



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

July 21, 2020

Honourable Jonathan Wilkinson
Minister of Environment and Climate Change
Email: Jonathan.Wilkinson@parl.gc.ca

Re: Vista Coal Mine Expansion Project

Dear Minister Wilkinson,

Alberta Wilderness Association (AWA) urges you to overturn the Impact Assessment Agency of Canada's [December 2019 decision](#) and exercise your discretionary powers under subsection 9(1) of the Impact Assessment Act (IAA) to designate Coalspur's Vista Coal Underground Mine and Expansion Activities Project as a physical activity requiring a federal impact assessment. AWA believes the Impact Assessment Agency's decision is mistaken. The Agency dismisses potential, significant negative impacts of this project to several species at risk (endangered Athabasca rainbow trout and threatened bull trout). Furthermore, the Agency has not considered sufficiently the potential impacts of the expansion on water quality and quantity and on Canada's greenhouse gas emissions.

Founded in 1965, AWA strives to help Albertans understand the intrinsic values of our wilderness and wildlife, and encourages communities to participate in conservation initiatives that ensure a legacy for future generations. With over 7,000 members and supporters in Alberta and across Canada, AWA remains committed to assuring protection of wildlife and wild places in Alberta for all Canadians.

AWA believes the following concerns reinforce the need to designate the Vista coal mine project as a physical activity requiring a federal impact assessment:

1) The proposed expansion may negatively impact the stability of wildlife populations

The proposed Vista mine expansion is located in Alberta's eastern slopes, which provides vital habitat for many wildlife species including species at risk. Mining exploration and development activities are particularly intrusive. They commonly produce many direct and indirect negative impacts on ecosystems. Habitat loss and alteration, wildlife displacement, and wildlife behavioural changes are such impacts that have the potential to adversely effect local wildlife populations. .

The decision not to conduct a federal impact assessment of the Coalspur Mine Ltd. Vista Coal Mine Phase II Project in Alberta rejects the Agency's own analysis. That analysis clearly identified the following significant potential impacts on wildlife resulting from this project:

- "As many as 184 bird species have the potential to live in the Project area."
- "Five SARA-listed wildlife species were observed in the Project area: Barn Swallow, Canada Warbler, Western Toad, Little Brown Myotis, and Grizzly Bear."
- "Rainbow Trout (Athabasca River populations) and Bull Trout (Saskatchewan– Nelson Rivers populations) are listed as endangered and threatened under the *Species at Risk Act* [Sara] respectively, and are known to occur in fish habitat downstream of the mine pit (including McPherson Creek, which runs approximately 100 metres from Phase I and the Project). Rainbow

Trout (Athabasca River populations) presence was confirmed in one tributary that will be directly impacted by the mine pit.”

- “DFO advised that as proposed, the Project is likely to result in the death and/or harmful alteration, disruption or destruction of fish habitat; and effects to listed aquatic species at risk (endangered Rainbow Trout (Athabasca River populations) and threatened Bull Trout (Saskatchewan-Nelson Rivers populations).”

Grizzly Bear: The Government of Alberta has identified the region east of Hinton as a key wildlife and biodiversity zone. It also encompasses part of Alberta’s Grande Cache Bear Management Unit (BMA 2). These delineated management units serve as important core and secondary habitat zones that are integral to supporting the survival and health of grizzly bears. Literature has clearly shown that human-caused mortality is the primary cause for grizzly bear population declines with Alberta. Grizzly bears often demonstrate altered habitat use in proximity to human activity through increased vigilance and movement. This ultimately reduces their capacity to fully exploit critical habitat and primary foraging opportunities.¹ Without a comprehensive review of the project and surrounding area, AWA is concerned that the Vista coal mine expansion may directly contribute to grizzly bear population declines, in addition to significantly influencing the extent of cumulative effects for the region.

Native Fish: Many watercourses in Alberta’s eastern slopes provide the cold and pristine waters necessary for our native trout populations. Threatened bull trout and Endangered Athabasca rainbow trout have already endured significant habitat loss and degradation as a result of land-use activities. In particular, Fisheries and Oceans Canada notes that “active coal mining operations have caused the loss of nearly 15 km of Athabasca Rainbow Trout spawning and early rearing habitat in the Embarras, Erith, and upper McLeod and Gregg River watersheds.”²

The expansion of the Vista coal mine likely will produce more linear features on the landscape such as roads and trails to facilitate increased access and exploration. Roads generally increase sediment deposits into surface waters and therefore decrease aquatic habitat productivity.³ Increased sedimentation is a known stressor for bull trout “disrupting their feeding, growth and movements, and making them more susceptible to disease.”⁴ Expanded mining activities will likely also increase the level of point and non-point source effluent, which could elevate the concentration of deleterious and toxic substances found within rivers and streams. Currently, Teck’s Elk Valley coal mines are believed responsible for increased selenium levels in the Koochanusa reservoir. Those levels are described as being “four times the legal limit for safe drinking water.”⁵ Research also proves that excessive amounts of selenium can cause malformations, premature death, and reproductive failure within native fish populations,⁶ in addition to “embryonic deformities [being] documented in Rainbow Trout in the upper Athabasca River watershed”.

2) The proposed expansion should be subject to a comprehensive framework to mitigate potential environmental impacts and for effective cumulative effects management.

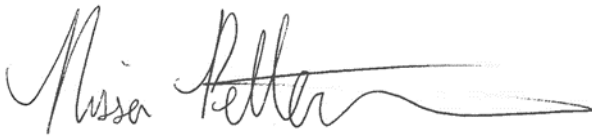
As of June 1, 2020, the provincial government repealed Alberta’s Coal Policy, an overarching framework that helped strike a balance between environmental, economic, and the social values affected by coal mining in the eastern slopes. The loss of this policy introduces a gap between Alberta’s piece-meal regulatory system and incomplete provincial land-use planning, neglecting the importance of identifying and conserving sensitive environmental features within the eastern slopes, in addition to impeding

cumulative effects management of industrialization throughout the region. AWA believes that designating the Vista coal mine expansion as an activity requiring a federal impact assessment would provide the opportunity for the public to present their concerns and effectively consider the cumulative effects of industrialization throughout the region, elements that that would otherwise be insufficiently addressed through Alberta's current regulatory standard.

In conclusion, AWA believes there is ample evidence to suggest that the Vista coal mine expansion requires a federal designation. Short-term impacts to landscapes from coal mining can be quantified as loss in biodiversity, decreased ecosystem health and functioning, landscape alteration and fragmentation, increased water and soil contamination, and increased water treatment cost, all of which have long-term implications for human health and climate change resiliency. Without a federal impact assessment, this expansion will likely further contribute to the ongoing environmental degradation occurring within Alberta's eastern slopes, and will culminate in a legacy of industrial scars and contamination that Albertans will be left to remedy for generations to come.

Thank you,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read "Nissa Petterson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Nissa Petterson
Conservation Specialist

cc'd:

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Honorable Sonya Savage
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References

¹Ladle, A., Avgar, T., Wheatley, M., Stenhouse, G.B., Nielsen, S.E., and Boyce, M.S. 2018. Grizzly bear response to spatio-temporal variability in human recreational activity. *Journal of Applied Ecology* 56(2): 375-386

^{2,7} Fisheries and Oceans Canada. 2020. Recovery Strategy for the Rainbow Trout (*Oncorhynchus mykiss*) in Canada (Athabasca River populations) [Proposed]. *Species at Risk Act Recovery Strategy Series*. Fisheries and Oceans Canada, Ottawa. vii +92 pp.

³Sawatzky, C.D. 2016. Information in support of a recovery potential assessment of Bull Trout

(*Salvelinus confluentus*) (Saskatchewan – Nelson rivers populations) in Alberta. DFO Can. Sci. Advis. Sec. Res. Doc. 2016/113. v + 190 p.

⁴Birtwell, I.K. 1999. The effects of sediment on fish and their habitat. DFO Can. Sci. Advis. Sec. Res. Doc. 99/139: 34 p.

⁵The Narwhal: Teck proposal to expand B.C.'s largest coal mine raises alarm about pollution on both sides of border. 2018

⁶Lemly, D.A. 2002. Symptoms and implications of selenium toxicity in fish: the Belews Lake case example. *Aquatic Toxicology* 57(1-2): 39-49