



Timberwolf Wilderness Society

PO Box 398, Pincher Creek, Alberta T0K 1W0 Canada
Timberwolfwildernesssociety.ca info@timberwolfwildernesssociety.ca

14 November 2018

Director, Environmental Assessment, Alberta Environment and Parks
c/o Margot Trembath, Environmental Assessment Coordinator
2nd Floor, Petroleum Plaza, South Tower, 9915 – 108 Street
Edmonton, Alberta T5K 2G8 E-mail: environmental.assessment@gov.ab.ca

Re: Statement of Concern: Public Notice, Castle Mountain Resort Development

In further support of our statement of concern dated 12 November 2018, we would like to add the following information. Cited literature is listed on the accompanying sheet.

Grizzly bears. There is potential for grizzly bear denning sites within the proposed snowcat ski terrain in the Syncline Valley, an area well known to hold grizzlies, and that appears to be favourable for denning (Vroom *et al.* 1980, Pigeon *et al.* 2014). Snowcat operations in that terrain could prevent its use for denning by grizzlies, drive bears from their dens in midwinter, or even injure or kill grizzlies in their dens. Grizzlies in Alberta are threatened, and are protected as threatened under the Endangered Species Act in the USA as well. The small population in the Castle region (~50 animals), is part of a Canadian-American transnational population (Proctor *et al.* 2012), raising international concerns.

Evidence in support of statements 1—4 in our Statement of Concern of 12 November 2018.

1. See BHA (2017:Figures E-5, 4-1).
2. Access to the proposed catskiing terrain in the upper Syncline Valley is not shown (BHA 2017). The terrain strongly suggests that access will be a low-standard trail up Syncline Creek. Runoff from, and stream crossings along such a trail would pose a threat to threatened, federally protected westslope cutthroat trout and their critical habitat (DFO 2014).
3. See BHA (2017, e.g., 4-162 and elsewhere). Acceptance of this proposal would commit governments to a pig-in-a-poke, allowing unspecified additional developments on the West Castle River floodplain/riparian zone of unknown design. Without an EIA, we don't know whether ANY further developments of ANY design are tolerable. The West Castle River above and below the West Castle Development is critical habitat for bull trout and westslope cutthroat trout (Boag and McCart 1993, Boag and Hvenegaard 1997). The entire West Castle River stands a good chance of being designated federally under the Species At Risk Act as critical habitat for the recovery of westslope cutthroat trout (e.g., Mayhood 2014).
4. See BHA (2017, e.g., 4-162 and elsewhere)

Timberwolf's Status as a Directly Affected Party

The following information is offered in support of our status as a directly affected party.

1. Timberwolf Wilderness Society (Timberwolf) is incorporated under the Alberta Societies Act;
2. Timberwolf acts to protect and improve wild lands and wildlife habitat along the Eastern Slopes of Alberta through legal, political and public action.

Specifically, Timberwolf has launched successful legal action in federal court to ensure that Canada's Species At Risk Act is enforced to protect listed species and their critical habitats in Alberta. It has conducted and published scientific research to support protection of at-risk species. Support for these statements is provided in the document accompanying this letter.

Our concerns are not limited to the issues raised in our Statement of Concern to you of 12 November 2018 and herein, but are offered only as examples of some of the serious issues that must be addressed by an Environmental Impact Assessment of the Castle Mountain Resort Development, and a public hearing on that subject. Timberwolf will continue to comment on whatever matters affect our interests with respect to this development.

Sincerely,

Timberwolf Wilderness Society



David W. Mayhood, President

Please send any responses directly to dmayhood@fwresearch.ca

Literature Cited

- BHA. 2017. Castle Mountain Resort Master Development Plan. Brent Harley and Associates, Inc., Whistler, BC. http://www.skicastle.ca/wp-content/uploads/2017/07/CMRMasterDevelopmentPlanFinal_June232017.pdf
- Boag, T. D., and P. J. Hvenegaard. 1997. Spawning movements and habitat selection of bull trout in a small Alberta foothills stream. pp. 317-323. in W. C. Mackay, M. K. Brewin, and M. Monita, editors. Friends of the Bull Trout Conference Proceedings. The Bull Trout Task Force (Alberta), c/o Trout Unlimited Canada, Calgary, AB.
- Boag, T. D., and P. J. McCart. 1993. Baseline studies of bull and cutthroat trout in the West Castle River, Alberta. Report prepared for Vacation Alberta Corporation & HBT_AGRA Ltd. by D. A. Westworth & Associates Ltd. & Aquatic Environments Limited., Calgary & Spruce View, AB. 53 p.
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Timberwolf Research

- Mayhood, D. W. 2017. Emergency report: Alberta native cutthroat trout populations & critical habitat at risk. Report prepared for Timberwolf Wilderness Society, Pincher Creek, AB, and Alberta Wilderness Association, Calgary, AB. Freshwater Research Limited Technical Note 2017/08-1. iii+32 p. <http://fwresearch.ca/Library.html>

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Mayhood, D. W. 2013. Suspended sediment in Silvester Creek and its potential effects on the westslope cutthroat trout population: Photo appendix. Report prepared for Timberwolf Wilderness Society. Freshwater Research Limited Technical Report 2013/07-1 Appendix. 12 p. <http://www.fwresearch.ca/Library.html>

Timberwolf Litigation

2017: Timberwolf Wilderness Society, with Alberta Wilderness Association and University of Calgary Public Interest Law Clinic, applied to Federal Court of Canada to order the Minister of Fisheries, Oceans and the Coast Guard to post statutorily required summary of progress on more than 2-year overdue Action Plan for the recovery of westslope cutthroat trout (Alberta population). Result: Action Plan Summary issued by Minister of Fisheries, Oceans and the Coast Guard.

2015: Timberwolf Wilderness Society, with Alberta Wilderness Association and University of Calgary Public Interest Law Clinic, applied to the Federal Court of Canada to order Minister of Fisheries and Oceans to issue a Critical Habitat Order, required by statute, to protect the critical habitat of westslope cutthroat trout (Alberta population), then more than one year late. Result: Critical Habitat Order issued by new Minister of Fisheries, Oceans and the Coast Guard.