



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

The Honourable Steven Guilbeault
Minister of Environment and Climate Change Canada
Delivered by email to: ministre-minister@ec.gc.ca

August 26, 2024

Dear Minister Guilbeault,

Alberta Wilderness Association (AWA) is writing to express our support for the request made by Ecojustice on behalf of Keepers of the Water and the West Athabasca Watershed Bioregional Society that the [Vista Coal Mine Phase II Expansion Project and Vista Underground Mine Project](#) be designated again under section 9(1) of the [Impact Assessment Act](#) (IAA).

AWA is an Alberta-based conservation group with more than 7,500 members and supporters across Alberta, Canada, and around the world. AWA seeks the completion of a protected areas network and the good stewardship of Alberta's public lands, waters, and biodiversity to ensure future generations enjoy the abundant benefits they provide.

AWA shares [the concerns outlined by Ecojustice](#) about the proposed expansion of the Vista Coal Mine, particularly the adverse impacts posed to water, critical aquatic habitat, and species protected under the federal *Species at Risk Act* including endangered Athabasca rainbow trout (*Oncorhynchus mykiss*) and threatened Bull Trout (*Salvelinus confluentus*). These impacts demonstrate that the project is well within federal jurisdiction, and the seriousness of these impacts require assessment under the IAA. This is consistent with the IAA's preamble, which emphasizes the importance of an impact assessment process that "prevents or mitigates significant adverse effects within federal jurisdiction", "integrates scientific and Indigenous knowledge", and "contributes to fostering sustainability and to the Government of Canada's ability to meet its environmental obligations and its commitments in respect of climate change".

Alberta is adversely impacted by coal mines within the province and in nearby jurisdictions. In recent years, [numerous incidents](#) have occurred at existing operations whereby coal wastewater was discharged into the environment. Known to have detrimental effects on fish and aquatic ecosystems, coal wastewater often contains selenium which can cause deformities and reproductive failure for fish. Pollutants from coal mining can also interrupt seasonal migrations and lead to extirpation in affected watersheds. Recent tributaries impacted by these incidents include Gold Creek, McPherson Creek, and the Smoky River, which are all known to be critical habitat for species at risk.

[Recent research](#) has also demonstrated that mine sites continue to pollute long after operations cease; elevated levels of selenium continue to be detected downstream of Tent Mountain, which was suspended in 1983. The underground adits of Grassy Mountain, abandoned back in the 70s and similarly subject to an "advanced project" status like Vista, have been periodically discharging iron, various

metals, and suspended sediment for decades. Even the [recent and brief exploration efforts](#) following the removal of the *1976 Coal Policy* in 2020 have long-lasting impacts. The logging required to make access roads fragmented habitat and exposes the shallow montane soils to erosion and colonization by invasive species. Exploratory roads become sources of sediment, washing downstream rivers and creeks during precipitation events, negatively impacting aquatic habitat and watershed health.

Negative impacts from coal mining also transcend borders, further implicating the federal government's involvement; [researchers recently found](#) that coal dust containing known carcinogens is blowing over the Rockies from the Elk Valley coal operations in British Columbia and settling in Alberta's snowpack, which eventually drains into and recharges the province's watersheds.

Evidently, coal development and exploration has left widespread and long-lasting liabilities on Alberta's landscapes that continue to go unaddressed. Operational mitigation processes are inadequate to protect the environment, and subsequent reclamation has been poorly enforced and insufficient to restore the original ecosystem function. Further, the [overall economic costs to Albertans](#) of more coal mining dwarf any benefits. At best, current and proposed mining operations are projected to break even for private investors, creating only marginal tax revenues and opportunities by way of employment for people in the region. These minimal boons are significantly outweighed by the substantial and adverse impacts to water, wildlife, vegetation, air, and human health. Coal mining interferes with the Land, rights, and sovereignty of Indigenous Peoples, have negative social impacts on nearby communities, displace other economic activities like ranching, recreation, and tourism, all with a non-zero chance taxpayers will be on the hook for the reclamation costs.

Considering [Canada's pledge](#) to end coal-fired electricity production nationally and phase out all thermal coal exports no later than 2030, an impact assessment would clarify how Vista's proposed expansion is consistent with meeting federal climate commitments. As Vista will likely become a stranded asset post 2030, an assessment would address whether the increased footprint and associated impacts of the expanded mine are acceptable, recognizing that prevention of habitat destruction and maintenance of biodiversity and ecologically integrity are key for fostering climate resilience.

It is well established that coal production must decline to keep global warming below the 1.5°C threshold, and as the [ninth largest exporter of thermal coal in the world](#) (and seventh including metallurgical coal), Canada's participation is not optional. An impact assessment would elucidate how shipping Vista's proposed 15 megatons of thermal coal each year, the equivalent of 33 megatons of annual carbon emissions, is conscionable from a country committed to addressing climate change.

Designating Vista's proposal under the IAA is further necessitated by the [Canadian government's recent assertion](#) that "every individual in Canada has a right to a healthy environment as provided under the *Canadian Environmental Protection Act*." Coal mining has been shown to cause increased air and water pollution and is associated with an increased risk of disease including asthma, chronic obstructive pulmonary disease cancer, and respiratory infection. An impact assessment will help evaluate whether further coal development will help maintain a healthy environment for those in affected communities.

Supported by ample evidence and respecting past precedent, it is clear the Vista Mine expansion requires a federal designation under the IAA. 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 air, water, and soil pollution, 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 further contribute to the ongoing environmental degradation occurring within Alberta's eastern slopes and watersheds, and culminate in a legacy of industrial scars, ecological destruction, and emissions that Canada will be left to contend with for generations to come.

Thank you,

ALBERTA WILDERNESS ASSOCIATION

A handwritten signature in black ink, appearing to read 'Kennedy Halvorson', with a long horizontal flourish extending to the right.

Kennedy Halvorson
Conservation Specialist