



Alberta Wilderness Association
"Defending Wild Alberta through Awareness and Action"

Hon. Andrew Boitchenko
Minister of Tourism and Sport
Government of Alberta
ts.minister@gov.ab.ca
cc: allseasonresorts@gov.ab.ca, info@fortressmountainresort.com

Our Concerns Regarding the Proposed Fortress All-season Resort Masterplan

Dear Minister Boitchenko,

Alberta Wilderness Association (AWA) is writing to express our concerns regarding the Proposed Fortress Mountain Resort and its impacts on the ecological integrity of the region.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values that wildlife and wilderness provide, and encourage communities to participate in conservation initiatives that will ensure a legacy for future generations. With over 10,000 members and supporters in Alberta and around the world, AWA is dedicated to conserving Alberta's wild spaces and species and advocating for conservation strategies that protect Canada's biodiversity.

Last year, the Government of Alberta removed 131 hectares (324 acres) of land from Spray Lakes Provincial Park without public consultation and rezoned it as an All-season Resort Area allowing for the expansion of the Fortress Mountain Resort lease area. The *All-season Resorts Act* (ASRA) was established with the hope that designating new areas for visitors will relieve pressure on areas experiencing overuse. Kananaskis Country itself welcomes over 5,000,000 visitors annually. Establishing a new commercial resort that will welcome 10,000 daily visitors into a park already facing issues with overuse is contrary to the ASRA's goal of reducing overuse. Infrastructure within Kananaskis Country will struggle to sustain its ecological values with this increased demand on the region.

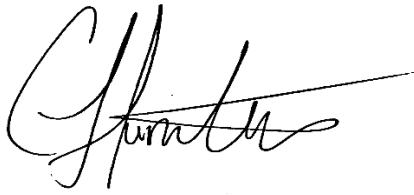
Increased use is almost guaranteed to affect local grizzly bear populations, notable since Fortress is an important feeding and resting area for these threatened species. Increased visitor presence in summer would raise the chances of human-wildlife conflict. The higher recreational use would push animals away from this key habitat, resulting in a loss of habitat not only for bears, but other at-risk animals such as wolverines and olive-sided flycatchers. Additionally, 17 percent of the Fortress All-Season Resort area falls within designated critical habitat for Bull trout, listed as a threatened species under the *Species at Risk Act* (SARA) (**see Figure 1**). These concerns are not addressed within the Environmental Assessment, which also lacks a cumulative effects assessment and fails to consider how climate change might influence the development's impact.

Intensification of water use is also a concern, as the standing moratorium on new water licenses in this region indicates that no additional water licenses are to be established, and their existing water license is not poised to provide enough water to support the proposed fully phased build-out. Better understanding of the environmental impacts of water withdrawal and waste management is needed.

Lastly, the proposal contradicts many provincial government policies in place for this region, such as the vision of the [Kananaskis Country Recreation Policy](#). As well, a portion of the Fortress All-season Resort area falls within the [Eastern Slopes Policies](#) "Prime Protection Zone." Additional developments in the Kananaskis Valley exist, and as little as 13 kilometres away, the Nakiska Ski Area is poised to receive similar increases in activity through the ASRA. The ecological importance of the Kananaskis Valley deserves a regional environmental assessment that considers cumulative effects, as called for in the Land-use Framework and South Saskatchewan Regional Plan. *"Cumulative effects cannot be managed as an "add-on" to existing management approaches; nor is it about shutting down development."*¹

Due to what we have stated above, we do not currently support the Fortress All-season Resort Masterplan as proposed. Thank you for considering our comments and please feel free to reach out with any questions.

Sincerely,
Cameron Hunter
Conservation Specialist, Alberta Wilderness Association



¹ <https://landuse.alberta.ca/LandUse%20Documents/Land-use%20Framework%20-%202008-12.pdf#page=38.38>

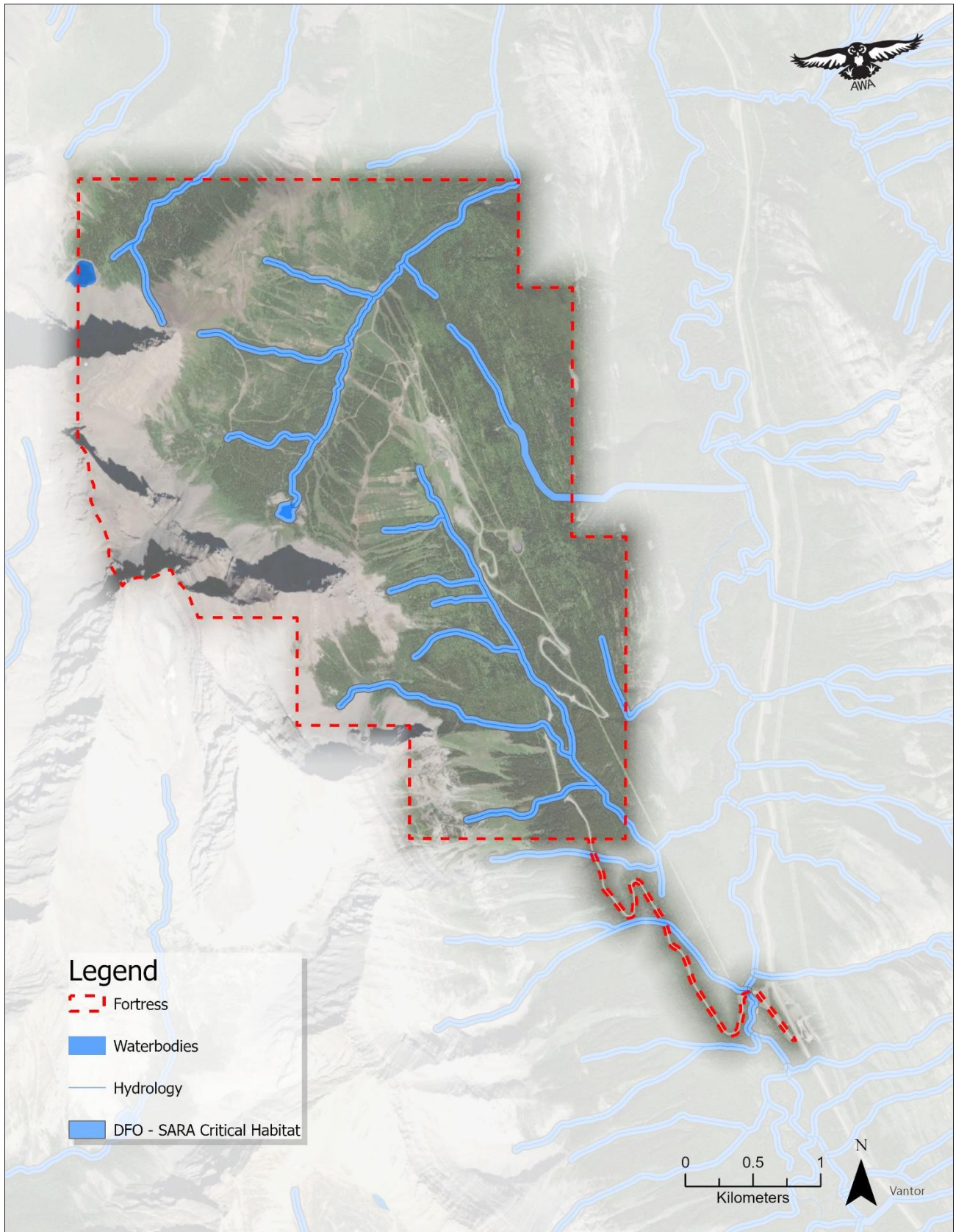


Figure 1: Species at Risk Act - Bull Trout Critical Habitat in the area under consideration for Fortress All-Seasons Resort.