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The Light Goes Out at the NRCB on Major Recreational Project Reviews

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Legislation Commented On: *All-season Resorts Act*, [SA 2024, c A 38.5](#)

At some point during the last few months of 2025, the Alberta [Natural Resources Conservation Board \(NRCB\)](#) seems to have erased some history on reviewing major recreation and tourism projects in Alberta, by removing from its [website](#) several recreational project review decisions the NRCB issued in the early 1990s. This became apparent to me recently, as I prepared for a media interview to discuss the application by [Fortress Mountain Holdings Ltd.](#) under the *All-season Resorts Act* to construct and operate a new commercial and recreational destination in Kananaskis Country at the site of the former Fortress Mountain ski area (see [here](#) for some earlier media coverage of this expansive application). This short comment critiques the *All-season Resorts Act* and the removal of NRCB jurisdiction over major recreational projects.

The NRCB and Recreational Projects

The NRCB was established in the early 1990s by the *Natural Resources Conservation Board Act, RSA 2000, c N-3 (NRCB Act)* as a quasi-judicial agency responsible for reviewing major non-energy resource development project applications and to assess whether project approval would be in the public interest. This mandate includes a review of recreational and tourism projects (*NRCB Act*, section 4). While the NRCB does not have ongoing regulatory oversight over these projects, no such project can be commenced without the approval of the NRCB. The essential function of an NRCB review over a recreational project proposal is a sustainability assessment on the social, economic, and environmental impacts, as well as providing for a transparent public hearing process (see [here](#) for a short video description of the NRCB hearing format on a project review).

Early in its tenure, the NRCB reviewed three major recreational projects proposed for construction in the Alberta rocky mountains, including a 1993 decision on the expansion of the Westcastle ski hill (now known as [Castle Mountain](#)) into an all-season resort. In a study of public participation in resource development decisions published as [The Right to Public Participation in Resources and Environmental Decision-Making in Alberta](#) in 2015, I noted that the public hearings held by the NRCB to review the three recreational projects in the early 1990s were arguably the high-water mark for meaningful and inclusive public engagement on major resource development project decision-making in Alberta (at 592-593).

The *All-season Resorts Act* and Fortress Mountain

The *All-season Resorts Act* was enacted in December 2024. It is a short statute, consisting of only 22 sections. A review of the statute makes its purpose very clear: transfer and bring all environmental and other public land-use decision-making authority under the *Environmental Protection and Enhancement Act*, [RSA 2000, c E-12](#), *Water Act*, [RSA 2000, c W-3](#), *Public Lands Act*, [RSA 2000, c P-40](#), and the *Alberta Land Stewardship Act*, [SA 2009, c A-26.8](#), associated with the approval of a major recreational project into the fiefdom of the Minister of Tourism and Sport. To facilitate this transfer of authority, consequential amendments to these statutes were made by sections 17 to 21 of the *All-season Resorts Act* (see the originally enacted version of the Act [here](#) to view these sections). And as icing on the Minister's cake, a consequential amendment to the *NRCB Act* removed decision-making authority from the NRCB over a recreational project designated as an all-season resort development under the *All-season Resorts Act*.

The UCP government praises these changes as strengthening investor confidence, providing regulatory clarity, offering tailored support to the resort development industry, and generating regulatory efficiencies, all the while not replacing existing environmental standards (see [here](#) for this preposterous list of claims). And yet somewhat quietly because there is no mention of this on the government website, the *All-season Resorts Act* eviscerates Alberta's longstanding history of subjecting a major recreational project in Kananaskis Country to an environmental impact review by way of a full public hearing. There is no legislated process with respect to all the environmental decisions moved into the Minister's office, and the *All-season Resorts Regulation*, [Alta Reg 283/2025](#) **which is not yet proclaimed into force** provides the thinnest gruel imaginable on participatory entitlements for a major project review on public lands: the requirement for a minimum 30 day public notice and comment period (*Regulation*, section 5).

The [Fortress Mountain project application](#) makes it obvious how utterly deficient this new process is. The [Canadian Parks and Wilderness Society – Southern Alberta Chapter](#) summarizes the scale and magnitude of the proposed project as follows:

With a sweeping Crown Land lease, on a new 'All-Seasons Resort' land-use designation, of more than 3,600 hectares, the Fortress Mountain Resort Master Plan — which aims to attract year-round tourism — includes a new base lodge, hotel, brewery, spa, commercial shopping street, condominium development and much more.

With 8 aerial lifts, 6 surface lifts, and supporting infrastructure for activities ranging from zip lining to glamping to mini golf, the plan hopes to attract up to 9,650 visitors per day.

(see [Fortress Mountain Resort: An Amusement Park in our Wilderness](#))

The potential for significant adverse environmental impacts in the Kananaskis valley includes adverse impacts to grizzly bear habitat and designated habitat for bull trout under the federal *Species at Risk Act*, [SC 2002, c 29](#), as well as questions over impacts to water. The [Biosphere Institute of the Bow Valley](#) notes that none of these potential adverse impacts are addressed by the

proponent's filed environmental impact statement included with the application under the *All-season Resorts Act*.

There is absolutely nothing in the *All-season Resorts Act* to explain how the Minister's office will address and consider these impacts and other concerns with this project proposal. The project application page for submitting public comments is frankly one of the worst efforts at seeking public comment that I have ever seen – see [here](#) – even the fillable boxes fail to solicit meaningful information on project impacts.

Back to the NRCB

To further the point that the UCP government's claim of maintaining environmental standards under the *All-season Resorts Act* is patently false, consider how the NRCB review process would apply to the Fortress Mountain proposal. A good illustration of this would be the 1993 NRCB review of the Westcastle ski area expansion project. This curiosity is what led me to visit the NRCB website because I knew the NRCB had reviewed the ski area expansion proposal back in the early 1990s. Steve Kennett wrote a thorough description of the NRCB review process and findings on the Westcastle project in [Spinning Wheels in the Castle: A Lost Decade for Sustainability in Southwestern Alberta](#) (Canadian Institute of Resources Law Occasional Paper #14, October 2003). The NRCB conducted a one-month public hearing in 1993 between June 21 and July 19, and rendered a project review decision in December 1993 that considered the justification and need for the project, the applicant's capacity to implement the project, the infrastructure implications, and in particular, the NRCB applied a broad ecosystem approach to assessing the social, economic, and environmental impacts of the project. Kennett described the decision as the “cutting edge of environmental assessment practice” (at 6).

The review of the Westcastle application in 1993 is exactly the form of project review that should be undertaken on the contentious Fortress Mountain application.

When I visited the NRCB website, I was astounded to see that the 1993 Westcastle decision (along with the other two recreational project decisions) were not mentioned in the list of resource development project review decisions. Because of my prior work on the 2015 public participation paper and other matters, I knew that this decision was previously listed on the NRCB website. So, I did some sleuthing.

The [Wayback Machine](#) has a screenshot grab from the NRCB webpage taken on September 16, 2025 that shows all three recreational project review decisions made in the early 1990s – Westcastle, Three Sisters and the Evans Thomas Golf Course – on the NRCB website and listed under its resource project decisions:

Decision Date: May 12, 1998 | Water Management

Pine Coulee Water Management Project

Decision Date: February 28, 1995 | Water Management

Chem-Security (Alberta) Ltd.

Decision Date: October 31, 1994 | Referral by Order in Council

Westcastle Four Season Resort Project

Decision Date: December 3, 1993 | Recreation

Consumer's Paper Corp. - Waste Paper Recycling Project

Decision Date: April 27, 1993 | Forestry

Three Sisters Recreational and Tourism Project, Canmore

Decision Date: December 8, 1992 | Recreation

Golf Course at Evan Thomas Creek

Decision Date: August 14, 1992 | Recreation

Swan Hills Special Waste Treatment Centre Expansion

Decision Date: May 8, 1992 | Referral by Order in Council

The screenshot shows that these recreational project reviews were 3 of the first 5 project decisions issued by the NRCB after it was created. However, none of those three recreational project review decisions were listed on the NRCB website when I looked on February 13, 2026. Instead, the resources project decision list webpage indicates that project decisions made prior to 2005 can be requested from the NRCB Manager, Board Reviews (see [here](#)).

Conclusion

The timing on this removal of recreational project decisions by the NRCB is curious, making it difficult for me to see this change as merely the result of some website administration. I deduced that these decisions were erased from the NRCB website sometime after September 16, 2025,

because that is the last date shown by the Wayback Machine with these three project decisions listed (see [here](#)), and before January 4, 2026, because that is the date on the next screenshot grab and the projects are then not listed (see [here](#)). Within this window of approximately three months, I speculate that these removals likely occurred sometime in early December 2025 – maybe even on December 10. Why is that? Because there was a flurry of other hasty moves by the UCP government in early December under the *All-season Resorts Act*. The *Regulation* offering the public its tiny morsel of engagement was made by [Order in Council 393/2025](#) on December 11. The Castle, Fortress, and Nakiska region all-season resort area designations were made by [Order in Council 390/2025](#), [Order in Council 391/2025](#), and [Order in Council 392/2025](#) respectively on December 10. And the All-season Resorts glossy government [brochure](#) (or poLiCy) was published by the Minister - also on December 10. All this end-of-year rush of activity sure seems like it was in anticipation of the Fortress Mountain application which arrived shortly thereafter.

I would like to think that pressure applied by the political executive is not the reason why the NRCB has erased its own history of robust environmental impact assessments on major recreational projects in Alberta. Sadly though, all signs point to political interference from the Minister’s office. This Orwellian removal of recreational project review decisions from the NRCB website represents yet another institutional casualty in the UCP government’s attack on democracy in Alberta.

The Fortress Mountain application is open to feedback (it is hard to even say this is a comment process) until February 27, 2026. There are also three dog and pony shows scheduled in Canmore (February 17), Calgary (February 20), and Edmonton (February 23) – see [Fortress Mountain Resort: An Amusement Park in our Wilderness](#) for details.

One comment that the Minister should absolutely receive is to request that the Lieutenant Governor in Council exercise its power under section 4(f) of the *NRCB Act* to designate the Fortress Mountain application for an NRCB project review.

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