



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

January 15, 2014

Hon. Donna Kennedy-Glans, Associate Minister of Electricity and Renewable Energy
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Dear Panel Participants,

Alberta Wilderness Association (AWA) has longstanding involvement and concern with coal exploration and development in the province. As you may know, AWA supports 'phasing out Alberta coal power' for several reasons. We are writing this letter to you as we are aware you are a participant in the Canadian Association of Physicians for the Environment Alberta Coal Phase-Out Panel Discussion, January 16, 2014, and we hope our perspective may help inform your debate.

Coal Development and Landscape Disturbance

Coal mining and burning for electricity have many adverse effects on the environment, which correlates directly to the physical and mental health of Albertans. Coal development creates huge land disturbances and increases linear footprint which fragments and degrades wildlife habitat, further endangering many species already at risk in Alberta. Mining completely eradicates the existing vegetation, alters soil composition, and displaces fauna which can result in permanently scarred landscapes. Aquatic ecosystems, including wetlands, aquifers, and running surface water, are negatively affected by coal mining and coal-fired power plants. Wetlands are destroyed in site areas, significant amounts of freshwater are used for commercial cooling, and tailing ponds leach out harmful pollutants into watersheds. A perfect example of this is the recent Obed Mountain Mine containment pond breach causing 670 million litres of coal slurry, containing toxic heavy metals, into the Athabasca watershed.

Coal-fired Power Plants

Currently, coal-fired power plants generate the majority of Alberta's electricity. AWA believes we need to move away from such environmentally destructive methods of power generation. Given that coal-fired power plants significantly contribute to Alberta's large greenhouse gas emissions, these plants play a vital role in determining whether Canada meets its federal and international commitments on climate change. Until coal can be phased out of Alberta's electricity grid, the provincial government must apply more stringent emission regulations to existing power plants to uphold these obligations. In the study, ["Reduced Emissions of CO₂, NO_x and SO₂ from U.S. Power Plants Due to the Switch from Coal to Natural Gas with Combined Cycle Technology."](#) researchers found that 40 percent less carbon dioxide is released by a combined-cycle natural gas power plant. There are examples of this transition already taking place, such as Maxim Power Corporation, who has made plans to switch their current coal-fired power plant on Alberta's Smoky River to a natural gas-fired facility. With more global understanding and acceptance of climate change, investors are increasingly hesitant to invest in coal, making good economic sense for Alberta to be at the forefront of the phase out.

Alberta's Coal Policy

Combining an already strained landscape with uncertain global demands for coal, Alberta needs to seriously consider the harmful impacts of extracting coal deposits. Under the current *Coal Development Policy for Alberta* (1976), many important headwater areas are protected through category one and two restrictions. AWA believes if there are any changes to the policy, the intent and environmental focus must be not only maintained but enhanced. Any changes to the policy should not further exacerbate headwater security along the eastern slopes or important wetlands and riparian areas. The Coal Association of Canada is pushing for new policy, stating the current one is outdated and constricting development. Contrary to being outdated, AWA believes the current coal policy was built on sound geological and biological science and is regarded as one of Canada's most farsighted policies integrating energy and environment. Alberta should not encourage further coal development; we should be taking into consideration the significant health and environmental costs associated with coal exploration, mining and burning and begin the Alberta coal phase out now! AWA hopes these comments are useful to your debate and that you will have opportunity to consider and implement these comments in future decisions.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION



Brittany Verbeek, Conservation Specialist