



Mr. Ralph D. Scurfield
President and Chief Executive Officer
Sunshine Village Corporation
P.O. Box 1510
Banff AB T1L 1J5

January 14, 2019

Dear Mr. Scurfield:

This letter is in follow up to the meeting with yourself, Dave Riley, Dave McDonough and myself on January 3, 2019, and your telephone call to me January 4, 2019, requesting clarification and additional information on items relating to the approved Site Guidelines and other matters. I apologize for the delay.

Future Road Parking

Further to your question regarding Parks Canada's future intentions with respect to parking on the access road, parking may continue indefinitely subject to the conditions described in my May 17, 2018 decision, which provides for a review of the decision every 5 years or earlier should there be a change in circumstances. Parks Canada intends to conduct these reviews as described. At present the road parking protocols appear to be working well, and as long as there are no environmental or safety problems, I do not foresee a change in the current arrangement. In answer to your question about whether or not you would be allowed to continue using the road should you develop in-lease parking, Parks Canada would re-examine the need for road parking in the context of your specific proposal and all other relevant factors, and it would be a decision for the Superintendent to make at that time.

Boundary Issues Pertaining to the Parking Lot

Further to your concern that the survey boundary might have been re-drawn to leave some of your tanks outside the lease in the back parking lot, we do not have the final survey in our possession however we have examined the draft lease and it indicates that the lease boundary at the back of the lot did not change at all from the previous survey (i.e. the original survey markers were used). In looking at an airphoto of the area it appears that most tanks are well within the lease, however at the far end of the lot some structures may be on or slightly over the lease boundary (see attachment A) but this was the case with the original lease. This can be verified once the final survey is received from the Surveyor General's Office.



Definition of Commercial Space to Exclude Not-for-Profit Uses

In reviewing Parks Canada's ski area policy and leases, there is nothing in the definition of commercial space that would support differentiating specific areas or facilities as non-commercial on the basis of who is served by them (i.e. disabled or non-disabled). We applaud your desire to support Rocky Mountain Adaptive and other community programs that make outdoor recreation more accessible for people of all abilities, and would hope to see any new facilities for the disabled integrated into mainstream facilities for all of your guests.

Calculation of Commercial Space

This was calculated using an industry expert and the same criteria as applied in the other ski areas, with the overall goal of having the resort's commercial space be within the industry standard 1.0 to 1.5 square meters of commercial space per skier for your maximum growth limit. Sunshine's current commercial space per skier was calculated and this number was used as the basis for calculating what the future space should be. Decks and hotel rooms were not included and some additional space was added (to the degree possible while still staying within industry standards) to allow for previous approval of Goat's Eye Daylodge. The details follow:

Total Interior (i.e. no deck space) Commercial Space	12,015 sq. m
Less Hotel Room Accommodation (main floor restaurant / café was <u>not</u> excluded as it is available to skiers)	- 2923 sq. m
Results in current interior commercial space	= 9092 sq. m
Divided by current maximum skier capacity	÷ 6500 skiers
Results in current square meters per skier	= 1.39 sq. m/skier
Current square meters per skier applied to potential maximum skier capacity	x 8500 skiers
Results in future commercial space requirements to maintain same standard (1.4 sq m /skier)	= 11,900 sq. m
Plus additional space for Goat's Eye daylodge	+ 842 sq. m
Results in total allowable commercial space (1.5 sq. m / skier)	= 12,742 sq. m

Thus the Site Guidelines provide for future commercial space per skier that is at the top of the industry standard.



Request for the Final Strategic Environmental Assessment
This was provided to you via email on January 6th, 2019.

Request for Lift Modifications to Increase Carrying Capacity

Based on the verbal description you provided, these are the types of projects that Parks Canada would expect to see as part of a Long Range Plan, as they do not appear to be “maintenance, repair, or replacement on a true ‘like-for-like’ basis” as per the Ski Area Management Guidelines. The Site Guidelines (Section 4.1) also state that “Effectively buffering Healy Creek from the impacts of the parking lot operations is essential and must be addressed at the earliest opportunity and before any additional development, including like-for-like projects, will be permitted”. I would direct your attention to section 4.4 of the Site Guidelines for further details on what might be permitted in advance of a Long Range Plan.

Request for Additional Time to Respond to Parks Canada Regarding Your Acceptance of Site Guidelines and your Intentions in Respect of a New Lease

Your request has been conveyed to the CEO and he has responded to you directly.

I trust this information is helpful, and would be please to answer any further questions.

Sincerely,

S. Luey
Acting Field Unit Superintendent
Banff Field Unit
Parks Canada Agency

cc. Dave Riley



Appendix A

Pink line is the new lease boundary and the blue line is the old lease boundary.

