

**Environmental Assessment Amendment
Of Environmental Impact Analysis BNP-1268
West Sulphur Mountain Wildfire Risk Reduction Project**

Project Title	West Sulphur Mountain Wildfire Risk Reduction Project
Amendment Date	April 2021
Banff EA Office Reference #	Original EIA BNP-1268 (2018)

Background

The West Sulphur Mountain Wildfire Risk Reduction project is a landscape-level fire guard that is intended to reduce the risk of potential wildfire spread towards the Town of Banff in support of public safety and infrastructure protection. The project builds upon existing fuel management units located on the west facing slopes of Sulphur Mountain, providing an additional fuel break in the event of fire threat to the Banff community from the western reaches of the Bow Valley. Currently, both Mechanical Thin Units 1 and 2 of the project have been harvested, and restoration and reclamation work remains to be completed in the summer and fall of 2021.

Parks Canada prepared a Basic Impact Analysis (BIA) for the project in 2018 with an Environmental Impact Analysis determination of “project not likely to cause significant adverse environmental effects” (Appendix 1).

In the BIA, the use of the Sundance Trail and Sulphur Mountain Fire Road were proposed for site access. In-block roads, skid trails and landing areas were also considered in the BIA. Per mitigations identified in the BIA, all in-block roads, skid trails and landing areas created during operations will be rehabilitated according to the *Vegetation Removal and Restoration / Reclamation Guidelines Banff National Park (2017)* and a detailed reclamation plan developed by Parks Canada (forthcoming).

EIA Amendment (2021)

At the time the BIA was approved, the original hiking trail from Sundance Road to Sulphur Mountain Westside trail was proposed to remain as the long-term hiking/access trail to the area. However, it is now desired to change the original scope of the project as it relates to the “entrance” to the Sulphur Mountain Westside trail and WSWRR project access (Figure 1). As the original trail (used by hikers and horse) is steep, eroded and requiring repairs the intent is to replace this route with the new “road” that was constructed for the WSWRR Project. This route is less steep and will remain connected to the Sundance – Highline and Sulphur Mountain Westside trails.

A meeting on June 9th, 2020 was held to discuss this proposed change. Daniella Rubeling (VE), Alice Wan (ILUPP), Anna Brown (EA), Bill Hunt (RC), Jane Park (Fire/Veg) and Brian Yakiwchuk (Veg) were in attendance and agreed, in concept, to the proposed changes. A previous amendment was made to the original BIA determination in 2018 to allow for the installation of the current lower road alignment access to the project site.

On April 8th, 2021, a site visit was held with Don Gorrie (Maintenance Coordinator), Jane Park (Fire/Veg), Brian Yakiwchuk (Veg) Megan Kinley (EA) and Tommy Hooper-Wolfe (Fire). A variety of option and considerations were discussed, but overall Don had no concerns regarding the scope and scale of this trail work. In order to establish the gentlest grade and mitigate erosion issues, the trail will be routed across the slope of the new access road to follow natural contour lines. In order to accomplish this more gradual slope, the new trail may be routed 1-2m wider than the current access road berms in some locations. It was identified that if there was excess fill, this material may be used to improve the horse trail along Sundance Rd. Reclamation of the original trail will involve ripping (decompaction), using local-to-site overburden (berm on side of trail) and potentially some minor planting.

Based on discussion with stakeholders it is desired that the proposed trail be established in fall 2021 and the reclamation work on the original trail be completed after. Therefore, reclamation of the original trail may occur in fall 2021 (if weather allows) but may occur in spring 2022. Funding for this activity is committed.

Scope of Changes

1. Reclaim the original trail (200m) as part of the restoration plan associated with the original BIA and project funding. Proposed timing is fall 2021.
2. Modify the new road to trail standard in coordination with Don Gorrie as part of the restoration plan associated with the original BIA and project funding. Proposed timing is fall 2021.

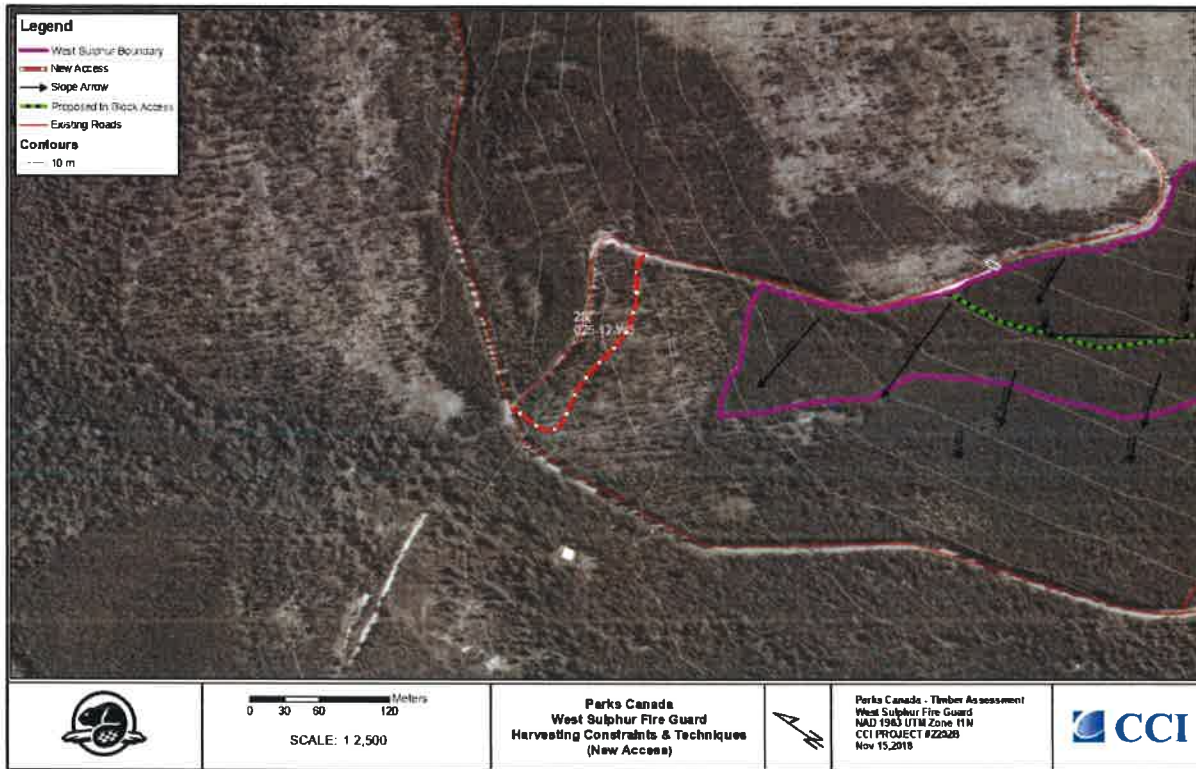


Figure 1: Proposed amendment to original West Sulphur Wildfire Risk Reduction BIA, with new permanent access trail. The thin red line is the original trail; thick red line is the road that was installed in 2018 for logging operations and the proposed “new” trail to remain following completion of the project.

Rationale

The original old road is extremely steep and includes a very sharp corner that is susceptible to erosion and is more difficult to maintain. The old trail is also slippery and dangerous to horse-back riders. The proposed new trail will allow a more gradual slope, and will provide a more suitable substrate for trail users.

Environmental Effects

The environmental effects of retaining the proposed new access road and reclaiming the previous trail are the same as for the previously assessed in-block roads, skid trails and landings. There will be no change in net disturbed footprint as a result of this amendment, as the old trail will be restored and replaced by the new trail.


Mitigations for the 2021 Amendment


All mitigations from the 2018 BIA apply. In addition:

- The old access trail for this project will be subject to reclamation and restoration, as described in the detailed Reclamation and Restoration Plan, and as part of the restoration of the entire project area.
 - The plan developed for the in-block roads, skid trails and landings associated with the West Sulphur project includes soil conservation, erosion mitigation, native vegetation establishment and non-native vegetation control activities also applies to the access road.
- A project-specific Environmental Protection Plan will be developed and implemented for the scope of work described in this amendment.

Determination
<input checked="" type="checkbox"/> The project is not likely to cause significant adverse environmental effects.
<input type="checkbox"/> The project is likely to cause significant adverse environmental effects that cannot be justified.
<input type="checkbox"/> It is uncertain whether the project is likely to cause significant adverse environmental effects.
<input type="checkbox"/> The project is likely to cause significant adverse environmental effects that can be justified.
<input type="checkbox"/> Public concerns warrant a more detailed environmental review.

EIA Amendment Prepared by: Megan Kinley, Environmental Assessment Scientist, Banff Field Unit

Signature of Responsible Centre Manager: 	Date: 2021-05-03
Alice Wan, Manager of Integrated Land Use Policy & Planning	

Signature of Superintendent: 	Date: 2021-05-04
Dave McDonough, Superintendent Banff Field Unit, Parks Canada Agency	