisters Village ASP as well as previously approved development lands in the TSMV</p>	<p>Sec. 4.1 Fig 11, p.52-53</p> <p>Fig 12</p>	<p>Y</p> <p>Y</p>	<p>EARC noted that the datasets used in the EIS are dated. For example, select datasets are more than ten years old and the newest camera data set is more than three years old. The age of the data limits the comprehensiveness of the analysis.</p> <p>EARC noted that the majority of the evaluation was focused on the Project and Local Study Area. Several studies (e.g., wildlife migration, climate change) would have benefited from a more in-depth review of the impacts in the Regional Study Area.</p>

<p>(i.e., Stewart Creek ASP), and adjacent wildlife movement corridors.</p> <p>iii. <u>Regional Study Area</u> boundary for Environmental Consequences of residual effects from the Project, should include future developments whose impacts overlap with those of the Project. The Regional Study Area needs to be meaningfully sized to properly reflect the effects of the proposed Project.</p> <p>iv. The Project, Local and Regional Study Areas are illustrated on Maps A and B.</p> <p>b. Temporal Boundaries should extend from the time of project approval to full build-out of the facilities, including the construction and build-out phases (e.g. 5 to 20 years).</p>	<p>Fig 13</p> <p>Sec. 4.1, 4.2</p>	<p>Y</p> <p>Y</p>	
<p>4.5 Valued Environmental Components</p> <p>a. Valued Environmental Components (VECs) are any part of the environment that is considered important by the proponent, public, scientists or government involved in the assessment process. Importance may be determined based on cultural values or scientific concern. Several key features of the environment should be selected as VECs for this assessment.</p> <p>b. The level of assessment detail for each VEC will reflect the potential effects from the Project. More detailed assessments should be provided for those VECs for which potential effects are greater.</p>	<p>Sec. 4.2, p.53 p.28-36 Secs. 5 and 6</p>	<p>Y</p> <p>Y</p>	<p>EARC noted that VECs include grizzly bears, wolves, cougars and elk, wildlife, vegetation, aquatic ecology, surface and bedrock geology, soils and terrain, surface and groundwater, air and noise. However, black bears are not discussed although human interactions with black bears are seemingly more frequent than other wildlife in the local area.</p> <p>EARC noted that the approximation using grizzly bear data to assess the impact of black bears is not in alignment with the general understanding of the differences in the species behaviors and movements.</p> <p>EARC noted that the Valued Environmental Components could have included climate change mitigation aspects. While not specifically mentioned in the TOR, climate change has emerged as an important environmental concern in the community since the date of the TOR, as evidenced by the <i>Climate Action Plan</i> (2018) and the declaration of a climate emergency (2019).</p>
<p>4.6 Baseline Conditions</p>	<p>Sec. 4.2</p>		<p>EARC noted that some of the data used to establish the baseline is dated (e.g., wildlife data being more than 10</p>

<p>a. A description of existing environmental conditions within the Local Study Area, and, as required, within the Regional Study Area, including:</p>		Y	<p>years old) and are therefore not reflective of the 'base' at this time in point. EARC acknowledges that the consultants performing the EIS modelled the historical data to approximate the current state/baseline data in support of the analyses.</p> <p>EARC noted that black bears and coyotes have not been considered in the baseline assessment.</p> <p>EARC noted the opportunity for the town to request the inclusion of more up-to-date data to enhance the assessment of risks as well as cumulative effects. EARC noted the limitation of the adaptive management plan to enforce/encourage the collection of more accurate/relevant data.</p>
<p>i. Air Quality and Noise</p>	<p>Sec. 6.3 p.267</p>	Y	
<p>ii. Surface and Bedrock Geology</p>	<p>Sec. 6, 6.1.2</p>	Y	
<p>iii. Groundwater Quantity and Quality</p>	<p>Sec. 6.2.2</p>	Y	
<p>iv. Surface Water Quantity and Quality</p>	<p>Sec. 6.2.2</p>	Y	
<p>v. Soil and Terrain, including hazards and constraints for development (e.g., slope, undermining)</p>	<p>Sec. 6.1.3</p>	Y	
<p>vi. Terrestrial and Aquatic Vegetation, including wetlands</p>	<p>Sec. 5.12-5.13</p>	Y	
<p>vii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people.</p>	<p>Sec. 5.21</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 5.2, 5.3, 5.4</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 5.19, 5.20, 5.21</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 5.0</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 7.2</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 7.1</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 7.3</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 5.3.2, fig 18</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>p.77-83</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Secs. 4.5, 5.3</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Figures 15-22</p>	Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>		Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>		Y	
<p>viii. Wildlife including populations, habitat and movement corridor functionality and connectivity, and interactions with people. The wildlife assessment must include an assessment of human use and public safety.</p>	<p>Sec. 5.12-5.13</p>	Y	
<p>b. A literature review of relevant studies, including background environmental effects studies, and the most current monitoring data from remote cameras, telemetry from collared wildlife, and wildlife-human interactions, and the effects of wildlife enhancement and fire reduction sites.</p>			
<p>c. Conduct field programs where data gaps exist in baseline conditions. Based on discussion with the third-party reviewer, the additional site-specific field surveys should include rare plant</p>	<p>Sec. 5.4, p.114-135</p>	Y	
<p>c. Conduct field programs where data gaps exist in baseline conditions. Based on discussion with the third-party reviewer, the additional site-specific field surveys should include rare plant</p>			
<p>c. Conduct field programs where data gaps exist in baseline conditions. Based on discussion with the third-party reviewer, the additional site-specific field surveys should include rare plant</p>	<p>Sec. 4.2</p>	Y	

surveys; and wildlife corridor surveys for constraints and sites for mitigation to improve functionality. d. Discuss effects from the existing developments/footprints, including existing mitigation.	Secs. 4.2	Y	
4.7 Legislative Requirements For each VEC, identify Federal or Provincial requirements or restrictions relevant to the VEC, and how the proposal will meet the intent of legislative requirements.	Sec. 5.5, 5.14 p.136, p.261	Y	EARC noted the opportunity to include the identification of municipal requirements in future TOR requirements.
4.8 Project Environmental Impact Assessment a. Identify the benefits of the Project. b. Evaluate how the Project has been designed to address environmental sensitivities or constraints. c. Outline alternatives and modifications to the Project to limit or remove environmental impacts. Where feasible reduce existing effects from the currently developed TSMV lands. Discuss how the Project has addressed concerns of the public. d. Identify anticipated impacts from activities of future residents associated with the Project on VECs. e. Identify cumulative impacts from the Project and the existing conditions, on VECs. f. Address impacts from both the construction and build-out phases of the Project. g. Define the significance of impacts: i. Identify the pre-mitigated nature and scale of environmental risks and the significance of the residual (or post-mitigated) effects from the Project, and the Environmental Consequence of the residual effects (positive, negligible, low, moderate and high). ii. Significance terms to be used in defining the impacts will include:	Sec.8.1, p.292 p. 136-145 Sec. 2.0 Sec. 5.7 p.146, 181 Sec. 5.9 Sec. 5.8;p.185-213 Table 50 p.291 Tables 32-39	Y Y Y Y Y Y Y Y	Related to i) EARC noted the lack of discussion of potential mitigation measures of greenhouse gas emissions from buildings and transportation. Related to iv) EARC noted that there was no meaningful discussion of existing or past cooperative efforts documented, therefore the TOR requirement was not met. With the exception of the fencing concept discussed with relevant experts in Section 1.4.

effects, and hence the confidence in the predictions of residual impacts. Identify how uncertainty has been managed in the EIS.	Sec. 4.4 Section 5, throughout		
4.9 Cumulative Environmental Assessment	Sec. 5.9	N	EARC noted that the cumulative effect assessment did not discuss the potential implications of the project on the environment/climate. EARC noted the limitation of the quality of the cumulative effects study on wildlife in light of the age of the data used as well as the scope (i.e. using grizzly data as proxy for black bear data). EARC noted that the scope of the cumulative effect assessment focused to a large extent on the Project and Local Study Area. While the Regional Study Area was discussed, the discussion was limited to a higher level review.
a. Conduct a meaningful cumulative effect assessment (CEA) within the Regional Study Area that includes proposed and probable projects that could occur in the next 5 years and impact the same environmental resources (e.g., grizzly bears, elk, groundwater) as those affected by the Project.	Table 33,34, 35		
b. In the broader CEA, include residual impacts from the Project with an Environmental Consequence greater than negligible.	Sec. 5.9	Y	
c. CEAs for projects can be variable depending on the existing and future developments near the Project area. Issues that may need to be addressed in the CEA include:	Sec. 5.9	Y	
i. Incremental effects on the wildlife movement corridors,			
ii. Increased human-wildlife interactions, and			
iii. Increased traffic on wildlife mortality.			
4.10 Monitoring Programs and Future Studies			EARC noted the opportunity for the town to request more up-to-date data related to wildlife movement as well as the cumulative effects of the project on the environment in monitoring programs and future studies. EARC noted the opportunity to manage and maintain the monitoring data in a central repository to enable access to the most current and complete/comprehensive data set(s). EARC noted the need to ensure that the monitoring programs and studies include the required follow up actions concerning analysis and mitigation of findings and incorporation into applicable management programs.
a. Local Monitoring Program and Future Study Recommendation	Sec.5.9.2	Y	
i. Monitoring programs are required both to verify the predicted effects, and to track uncertain effects of the Project. Identify potential monitoring programs for the Project. The programs need to have linkage to potential thresholds defined for effects (e.g., water quality objectives, air quality objectives).	Table 50	Y	
ii. Identify whether additional environmental studies are required.	Sec.5.8 Wildlife Sec. 5.17 Vegetation Sec.5.26 Aquatics		
b. Regional Monitoring Program	Sec. 6.27		
i. Monitoring programs are required to assess regional cumulative effects. Identify and	Groundwater Sec. 6.37 Air		

<p>participate in comprehensive valley-wide regional monitoring programs, involving and funded by all stakeholders, to monitor the status and mortality of wildlife populations, and to determine the effectiveness (i.e., functionality, connectivity) of wildlife movement corridors near the TSMV lands.</p> <p>c. Provide all data from monitoring programs and future studies to the Town of Canmore or regional bodies assisting in the management of wildlife in the Bow Valley.</p>	<p>Sec. 6.4.7 Noise Sec. 7.1.7 Visual Sec. 7.2.7 Historic Sec. 7.3.6 Land Use</p>		
<p>4.11 Specific Analyses To Be Completed</p> <p>a. Environmental impacts due to undermining, including effects on ground and surface water.</p> <p>b. Related to Wildlife:</p> <p>i. Use meaningful and well justified Alternative Development Scenarios that will lead to the selection of development plans that will have acceptable impacts on wildlife. Scenario assessments could reflect a range in development densities and layouts, and hence different development footprints, different numbers of people who could reside in the development, and different pressures on wildlife from increased human use of wildlife corridors, from increased traffic and from indirect effects of noise and light.</p> <p>ii. Assess the effects of the Project on existing wildlife corridor movement patterns related to change in habitat use and increased human use. Use validated habitat selection models (e.g., resource selection functions developed and validated using telemetry data collected in the RSA). Use approaches that recognize existing movement constraints and propose mitigations to improve those constraints. Include the Along Valley, Tipple Across Valley,</p>	<p>Not specifically addressed</p> <p>Sec. 2.0</p> <p>Sec. 5.7.2.3 Grizzly Sec. 5.7.3.4 Cougars Sec. 5.7.4.4 Wolves Sec. 5.7.5.4 Elk</p> <p>Sec. 5.4.2 Sec. 5.4.3 Sec. 5.4.4</p>	<p>2.3</p> <p>N</p> <p>Y</p> <p>y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>EARC noted the lack of black bear data and concern with the use of grizzly bear data to approximate related risks and implications.</p> <p>EARC noted the limitation of the EIS (and TOR) to due excluding an analysis of potential implications of the project on the environment/climate change.</p> <p>Related to iv) EARC noted that fencing is conceptual only and does not entirely enclose the proposed development based on the maps included in the EIS, for example</p> <ul style="list-style-type: none"> - Missing are the northwest and southeast end tie-in points, a barrier for the north boundary and road access points with appropriate barriers. - Missing are details with regard to vehicular access control (e.g., Texas gates) <p>While Dr. Kyle Knopff stated that these aspects have been considered in the EIS, EARC noted that the information provided in the documentation including maps is not sufficient to provide the required detail EARC recommends to review these aspects more closely and obtain further clarification and information from the developer prior to any construction and during the development of the adaptive management plan.</p>

<p>and Steward Creek Across Valley wildlife corridors in the analysis.</p> <p>iii. Identify impacts from the wildfire mitigation strategy that will be required for development, including changes to vegetation, habitat and effects on wildlife.</p> <p>iv. Evaluate the mitigation used to reduce effects on wildlife, including fencing, if this is proposed to manage Project effects.</p> <p>v. Address human-use impacts on wildlife populations (e.g. corridor functionality, vehicle collisions), as well as the potential effects on human safety from wildlife conflicts.</p> <p>vi. Update the Wildlife Human Interface Prevention Plan (previously prepared in 2004 for the TSMV) to reflect current legislation, and potential wildlife – human effects, and mitigation and monitoring required for the Project.</p>	<p>Sec. 5.6.2</p>		
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