

December 21, 2016

Town of Canmore
902 7th Avenue
Canmore, AB
T1W 3K1

Ms. Tracy Woitenko,

Re: Resort Centre ASP Amendment

On behalf of the owners of Three Sisters Mountain Village Properties Ltd.,
QuantumPlace Developments Ltd, respectfully submits the following Resort Centre
ASP amendment and supporting rationale for your consideration.

Sincerely,

Jessica Karpat, MEdes, RPP, MCIP
Principal – Planning
QuantumPlace Developments Ltd.

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Executive Summary

QuantumPlace Developments Ltd., on behalf of Three Sisters Mountain Village Properties Ltd. (TSMVPL) is seeking to amend the Resort Centre Area Structure Plan (ASP). The proposed amendments primarily provide overarching policy to guide the future development of the unfinished golf course lands and update the ASP to include the recommended approach and mitigations contained within the supporting Golder Environmental Impact Statement (EIS). At the time of this document's submission, the EIS is undergoing third party review, which may impact the ASP and accompanying rationale.

TSMVPL has determined that another golf course in Three Sisters would not be viable given an overall decline in demand for golf and saturation of the Bow Valley golf market. Many of the proposed changes improve clarity, reference current policy, or respond to events such as the 2013 floods, rather than to alter the intent of the ASP. The focus of the proposed amendments is to replace golf course lands with resort accommodation uses, permanent residences, and comprehensive public and private recreation and open space amenities. The expanded Resort Core and Expansion Areas are essential to the effective clustering of town centre activities that creates a vibrant, resilient and engaging resort. The proposed amendments align with the vision of the existing ASP and update the language to include current practices and approaches to tourism, commercial and residential growth, and seniors' and affordable housing opportunities.

Where appropriate, the proposed amendments incorporate the new findings and recommendations from the supporting EIS, using a comprehensive approach to mitigating human-wildlife interactions. The proposed amendments include the implementation of a wildlife fence and other community planning measures—such as attractant management and education—to reduce negative human-wildlife interactions, enhancing local pathways and trails in developed areas, and reducing sensory disturbance to wildlife corridors.

The applicant has reviewed relevant legislation and statutory plans to ensure that the proposed amendments to the Resort Centre ASP align with existing policy and will:

- align with *Municipal Government Act*;
- align with Provincial undermining regulations;
- align with the Natural Resources Conservation Board (NRCB) decision;
- align with the policies of the South Saskatchewan Regional Plan;
- align with the Town of Canmore Municipal Development Plan; and
- adhere to the maximum gross developable area (GDA) and residential unit cap identified in DC 1-98.

Historical Background

For more than a century, Canmore was a coal mining town; many lands, including those owned by TSMVPL, were cleared of trees and mined heavily. By 1979, Canmore Mines Ltd. closed the last active mine and the Town of Canmore slipped into economic recession. To provide economic stimulus to the Town and the Province, in November, 1992, the Natural Resources Conservation Board (NRCB) granted Three Sisters Resorts (owners of Three Sisters lands at the time) approval to develop a “Recreational and Tourism Project in the Town of Canmore, Alberta” on the Three Sisters Mountain Village (TSMV) site. The NRCB reviewed the proposal on the basis of a “recreational or tourism project”, and identified that “the facilities and services to be provided by the Three Sisters project could generally be categorized as follows:

- Tourism:
 - Resort destination and other hotels
 - Convention facilities
 - Shopping facilities
 - Golf courses and other recreational facilities
- Other commercial space
- Residential
 - Single-family detached and multi-family: all price ranges considered
 - Staff dormitory-type housing
 - Weekend and holiday homes.” (NRCB, 1992, 11-2).

The NRCB approved the project on its conceptual merits as a tourism and recreation project. While golf was included in the considerations of the NRCB, it was not the primary focus of the decision. Further, the NRCB expressed concern that the many other golf courses being developed in the area in the 1990s would negatively impact demand for golf courses in the Three Sisters project (NRCB, 1992, 11-5); market oversaturation has subsequently proved to be the case.

In 2004, the Town of Canmore Council approved the Resort Centre ASP. The 2004 ASP envisioned the Resort Centre as the “heart of Three Sisters Mountain Village” with a focus on health, wellness, lifestyle spa facilities, and related resort accommodation uses. A golf course was a central component of the Resort Centre ASP area. Between 2004 and 2006, land use approvals were granted by Canmore Council for several sites, including a portion of the Resort Core, the eastern most Resort Accommodation area and the golf course. When Morgan Stanley purchased the land in 2006, and placed it under the management of East West Partners, construction on Three Sisters Creek Golf Course commenced. Only fifteen of eighteen holes were actually completed when East West Partners declared bankruptcy in 2008. Subsequently, PricewaterhouseCoopers (PwC) was appointed the receiver and efforts to complete the golf course were halted indefinitely.

The current owners of Three Sisters Mountain Village (TSMV), Three Sisters Mountain Village Properties Ltd. (TSMVPL), purchased the Three Sisters lands from PwC in 2014, and explored options to complete the unfinished golf course. It was determined that the cost to complete construction of the course would be substantial. In addition to the construction of the final three holes, the existing fifteen holes required significant

restoration work. Canmore currently has three golf courses, nearby Banff has two and Kananaskis is currently rebuilding their course and with golf demand declining, it was determined that an additional golf course within Three Sisters was no longer economically viable.

Since work on the golf course was halted in 2008 due to the receivership, there has been no further development in the Resort Centre area. The 2004 Resort Centre ASP conceptualized the golf course as the core feature of the Plan area, in addition to the other resort, commercial, residential and recreational uses. In order to ensure that the Resort Centre is developed in a comprehensive manner, it was necessary to determine an alternative use for the golf course prior to development. Recreation is still envisioned as central to the Resort Centre, and both public and private, active and passive, recreation opportunities are proposed throughout; these uses are explained in more detail in the “Recreation and Open Space” section of this document.

Golf Course Market Saturation and Decline in Use

In January of 2016, TSMVPL determined that another golf course in Three Sisters would no longer be economically viable due to a decline in the demand for golf in North America and a market saturation of golf courses in the Bow Valley. Specifically, market research suggests that participation in golf is stagnant and declining across North America. In a 2014 *Macleans* article, golf course developer Jon MacKay stated “if you talk to a golfer, [they will] say the game of golf is fine...but if you talk to a golf course owner, [they] will say the business of golf is suffering because we overbuilt”¹. Several other articles, including publications by *Global News* (2015), *The Globe and Mail* (2015), *Canadian Broadcasting Corporation* (2015), also explore the decline of golf in Canada. Even Canada Golf, in their *Consumer Behaviour Study* (2012) found that not only is there a limited interest in the sport outside of those that already participate in the game, the number of golfers playing fewer rounds (38%) is greater than the number of golfers playing more rounds (14%). In addition, the 2012 Canada Golf *Consumer Behaviour Study* found that golf-related spending is generally flat, or in some cases, decreasing. Only 3% of Canadians believe that they are likely to take up the game in the next 3 – 5 years (this represents approximately between 600,000 and 700,000 individuals nationally).

In addition to a general decline in the demand for golf in Canada, an additional golf course in Three Sisters was determined to be unviable because there are several other golf courses in the Bow Valley, including the Banff Springs Golf Club, Stewart Creek Golf and Country Club, SilverTip Golf and Country Club, and the Canmore Golf and Curling Club, which saturate the golf market in the vicinity of the Resort Centre. In addition, the Province announced that it will rebuild the Kananaskis Golf Course after the 2013 flood damage. While these successful golf clubs improve the viability of a four-season resort, they also affect the competitiveness and viability of another golf course in the area. Consequently, QPD is seeking to amend the Resort Centre ASP to repurpose the unfinished golf course lands to support a health-and-wellness spa and resort-oriented development to ensure the future viability and success of the resort.

¹ Sorenson, C. (2014). The End of Golf. *Macleans*. Accessed online: <http://www.macleans.ca/economy/business/the-end-of-golf/>

Resort Centre Policy Development & Community Engagement

In 2015, QPD embarked on the collaborative Smith Creek ASP process with the Town of Canmore. The Resort Centre ASP area was not included in the Smith Creek process and, during public engagement, the community expressed a desire to address the uncertainty surrounding what would happen with the incomplete golf course. Driven by renewed public interest and the lack of viability to develop a golf course in Resort Centre, QPD began working on an amendment to the Resort Centre ASP in January, 2016.

The Resort Centre ASP amendment process has been independent from the Smith Creek ASP collaborative process; however, the issues identified and lessons learned through the Smith Creek process have informed QPD's approach to planning the Resort Centre ASP amendments. As part of the Smith Creek ASP collaborative process, the Project Team met with a diverse group of community members representing varying interests through the Community Advisory Group (CAG) to address concerns and questions.

In January, 2016, the Resort Centre Planning Team formed a Resort Centre community advisory sub-group with some members of the Smith Creek CAG. The Resort Centre community advisory sub-group met a total of five times and engaged in issues-based discussions that informed the Planning Team's approach to the proposed land use concept, wildlife mitigation strategies, undermining considerations, and recreational amenity types. In particular, the Smith Creek CAG and the Resort Centre CAG sub-group were involved in exploring possible approaches to wildlife mitigation, including the wildlife fencing strategy.

As part of the community engagement process, the Planning Team also hosted a series of "community conversations" with stakeholders and community members to discuss particular components of the proposed plans (Figure 1). Between June and September, 2016, the Resort Centre Planning Team had the opportunity to meet with representatives from local environmental groups, recreational groups, community service groups and residents to discuss wildlife mitigation, undermining, trails and recreation, community amenities and services, as well as the proposed land use concept.

The community conversations allowed the Planning Team to not only share information about the Resort Centre ASP amendments with the community and obtain feedback, but also to revise the ASP amendments to integrate feedback from the community wherever feasible. For example, Hubman residents sought certainty around the land uses proposed for the lands behind their homes and expressed a high preference for recreational uses rather than commercial or resort accommodation uses. In response to the meetings with Hubman residents, policy "Area F" was created with an intended high focus on recreation. More detailed discussion of the proposed structure of Area F can be found in the "Proposed Amendments" section of this document.

In an effort to ensure that the engagement process was transparent, detailed notes were taken at each Resort Centre CAG sub-group meeting and community conversation and circulated to attendees for comment and revision. After formal

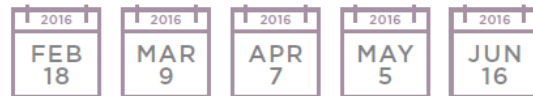
approval of the notes by participants, the meeting notes were posted on the Resort Centre ASP project website (www.resortcentrecanmore.ca). All of the approved notes from the Community Conversations have been included as part of this submission package.

In addition to the community conversations with stakeholder groups, the Planning Team also hosted several events to provide the broader community with the opportunity to learn about Resort Centre. Specifically, QPD hosted two online community conversations on wildlife and undermining, during which participants were able to watch the webcast live from their homes and use instant messaging to ask questions. The sessions are available for on-demand viewing on the Resort Centre website and there is a detailed Question and Answer document that outlines and responds to every question asked during the session.

On October 18, 2016, the Planning Team also hosted information sessions for community members to drop in to view informational display boards and learn more about the proposed amendments. The Planning Team, project biologists, engineers and representatives from the Town were available at the sessions to answer questions and address concerns.

RESORT CENTRE COMMUNITY ADVISORS

The Resort Centre Project Team participated in five (5) meetings to discuss wildlife corridors, human-wildlife interactions, undermining, potential land uses and recreational amenity types.



COMMUNITY CONVERSATIONS



Figure 1: Summary of Community Engagement Prior to Submission

The Resort Centre Planning Team has also committed to ongoing public engagement following the submission of the Resort Centre ASP amendments to the Town of Canmore. Specifically, since submitting the first draft of the Resort Centre ASP Amendments to the Town in October, 2016, QPD and TSMVPL have held personal meetings with local business owners, met with the Business Revitalization Zone (BRZ), produced and published an informational video on Undermining in Canmore, and hosted “Question and Answer” sessions. Regular email newsletter updates regarding the applications have been, and will continue to be, sent to interested community members leading up to the public hearing.

Resort Centre Amendments

Purpose

This section highlights the overall scope, intent and approach for the proposed amendments to the Resort Centre ASP.

Although the extent of changes made to the 2004 ASP may appear to be significant, many changes are made to improve clarity, reference current policy, or respond to events such as the 2013 floods, rather than to alter the intent of the ASP. Many of the proposed amendments are related to updated policy, technical or mapping information, or result from the aforementioned amendments. Changes are necessary to ensure that the Plan provides the technical or administrative guidance necessary to implement the Resort Centre ASP as intended. For example, a small area on the NW corner of the Plan area (referred to as “Island A”) was sold in 2014 and is no longer owned by TSMVPL. Consequently, the proposed amendments reflect a change in the Resort Centre ASP boundary and land area.

Content changes are concentrated on the area of the incomplete golf course, and the associated redistribution of units and areas; therefore, the changes remain within the scope of an amendment. For additional rationale related to the specific amendments, please see Table 1 at the end of this document.

Revised Policy Areas

The proposed amendments to the Resort Centre ASP focus on providing for alternate forms of development on the lands previously identified as golf course. Through the ASP amendment process, all references to the golf course and associated facilities being located within the resort are proposed to be removed from the ASP and replaced with references to uses related to resort accommodation, permanent residences, and comprehensive public and private recreation and open space amenities.

The unfinished golf course lands are proposed to provide for the expansion of the Resort Core and Resort Expansion area, and creates two additional policy areas: Resort Accommodation Areas E and F. The amendment proposes to expand the Resort Core and the Resort Expansion areas to ensure that there are enough patrons to sustain the businesses that will locate in Resort Centre in lieu of a golf course. Area E is intended to provide a range of resort accommodations and permanent residential uses, opportunities for affordable housing, and public and private recreation. The primary

focus of Area F is public or private recreation opportunities and open space; however, resort accommodation and residential uses may also be accommodated in Area F.

Expanded Resort Core and Expansion Area

Many of the proposed amendments focus on increasing the size of the Resort Core and Expansion Area, and the associated changes to other policy areas. The rationale for these changes are explained below.

Generating Critical Mass

The current Resort Centre ASP does not provide enough land in the Resort Core and the Resort Expansion areas to generate enough critical mass to facilitate the development of a vibrant, active community that would achieve the aforementioned principles. The original concept envisioned an elongated linear development not much larger than the residential cul-de-sac of Miskow Close to the east (Figure 2).

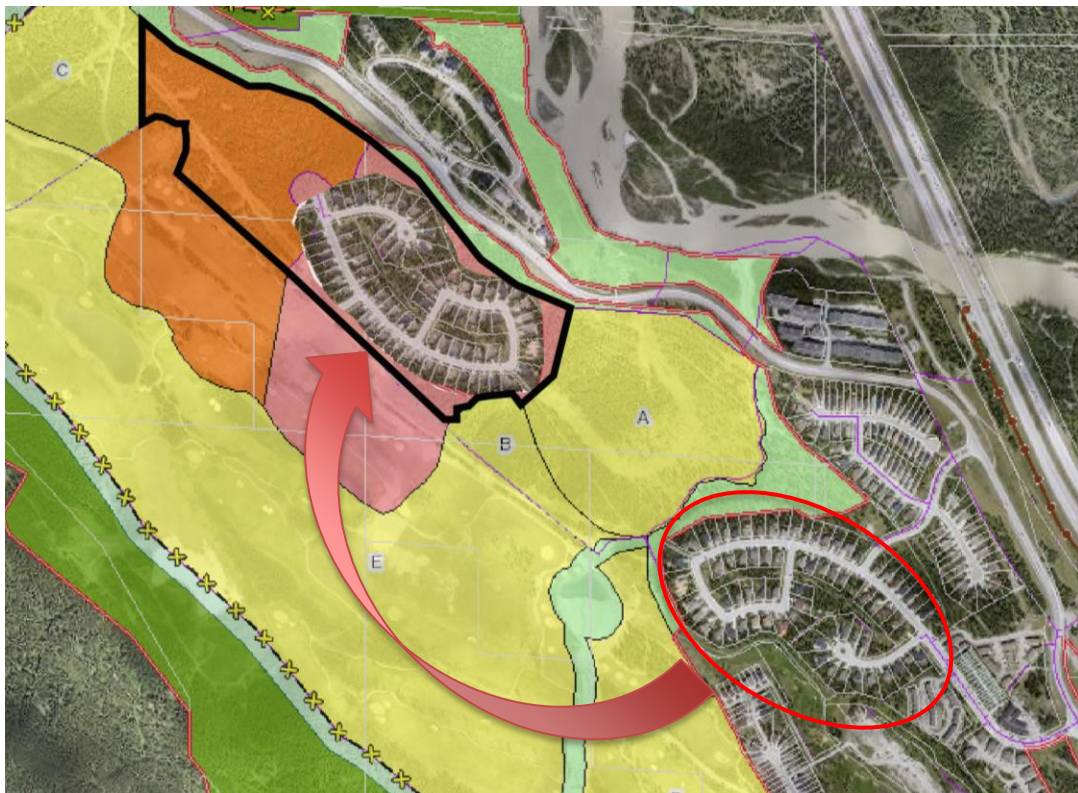


Figure 2: Miskow Close superimposed over the original Resort Core boundary

More specifically, the existing Resort Core and Expansion Area are constrained to a 280 – 300-meter wide development strip, hampered by steep-slopes near the Three Sisters Parkway, which restricts the developable area. Similar resort retail centres, such as Whistler and Mont-Tremblant are more than 350 meters wide, with pedestrian-oriented centres of more than 30 hectares. The existing geographical constraints of the 2004 ASP boundaries for the Resort Core and Expansion Area would prohibit

successful development of a village core similar to those seen in Whistler or Mont-Tremblant.

“At well-established resorts and communities such as Vail, Colorado, and Whistler, British Columbia, shopping and dining have become increasingly popular, often surpassing traditional recreational activities connected with the natural environment” (Matheusik, 1996, p.1).² Organizing those shopping and dining opportunities, and “maintaining the right mix of...elements in a dynamic consumer climate is perhaps the most significant challenge currently faced by resort and tourist community developers, planners, and retailers worldwide” (Matheusik, 1996, p.1).

In his article, Matheusik identifies several important characteristics of and principles of success for tourist-based retail, including the following:

1. Milieu (Ambience)
 - a. The uniqueness of the setting and the way in which the resort or village evolves around the natural environment provide a baseline ambience.
2. Multiactivity Environments
 - a. In addition to conferences and sporting activities, many resorts now provide educational, cultural, and health and wellness facilities and host special events throughout the year.
3. Town Center Hub
 - a. Clustering town center activities in one central area increases their appeal and drawing power.
4. Character through Tenant Mix
 - a. A creative and collective mix of tenants, their merchandising, and the ambience they create is what visitors come to experience.
5. The Right Retailers
 - a. Proactive resorts develop tenant mixes that capitalize on the tremendous attractiveness of health, wellness, and other services and products designed to make people feel good.
6. Design, Merchandising, and Animation
 - a. Distinct neighbourhoods or merchandising districts with strong themes create a cohesive image for the resort and support animation and vitality (Matheusik, 1996, pp. 2-4).

Successful resort retail, as described above, requires not only an engaging, vibrant mix of retailers and activities, but a cohesive “clustering of town center functions in one central area” surrounded by myriad activities. The current geographical layout afforded by the 2004 ASP prohibits effecting clustering of these “town center functions” to create the character required for a successful resort retail environment.

Through the Resort Centre ASP amendment, TSMV has the opportunity to allocate additional space to the Resort Core and Resort Expansion areas using the aforementioned design principles to develop a more resilient and vibrant resort

² Matheusik, M. (1996, August). Resort Retailing: Finding the Right Mix. *Urban Land*. Retrieved from: <http://trecinternational.com/pdf/ResortRetail.pdf>.

community than previously approved. A mixed-use, functional core must be designed to create such a place.

The expansion of the Resort Core and Resort Expansion areas will allow for a configuration of interconnected streets that allow for and encourage retail activity supported by pedestrian activity. A 2009 report, titled *Creating Walkable Neighborhood Business Districts*³, found that in successful areas, “typical walking distances to a shopping district are in the range of [400 meters]. A [400-meter] radius circle of land has an area of approximately 125 acres...” (Easton & Owen, 2009, p. 8). The proposed Resort Centre Core and Resort Expansion areas represent 99 to 124 acres of land and 800 to 1,425 units supporting at least 300,000 square feet of commercial space.

Gross Floor Area – Commercial

As previously discussed, the Resort Centre will offer a minimum 300,000 square feet of retail space. In addition, the Resort Centre will offer other commercial space, including hotels that— combined with the retail — will give the Resort Centre a minimum of 450,000 square feet of commercial gross floor area. The initial assessment completed by the town that identified 500,000 – 700,000 square feet of commercial gross floor area included commercial uses, such as hotels, hostels and seniors’ complexes. These uses have been separated to more accurately reflect the floor areas that will be added to Canmore’s commercial base.

Resort Accommodation / Residential Area E

The success of the Resort Centre will depend on the presence of people—an active community. Other successful alpine resort towns in North America, such as Whistler, British Columbia or Aspen, Colorado, have a mix of temporary or seasonal (owner) residents (approximately 45%), mostly living near or in the Resort Core, and permanent residents (approximately 55%) concentrated in the surrounding areas. Without offering a portion of permanent residential housing in proximity of the core, these areas success and vibrancy would suffer. The Resort Centre proposes a similar distribution of permanent and seasonal residents, in addition to staff in Employee Housing (that may be located in the Resort Centre or elsewhere). These permanent, temporary or seasonal residents will form the fabric of the Resort Centre (and TSMV) community, and foster the vibrant and active community lifestyle envisioned therein.

Overall, the more residents and visitors that surround the Resort Core and the Resort Expansion areas, the more vitality the core will experience daily. This in turn, will support the commercial endeavors and the perceived vitality of the development, and will “strengthen and support Canmore’s external identity as a walkable, authentic, and independent retail destination” (MDP, 2016, p.46).

³ Easton, G. & Owen, J. (2009, June). *Creating Walkable Neighborhood Business Districts: An exploration of the demographic and physical characteristics needed to support local retail services. MAKERS: Architecture and Urban Design*. Retrieved from: http://www.makersarch.com/wp-content/uploads/2016/04/Creating_Walkable_Neighborhood_Districts_2009.pdf.

Resort Accommodation / Residential Area F

As previously discussed, during the public engagement, the Planning Team met with and obtained feedback from residents of Hubman's Landing. The Hubman residents sought certainty around the land uses proposed for the lands behind their homes and expressed a high preference for recreational uses rather than commercial or resort accommodation uses. In response to the meetings with Hubman residents, policy "Area F" was created with an intended high focus on recreation.

It is envisioned that a good proportion of the Municipal Reserve land may be located in this area, possibly including recreational amenities such as soccer fields, pickle ball courts, a trailhead for the Highline Trail—among others. The Town is also looking to mitigate steep creek hazards for existing residents in the area and may require land in this area for mitigation. It is possible that Area F will contain some Resort Accommodation, Seniors' Complexes, and other residential uses, in addition to recreational uses.

Updating the Vision

The 2004 Resort Centre ASP envisioned the Plan area as a "new model of health, wellness, fitness, and nature-based resort" to provide visitors with a unique Canadian Rocky Mountain experience through the design of a "state-of-the-art health, wellness and lifestyle spa facility and other related accommodation uses" (Resort Centre ASP, Section 1.0). While the proposed amendments remain consistent with the overall intent of the original vision, updates to the vision reflect current socio-economic considerations and align with the Town of Canmore's goals and objectives outlined in the recently adopted Municipal Development Plan (MDP).

In addition to the removal of golf-related references, proposed amendments to the Resort Centre ASP vision include specific references to tourism, recreation (such as mountain biking), commercial and residential growth, a continuum of housing and care for seniors and affordable housing opportunities. Not only are affordable housing and age-in-place opportunities identified as guiding principles in the Town of Canmore MDP, but tourism, commercial and residential growth also promote a diverse and resilient local economy. The vision has evolved since 2004 through engagement with the community, and has been altered and updated in alignment with the MDP, and policies such as the Steep Creek Hazards policy.

Incorporating EIS Recommendations

The proposed ASP amendments incorporate new findings and recommendations from the Golder EIS (2016). Specifically, the proposed amendments ensure that the Resort Centre ASP reflects more recent wildlife research and EIS recommendations. Amendments to the Resort Centre ASP apply the EIS recommendations to implement a wildlife fence and other measures to enhance local pathways and trails in the developed areas while reducing sensory disturbance.

The primary objective of wildlife mitigation recommendations outlined in the EIS is to increase the functionality of existing and approved wildlife movement corridors by proposing proactive policies manage human use. The ASP takes a comprehensive approach to reducing negative human-wildlife interactions by limiting wildlife access to developed areas and limiting human use in the wildlife corridors to designated Provincial trails through educational signs, planning access points, and the provision of trails and recreational opportunities as an alternative to private trail use. Please refer to the Golder EIS (2016) submitted with this ASP amendment application for supporting information.

Policy Alignment

Relevant legislation and statutory plans have been considered to ensure that the proposed amendments to the Resort Centre ASP align with existing Provincial and municipal policy. The following section outlines a several policy areas in the Resort Centre ASP and their consistency with relevant legislation and statutory plans including the *Municipal Government Act*⁴, 1992 NRCB decision⁵, the South Saskatchewan Regional Plan (SSRP)⁶, Town of Canmore Municipal Development Plan (MDP)⁷, and the Town of Canmore Land Use Bylaws, such as Direct Control (DC) District 1-98⁸.

Municipal Government Act (MGA)

This ASP aligns with the MGA, including (but not limited to) the provisions related to undermining liability and mitigation.

Natural Resources Conservation Board (NRCB)

Gross Developable Area and Unit Counts

The NRCB allocated Gross Developable Areas (GDA) and total units to policy areas when it rendered its decision in 1992. To ensure long-term viability of the project, the GDA and Unit Counts were transferrable between policy areas. The details of GDA and Unit Counts are explained in detail in the “Town of Canmore Land Use Bylaws” section below.

⁴ Alberta Queen’s Printer. (2000). *Municipal Government Act*. Revised Statutes of Alberta 2000 Chapter M-26. Retrieved from: <http://www.gp.alberta.ca/documents/Acts/m26.pdf>.

⁵ NRCB (1992). *Decision Report: Application # 9103 – Three Sisters Golf Resort Inc.* Retrieved from: <https://nrcb.ca/Portals/1/Documents/Decisions/Three-Sisters/decision-report.pdf>

⁶ South Saskatchewan Region (2014). *South Saskatchewan Regional Plan*. Retrieved from: https://www.landuse.alberta.ca/LandUse%20Documents/South%20Saskatchewan%20Regional%20Plan_2014-07.pdf

⁷ Town of Canmore (2016). *Canmore Municipal Development Plan*. Retrieved from: <http://canmore.ca/residents/residents-development-planning/municipal-development-plan>

⁸ Town of Canmore (1998). *Direct Control Districts*. Retrieved from: <http://canmore.ca/documents/bylaws/land-use-bylaw/208-section-3-direct-control-districts/file>

Wildlife & Wildlife Mitigations

In 1992 the NRCB expressed concern over potential development in the Wind Valley, concluding that “certain measures would be necessary to protect wildlife should the project proceed” (p. 13-4). Furthermore, the Board required TSMV to “retain corridors in as undeveloped a state as possible to allow wildlife movements to continue” (p. 13-4). The Board specified that the location and width of these corridors will be subject to approval by Alberta Forestry, Lands and Wildlife (now Alberta, Environment and Parks). Finally, the NRCB concluded that “developments in the Wind Valley should probably involve no more than hiking trails, viewpoints and similar facilities designed with controlled access as the goal” (NRCB, 1992, p.13-7).

QPD is committed to working with the Province to ensure functional wildlife corridors that provide habitat patch connectivity. QPD’s approach to wildlife corridor dedication not only aligns with Section 4 of the MDP, but it is also guided by current wildlife science. Specifically, the Along Valley Corridor in proximity to the Resort Centre Plan area maintains an average width of 600 meters⁹. While the wildlife corridors that surround the Resort Centre are already provincially designated, the wildlife fence is proposed inside a 35-meter conservation easement, which will add to the overall width of both the Along and Across Valley corridor. A natural trail running perpendicular to the fence is proposed *inside* the Resort Centre.

The wildlife fence will be built by TSMV at the time of development, and may be either built prior to, or phased in with, the development. There are a variety of mechanisms being considered for the maintenance of the fence, including an Owner’s Association and/or registering the fence as an easement on private title for land owners to maintain. Currently, Town Administration is investigating the pros and cons of taking on the ownership and maintenance of the fence and exploring potential community tax mechanisms; one possible application could be supporting the fence through a tax borne solely by residents of TSMV.

The Financial Impact Assessment financial model currently assumes the Town taking on maintenance and upkeep after the fence has been constructed. A final decision on Town ownership and maintenance of the wildlife fence is ultimately subject to Council approval, but the decision is *not* part of the ASP approval process—it will be considered during later stages of the planning process.

The science and mitigations outlined in the EIS, and integrated into the ASP amendments, acknowledge Canmore’s commitment to environmental stewardship as outlined in Section 1.4 of the MDP. For more information on the proposed wildlife mitigation strategy, please refer to the EIS submitted with this ASP amendment application and the appendix of this document.

⁹ Measured using Vertisee—an online Geographic Information Systems (GIS) software—every 150 meters, then the mean average was calculated and rounded to the nearest 10 meters.

South Saskatchewan Regional Plan (SSRP)

Wildlife & Wildlife Mitigations

The SSRP also acknowledges the importance of wildlife connectivity. Specifically, the SSRP states that “connectivity of wildlife habitat across landscapes, within the region and across regions, is also an important factor in maintaining biodiversity....Additionally the southern Rocky Mountain areas are critical to the long-term survival of grizzly bears, wolverines and lynx, which require habitat connectivity from Montana north and through Kananaskis” (SSRP, p. 57).

Tourism

The SSRP and *A Pathway to Growth: Alberta's Tourism Framework 2013-2020*¹⁰ supports the development of private lands to promote and support tourism, and encourages the partnership between “municipalities, private investors and land owners to identify areas of high value for recreation and tourism and to encourage tourism investment and infrastructure development opportunities on identified lands” (SSRP, p. 51). Further, the documents highlight and promote the potential for the Kananaskis region “to become Canada’s premier mountain sports playground and internationally recognized four-season destination....” (SSRP, p. 20). A mix of high-quality private and public recreation and tourism facilities and opportunities in the Resort Centre will help realize the aforementioned objectives.

A similar vision for the region is identified in the *Active Alberta* policy, which notes that “recreation, active living and sport are key components of the wellness of Albertans, their families and communities. ... The *Active Alberta* policy sets out a vision where Albertans enjoy a high quality of life, improved health and wellness, strong communities, economic benefits and personal fulfillment through recreation, active living and sport” (SSRP, p. 36). The Resort Centre is envisioned as a “health, wellness, fitness, and nature-based resort,” (Resort Centre ASP, Section 1.0) which acts as a base camp to the recreational amenities found in and around the Bow Valley and beyond offering health, wellness, lifestyle and related tourism and accommodation services to residents and visitors alike. The Resort Centre will also offer a wide variety of outdoor and indoor recreation opportunities connected by a comprehensive multi-use trail network, providing linkages to the regional commuter and recreational trail system. The proposed ASP amendments remain consistent with the SSRP and the *Active Alberta Policy*.

A June 2016 study focusing on the economic impact of tourism in Banff, Jasper and Canmore found that

¹⁰ Government of Alberta (2013). *A Pathway to Growth: Alberta's Tourism Framework 2013-2020*. Retrieved from: <http://culture.alberta.ca/tourism/albertas-tourism-framework/>

the income of Canmore (value added expenditures made by visitors within Canmore) is permanently increased by over \$273 million annually by...initial tourism expenditures.... These impacts are considered recurrent that can be expected year in and year out.... The multiplier measures for the total value-added (income) impacts were 1.17 for Alberta and 0.79 for Canmore. This finding confirms that much of the indirect and induced impacts of spending in Canmore fall to regions outside Canmore, and particularly the Calgary and Area Tourism Region. This is to be expected in small and undiversified local economies in the proximity of major urban centres. The Calgary and Area Tourism Region supplies the Canmore tourism industry with most of its goods and services, explaining why the indirect impacts fall heavily out of the region (p. 25)¹¹.

The Resort Centre provides an opportunity to increase the goods and services produced locally in Canmore, thereby increasing the likelihood the spending impacts return to the Town. The development of the Resort Centre will be attractive to tourists, and will not only increase Canmore's 'annual income from initial tourism expenditures', but also the associated provision of diversified local goods and services is likely to increase Canmore's 'multiplier measures for the total value-added (income) impacts.'

Efficient Use of Land and Resources

The principles outlined in the SSRP acknowledge that municipalities should reclaim and/or convert previously developed lands that are no longer required in a progressive and timely manner (2014, p. 89). The unfinished golf course in Resort Centre is on previously disturbed and developed land, and is a brownfield due to the previous mining activity in the area that requires remediation and mitigation to develop. Further, the SSRP suggests that developments "utilize the minimum amount of land necessary for new development and build at a higher density than current practice" (2014, p.89); the proposed development has dedicated substantial lands to wildlife corridors, municipal reserve and private recreation, and intends to construct the remaining development to efficiently use the land with appropriate densities, particularly in the resort core and expansion areas.

Municipal Development Plan (MDP)

A MDP amendment will be required to ensure alignment with the proposed ASP amendments as they pertain to policy areas. Currently, the conceptual land use map in the Canmore MDP identifies the unfinished golf course as "private recreation." QPD recognizes that map amendments will be required to allow for resort accommodation, residential, and commercial development on the land previous identified as "private recreation" for the golf course. It is proposed that the mapped "private recreation" be replaced with "resort centre" in the TSMV Resort Centre area. For the purpose of the Resort Centre ASP, TSMV will use the definition of 'Residential Use' and 'Resort Accommodation – TSMV' reflected in Section 16 of the Land Use Bylaw.

¹¹ Thornton, G. (2016). *Banff, Jasper and Canmore: Tourism Economic Impact Study*. Retrieved from: <http://canmore.ca/documents/benchmarking-documents-reports/975-tourism-economic-impact-study-2016>

The proposed TSMV Resort Centre is consistent with the Town of Canmore MDP. Section 11 of the MDP not only highlights the necessity for a Resort Centre to provide a range of commercial and recreational amenities, but also that the development of a Resort Centre should strive to “create year-round resort destinations that build on Canmore’s mountain destination lifestyle” (2016, p.51). Section 11.1.6 also states that while “Resort Centres are intended to be predominantly commercial..., residential uses may be allowed to create opportunities for permanent residents in a resort setting in accordance with area structure plan policies” (2016, p.52).

The Resort Centre ASP states that the Resort Core policy area will contain a vibrant mix of accommodations, commercial, social and cultural spaces that support health, wellness, and lifestyle oriented activities. The Resort Core is intended to operate as a pedestrian-oriented, walkable destination. It is intended that those who arrive by car will ultimately park it, and explore the Centre on foot. The remainder of the Resort Centre, which comprises short and long-term accommodations and recreational space, is accessible to the core by foot, bicycle, and transit.

The proposed Resort Centre ASP amendments also remain consistent with the growth management policies outlined in the MDP. The MDP identifies responsible and sustainable development within the Town of Canmore growth boundary as a primary goal. Not only is the Resort Centre within the urban growth boundary, the Resort Centre ASP Plan area is also specifically identified as “Resort Centre Lands” in Section 2.2 of the MDP. The MDP states that “these lands accommodate large scale commercial developments to provide commercial services, [and] short-term stays for visitors and resort accommodation. Non-accommodation commercial uses in Resort Centres diversify the local economic base and support increased occupancy within the Resort Centre area” (2016, p.9). Finally, in accordance Sections 2.3 of the MDP, development in the Resort Centre will be phased to “allow for orderly growth at a pace and manner that can be integrated into the community’s social and physical infrastructure while considering the long-term fiscal implications” (2016, p. 9).

Recreation and Open Space

The Resort Centre ASP acknowledges the provision of open space that is both dedicated MR and privately owned. Section 8.1.2 of the MDP states that in order “to support the expansion and diversification of tourism and recreational opportunities, recreational development on private lands will be supported...within an approved area structure plan.” The Resort Centre ASP amendments related to private recreational uses remain consistent with the intent of MDP section 8.1.2.

The ASP amendments are also consistent with the Town of Canmore’s Open Space and Trails Plan. The Resort Centre will continue to connect residents and visitors to trails and open spaces throughout TSMV and the Bow Valley. Section 4.3.5 of the Open Space and Trails Plan indicates a desire to re-route the Three Sisters Highline Trail connection to continue parallel to Three Sisters Creek (as per a commitment with Alberta Parks, to minimize travel in wildlife corridor) and decommission and rehabilitate existing connection. Finally, the proposed Resort Centre will develop public and private recreation amenities, including trails and recreational facilities, with recognition of the

priorities identified in the Town of Canmore's Recreation Master Plan. Pursuant to MDP section 7.2.1, TSMV shall provide "a maximum of ten percent (10%) of the area of a parcel of land to be subdivided shall be required to be dedicated MR. The Town prefers MR dedication to be provided as land and where this is not in alignment with the Town's municipal reserve priorities or criteria, as cash-in-lieu." Other parks and open space may be registered as private land with a caveat on title.

The Resort Centre is envisioned to benefit from an interconnected series of indoor and outdoor recreation opportunities, both public and private, via a comprehensive trail network within and beyond the borders of the Centre. In the Resort Core, visitors and residents may enjoy a winter's evening skate on an outdoor rink or a relaxing evening in a rejuvenation pool at the Spa. On a pleasant fall evening, a family visiting for the weekend could stroll along the vibrant boulevard to a nearby park, where they can participate in the Yoga in the Park session. Or perhaps, they could continue their stroll to the more adventurous Ropes Course strung between the trees in Area F. Locals and visitors alike will continue to enjoy convenient access to the Highline Trail—but now, after a long day, hikers can stroll along the connector trail and into the basecamp of the Resort Core where they can re-energize for the next day of adventures.

The vision for TSMV Resort Centre identifies a vibrant, active and healthy basecamp for visitors and local Canmorites to engage with new and existing recreational opportunities. Much of Three Sisters' programming could be built around our envisioned village plaza in the Resort Core, with an event pavilion and stage and an experiences cabin—the command centre of Three Sisters' program offerings where visitors and residents can see what is going on across the entire resort, any day of the year. Potential programs are envisioned to include Arc'teryx Climbing Academy, Lululemon Wanderlust Festival, kids' music camps, cross-country ski lessons, running clubs, competitions, festivals and concerts. In response to comments from the Town, QPD has updated the Open Space System and Trail Network Map (Map 6) in the ASP to include a *conceptual* recreation network.

Affordable Housing

The Resort Centre ASP amendments related to the provision of employee housing align with the NRCB decision and are further pursuant to the MDP and the Town of Canmore Comprehensive Housing Action Plan. The amendments recognize that an estimated employment generation analysis will be required for a commercial development proposals to address employee housing. The Resort Centre ASP outlines policies that are intended to provide a range of employee housing options, which may be provided within the Stewart Creek Plan area or the future Smith Creek Plan area in accordance with policies contained in the Stewart Creek and (forthcoming) Smith Creek ASPs. Given that the MDP stipulates that employee housing for businesses within the Resort Centre must be located within a "reasonable" distance, the employee housing policies proposed as part of the Resort Centre ASP amendment are consistent with the Town of Canmore MDP.

In addition to Employee Housing, the Resort Centre will provide market affordable housing in the form of Entry-level Housing (ELH), defined in the Town's Comprehensive

Housing Action Plan as “private market housing provided at the lowest cost that the builder will provide without any direct or indirect subsidies to an occupant” (2011, p.13). Pursuant to the ASP, ELH will be provided as 25 percent of the residential housing. QPD and the Town may consider bonusing GDA in exchange for Perpetually Affordable Housing, or other community need, to the satisfaction of the Town.

Town of Canmore Land Use Bylaws

Gross Developable Area and Unit Counts

As part of the Three Sisters Resorts Direct Control (DC) District, the Resort Centre ASP area is subject to the policies identified in land use bylaw (LUB) DC 1-98. The LUB stipulates that the total remaining Gross Developable Area (GDA) for all land uses in TSMV cannot exceed 306 hectares (756 acres), with 205 hectares (507 acres) remaining across TSMV. In addition, **remaining** unit counts identified in DC 1-98 permit a maximum of 4,104 units to be allocated across TSMV lands. The 4,104 units comprise 2,604 residential or timeshare units (excluding PAH or secondary suites), and up to 1,500 visitor accommodation units.

With regards to the total GDA, DC 1-98 allows transferability across Three Sisters lands. TSMV will use this flexibility to distribute the 306 ha GDA between the Resort Centre, Stewart Creek, and (forthcoming) Smith Creek plan areas as needed to support feasible development. We propose a GDA that will not exceed the 306-hectare maximum identified in DC 1-98. There are 160 hectares of overall area allocated to the Resort Centre, although the ASP boundary covers 295 hectares of land. That 295 hectares includes designated wildlife corridor, 10 hectares (25 acres) of legally protected land in the 35-meter conservation easement, and approximately 15 hectares (37 acres) of land currently identified as open space in the ASP. Our estimates allocated 120 hectares (+/- 10 percent) of GDA to the Resort Centre.

Our estimates of GDA in Resort Centre, and the forthcoming Smith Creek ASP, may be further reduced; as per DC 1-98, areas of a site identified as undevelopable environmental reserve lands, areas of a site where a conservation easement or restrictive covenant is registered against the equivalent undevelopable land, or areas that would otherwise be developable are excluded from GDA calculations. Furthermore, GDA calculations also exclude developable areas of a site that are allocated as recreational uses with a registered deferred reserve caveat, areas that have been taken by the Town for uncredited municipal reserve (MR), or public access roads without developable frontage. Details related to the provision of MR and the identification of open space is determined at the subdivision stage. Proposed unit counts and GDA are organized to allow for flexibility and variations in the market over the long-term development of the Resort Centre. Development on TSMV lands is intended to adhere to DC 1-98 regarding both the GDA and the remaining unit counts.

QPD acknowledges the number of permitted residential and resort accommodation units identified in DC 1-98. The original Resort Centre ASP provided for a range of 1,330 to 2,525 units, while the proposed amendments provide for between 1,600 and 3,000 units. Currently, there are 4104 units remaining under the DC 1-98 cap. DC 1-98 also permits the transfer of units from one TSMV Plan area to another. At the ASP

level, the number of units is presented in a range to ensure there is enough flexibility to respond to market demands at the time of development, while respecting the maximum number of permitted units outlined in DC 1-98. An amendment to DC 1-98 is not required at this time, but may be required as land use changes are proposed and approved by Council in alignment with this ASP and during the implementation of this project.

Following the 2004 ASP, land use was granted for Areas A, B and a portion of the original Resort Core. Those land uses do not include permanent residential land uses—only Resort Accommodation and other commercial uses. The conceptual policy areas for Areas A and B remain consistent with 2004 land use, but to provide additional certainty regarding tenure, taxation and ownership to the Town and to owners of resort accommodation, TSMV Resort Centre will use central reservation systems (CRS), including rental pools, to ensure that commercial Resort Accommodation properties are rented when not in use by the owner. The CRS may be applied to individual projects or to groups of projects (for example, by form or by area). CRS are used effectively in many other popular tourist destinations, including Whistler, Niagara and Panorama, and can be internet or phone-based. Specific logistics surrounding the implementation of the CRS will be determined at later stages of the planning process.

Engineering

There are several key engineering considerations explored in the ASP and proposed amendments, which are explored below.

Steep Creek Hazard and Risk Policy

Development in the Resort Centre is proposed with acknowledgement of the Town of Canmore steep creek hazard policies outlined in Section 3.5 of the MDP and the Town of Canmore *Steep Creek Hazard and Risk Policy*¹². In accordance with the MDP, the ASP amendments allow for development in hazard areas only in accordance with the aforementioned policies. Further, the proposed ASP stipulates in policy 2.2.2.6 that a detailed steep creek hazard assessment shall be completed prior to any development on lands impacted by, or are located in, steep creek hazard areas, including those lands identified in the 2015 BGC Engineering Inc. assessment¹³.

If new or additional creeks are identified that require hazard analysis, the approach will follow section 3.5.3 of the MDP. These considerations are incorporated into the ASP, the MDP and Canmore's *Steep Creek Hazard and Risk Policy*. Any steep creek hazard mitigation proposed, "whether active or passive, local or off-site, [will] be designed and

¹² Town of Canmore (2016). *Steep Creek Hazard Policy*.

<http://canmore.ca/documents/municipal-development-plan/479-draft-steep-creek-hazard-policy-v1>

¹³ BGC Engineering Inc. (2015). *Three Sisters Creek Debris Flood Hazard and Risk Assessment: Final*. Document No: TC14-007. Retrieved from: canmore.ca/documents/flood-mountain-creek/187-flood-three-sisters-creek-geohazard-risk/FLOOD - 20150119 Three Sisters Creek Geohazard Risk FINAL_ecopy_reduced.pdf

constructed in accordance with the Town's Steep Creek engineering guidelines" (MDP, p.15, 3.5.9).

Undermining

Section 3.7 of the MDP states that "development on undermined lands within the Three Sisters Resorts NRCB decision area ... is covered by the Canmore Undermining Review Regulation 114/1997" (2016, p. 18). The existing and the proposed Resort Centre ASP amendments are consistent with the NRCB, the MDP and Alberta Regulation 114/97 enacted under the *Municipal Government Act* (MGA) by stating that "any area that is proposed for development that is affected by undermining will be mitigated in accordance with Provincial Regulations."

Under the Undermining regulations, the Province grants indemnity to third parties and private land owners provided that mitigation strategies have been implemented in accordance with the undermining report registered on title for the property. Furthermore, as per Alberta Regulation 113/97, the Town of Canmore is not liable for any loss or damage relating to undermining on the land designated in Alberta Regulation 114/97.

Three regulations were enacted by the Province in 1998 relating to undermining, and are summarized as follows:

- Canmore Undermining Review Regulation
 - Undermining Exemption
 - **3(1)** Part 17 of the Act and the *Subdivision and Regulation* (AR 43/2002) do not apply with respect to undermining and related conditions in designated land.
 - **3(2)** Canmore and Canmore's agents have no responsibility, duty or obligation to consider undermining and related conditions in designated land with respect to the subdivision, development or any other land use planning function of Canmore under Part 17 of the Act and the *Subdivision and Development Regulation* (AR 43/2002), including, without restricting the generality of the foregoing, with respect to enforcement, maintenance or inspection of undermining and related conditions in designated land.
- Canmore Undermining Indemnity Regulation
 - Authority for Indemnity
 - **(2)** The President of Treasury Board and Minister of Finance is authorized to enter into an agreement with Canmore that indemnifies Canmore and Canmore's agents in respect of loss or damage.
 - **(a)** that arises during development on the designated land or that arises from the use of the designated land as a result of development on the designated land, and
 - **(b)** that is directly or indirectly caused by undermining and related conditions in respect of the designated land.
- Canmore Undermining Exemption from Liability Regulation

- Exemption from Liability
 - **(2)** Canmore and Canmore’s agents are not liable for any loss or damage
 - **(a)** that arises during development on the designated land or that arises from the use of the designated land as a result of development on the designated land, and
 - **(b)** that is directly or indirectly caused by undermining and related conditions in respect to the designated land.

The *Municipal Government Act* requires that ASPs conform with the Act, all enabling legislation (which includes the Undermining Regulation), and higher level policies like the Town of Canmore Municipal Development Plan. As a result, any ASP approved by the Town cannot contain policies that do not align with such legislation and the ASP amendment proposed to the Town cannot suggest policy that would bring it out of alignment with the Act or any regulations enacted under it.

Transportation

The transportation network proposed follows the direction of the Town’s Integrated Transportation Plan, which focuses on “creating a multi-modal transportation network through Complete Streets that prioritize pedestrians and cyclists wherever possible, complemented by a trail network” (ITP, 2014, p.43)¹⁴. Plans of the Resort Centre transportation network will include the street classification Livable Urban Boulevard, which prioritizes alternative transportation modes through the allocation of space in the cross section and emphasis on the public realm elements. This policy direction encourages active modes and transit. To further promote alternative modes of transportation, we propose two-lane cross section streets, rather than wider four-lane streets, which also prioritizes active modes of transportation by allocating more space to walking and cycling in the corridor.

Pursuant to the Traffic Impact Assessment (TIA), we are proposing basic intersection designs with signalization due to the estimated demand. Phasing (allocated signal time) in all directions will cater to pedestrians and cyclists. A *minimum* of 1.5-meter wide bicycle lanes are proposed, and the TIA specifies that “streets with higher volumes should have a buffer between the dedicated cycling facility and the moving vehicles – and a buffer with an on-street parking lane if it exists.” (Section 7.2, p. 25). Further, buffered bike lanes shown in Appendix A (Sections 1.1) of the TIA have allocated 2.5 meters per direction for the bike lanes. We recommend that ‘Cycling facilities should be designed in accordance with current best practice guidelines (including the Ontario Traffic Manual Book 18, NACTO and MassDOT’ (TIA, Section 8.2, p. 37). Elements such as the character of the buffer from vehicle lanes, or narrowed vehicular land widths to be designed by a Town of Canmore Engineer, and reviewed and approved at time of development at a later stage of the planning process.

¹⁴ Town of Canmore. (2014). *Integrated Transportation Plan*. Retrieved from: <http://canmore.ca/permits-forms-menu-item/engineering-permits/446-2014canmoreintegratedtransportationplanfinal>

The TIA was not amended for the purpose of this resubmission, however, a document with responses to Administration's comments on the TIA is also included in this resubmission package.

Many elements of the network design have been considered, and will be addressed at a later stage in the planning process. These include the following:

- Protected intersection treatments that would further serve to prioritize alternative modes and increase the mode share of active transportation.
- Pedestrian treatments, such as midblock crossings and control devices, curb extensions, radii-reductions at intersections (which slow vehicles and eliminate right turn channelization) are also considered (pursuant to section 4.8.2 of the ITP), and will be addressed at a later stage of the planning process.
- Cycling treatments, such as the details of a protected intersection design, specific buffer treatments and widths, management of on-street parking access, and turn boxes.
- Transit treatments such as stop and station design, transit signal priority technology at intersections, queue-jumps at strategic locations, and additional capacity for buses.

As previously discussed, the Resort Centre is envisioned to benefit from an interconnected series of indoor and outdoor recreation opportunities, both public and private, linked via a comprehensive trail network within and beyond the borders of the Centre. This trail network will be integral to the transportation network, servicing both utilitarian and recreational trips.

The Resort Centre will be able to accommodate transit use efficiently and effectively by pulling the route off of Three Sisters Parkway and through the resort. This will encourage the use of transit to connect to many other areas of town, and the concentration of businesses, visitors and residents in the Resort Core will support not only transit, but walkability as well. Provision of transit is outside the control of TSMVPL and QPD; however, the development design locates all land uses are within a 400-meter radius of roads that can support transit. Subject to transit services being provided in this area, all development will be within a short walking distance to transit facilities.

Stormwater Management

Stormwater Management policies will be detailed at a later stage of the planning process, but are considered conceptually in the ASP. The Resort Centre development will consider its impacts on downstream infrastructure, with a particular regard for the Cairn's on the Bow development. TSMV will either (1) not exceed existing capacity of stormwater infrastructure, or (2) upgrades will be utilized to create additional capacity. Two alignment options have been outlined in the Stormwater Management Strategies Report (SMSR) regarding the alignment of the 'unnamed creek' in the Resort Centre; detailed alternatives will be provided following a site investigation at a later stage.

Drainage catchments delineated in the area approximations,¹⁵ and final developed land may not follow the existing natural topography. Therefore, final catchment delineations will be detailed at a later stage of the planning process.

The NRCB decision, specifically section 10.4.3.3 Wetlands (p. 10-25), does **not** require the protection of wetlands. The section identified that the “wetland of most significance within the proposed project area is the fen in Wind Valley”, and that *should development proceed in Wind Valley*, “the following requirements of Three Sisters would lessen the effects:

- Avoid encroaching on the fen in the construction of building, roads or golf courses;
- Attempt to avoid intercepting or blocking groundwater flow in to the fen;
- Ensure that surface water flow into the fen is altered as little as possible in quantity, distribution, or chemical composition; and,
- Do not extract peat from the fen.”

The aforementioned requirements are *only* applicable to the fen in Wind Valley. As no development is occurring in Wind Valley, and the fen is not at risk, there are no requirements imposed on Three Sisters to protect wetlands under the NRCB approval.

The NRCB also acknowledges “two ponds south of and close to the Trans-Canada Highway that...are not on the Applicant’s property” and “two small wetlands near Quarry Lake” and “the Board notes that neither Quarry Lake nor the associated wetlands are on the Applicant’s property.” Therefore, no restrictions or requirements are placed on Three Sisters regarding the identified wetlands per the NRCB decision.

Staging of Development

Section 9.2 of the Resort Centre ASP notes that development in the Plan area will “occur in a staged manner” and “in a sequence that reflects the availability of required utility infrastructure and access roadways” by moving east-west and north-south. The proposed amendments in this section maintain this intent. This approach is consistent with the SSRP’s suggestion to “plan, design and locate new development in a manner that best utilizes existing infrastructure and minimizes the need for new or expanded infrastructure” (2014, p. 89).

Currently, there are three approved land use districts within the Resort Centre ASP Plan area: Three Sisters Resort Accommodation District (TS-RA1), Three Sisters Resort Core DC District (DC27(Z) 2006), and Three Sisters Resort DC District (DC 1-98 Site 1). The first stages of development will likely occur on a site within an approved land use district and will be dependent on the availability of required infrastructure; although, the intention is to begin development in Sites A and B, and move west towards the Resort Core. This progression would make the most efficient use of existing infrastructure, while providing accommodations for patrons of the Resort Core that will be necessary for its success.

¹⁵ Catchments have been delineated with respect to downstream end considerations.

While the land use bylaw DC 1-98 Site 1 accommodates some residential uses, land use approvals within the Resort Accommodation and Resort Core Districts do not provide for any non-commercial residential uses. Any amendment to the land use bylaw to accommodate residential uses would require Council approval. Administration and Council can be assured of seeing commercial components of the resort, as existing land use approvals and the staging of the ASP supports building the commercial components first.

As previously discussed, the wildlife fence may be implemented in one of two ways: phased with development, or constructed in full prior to development. The implementation will be considered at a later stage of the planning process.

Fiscal Impact Assessment (FIA)

The FIA produced for the Resort Centre project is a result of a collaborative approach between the Town and QPD. The Town undertook a review of community services and infrastructure that would be impacted by the Resort Centre. A review of both operating revenue and expenses were used to calculate fiscal impacts to the Town. A conservative approach to modeling was used. For example, the assessment included all possible costs, including Town maintenance of the wildlife fence and several of the public recreational fields requested within the resort. Revenues were also conservatively calculated using the resort accommodation units as the *only* projected commercial other than retail. Hotel uses were not included, even though they would be included in the resort and generate a significant amount of revenue. The FIA low scenario, though projecting a loss at year one, will generate revenue at full build out. Regardless, the estimates to generate the model were conservative.

Conclusion

The proposed amendments to the Resort Centre ASP provide for alternate uses for the lands identified as golf course in the original 2004 ASP, reflect current socio-economic circumstances in the Town of Canmore and reflect current wildlife science and the mitigation recommendations outlined in the EIS. Overall, the Resort Centre is envisioned as the “heart of Three Sisters Mountain Village” with a focus on health, wellness, lifestyle facilities and related resort accommodation uses. Development in the Resort Centre has the potential to support the Town of Canmore’s goals related to economic growth and tourism, recreation and affordable housing. The proposed amendments align with relevant Provincial policies, such as the NRCB decision and the SSRP, and the Town of Canmore’s statutory and non-statutory plans, including DC 1-98 and the MDP.