



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

January 23, 2015

Manager, Environmental Assessment, Authorizations Branch
Alberta Energy Regulator
Suite 1000, 250
5th Street SW, Calgary, AB T2P 0R4
Email: AEREnvironmental.Assessment@aer.ca

Dear Manager,

Re: Riversdale's Grassy Mountain Coal Project

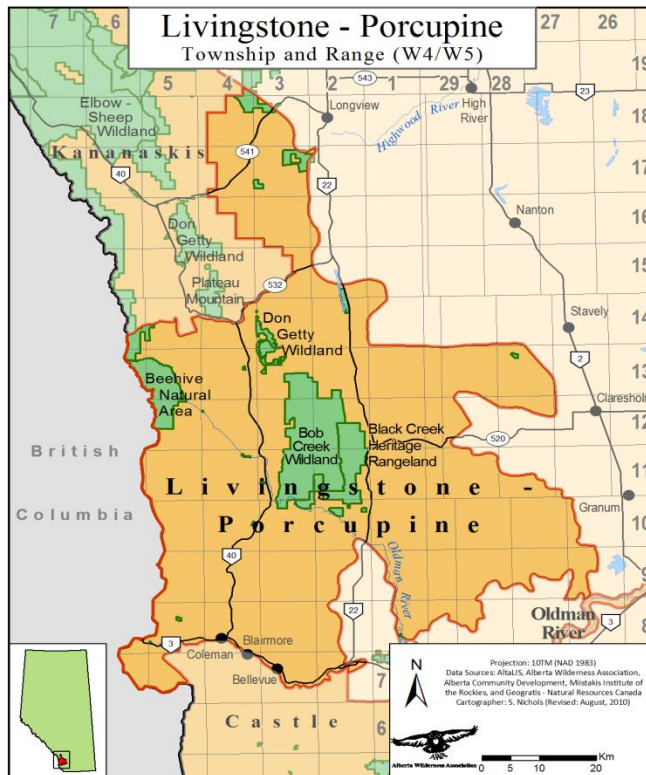
Request for comments on Proposed Terms of Reference (TOR) for EIA

Alberta Wilderness Association (AWA) works throughout Alberta towards more representative and connected protection of Alberta's unique and vital landscapes that are the source of our abundant clean water, clean air and vital habitat for wildlife in each one of our six natural regions. We have been working in Alberta for almost fifty years, to raise the profile of Alberta's spectacular wilderness, and to help Albertans learn more about the value of our wilderness and wildlife, and participate in opportunities to protect and care for the legacy that we will leave for future generations. With over 7000 members and supporters, AWA remains committed to assuring protection of wildlife and wild places for all Albertans.

AWA's long standing interest in the environmental protection of the Livingstone – Porcupine area is well documented (see map showing our area of interest and concern below).

AWA believes consideration must first and foremost be made as to whether further coking coal development is even needed within Alberta in view of the thin coal seams, the high expense to produce and transport the coal, and volatile global coking coal prices. AWA believes the provincial coal policy should identify this Grassy Mountain proposed development area as category one or two land prohibiting surface mining and limiting exploration.

AWA is writing to respectfully request that the Grassy Mountain Coal Project not proceed.



If the project is allowed through to the Environmental Impact Assessment, AWA requests the following be included in the Terms of Reference (TOR). This list is not exhaustive but highlights important missing elements.

- 2.6.3 Wastewater Management (pg.7)
The TOR should require a Selenium Management Plan to ensure toxic levels of selenium do not enter waterways and poison aquatic organisms.
- 2.8 Conservation and Reclamation (pg.8)
The TOR should include a request for a Reclamation Plan that incorporates the un-reclaimed aspects of the previous mine.
- 3.1.2 Impact Assessment (pg.10)
[B] Identify stages or elements of the Project that are sensitive to changes or variability in climate parameters, including frequency and severity of extreme weather events.
The TOR should specifically ask about mitigation measures for flood events because the area is prone to frequent flooding.

The Livingstone-Porcupine region as a whole is crucial forested headwater landscapes that are the water lifeline for the rest of southern Alberta and east into Saskatchewan and Manitoba. It is a biodiversity hotspot with internationally recognized environmental significance. Unique flora and fauna are found in this region that supports remnant populations of some of our most at risk species in the province. It is also heavily valued for its world class recreational opportunities and backcountry exploration.

AWA believes this area has been impacted in many ways that cumulatively exceeds existing thresholds. The proposed coal development will be to the detriment of the landscape and the higher values for wildlife and humans this area provides.

The Grassy Mountain Coal Project should not proceed.

Sincerely,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in blue ink, appearing to read "Brittany Verbeek", with a stylized flourish at the end.

Brittany Verbeek
AWA Conservation Specialist