



January 26, 2017

Mr. Roger Ramcharita
Regional Executive Director
South Saskatchewan Region
Environment and Parks
3rd Floor, Deerfoot Square
2938 - 11 Street NE
Calgary, AB
T2E 7L7

**RE: Three Sisters, Final Wildlife Corridor Submission
Smith Creek Along Valley Corridor (formerly Sites 7, 8 and 9)**

Dear Mr. Ramcharita:

On behalf of Three Sisters Mountain Village Properties Ltd. as an Authorized Agent, I am pleased to submit our proposal for the Smith Creek Along Valley Corridor in Canmore, Alberta. As you are aware in October, 1991, Three Sisters Golf Resorts Inc. (now owned by Three Sisters Mountain Village Properties Ltd. [TSMVPL]) filed an application for approval to develop a recreation and tourism project in the Bow Valley.

In November 1992, the Natural Resources Conservation Board (NRCB) approved the Three Sisters tourism and recreation project with several conditions. Within the Decision Report 9103, Condition 14 in Schedule C-2 required that *“Three Sisters shall incorporate into its detailed design, provision for wildlife movement corridors in as undeveloped a state as possible, and prepare a wildlife aversive conditioning plan, both satisfactory to Alberta Forestry, Lands and Wildlife.”* In this condition, the NRCB placed an obligation on Three Sisters to provide for wildlife corridors and an aversive conditioning plan and for Alberta Forestry, Lands and Wildlife (now Alberta Environment and Parks [AEP]) to evaluate the design of the proposed wildlife corridors and the efficacy of the wildlife aversive conditioning plan. As you are also aware, current Provincial law precludes TSMVPL from undertaking wildlife aversive conditioning without special permitting, as that is generally undertaken only by the Province when required, and accordingly we have not prepared such a plan, but instead Three Sisters previously prepared a Wildlife Human Interaction Prevention Plan (WHIPP). The first WHIPP was approved by the Province in February 1999, and subsequently revised and approved by the Province in September 2004.

Since 1992, the Three Sisters property has developed the lands and wildlife corridors in stages. The Along Valley Corridor south of the Resort Centre and Stewart Creek east to the section line separating DC Site 7 and DC Site 9, along with the Stewart Creek Across Valley Corridor were approved in 1998 (Golder 2017; Figure 1). These corridors include a combination of Three Sisters lands, as conservation easements, in combination with adjacent provincial lands.

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The remaining portion of the Along Valley Corridor and connectivity between the Wind Valley and the Bow Flats Habitat Patches via the G8 Legacy Underpass remains to be approved or designated in any way despite several drafts by various parties over the years. TSMVPL is proposing herein the Smith Creek Along Valley Corridor to connect the existing approved Along Valley Corridor with the Wind Valley Habitat Patch and Bow Flats Habitat Patch through the G8 Legacy Underpass. This will be accomplished by extending the existing and provincially approved Along Valley Corridor to the east approximately 2.5 km through TSMVPL's Smith Creek lands. The portion within TSMVPL land includes 111.18 ha on the south side of Site 9, and another 63.48 ha within Site 7/8 for a total of 174.66 ha (431.59 acres) of private land proposed to be dedicated as wildlife corridor.

The narrowest portion of the current approved and designated Along Valley Corridor, 350 m, occurs immediately south of and above Sites 7/8. As discussed with the Province over the course of 2015 and 2016, this proposal will add land to the north side of the designated Along Valley Corridor on less sloped terrain increasing the width of the corridor immediately above Sites 7/8 resulting in an overall width of 625 m at its narrowest point. The remainder of the Smith Creek Along Valley Corridor through Site 9 also exceeds 625m.

The additional land on Sites 7/8 in this proposed corridor also addresses a portion of land on Site 7 that was considered a potential disconnect for wildlife movement in previous wildlife planning documents. The northern border of the designated Along Valley Corridor and the proposed extension will consist of a single smooth edge without any disconnects. The border was also moved north sufficiently to encompass an important large fen wetland, the largest single fen wetland on the TSMV lands. All mapped wetlands on Site 7, 8 and 9 lands identified by the NRCB will be within the proposed Smith Creek Along Valley Corridor.

This proposal also proposes to relocate the Stewart Creek Across Valley Corridor approximately 300 m to the east, centering the corridor on the location of a proposed new wildlife underpass across the TransCanada Highway. The proposed new Stewart Creek Across Valley Corridor is comprised of habitat preferred by grizzly bear, elk and cougars based on habitat suitability modelling for these species in the Bow Valley (Golder 2013). It is also proposed that wildlife will also continue to have access to the existing Stewart Creek underpass, increasing the number of underpasses that cross the TransCanada Highway from two to three (G8 Legacy Underpass, two Stewart Creek Underpasses) and relocating the existing Stewart Creek Across Valley Corridor to a drainage which is a natural movement corridor for wildlife.

The Stewart Creek Across Valley Corridor relocation is proposed as an option, subject to Alberta Transportation and other appropriate regulators approving a new wildlife underpass beneath the TransCanada Highway. Should the relocation not be approved by all necessary parties, then the existing structure and the existing Stewart Creek Across Valley Corridor alignment would remain in place. If the alignment is relocated, retaining the existing wildlife underpass at Stewart Creek would also be subject to regulatory approval and any connection to it from the realigned Stewart Creek Across Valley Corridor comes with the stipulation from TSMVPL that no land beyond that shown (Golder 2017; Figure 1) is removed from development, whether through Provincial request or municipal regulation with respect to layering, buffering, setbacks or similar restrictions for environmental or wildlife considerations. A portion of the existing Stewart Creek Across Valley Corridor would then once again become developable lands under the NRCB Decision 9103 as shown in TSMVPL's proposal.

The proposed Smith Creek Along Valley Corridor adheres to general biophysical principals of corridor design that have been discussed with AEP in the recent past, and generally as outlined in BCEAG (2012). Overall, habitat suitability modelling, based on species-specific radio telemetry data collected in the Bow Valley, demonstrates that the majority of the proposed corridor includes habitat that was preferred by grizzly bears cougars and elk (Golder 2013). It is greater than 350 m in overall width, significantly so at over 600 m and with very minor deviations, are useable by wildlife over its entire width over all seasons. Although there are a number of discontinuous cliffs interspersed within the proposed corridor, these are easily circumvented. Multiple well used wildlife trails above

and below these features demonstrate that wildlife are currently moving around these features without material impediment even with the current level of dispersed human use in the corridor. We also note that the minimum width of the proposed Smith Creek Along Valley Corridor below generally continuous 25° slopes is approximately 470 m. As such, the proposed corridor does not contain any notable or material impediments to wildlife movements. The corridor represents known movement routes of wildlife through the area and includes preferred movement routes; wildlife trails occur throughout the proposed corridor and current remote camera monitoring has shown that they are used by a wide variety of wildlife including carnivores like cougars and wolves (Alberta Environment and Parks, unpublished remote camera data). The proposed Smith Creek Along Valley Corridor alignment has been ground-truthed numerous times, including visits with representatives of AEP, the Town of Canmore and community members. The alignment makes good use of existing old mining roads, wildlife trails and natural breaks that contour along the slopes, creating natural movement routes for wildlife. Finally, because the proposed corridor borders a provincial park on the south side, there will never be development on both sides of the Smith Creek Along Valley corridor. With the addition of wildlife conservation fencing along the north border of the existing designated along Valley Corridor and this extension to the east separating them from TSMV and other development, legitimate human use in the corridors will be primarily on designated trails, and wildlife in the corridor will not be able to stray into developed areas such as the issues occurring on the school fields in Stewart Creek community, increasing corridor functionality and reducing human/wildlife conflict risk. Wildlife conservation fencing will similarly increase the functionality of the Stewart Creek Across Valley Corridor.

Human use, including walking, off-leash dogs and mountain biking, in the existing approved wildlife corridors and habitat patches in and around Canmore currently has an adverse effect on the ability of these undeveloped areas to serve as undisturbed habitat and movement routes for wildlife. Although this situation has been well known for over a decade, and some progress has been made, data from remote cameras around Canmore indicate that there are more people and their pets using the wildlife corridors than wildlife. In addition, wildlife human conflict in and around Canmore is an on-going challenge for both the Town of Canmore and Alberta Environment and Parks. Elk present human safety concerns in town and bears continue to be removed at an unsustainable rate. The Bow Valley was considered a mortality sink for bears in 2013 (Golder 2013) and that situation has not changed since then. Previous development approaches using soft edges or “layers” to reduce sensory disturbance in an adjacent wildlife corridor have failed because habituated wildlife are attracted to development/human areas. In addition, the soft edge or layered approach has led to many questions as to where the actual corridor is by residents and visitors to Canmore.

Accordingly, a hard edge in the form of a wildlife conservation fence is proposed to border the entire Along Valley Corridor to clearly demarcate where the corridor is. Two distinct fences will separate all new TSMV development in the Resort Centre and Smith Creek ASPs, respectively, and in doing so will also protect large portions of existing development around Stewart Creek and other communities on the south side of Canmore (Figure 3). The proposed fence will prevent wildlife from entering the developed area and will also reduce the significant amount of dispersed human use within the wildlife corridor because entry into the corridor will be restricted to designated trails connected to the regional trail network entering through gates in the wildlife conservation fence. Fencing has been successfully used to separate people and wildlife in a wide variety of applications across North America, including nearby Banff National Park, and globally. We believe it is a reasonable solution for the wildlife human issues currently faced by Canmore, with a good track record in many other locations like Banff National Park, which shares the same Bow River Valley. We believe it is a necessary requirement for effective wildlife corridors and habitat patches in a landscape as busy as that of the Bow Valley in and around Canmore. Although it will be an inconvenience and a change of culture for some residents and visitors to Canmore, it is a necessity if wildlife, like grizzly bears, black bears and cougars, are to successfully continue to move through the Bow Valley via the corridors.

In conclusion, the Smith Creek Along Valley Corridor, the proposed extension of the designated Along Valley Corridor will accomplish the intended function of connecting the current approved Along Valley Corridor to the Wind Valley Habitat Patch and the Wind Valley Habitat Patch to the Bow Flats Habitat Patch under the G8 Legacy Underpass on the TransCanada Highway. This proposed corridor in combination with previously-approved wildlife corridors on the south side of Canmore will result in the formal completion of a wildlife corridor and habitat patch network in the Bow Valley between Banff National Park and Kananaskis Country, a significant benefit to the wildlife and the people of the Bow Valley. The wildlife corridor network as proposed would also have no need for any additional "layers", buffers, setbacks or other similar municipal or provincial restrictions for environmental or wildlife considerations, and provide certainty for the developer and the Town alike with respect to development. The inclusion of a wildlife conservation fence separating development from the wildlife corridor will materially reduce the current dispersed human use in the corridor and in parallel, reduce the movement of habituated wildlife into developed areas, reducing existing and potential future wildlife conflict.

As discussed, and as the Province has agreed, the additional 63.48 ha within Site 7/8 proposed herein at the request of the Province is over and above what TSMVPL has already provided for the provincially approved and designated Along Valley Corridor, and accordingly is over and above what the landowner is required to provide under the 1992 NRCB Decision 9103. This extra land dedication requested is subject to compensation to TSMVPL either in the form of a land exchange acceptable to TSMVPL and/or financial compensation or a combination of both. As discussed, TSMVPL is quite willing to potentially acquire Crown lands within the NE and NW quarters of S12-24-10-W5M or other nearby areas based on fair assessment and valuation of both Crown lands and TSMVPL lands being proposed. We also note that as discussed, TSMVPL would be open to discussing having the Province acquire TSMVPL private property already within existing approved and herein proposed corridors like the Tipple Across Valley Corridor, such that those lands become Crown property and consequently protected from private development, and in many areas would be an easy addition to the existing Bow Valley Wildland Provincial Park should the Province so choose.

We have asked Golder to provide a professional review of TSMVPL's proposal to you, and for convenience, they have packaged up the maps, background and their review in one document attached (Golder 2017).

We look forward to hearing from you regarding this proposal at your earliest opportunity, and believe you will find that it represents the essence and core of the last two years of discussion with you and your team, and will therefore be quite familiar to you. We thank you and your team for your guidance and patience in discussing this important matter given its history and complexity. If you have any questions or require further information on this submission, please don't hesitate to contact me directly at any time.

On behalf of Three Sisters Mountain Village Properties Ltd.,



Chris Ollenberger, P. Eng.
Authorized Agent

cc: D. Taylor and P. Wallace, TSMVPL
J. Karpat, QPD

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