

Detailed Impact Assessment Decision Statement: Lodge at Bow Lake Redevelopment

This notice of determination is being issued by Parks Canada under the Impact Assessment Act. Parks Canada has determined that the project is not likely to cause significant adverse environmental effects.

Lodge at Bow Lake is proposing to redevelop its facilities located at Bow Lake in Banff National Park. Given the project includes an expansion of facilities within a sensitive site, Parks Canada has determined that the level of the analysis appropriate for this project is the Detailed Impact Assessment (DIA) pathway.

Presently the Lodge at Bow Lake consists of a main lodge accommodating 34 guests per night and various staff accommodations that house 23 staff on site. Historically the lodge accommodated 75 guests and 37 staff on site year-round. The total number of guest accommodation units being proposed is 35, with a guest capacity of 72 with 32 staff proposed to be housed on site. The total proposed increase in commercial space and staff accommodation is consistent with Parks Canada's Outlying Commercial Accommodation (OCA) site-specific redevelopment guidelines for Lodge at Bow Lake.

In the event a possible lease reconfiguration is accomplished in future, the master plan redevelopment DIA assessed the construction of 4 guest cabins. However, any potential changes to the leasehold boundary, including the guest cabins proposed off lease, will be done under a separate approval process and is not within the scope of this DIA approval.

The DIA assessed potential impacts of the project and resulted in the following key findings:

The leasehold includes tributary creeks which contain all the critical habitat attributes for Bull trout, a species at risk. The planned development has considered the riparian environment, concentrating development and site uses into a relatively compact footprint. Riparian set back zones have been established to reduce and mitigate the impact of use and development (i.e., green zone: > 30m from water; yellow zone: 20-30m from water; red zone: <20m from water). A portion of the proposed Annex Building will encroach within the 'yellow' riparian set back zone up to 20m from the creek with a total disturbance footprint of 160m². Alternative development locations were considered, and the current planned location was chosen considering the constraint issues, such as complying with the minimum separation requirements of the 2020 National Building Code, and increased disturbance to the environment. Revegetation of an equivalent or greater area of disturbed riparian areas on the lease will be undertaken to offset the reduction in riparian habitat caused by construction footprints, and to maintain key fish habitat parameters. All other developments will occur outside the 30m riparian zone, except for the guest cabins (conceptually proposed on partially disturbed land). However, as stated above, the cabins are outside the scope of this DIA approval since they are proposed off lease.

Water consumption and wastewater production are expected to increase following the redevelopment with potential for adverse effects. Engineering assessments concluded that sufficient well water is available for future supply demands and that the current wastewater system has sufficient capacity to handle increased flow from future expansion. Consumption and water quality monitoring (groundwater and surface water) is required to ensure the water and wastewater systems are not having a measurable adverse impact on aquatic or groundwater resources in the area or exceeding established capacities. With application of mitigation

measures outlined in the DIA and restoration of existing disturbed riparian habitat, the redevelopment is expected to have a minor residual effect on riparian area and aquatic environment.

A large portion of new developments will take place on disturbed land, however tree removal and clearing of land will be required for construction activities and wildfire protection (FireSmart) within 10m of facilities. The DIA predicts the total footprint of new construction is planned at 705m², with a conservative estimate of 160m² (of the 705m²) to be on previously undisturbed land (excluding the cabins). Reclamation (revegetation and landscaping) of disturbed lands on the lease site are expected to encompass 2,765 m². Therefore, the proposed project is anticipated to result in a net gain in native vegetation, even if the cabins are built in future should a lease reconfiguration be achieved.

Redevelopment and continuing long term operations may adversely affect wildlife, including species at risk, through habitat loss, disturbance, attraction, habituation, human-wildlife conflict, and mortality. The project is likely to add incrementally to existing wildlife impacts associated with high levels of human activity at the site, such as the neighboring Bow Lake Day Use and Picnic Site and Icefields Parkway. The redevelopment will likely increase visitor use on trails and day use opportunities in the area. However, with an increase of 38 guests and 9 staff, the lodge's incremental contribution is relatively minor compared to those associated with the adjacent day use areas. Mitigations regarding the timing of work, implementation of pre-construction wildlife surveys and application of species-specific mitigations, application of best practices for food and waste management, non-native vegetation management, development of a detailed landscape and reclamation plan, implementation of a staff and guest education program that includes messages about the impacts of human use on wildlife will reduce impacts on wildlife.

The site has cultural and historical significance due to its historical associations with Jimmy Simpson, an early guide and outfitter in the Rocky Mountain Parks. Alterations to or removal of character-defining elements of a historic building or cultural landscape can diminish heritage value. The leasehold area is also located within and adjacent to known archaeological historical sites and there is potential for Indigenous archaeological sites in areas previously undisturbed. Prior to construction, an Archeological Impact Assessment (AIA) will be undertaken of the disturbance footprints. Mitigations to avoid or minimize impacts to cultural resources that arise from the AIA will be implemented in project construction. Trees will be surveyed for any blazes before they are removed. Development will follow the Standards and Guidelines for the Conservation of Historic Places in Canada and the OCA Guidelines, with any permitted deviations from the recommendations subject to approval by Parks Canada. The redevelopment does not include any plans for the existing historic Ram Pasture building or stone fireplaces in the vicinity.

The project proposal has the potential for adverse effects on other Valued Components that, because of known impacts and mitigations, were considered to be of low risk. The DIA found that there are negligible to no residual adverse effects associated with these interactions.

Feedback on the draft DIA was received from several members of the public and local stakeholders during the public engagement period. This feedback was largely related to the project or park management rather than the impact assessment process or DIA. All but one comment did not object to the project however concerns raised through feedback included: wildlife impacts due to higher levels of human use and development, lack of alternative energy

systems proposed, increased wastewater production and resulting impacts from the septic field, parking lot expansions on undisturbed land, cabin development and loss of visitor access and use of lakeside areas, and on-site generator noise. Other concerns noted were around allowance of commercial development in backcountry areas of the park and visitor use management at Bow Lake with suggestions of ways to limit visitor use. Details on the feedback received and responses provided are outlined in Appendix 5 of the final DIA. None of the comments resulted in changes to the DIA as mitigations sufficiently addressed potential impacts. Other issues raised, such as alternative energy systems, will be considered during the development permitting stage. Comments related to policy and visitor use management were considered by Parks Canada, however, are outside the scope of the DIA.

Indigenous groups were notified by Parks Canada of the redevelopment and invited to review and provide input on draft DIA. The proponent also independently notified the same Nations of the project with an invitation to meet about the proposal. Dialogue between interested Indigenous groups has continued with the proponent, as well as initial meetings held with Parks Canada. Site visits with interested Nations are planned for spring 2024. As the Indigenous consultation and engagement process is ongoing, Parks Canada and the proponent remain open to feedback and input from these Nations and are committed to addressing interests or concerns raised through further engagement activities which may result in additional mitigations or accommodation measures by the proponent. Indigenous concerns or interests will be considered and addressed to Parks Canada's satisfaction before permits are issued for construction, barring the main lodge addition which is located on developed land and required for operational and staff service needs.


Mitigation measures will be implemented for the following Value Components during the project: fish and fish habitat, surface and groundwater water quality, vegetation and soils including non-native vegetation management, heritage and cultural resources, wildlife, species at risk, Indigenous people's values and rights, and visitor experience.

The Lodge at Bow Lake will also develop and implement the following:

- A detailed landscape and reclamation plan describing best practices, methods, species selection, and material sources to ensure disturbed areas and riparian offset plantings are successfully revegetated.
- A monitoring program approved by Parks Canada. Appendix 3 of the DIA proposes an initial monitoring plan for vegetation, groundwater and surface water quality, and water/ wastewater volumes, however further work on the proposed program is required, in consultation with Parks Canada. The monitoring program will establish objectives, targets, guidelines, methodologies, frequency of monitoring, reporting requirements and follow up actions. If monitoring indicates measures are not successful and/or inadequate, appropriate corrective action will be taken in conjunction with and as approved by Parks Canada.

Taking into account implementation of mitigation measures outlined the DIA, the project is not likely to cause significant adverse environmental effects.

RECOMMENDATION AND APPROVAL

Recommended by: Jón Stuart-Smith, Manager Integrated Land Use Planning & Policy	Date: 17 June 2024
Approval: François Masse Superintendent, Lake Louise, Yoho & Kootenay Field Unit: 	Date: June 17, 2024